



TERENCE
O'ROURKE

James Neave
Principal Planner
County Planning
West Sussex County Council
Chichester
West Sussex
PO19 1RH

26th July 2021

Our Reference: 264101

Dear James

Application reference: WSCC/011/21

**Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL.
Demolition of existing buildings and structures and construction and
operation of an energy recovery facility and a waste sorting and transfer
facility for treatment of municipal, commercial and industrial wastes,
including ancillary buildings, structures, parking, hardstanding and
landscape works .**

**The Town and Country Planning (Environmental Impact Assessment)
Regulations 2017 - Regulation 25 Further Information and Evidence
Respecting Environmental Statements**

Thank you for your letter of the 2nd July 2021 setting out your request for further information / clarification in relation to the above planning application. Responses have been provided in the order set out in your letter and under the same sub-headings for ease of reference. A separate ES Addendum has been prepared to cover any new information provided and this letter focuses on information for clarification purposes only.

Further information / clarifications sought

1. *Clarify Proposed boundary treatments. Heights and finishes should be annotated on the submitted 'Fencing Layout' Plan for ease of reference. Further, submitted 'Site Elevation' Plans do not appear to detail the proposed 'Paladin' fencing. Plans should also clarify the proposed finish of the timber acoustic fence (understood to be stained dark grey). Please clarify and update accordingly.*

The fencing layout plan already identifies fencing heights with annotations on the drawing, but to assist further the plan has been amended to show the different heights to the acoustic timber fencing with different line types

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identified in the drawing key. It also now shows where fencing sections taper between the different heights. See drawing: 1404_PL108_A_FencingLayout1to500_NS.

The exact acoustic timber fencing stain finish is listed in the drawing key and labelled on the following detailed drawings:

- 1404_PL310_A_NorthSiteElevation_NS
- 1404_PL311_A_EastSiteElevation_NS
- 1404_PL312_A_SouthSiteElevation_NS
- 1404_PL313_A_WestSiteElevation_NS
- 1404_PL202_TunnelUnderpassSection_NS
- 1404_PL363_A_FencingElevations_NS

The four submitted site elevation plans show the Paladin fencing with a dashed line, but this is clarified further by showing this fencing with a transparent grey tone. These now indicate Anthracite (RAL 7016) 'Paladin' security fencing, see drawings:

- 1404_PL310_A_NorthSiteElevation_NS
- 1404_PL311_A_EastSiteElevation_NS
- 1404_PL312_A_SouthSiteElevation_NS
- 1404_PL313_A_WestSiteElevation_NS

See Appendix 1 for all the drawings and a list of those that are now superceded.

2. *A hard-landscaping plan is required.*

A hard landscaping plan has been prepared, see Appendix 1, drawing: 2829-01-004Hardworks Rev A.

3. *Whilst it is noted that 'high levels of glazing will be fitted with blind systems which will close during the hours of darkness', clarification is sought of the areas of glazing where this would be applied, and the proposed mechanisms to secure this (e.g. ensure automatic closing rather than being dependent on manual closing).*

All high-level areas of glazing will be fitted with blind systems which will close automatically during the hours of darkness to prevent internal lighting being visible from surrounding areas. This applies to the western elevation of the administration block, this being the only elevation with glazing. The automatic blind system will be provided on all windows in this elevation. The applicant considers that a suitably worded planning condition could be used to ensure that details of the exact automated system to be installed are submitted for approval by the planning authority prior to occupation.

4. *Diesel and Water Treatment facilities are detailed on the 'Proposed Site Layout' Plan, but do not appear on the associated elevation plans. Please clarify and update accordingly.*



The diesel / ammonia tank elevations were provided separately and the elevations (e.g. PL300 and PL301) are of the ERF building so do not show things that are in front of the ERF elevation. The water treatment tank is a concrete pit and is not visible above ground. There will be some minor structures (e.g. vents, rails, control cabin), details of which will be subject to final contractor design.

5. *Design and Access Statement – The Shadow Plans are seemingly incorrectly labelled – Please clarify.*

Two of the three sun path studies in the Design and Access Statement are incorrectly labelled.

- Figure 5.13 labelled as Sun Path Study - March 20th should be labelled as Sun Path Study - December 21st.
- Figure 5.14 labelled as Sun Path Study - December 21st should be labelled as Sun Path Study - March 20th.

Please note that these were submitted as separate illustrative drawings as well as provided in the Design and Access Statement and are correctly labelled on those individual drawings.

6. *Address inconsistency in planting proposals between the proposed Landscaping Plan (Softworks General Arrangements Plan) and Proposed Site Plans. Also clarify which version of landscaping has been considered in the assessment of visual effects, visualisations, and BNG calculations.*

There is indicative landscaping presented on several drawings, but the Softworks General Arrangements plan shows the detailed planting scheme and was the drawing used as for the basis for the LVIA and BNG assessment work.

All the indicative trees have now been removed from all the site layout drawings and only a green colour now indicates the soft landscape areas, see Appendix 1, drawings:

- 1404_PL105_A_ProposedSitePlan1to1000_NS
- 1404_PL106_A_ProposedSiteLayout1to500_NS
- 1404_PL107_A_ProposedMasterplan1to1000_NS
- 1404_PL108_A_FencingLayout1to500_NS

7. *Visualisation view 36 (Environmental Statement (ES) - Chapter 12) appears to be missing. Please provide.*

There is no visualisation for Viewpoint 36, which is the view from the section of the existing exit road from Ford WTW, just west of Rodney Crescent. Although suggested amongst others by WSCC during pre-app discussion, it was considered that with other visualisations from the eastern direction, plus the high quality illustrative visualisation (figure 5.11) from a similar location in the DAS, there was no need for this additional visualisation in order to inform the assessment.



8. *Clarify if (or which) visualisations have included the proposed bunds and/or landscaping. Where landscaping has been shown in visualisations, please indicate at what year of growth this has been represented.*

All visualisations were produced with a model that included the bund and planting at 15 years (maximum 10m height). In most of the longer distance views, the bunds / planting would be difficult to perceive, but in some views the effects are to reduce the amount of visible building. The visualisations in which the bunds and planting are more clearly seen are viewpoints: 15, 26, 28 and 37. There is also some visible but not easily perceived vegetation in visualisations for viewpoints: 12, 19, 31, 32 and 34.

9. *Clarify the total volume of material to be excavated, and whether this material would be stored/re-used on site or removed (and to where). Further clarify the total volume and likely specification of imported fill material for proposed bunds. In both cases, please clarify whether HGV movements associated with removal/delivery of such materials has been considered in anticipated construction HGV numbers/associated impacts.*

The total volume of material to be excavated is 46,300m³. It would be removed from the site and taken to a suitable licenced facility for re-use/recycling. The total volume of material imported for bund construction is 58,800m³. The specification will be a matter for the contractor who will build the ERF and the bunds and will be required to have appropriate structural characteristics as well as including soils of suitable quality to support the proposed landscape planting. Where possible, excavated material will be retained on site and used as engineering fill by the contractor.

A condition to require the submission of details of fill material for approval by the planning authority prior to construction of the bunds would be acceptable to the applicants.

It is confirmed that the HGV movements in the Transport Assessment do take into account the import and export of this material.

10. *ES Paragraph 3.98 suggests some HGV deliveries outside the hours of 06:00- 20:00 Monday-Friday and 08:00-18:00 Saturdays to avoid traffic or prevent build up in WSTF. Please clarify the frequency and likely timings of such movements (which would exceed that specified by the extant permission at the site).*

The applicants will adhere to the hours of 06:00 - 20:00 Monday - Friday and 08:00 - 18:00 Saturdays and will accept a suitably worded planning condition on this.

11. *ES Paragraph 3.104 suggests some 122 HGV deliveries (244 movements) is sought. Please clarify why this exceeds that currently permitted by the extant permission at the site/provide an explanation of this.*

This does not represent a specific number of movements that is being sought, it is a function of how the traffic model has been constructed to present a conservative worst case, and also reflects the result of 'rounding



up' being used. For example, the ERF would only receive approximately four deliveries per year of powdered activated carbon (PAC), however, the calculations assume one delivery per day. Likewise, there will be approximately nine deliveries per year of diesel but one delivery per day is included in the modelling assumptions. The modelling has therefore been very conservative and hence the HGV cap will not be exceeded even during peak periods.

12. *Clarify whether doors would remain closed when deliveries are not taking place (i.e. via fast acting roller shutter doors) for both the ERF and WSTF. ES paragraph Para 3.129 suggests this may not be the case, at the WSTF. Please also clarify if the WSTF would be subject to negative pressure. Clarify how this has been considered in conclusions on operational odour impacts.*

The context for odour impacts needs to take account of the fact that the site is safeguarded in the adopted waste local plan for waste management and there is already an operational waste transfer station at the site. Furthermore, there is an extant planning consent for an EFW and materials recovery facility at the site.

Operations at the existing waste transfer station are the same as those at the proposed WSTF. However, if the applicant is successful in securing planning permission for the proposed development, the waste transfer operations will be undertaken in a new and modern building which will be designed for the waste transfer activity. On this basis, it is not anticipated that the potential for off-site odour impacts from the WSTF will be the same as that generated by the operation of the existing waste transfer.

Under the proposed new arrangements, the majority of waste handled within the WSTF will be recyclable materials which are less likely to give rise to odours. The potential source of any odour is likely to come from any residual waste received within the WSTF, however, this will be in extremely small amounts and would be transferred to the ERF at the end of each working day. As highlighted in the ES, the ERF will be held constantly under negative pressure.

The length of time which waste is stored within the WSTF will be agreed with the EA at the permitting stage. Agreeing storage times for each waste stream will also help prevent a build-up of odour from within the WSTF.

Therefore, it is not anticipated that the WSTF will generate odours from the storage of waste. At the end of each day, the waste reception and processing areas will be cleaned down to prevent the accumulation of wastes/residues in these areas and minimise the risk of odour from the WSTF.

The doors on the tipping hall and waste reception areas for both the WSTF and the ERF would remain closed when deliveries are not taking place. The entry and exit doors to these areas will be equipped with fast acting vertical folding or roller shutter doors, which will be kept closed except when a vehicle is travelling through them. Therefore, any potential odours in these areas will be contained within the buildings.



The tipping hall and waste storage bunker for the ERF will be maintained at negative pressure, through the extraction of air from the tipping hall waste storage bunker. This potentially odorous air being combusted within the ERF as combustion air, with the odour compounds released from the storage of the waste being destroyed at high temperatures prior to release from the stack.

The Environment Agency requires that the environmental permit (EP) application for the WSTF is supported by an Odour Management Plan which sets out the measures to be implemented at the facility to ensure that there are suitable mitigation measures allowed for within the design and operation of the WSTF to ensure that its operation will not result in an unacceptable odour impacts at off-site receptors. At this stage, the EP application (and associated Odour Management Plan) for the WSTF is being developed by the applicant, but it is confirmed that this will expand upon the odour mitigation measures already set out in Chapter 3 of the ES (paras 3.121 to 3.134).

13. Clarify the reduction in decibels assumed for boundary screening at ES paragraph 14.97 (bunds and fencing), and whether this accounts for varied heights of the bund.

The decibel reduction from the screening was not assumed but was calculated and included in the operational noise contours (see Figures 14.13-14.15 of the ES).

With reference to the figures set out for clarification purposes in Appendix 2 of this letter, figures 1-3 show the noise contours without screening in place but including the lower site level of -1.5m. Figures 4-6 show the predicted noise level reduction due to the proposed screening. The calculated decibel reductions for each receptor are provided below.

For existing and proposed residential receptors (at the proposed residential development adjacent to the site, known as The Landings) closest to the site, the screening is expected to provide up to 4 dB and 3 dB noise reduction during the daytime and night-time, respectively. Figures 4-6 show that the screening is predicted to provide a noise reduction benefit for much of the proposed residential site allocation.

For existing receptors further from site, the screening is expected to provide up to 1 dB noise reduction.

The difference in noise levels between daytime and night-time periods is that the daytime levels are predicted at a height of 1.5m above ground level (to represent ground floor level) and the night-time levels are predicted at a height of 4m above ground level (to represent first floor level).



Difference	Daytime 07:00-23:00 reduction from screening dB	Night-time 23:00-07:00 reduction from screening dB	Night-time with HGVs 06:00-07:00 reduction from screening dB
R1	1	1	1
R2	1	1	1
R3	1	0	0
R4	2	0	2
R5	4	3	3
R6	2	1	2
R7	0	1	0
R8	0	0	0
R9	0	0	0
R10	0	0	0

14. Clarify consideration given to noise, dust and odour impacts upon neighbouring sports fields (existing and future).

The potential for noise impacts on the existing sports fields has been considered. However, as there is not an accepted methodology and no applicable criteria for the assessment of demolition / construction noise impacts to sports fields, or places other than the agreed range of sensitive receptors, an assessment has not been provided. Without an accepted methodology, any assessment that might be attempted would be bespoke and open to a potentially wide range of interpretation.

Any future sports fields will be subject to their own permissions for their construction and use and this will have to address how their location and proposed use has regard to the existence of a safeguarded waste management site on the adjacent land.

With regard to dust and odour the ES Addendum updates the air quality chapter to include the neighbouring sports field as a dust and odour sensitive receptor.

15. Clarify what consideration has been given to noise, dust and odour impacts upon future proposed employment uses immediately to the east, as included within the current Arun District Council planning application F/4/20/OUT (relating to the neighbouring Arun Strategic Development site).

With regards to noise, please refer to the following paragraphs of Chapter 14 of the ES:

- 14.144 - 14.446
- 14-149
- 14.159



The impact of dust was assessed in ES Chapter 6, paragraphs 6.138 to 6.144. This showed that even if these were developed and occupied prior to the construction of the proposed development there would be no change to the level of dust mitigation measures required and the site was deemed to be of medium risk.

The ES Addendum provides an update in relation to the impact of odour.

16. *ES Chapter 14, Noise levels for Calculation of Road Traffic Noise (CTRN). It is not clear how/if this assessment takes into account the size of HGVs and whether this could lead to different conclusions. Further, Table 14.13 seemingly suggests that the construction traffic noise assessment only considers two receptors, and not the full range of receptors as has been assessed for road traffic noise during operation (Table 14.17) and thus may omit consideration of properties located closer to the carriageway (e.g. south of Horsemere Green Lane). Please clarify.*

The operational road traffic noise assessment is completed to the industry standard 'Calculation of Road Traffic Noise' (1988) memorandum.

A correction is applied for the percentage of heavy vehicles. The methodology does not calculate the noise contributions from heavy vehicles depending on their size. However, it should be noted that the methodology was based on noise data that was collated for HGVs in the 1970s and 1980s when vehicles were considerably noisier than the present day.

The construction traffic assessment (paragraphs 14.84-14.87 and Table 14.13) uses the haul route methodology of BS 5228:2009+A1:2014 and considers the two worst-case receptor locations (given their proximity to the site and proximity to the road). Construction traffic is shown to constitute short term negligible effects at these locations and therefore it is not considered necessary to assess all road links as for the operational CRTN assessment to the same methodology. It should also be noted that the haul route calculations use the worst-case noise emission data of BS 5228-1:2009+A1:2014 for 44t lorries.

The 2025 Baseline with Committed Development and Construction Traffic scenario of Table 14.17 shows the predicted changes in road traffic noise levels with traffic growth and construction traffic. Paragraphs 14.118 and 14.120 state that the predicted increases in road traffic noise level due to construction traffic will be negligible and not significant on all road links.

17. *ES Chapter 14 does not appear to draw any conclusion on the potential for road traffic vibration impacts upon nearby properties (in particular those closest to the haul routes and on Ford Road/Church Lane). Please clarify.*

The number of HGV movements proposed is equal to the existing planning consent.

There is no standardised assessment methodology for traffic induced vibration.



18. Clarify what has been determined as a 'short-term' impact in consideration of construction related impacts. Given the anticipated duration of the proposed construction period, and proposed delivery of screening bunds as a final phase of works, further information/clarification is sought as to the consideration given to the potential impacts of the development (e.g. noise/dust/lighting/visual) upon neighbouring receptors (both existing and future), until such time as proposed screening bunds, acoustic barriers, and landscaping have been constructed/implemented. This should include consideration of both the WSFT (completed at month 7 of the 51-month construction programme) and ERF (which would seemingly be in operation prior to completion of landscaping). This should also explain how potential in combination effects with concurrent construction and operational activities during this period has been taken into account in the supporting assessments, including details of any mitigation assumed.

Noise

Short-term slight adverse effects are predicted at receptor R1 for scenario 4 (Construct ERF and excavate to lower ground level). The construction programme indicates a period of 6-months for these works. However, it should be noted that slight adverse effects are only predicted where works take place between the hours of 13:00-19:00 on Saturdays. For works completed between Monday-Friday (07:00-19:00) and Saturday (07:00-13:00), effects are predicted to be negligible.

Slight adverse effects are predicted for a period of up to 5 months at proposed receptor location R5, where works take place between the hours of 13:00-19:00 on Saturdays (scenarios 1 and 3).

If the receptors at R5 were in place before the construction of the ERF, slight adverse effects are predicted for a period of up to 3 years at proposed receptor location R5, where works take place between the hours of 13:00-19:00 on Saturdays (scenario 5).

Moderate-substantial adverse effects are predicted for periods of up to 6 months at proposed receptor location R5, where works take place between the hours of 13:00-19:00 on Saturdays.

However, for works completed between Monday-Friday (07:00-19:00) and Saturday (07:00-13:00), effects are predicted to be negligible for all demolition and construction phases. It should be noted that the receptors at R5 may not be in place for much of the demolition and construction works. A detailed construction programme is not available for The Landings.

Dust

For dust generating activities to result in an adverse impact at sensitive receptor, the activities would need to be undertaken in dry and windy conditions with the winds directed towards the sensitive receptor, i.e. there needs to be a source and effective pathway for an impact. The likelihood of these conditions continually occurring is very low. As such dust impacts at sensitive receptors are not likely to be continuous. For this reason the



assessment of construction dust was based on a 'short term' basis. In addition, the impact of dust emissions during construction would be controlled by the effective mitigation set out in Chapter 3 to ensure that impacts are controlled to a suitable level.

Lighting / visual

The construction period is just over 4 years which is a fraction of the long term time period (beyond 25 years) for operation of the proposed ERF. The assessment has identified that it would generate significant impacts and this is reflected in the assessed level of significance. For most visual receptors, intervening development and vegetation means that they would not be affected by many of the visual construction effects that occur at relatively low level. We assume that this is why WSCC focus on 'neighbouring receptors, both existing and future'.

In the LVIA, full consideration has been given to construction effects for these and all other receptors, and this is clearly set out in Chapter 12. In terms of existing neighbouring receptors, the receptors that would experience most change arising from the construction period would be nearest to the site, the users of local footpaths (Receptor VR14). The assessment sheet dealing with VR14 describes the effects taken into account. The other affected existing neighbouring receptors include VR1, VR2, VR3, VR4 and VR5 (local residents), VR23 (visitors to local heritage features within 1.5km of the site), VR24 (local railway travellers), VR26 (travellers on local roads) and VR27 (workplace receptors, including Ford Market). For all of these, the relevant assessment sheets include the assessment of effects during the construction period.

The future neighbouring receptor is VR6, future residents of The Landings and on this sheet also, there is a section considering construction effects.

Traffic

ES paragraph 3.160 states that to present a comprehensive picture, figure 3.14, which shows the breakdown of daily vehicle movements (both HGVs and passenger vehicles, for the 51 month construction period) also takes into account the daily vehicle movements associated with the operation of the existing WTS (up to month 7) or new WSTF (from month 8), which will be generating passenger, waste delivery and waste collection vehicle movements at the same time as the construction activities are taking place. Furthermore, daily vehicle movements associated with the operation of the ERF are included from when full operations begin in month 46, which will generate passenger, waste delivery, reagent delivery and residue collection vehicle movements at the same time as the landscaping activities. The topic assessments are based on this information.

- 19. Further, it is recommended that Plans setting out the five key construction phases (as detailed in Outline CEMP, Section 2) be provided to offer a visual representation of the phases and highlight any physical mitigation measures proposed in advance of proposed screening bunds, acoustic barriers, and landscaping being constructed/implemented.*



The phasing detail requested is best supplied by the contractor appointed to build the project, subject to planning permission. It would therefore best be secured by a suitably worded planning condition as a component of a full CEMP for approval by the planning authority prior to commencement.

20. *ES paragraph 14.167 suggests that if adopting the same (now superseded) standards for calculated specific noise levels, the required threshold noise level conditioned by the extant permission WSCC/096/13/F (35 dB(A)), would be achieved by the proposed development at each existing receptor location. Please clarify is this would also be the case for future proposed receptors (i.e. R5 & R6 – ‘The Landings’). It would be useful if Noise Contour Maps consistent with those produced as part of the WSCC/096/13/F could be provided to enable a direct spatial comparison of noise impacts from the now proposed scheme compared with the extant scheme.*

The daytime and night-time noise contours (without HGVs) have been provided in Appendix 2 to this letter, figures 7 and 8 to provide comparison with the noise contours provided in the extant permission WSCC/096/13/F.

The predicted levels (without HGVs and without penalties to BS 4142) for comparison to the extant consent are provided below. It should be noted that the predicted noise levels for receptors R5 and R6 are provided for information only, as these are not existing receptors and were not present when the planning condition was imposed or at the current date of writing this response.

Receptor	Daytime dB L _{Ar}	Night-time dB L _{Ar}
R1	30	30
R2	31	31
R3	26	29
R4	30	30
R5	36	36
R6	34	35
R7	29	29
R8	29	29
R9	26	26
R10	24	25

The daytime and night-time level at R5 is predicted to be 36 dB L_{Ar}.

The daytime and night-time levels at R6 are predicted to be 34 dB L_{Ar}. and 36 dB L_{Ar}., respectively. The difference in noise level between daytime and night-time periods is that the daytime level is predicted at a height of 1.5m above ground level (to represent ground floor level) and the night-time level is predicted at a height of 4m above ground level (to represent first floor level).

21. *Clarify what mitigation (including any physical features) has been assumed in the noise contours provided in ES Chapter 14, Figures 14.6 – 14.15 (i.e. both for construction and operational noise impacts).*

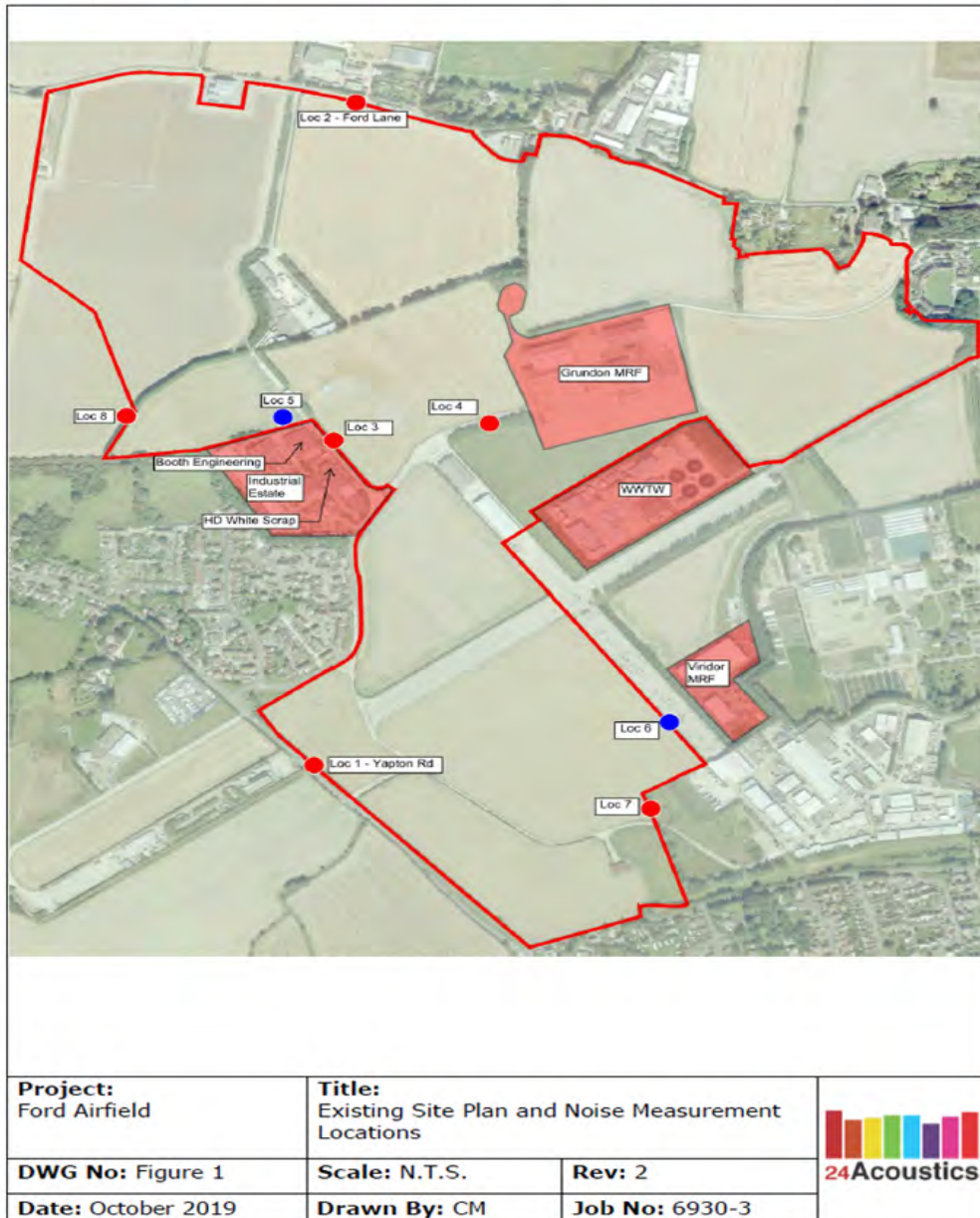


The construction noise contours allow for a 2.4m site hoarding (ES paragraph 14.75). The hoarding is shown in ES figures 14.6 - 14.12. Additional mitigation is expected to include Best Practicable Means, and so construction noise levels are expected to further reduce with these measures in place (see ES paragraphs 14.121 - 14.123).

The operational mitigation measures are detailed in ES paragraph 14.97.

22. *With reference to comments of Barton Wilmore dated 14th May 2021 (on behalf of Wates Developments Ltd and Redrow Homes (Southern Counties) Ltd) clarification and/or explanations are sought with regard to the reasons for (a) the difference in measured background noise levels, and (b) the differences in baseline traffic data, as have been measured/presented in the current Arun District Council Planning application F/4/20/OUT (relating to the neighbouring Arun Strategic Development site).*

(a) The levels stated in the Barton Wilmore memo are based on the levels measured at locations 7 and 8 of the 24 Acoustics assessment, which were not measured at the assessment location, and cannot be argued to be representative of the levels at location 4 (i.e. the locations of the nearest proposed residential dwellings). The daytime $L_{Aeq,16hour}$ value for location 4 in the 24 Acoustics assessment is 53 dB $L_{Aeq,16hour}$. The measured levels at LT1 in the ES are typically 52-56 dB $L_{Aeq,16hour}$ which shows good agreement. No justification is provided as to why it is believed that these locations are representative of the nearest assessment locations at The Landings and the comments do not highlight that the measurements were taken at different locations to the assessment locations.



(b) In summary, 2018 AM and PM peak hour survey data presented in the Ford Airfield TA was applied. This was adjusted to reflect the opening of the Southern Link Road at the application site. An AADT conversion factor was applied, based on WSCC automatic traffic counts for A259 in July 2018, to convert AM and PM peak hour flows to AADT. The AADT conversion factors are presented in Appendix 14 to the TA. The AADT conversion undertaken in the Ford ERF TA is considered robust and no concerns have been raised by WSCC Highways in this regard. On review, it is not clear how the AM/PM peak hour to AADT conversion was undertaken in the Ford Airfield Transport Assessment. However, it is considered that the approach taken in the Ford ERF Transport Assessment is robust and evidenced.

23. Consideration must be given to potential odour impacts upon future receptors (i.e. R5 & R6 – ‘The Landings’) which are seeming omitted from the operational odour impact assessment.



The ES Addendum provides an update in relation to the impact of odour on future receptors at The Landings.

WSCC Highway Authority

24. Details and an estimate of a proportionate contribution required to deliver opportunities to improve pedestrian and cycle access in the locality as set out in the WCHAR.

Consultation with WSCC Highways on the level of proportionate contribution to be secured is ongoing at the time of writing.

25. Provide of a Word copy of the designers' response.

A Word version of the Designers' Response has been sent to WSCC Highways on 7th July 2021. Consultation with WSCC Highways on the RSA (as per GG119 Road Safety Audit) is ongoing.

26. Further information on the occurrence of peak days (no peak day assessment has been provided as per the previous withdrawn application, where the maximum consented HGV movements were included).

The applicant has confirmed that the number of HGVs will remain within the permitted cap of 240 HGV movements per day, even on peak days.

27. Consideration of Church Lane vehicular movement construction impacts and various options proposed.

Table 6.8 of the TA indicates that the existing Church Lane/A259 roundabout is expected to have capacity issues in 2025 without the ERF construction phase traffic on Church Lane, A259 East and A259 West. The addition of ERF construction traffic (73 total vehicles in AM Peak and 53 total vehicles in PM peak) is expected to have minimal impact on the estimated poor performance of the roundabout in 2025.

It is suggested that option #3 of those proposed by WSCC Highways (via Construction Management Plan) would be the preferred option. Noted that option #1 and option #2 would not necessarily resolve the issue, whereas #3 ensures any potential impact is reduced/mitigated.

Therefore, it is suggested that WSCC Highways proceed to secure a Construction Management Plan to reduce level of construction traffic in network peak hours to be a similar level to the operational flows in the network peak hours.

The context for this suggestion is given by the table below: total vehicle movements generated by construction / operational phases of the proposed development, through the A259/Church Lane roundabout (of which HGV movements are shown in brackets).



	Construction	Operation
AM (8-9)	73 (22)	21 (21)
PM (5-6)	53 (0)	5 (3)

It is noted that HGV movements are similar but there are large differences in total movements. In response, potential Construction Management Plan mitigation options should focus on reducing the number of construction staff car trips during the network peak hours, such as by:

- Scheduling of shift patterns for different workstreams (e.g to 6 - 7am or 9 - 10am) to 'smooth' the peak and reduce demand during network peak hours (esp. 7 - 8am)
- Consolidation of construction staff person trips into fewer vehicle trips, e.g. encourage car sharing, run minibus services
- Monitoring of all vehicle movements to/from site and introduction of additional controls if movements are deemed too high.

It is also noted that the construction trip generation presented is for the peak months of the construction period (circa. months 28 - 45 based on current programme) and therefore represents the worst-case. The construction trip generation will be lower for much of the construction period.

28. Vehicle tracking information for the largest anticipated vehicles at the Church Lane junction.

"Church Lane junction" is understood to mean the Church Lane/A259 roundabout junction. The Church Lane/A259 roundabout junction should be specified for all general/permitted vehicle classes and sizes (especially as an ex-Trunk Road).

It has been agreed with WSCC Highways that Ramboll will later prepare an illustrative swept path plot to help communicate the ability for HGVs to pass through the junction, using a map base to be provided by WSCC Highways in due course.

All vehicles serving the ERF will be within legal limits for vehicle size, both in terms of national law and in terms of local highway restrictions.

29. Clarify HGV parking numbers.

There is space for HGV parking on-site however it's a 'multi-use' area and therefore not officially designated as HGV parking bays.

30. Clarify the anticipated number of days/occurrences that previously consented maximum daily HGV numbers are envisaged to be exceeded, and any further mitigating action to be taken.

The applicant has confirmed that the number of HGVs will remain within the permitted cap of 240 HGV movements per day, even on peak days.



The traffic model has been constructed to present a conservative worst case. For example the ERF would only receive approximately four deliveries per year of Powdered Activated Carbon (PAC), however the calculations assume one delivery per day. Likewise, there will be approximately nine deliveries per year of diesel but one delivery per day is included in the modelling assumptions. The modelling has therefore been very conservative, and the HGV cap will not be exceeded even during peak periods.

WSCC Landscape

The Council's Landscape Consultant has requested the following additional information:

31. Landscape General Arrangement Plan 2829-01=001 Rev D does not appear to show planting proposals consistent with indicative landscaping shown on Proposed site plans PL04, PL05, PL106 and PL107. Please clarify and amend as necessary.

See response to clarification point 6 above.

32. More detail of proposed materials and appearance of the proposed underpass at the north eastern corner is required.

Drawing 1404_PL202_TunnelUnderpassSection_NS has been prepared to provide more details of the materials and appearance of the proposed underpass. See Appendix 1.

33. A hard-landscaping plan is required showing proposed surfaces.

A hard landscaping plan has been prepared, see Appendix 1, drawing: 2829-01-004Hardworks Rev A.

34. Details of how lighting will be controlled and minimised from office windows.

The office windows will be fitted with blind systems which will close automatically during the hours of darkness to prevent internal lighting being visible from surrounding areas. This applies to the western elevation of the administration block, this being the only elevation with glazing. The automatic blind system will be provided on all windows in this elevation. The applicant considers that a suitably worded planning condition could be used to ensure that details of the exact automated system to be installed are submitted for approval by the planning authority prior to occupation.

35. Clarify the criteria with respect to assessment of visual effects on views, and what warrants the downgrading of the magnitude of change from high to medium/high.

The assessment sheets which we believe this comment relates to are: VR1, VR2, VR4, VR5, VR6 and VR14 and we have set out our reasoning for the levels of assessment transparently and clearly.



We have assessed the effects on views based on the GLVIA guidance. The assessment of visual effects is required to take into account the existing baseline conditions experienced by the visual receptors.

In this assessment, there is an existing context of development which is experienced by receptors to a greater or lesser extent in many viewpoints. Some of this visible development is industrial. This means that for most receptors, the nature of the view is already part developed. In closer views, for instance from footpaths that pass close to the site, receptors already experience a high degree of industrial development. The proposal is larger in scale than existing development, so is changing the scale of one of the components of the view, but the nature of the view which is a mix of industrial, residential and agricultural components, remains the same.

So, although the proposals are of a larger scale than existing, the nature of the view remains close to that currently experienced and therefore the magnitude of change of the view is reasonable assessed as medium / high.

Arun District Council Environmental Health Officer (EHO)

General

36. *Clarify potential noise nuisance from the site once commissioned but before the earth bunds have been constructed and mitigation proposed.*

The phases will not be in sequence but will overlap so that the bunding will be partially in place during commissioning. The phasing of the bunds can be managed in such a way that seeks to protect existing and future residents. Also see response to clarification point 13.

37. *Clarify the volume and frequency of HGV movements outside of normal working hours stipulated.*

The applicants will adhere to the hours of 06:00 - 20:00 Monday - Friday and 08:00 - 18:00 Saturdays and will accept a suitably worded planning condition on this.

38. *Clarify potential noise impacts associated with the proposed use of an emergency generator during abnormal operating conditions (including details of location and frequency of use).*

The emergency generator (EDG) is likely to be placed next to the north western corner of the turbine hall. This is the ideal location although the final location would be selected by the EPC contractor.

It is likely to emit a noise level of 85 dBA at 1m/65 dBA at 10m from the EDG container. The predicted noise levels at R1-R3 would increase by up to 0.2 dB which is a negligible increase in noise level. The noise levels would not increase at the other assessed receptor locations.

The EDG would be tested once per week, for a period of around 15 minutes. In terms of operation, the EDG is only required to operate if the plant loses grid connection and the steam turbine fails to enter island mode,



or to restart the plant without a grid connection. It should therefore operate very seldomly, for emergency start-ups only (up to 16-hours worst case) and shut-downs (up to one hour). At the detailed design stage it may even be possible for the appointed EPC contractor to design out the need for the EDG completely.

For context, based on experience at the Lakeside ERF, the EDG has only operated twice in the 12 years of operation (i.e. outside of the weekly testing regime).

Air Quality

39. *Clarify the extent to which likely vehicle movements associated with proposed new homes has been taken into account in assessment of air quality impacts.*

The 'do-minimum' vehicle movements was calculated using a Temprow growth factor which represents general growth due to the local plan allocations and additional committed developments.

The Temprow growth factor has been evidenced and defined as reported by Ramboll in the Ford ERF Transport Assessment. It allows for the proposed new homes at Ford Airfield as per the planning / land use change data provided by WSCC Highways to the Temprow database.

40. *Clarify if air quality monitoring/modelling is based on current vehicle numbers or maximum permitted by extant permissions.*

The traffic data used in the air quality assessment is based on a combination of current baseline data from The Landings transport assessment and / or based on the Temprow derived background forecast flows and / or estimated proposed development trip generation (the Ford ERF), depending on the combination required for the scenario being assessed.

With respect to the estimated proposed development traffic (the Ford ERF), these flows are based on estimated trip generation and not the maximum permitted by extant permissions (i.e. we haven't just assumed 240 HGVs based on the cap), noting all estimated traffic flows generated by the proposed development are within the permitted cap, as reported in the Ford ERF Transport Assessment.

41. *Clarify what consideration has been given to potential changes in air quality objectives and how/if the plant would address this to ensure future compliance.*

The ERF will need to comply with the emission limits set in the Environmental Permit for the duration of its lifetime. If there are changes to air quality objectives then the plant will respond through any future updates to the Environmental Permit that may be required as a result of consequent changes to the permitting regime, including any changes to the flue gas treatment processes that compliance with a revised permit may entail.



42. Section 6.93 of the report states that “the point of maximum impact occurs to the north east of the ERF on a small section of Station Road (i.e. an area where the annual mean AQAL does not apply).” Clarify why the AQAL does not apply here as there are several residential properties here around the junction with Ford Lane that have not been identified as sensitive receptors.

Section 6.93 of the ES specifically addresses the point of maximum annual mean impact which does not occur at an area of relevant exposure. As set out in Section 2.2 of Technical Appendix C3, the annual mean AQAL applies at residential properties, schools and hospitals. This does not occur at a residential property. The annual mean nitrogen dioxide impact in this area to the north east of the ERF is predicted to be 0.76 $\mu\text{g}/\text{m}^3$ or 1.9% of the AQAL, and the total predicted concentration is predicted to be 54% of the AQAL. It is noted that this does not specifically include the contribution from the local road. However, as shown in Table 27 of Technical Appendix C at receptors R1 and R2, which are located closest to this area, the contribution from road traffic from existing sources and the proposed development is ~11 $\mu\text{g}/\text{m}^3$ (or 27% of the AQAL). This includes 8.7 $\mu\text{g}/\text{m}^3$ from background sources (or 21.8% of the AQAL). Therefore, the road traffic is contributing approximately 2.3 $\mu\text{g}/\text{m}^3$ or 6% of the AQAL. If this was to be added to the PEC the total concentration would be around 60% of the AQAL. This would not change the descriptor of the magnitude of change set out in the ES or the conclusions of the assessment that the proposed development would not have a significant effect on air quality.

43. Emissions Mitigation Statement: Clarify the basis for calculation of the mitigation costs.

As context, it is pertinent to note that the purpose of the proposed development is to help prevent non-recyclable waste being sent to landfill or exported out of the county or overseas for disposal. It will also make a contribution to the security of UK energy generation. The ERF will treat 275,000 tonnes of non-recyclable waste and generate 28 MW (net) of energy to supply the national grid. Hence there is a degree of emissions mitigation actually built into the purpose of the project, in terms of diversion from landfill and reducing greenhouse gas emissions.

The WSTF will support this by treating 20,000 tonnes of household and commercial waste per year. A waste transfer station has been operated on the site since 2015 and as such there are already vehicles accessing the site.

The emissions mitigation calculation is based on the net change from the existing operations as if the proposed development was not to go ahead the site would continue to be used as a transfer station and hence the level of vehicles would remain the same.

The following are included:

- The operators will ensure that all new vehicles will comply with the latest European Emissions Standards, this will be implemented via the Operator's fleet strategy to reduce emissions



- Solar panels are included in the design to provide zero carbon electricity - this is in addition to the low carbon electricity generated by the ERF
- Bike racks and suitable changing facilities will be provided to encourage travel by bike
- All car parking spaces will be equipped with EV charging points. This is a greater benefit than a 'policy compliant' 10%.

Odour and Dust

44. Clarify location of nearest sensitive receptors to north east considered.

Figure 6.1 of the ES shows the nearest sensitive receptors. As shown the closest properties to the north east are off Ford Lane, approximately 200m from the site boundary.

45. Clarify consideration given to proximity to potential future sensitive receptors within the neighbouring strategic development site for dust and odour, and assumptions made in respect of likely proximity to future proposed dwellings in assessment conclusions (paras 6.113 and 6.114 and 6.133 suggest these future receptors have been excluded from the assessment), and any specific mitigation relied upon.

The receptors within the neighbouring strategic development site were considered in the cumulative assessment set out in paras 6.138 to 6.144 of the ES. It was assumed that the layout was as per the original outline application (noting that revised drawings have been submitted since, that now provide a greater set back to the site boundary). As set out in the ES, the inclusion of these receptors would not change the level of dust mitigation measures required during the construction period.

46. Clarify/justify why no Geographical Odour Modelling or provision of OEU levels caused in the worst-case scenario has been provided to support ES conclusions.

There is an existing waste transfer facility operating on site. This handles the same waste as is proposed as part of this application.

Therefore the level of odours anticipated are not expected to be significantly different than the existing operations, noting that as part of this application the waste will be handled within buildings which are built for purpose (which is not the case with the existing operations). This is an improvement that can reasonably be expected to mean that the position will as a minimum be no worse than currently experienced with regard to odour. There have been no substantiated odour complaints.

Geographical odour modelling requires a point source such as would be provided with an installed odour abatement system, such as exists at the nearby Southern Water WWTW site. No such abatement system is proposed at the application site as it is not considered necessary.

Given the above, it is not possible to provide geographical odour modelling.



It is also important to note that the site is safeguarded in the adopted waste local plan as it is an existing waste management site and has also already been granted consent for an EfW and materials recovery facility.

The ERF and WSTF will need to have Environmental Permits (EP) to operate. These will include a condition to ensure that there is no significant odour outside the site boundary. The Environment Agency (EA) will be responsible for enforcing this. The planning authority should rely on the EA to carry out its duties effectively in this regard.

To support the EP applications an Odour Management Plan(s) will be developed. These will include the measures to be implemented to ensure that odour is controlled. They will expand upon the measures set out in Chapter 3 of the ES (paras 3.121 to 3.134).

Noise and Vibration (ES)

47. *Clarify why a +3dB façade reflection has not been applied in some cases (e.g. paras 14.76, 14.105, 14.152) but in others has (e.g. 14.135).*

It is not appropriate to add a +3 dB façade reflection to the noise contours, as this will artificially add 3 dB to the predicted levels. A +3 dB façade correction is only appropriate for calculating the level at 1m from the façade of a sensitive receptor. The levels presented in Tables 14.11 and 14.12 are the levels at 1m from the facades of the nearest receptors and include a +3 dB facade reflection.

48. *Clarify the reduction in decibels assumed for boundary screening at para 14.97 (bunds and fencing).*

See response to clarification point 13 and Appendix 2.

49. *Clarify what consideration has been given noise impacts at times when roller shutter doors may be open (para 14.97).*

Doors will be left open during busy periods of deliveries as it wouldn't be practical to open and close doors so frequently during these periods. However, outside of these peak periods, doors will be kept closed.

With doors left open (which is infrequent) the noise levels at existing sensitive receptors would be predicted to increase by up to 0.3 dB, which is a negligible increase in noise level. The noise levels at proposed residential receptors would be predicted to increase by up to 0.5 dB, which is a negligible increase in noise level. With the tipping hall doors open, the only predicted increase in noise level would be at receptor R9 and the increase is predicted to be 0.1 dB, which is a negligible increase in noise level.

50. *Clarify what corrections/penalties, if any, have been assumed for intermittency (para 14.103).*

BS 4142:2014+A1:2019 states that penalties for intermittency may be required 'When the specific sound has identifiable on/off conditions'. This is



not expected to be the case for the proposed development. A penalty for impulsivity has been applied to account for the sorting of waste and the operation of HGVs.

51. Clarify/justify the use of a 65dB L_{Aeq} threshold for construction noise thresholds (para 14.134) particularly given the proposed construction hours and duration of the construction period.

65 dB $L_{Aeq,T}$ is the threshold that has been determined in accordance with BS 5228-1:2009+A1:2014, as has been done for all receptor locations. We would expect that any demolition/construction works during Public Holidays would be subject to a Section 61 application under the Control of Pollution Act 1974, as works on Public Holidays would be outside of typical working hours.

52. Clarify/justify why demolition and construction predicted noise levels does not include details or consideration of L_{Max} levels (Tables 14.18 & 14.19).

Predictions of L_{Max} are not required as the assessment is based on the ABC method of BS 5228-1:2009+A1:2014 which uses the $L_{Aeq,T}$ metric. There are no applicable criteria for the assessment of maximum noise levels from construction.

53. Clarify what is determined a 'short-term' impact in consideration of construction related impacts.

See response to clarification point 18.

54. Clarify what the 3dB addition relates to in table 14.20. Noise and Vibration (Appendix J)

As per ES paragraph 14.104, a 3dB penalty has been applied for impulsivity which may just be perceptible at the noise receptor to obtain the resultant rating levels (to the methodology of BS 4142:2014+A1:2019). This penalty has been applied to account for HGV movements on site and on the access road, and noise activity from the WSTF, e.g. handling of waste which may be audible over the typical noise climate. However, it should be noted that these noise sources and impulsive noise characteristics are already present on site.

Noise and Vibration (Appendix J)

55. Page 15, paragraphs 2 and 5. Clarify if assumptions regarding dominance of Road Traffic noise were correct.

We believe this assumption to be correct based on the results of our baseline noise survey. This indicated that road traffic noise was dominant.

56. Clarify consideration given to construction/demolition noise impacts upon neighbouring sports fields.

There is not an accepted methodology and no applicable criteria for the assessment of demolition/construction impacts to sports fields, or places



other than sensitive receptors. Any assessment would be bespoke and open to interpretation.

57. *Figures 4.1 – 4.4 show a period where data was not used due to Storm Ciara. Clarify why a precise 24-hour period was used instead of removing data based on the outliers (e.g. excessive wind speed etc.).*

A precise 24-hour period has not been used. 48-hours of data have been excluded but this is not purely based on omission of whole day periods. This is based on comparison of the measured levels before and after the storm event in Figures 4.1-4.4. The operational noise assessment uses the typical background noise levels outside of these periods. The lowest demolition and construction noise thresholds have been adopted for all receptors, other than those immediately adjacent to the road network and so this is deemed to be worst case. The omission of the data during Storm Ciara has been done to ensure that effects are not underestimated due to using higher and unrepresentative background noise level data.

Arun District Council Drainage Engineer

Arun District Council Drainage Engineer makes the following comments (and requests conditions). Clarification is requested as to whether such actions have been/would be undertaken, the extent to which they have been considered in the proposed drainage design, and/or whether it is proposed that this be considered at the detailed design stage (through planning conditions):

58. *The suitability for use of infiltration must be supported by on site testing. Groundwater levels are not so high as to preclude its use here.*

Based on the development proposals (with an area of lowered ground levels and a below ground waste bunker) and the ground conditions encountered in previous ground investigations (as documented in the submitted FRA and Geo-environmental Desk Study) it is not currently considered likely that the use of infiltration systems will be feasible for the site. However, at the next design stage, further ground investigations are proposed to be undertaken. This investigation will include assessment of the hydrogeological properties of the aquifers underlying the site and quantification of the permeability of the River Terrace Deposits. Based on the findings of the further investigation, the feasibility of using infiltration solutions will be confirmed. Such investigations can be secured by an appropriately worded planning condition.

59. *Discharge should be restricted to greenfield QBar where possible.*

As detailed in the surface water drainage strategy, attenuation is to be implemented on site sized to contain the 1 in 100-year storm event plus a 40% allowance for climate change (CC), equating to 2400m³. The attenuation has been sized based on a peak discharge rate of 60 l/s, which equates to the 1 in 30-year Greenfield runoff rate. This approach has been agreed with WSCC as the lead local flood authority (LLFA) and is documented in the communications with the LLFA, as included in Appendix H of the FRA and Appendix 3 of this letter.



60. *Surface water must be contained safely within the site for all events up to and including the 1 in 100 year plus 40% climate change event.*

The proposed attenuation system provides over 2400m³ of attenuation storage volume. This has been sized to contain the 1 in 100-year storm event including 40% allowance for CC. The attenuation comprises below ground cellular storage, channel drainage and shallow ponding of contained external areas. Storage volumes in excess of the 1 in 30-year event + 40% are to be provided below ground. Surface water volumes in excess of the 1-in-30 year event (including 40% CC allowance) will be managed on site by allowing shallow ponding of external hardstanding areas. These areas are contained by the higher ground levels surrounding them. Surface water from the lower ground level will be pumped and additional storage has been included within the strategy, at the lower level, in case of pump failure.

61. *If the existing outlet is to be used, then supporting evidence must be supplied to show that this is in an appropriate condition to receive this water.*

The majority of the on-site drainage network will be abandoned. The existing surface water manhole closest to the site boundary and the off-site downstream surface water drainage connection with the unnamed land drain (as shown in Figure 7 of the FRA) are to be reused. Discharge to the outlet will be at a reduced rate compared to the current situation, providing betterment over the existing situation. The condition of the outlet could be surveyed as part of the next stage of detailed design and could be secured by an appropriately worded planning condition.

62. *Further details on proposed treatment of surface water should be provided to evidence that downstream water bodies will not be negatively impacted by proposals.*

To minimise the impact to the surrounding environment in terms of water quality as well as water quantity it is proposed to install “light liquid” separators as required as part of the proposed formal surface water drainage system. Further to this the site would operate under an environmental permit and water quality monitoring stations are proposed for both the WSTF and the ERF to monitoring the chemical composition of runoff from the site prior to it being discharged downstream. These would be monitored in accordance with frequencies and criteria established as part of the environmental permit.

Additional Information to be supplied (not requested under Regulation 25)

In addition to the information detailed above, the County Council also requests that the following points are addressed.

63. *For all tables in Chapter 14 (Noise), it would useful for the identified relevant threshold levels and to be included, including any variance thereto. This would allow for clear comparison with modelled noise levels. Further, where adverse effects are predicted, these would also benefit from clearly setting out the corresponding Adverse Effect Level as set out in the Noise Policy Statement for England (NPSE).*



Each assessment table and corresponding criteria/effect levels are detailed below:

Demolition and construction

Tables 14.11, 14.12, 14.18 and 14.19 - assessed against Table 14.5 and Table 14.10.

Construction traffic

Table 14.13 – assessed against Table 14.5 and Table 14.10.

Operational noise

Tables 14.15, 14.16, 14.20 and 14.21 - assessed against Table 14.6 and excess of rating level over background noise levels included.

Change in road traffic noise levels

All scenarios of Table 14.17 assessed against Table 14.7, except for the 2018 Baseline to 2025 Baseline with committed development and construction (short term) scenario which is assessed against Table 14.8.

64. *Whilst the Plume Visibility Modelling Results (and discussion within Chapter 12 of the ES) are noted, consideration should be given to providing visualisations that include the plume in the worst-case scenario. It is recommended that these are provided for selection of viewpoints to be representative of near, mid, and distant views.*

The provision of plume visualisations has been considered. However, as the presence of a plume is an infrequent occurrence, as shown in the submitted documents, it is not considered that visualisations would assist the assessment and may create a false impression.

A representation of a visible plume would inevitably be open to interpretation. The execution of the image will always be inexact; the appearance of the plume will vary according to atmospheric conditions and whilst an image could be produced that would be as representative as possible by the skill of the visualiser, it would always be no better than illustrative.

In addition, it could be misleading to those who see the image, but do not have the context about its infrequent occurrence and that in practice it would be likely to vary in appearance from that presented. It might be assumed that the plume might be regularly present in the form represented in the image.

It is therefore not considered that presenting a visualisation of the plume is likely to be helpful to determining the application.

The presence of a visible plume on limited occasions has been assessed in the LVIA as explained in the ES.

65. *Whilst some consideration appears to have been given to the potential traffic impacts upon amenity on the wider route of HGVs along Ford Lane/Church Lane (e.g. Planning Statement page 80), this does not appear to have considered the likely increase in HGV sizes when compared with the extant permission WSCC/096/13/F (a key likely change in comparison to the fall-*



back position). Accordingly, further assessment is recommended to address the potential impacts of HGVs on amenities and the character of this route, and potential for any change in, visual, noise, intimidation impacts (e.g. NMUs), or character impacts which may result.

There is no likely increase in HGV sizes. There are no restrictions on vehicle size, so nothing is changing.

Noise

The operational road traffic noise assessment is completed to the industry standard 'Calculation of Road Traffic Noise' (1988) memorandum. A correction is applied for the percentage of heavy vehicles. The methodology does not calculate the noise contributions from heavy vehicles depending on their size. It should be noted that the methodology was based on noise data that was collated for HGVs in the 1970s and 1980s when vehicles were considerably noisier than the present day.

The operational noise model uses the worst-case noise emission data of BS 5228-1:2009+A1:2014 for 44t lorries and 26t refuse collection vehicles.

There is no accepted standard assessment methodology for the impact of HGVs for highway footpath users and we believe that this would be covered by the assessments already provided within the road traffic noise assessment. Any additional assessment would be bespoke and could not be assessed against relevant criteria. Therefore, further assessment of HGV noise for highway footpath users will not be provided.

Transport

The assessment undertaken for Ford ERF considered the potential impact of HGVs on the highway network and users including pedestrians, cyclists and equestrians in accordance with relevant IEMA Guidance. The movement of any HGV vehicles are considered within the assessment, irrespective of size.

66. *Provide an updated assessment of need and the sources of waste to be managed, taking into account the latest West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2019/20.*

This is addressed in an addendum to the Planning Statement.

67. *Provide clarification the basis for the conclusion that the proposed development could be considered a 'low carbon technology' (in comparison to the use of conventional fossil fuels) and 'renewable energy source', including the extent to which this would be reliant on the feedstock (and biodegradable fractions thereof).*

This is addressed in an addendum to the Planning Statement.

68. *Provide clarification as to whether Carbon Capture and Storage could be realistically 'retrofitted'.*

This is addressed in an addendum to the Planning Statement.



69. *Provide clarification/justification as to the methodology adopted for comparison of carbon emissions of the proposed development compared with Landfill, in particular regarding consistency in consideration of biogenic CO₂ emissions of both.*

For both EfW and landfill scenarios considered in the carbon assessment, the emissions of carbon dioxide from the combustion of biogenic carbon in the waste have been excluded from the assessment, as these are 'short cycle' carbon emissions (i.e. only relatively recently absorbed by growing matter).

The use of a 50% sequestration rate for landfill is in accordance with DEFRA's 'Energy from Waste – A guide to the debate'. The applicant does not consider that landfill should be given additional credit for sequestering biogenic carbon, as this would result in an overly conservative assessment.

The DEFRA report titled, 'Energy recovery for residual waste – A carbon based modelling approach' acknowledges that there is considerable uncertainty surrounding the amount of biogenic carbon that is sequestered in a landfill, and that further work is required to understand this. However, the report acknowledges that *"the outcome will be sensitive to the level of sequestration in two ways. Reducing the level of sequestration will require less biogenic carbon to be included in the EfW side of the model and will also result in more methane being emitted from the landfill side"*. This means that both factors will favour EfW over landfill. When taken as a whole, the DEFRA report provides an explanation that the assumed landfill gas capture rates are based on a high sequestration rate, which may not be correct and is at the higher end of landfill gas capture rates in published literature. As described previously, a lower sequestration rate would result in more landfill gas being generated, lower landfill gas capture rates and a considerably worse impact for landfill.

Taking the above into consideration, the approach used in the DEFRA report and applied in the Carbon Assessment (i.e. using high sequestration and landfill gas capture rates and not giving an additional credit for sequestered carbon) is considered to be conservative, in that it will tend to favour landfill over the incineration of waste in an ERF, when the opposite may be experienced in practice.

70. *It is noted in ES Chapter 7 that the proposal has the potential to deliver increased carbon benefits and reduced GHG emissions through potential use of the CHP or inclusion of solar panels, however, no indication of the extent of such benefits/emissions is provided. Please clarify and provide estimates.*

As stated within section 3.5 of ES Chapter 3, southerly facing photovoltaic (PV) solar panels are proposed to be mounted to the flat/low pitch roofs covering the reception hall, bunker hall and boiler/flue gas treatment enclosures and will provide for an area of 3,360 m². Furthermore, the flat/low pitched roof to the WSTF will also be fitted with approximately 1,140 m² of PV solar panels. This equates to a combined area of approximately 4,500 m² of PV solar panels and is expected to generate between 663 – 745 MWh per annum.



The use of PV solar panels creates a further opportunity for carbon savings associated with the ERF in addition to the benefits stated within the carbon assessment. A high-level determination of the benefit of installing a PV system on the roofs of buildings has been undertaken and is presented as follows. When establishing baseline carbon emissions and calculating carbon emissions resulting from displaced electricity from the National Grid, the BEIS 'Greenhouse gas reporting: conversion factors 2021' have been used. If it is assumed that electricity imported from the National Grid results in the emission of 0.21233 kg CO₂e per kWh. Assuming the lower range of the total energy output estimated from the solar panels, this equates to an additional grid displacement of 140 tCO₂e per annum.

With regards operation of the ERF in CHP mode, as indicated within Chapter 7 of the ES, the carbon benefits of the ERF would increase should heat be exported. The ERF will be able to export up to 10 MWth of heat in the form of steam or hot water in the future, subject to commercial agreements with off-site heat users.

A CHP report was submitted as a supporting document to the planning application, which identified an average heat load of approximately 3.56 MWth. This results in a reduction in electrical export to around 27.6MWe. An additional sensitivity has been run to determine the carbon benefits of the ERF allowing for this heat export. This will result in an increase in the carbon savings associated with the ERF from 48,102 tCO₂e/annum to 53,228 tCO₂e/annum.

It is currently proposed for the ERF to operate on a power-only basis; however, the applicant is committed to working with local heat-users to export heat subject to the appropriate technical feasibility and commercial agreements for the export of heat. The PSS Addendum provides some further information updating the position on potential heat users, including strong interest and support from the West Sussex Growers Association and its members.

With reference to the full comments of the WSCC Arboricultural Officer (dated 7th May 2021) and WSCC Landscape Architect (dated 4th May 2021) you should consider/address the following:

71. Clarify what, if any, opportunities for landscape screening, planting and biodiversity improvements beyond the site boundaries have been explored.

Whilst opportunities may in theory exist on public land in the vicinity around the site, in discussion with the relevant local authority or body, it is considered that the only likely source is highway land along the margins of public roads in the area. An initial review suggests that this is unlikely to yield any realistic opportunities for planting that would provide effective screening in any specific views towards the proposals.

72. The AIA suggests poplars along the access road have limited life remaining. Clarify how the LVIA has considered this and what, if any, opportunities have been considered to retain the screening effects of this landscape feature?



The poplars (group 10 in the AIA) along the access road are not within the control of the applicant. They provide only very limited screening effect for localised views from within the Ford Airfield wider site and so have no significant role in terms of the visual assessment. The only receptor group for which their loss might be a consideration is VR27, which includes people working / visiting workplaces, including Ford Market. This group already experiences obvious industrial development in views and therefore even the total loss without replacement of these trees would have no effect on the degree of significance of effects of the proposals. The LVIA process acknowledges that any vegetation off-site may be subject to change, either growth, reduction or even removal.

73. Consider detailed comments regarding proposed tree stock, species and densities and management/maintenance provisions as raised by the WSCC Arboriculturist and Landscape Consultant.

Following conversations with the Tree Officer, tree species along the southern boundary of the site have been amended from pear to field maple. Please see Appendix 1 for the following amended plan / details:

- 2829-01-001-Softworks Rev E
- 2829-01-002 Details Rev C
- 2829-01-003 Tree species and densities Rev D

The applicants have no objection to having smaller stock and different densities as suggested by the WSCC Arboriculturist and Landscape Consultant and note the comments about the larger stock in the planting plan.

However, the larger stock is proposed to improve early screening performance. It is understood and accepted that using smaller stock would make establishment easier due to the reduced need for management.

The additional costs of more maintenance for an extended period were justified by the importance of early impact in minimising visual impact. The planting shown in visualisations is based on having this larger stock.

However, if WSCC prefer to have the smaller stock suggested by the Arboriculturist and the Landscape Consultant response, this could be the subject of a planning condition to provide details.

74. Provide details of proposed pond and measures to maximise biodiversity and ecological value.

The proposed pond is intended as an ornamental and symbolic feature to mark the position of the former Portsmouth and Arundel Canal on the western boundary of the site. It will be a shallow water feature formed from concrete. It will not be suitable for planting or other measures that would provide any specific biodiversity or ecological value. However, as it is a surface water feature it may provide some benefit as a source of water for some species.



75. *Consider additional planting on some grey areas and around car parking areas.*

Such areas within the operational site are generally kept free of planting for maintenance reasons. There is not thought to be any landscape, design, or other reason to have planting in such areas, which are not public and are of a functional nature.

76. *Clarify consideration given to the visual and landscape effect of the plumes (both day and night) and why visualisations have not shown this.*

The provision of plume visualisations has been considered, as explained above under point 64. The plume is taken account of in the assessment as clearly stated in the text of each assessment sheet. So although not shown in the visualisations, it is considered in coming to a judgement on significance of impact. A normal part of the process of LVIA is that the assessor uses professional judgement to determine the significance of effects and in most cases needs to exercise experience knowledge and judgement in the absence of visualisations. It is impracticable to include visualisations for every instance and the applicants feel that taking account of the already extraordinarily large number of visualisations provided, that it would be unreasonable to have to provide more particularly when their provision would not inform or alter the professional judgement of the assessor.

77. *Clarify the examination of the landscape baseline and how this has taken into key recreational, perceptual qualities and characteristics set out in LCAs including tranquillity, association, openness, topography, panoramic views, and long views to the South Downs.*

The purpose of the landscape baseline studies is not to reproduce all of the various text relating to landscape character areas or to set out all of the observations made during the numerous visits to the site and surrounding character areas, but to set out the key aspects of the character areas that directly relate to the potential effects of the proposals. The baseline section of the chapter and the landscape assessment sheets set out the relevant baseline points clearly and in sufficient consideration in order to come to a balanced view of sensitivities and to come to an informed judgement on effects.

To illustrate this in more specific detail, in paragraph 9.5 of WSCC's comments issued in June 21, WSCC stated that *'the LVIA baseline omits key recreational or perceptual qualities and the long views to the South Downs.'* This statement is not correct. Where the long views to the South Downs are a key element then the baseline character assessments mention them, for instance in the descriptions for Marine Character Area MCA7 Selsey Bill to Seaford Head.

Generally, for most of the character areas, except those lying south of the site (LCAs 27, 28, 29 and 39) the proposals would not be in the same vector of view as views towards the South Downs. In the character areas mentioned, although visible, the high ground of the South Downs is a distant backdrop seen from some vantage points, and although it is part of the



wider setting it is not a key element in determining the character of the character area. Notably the Arun District Council character assessments appear to also take this approach as there appears to be no specific mention of this in that assessment.

Climping Lower Coastal Plain is the main character area where the South Downs backdrop is more noticeable, and this is considered in the assessment (see assessment sheet VR18).

Recreational qualities, chiefly focussed on walkers, (which are the main recreational receptor with a focus on views) are fully considered in several of the visual receptor sheets that relate to persons using public rights of way, see VR12 to VR20 inclusive. The other recreational receptors group, persons visiting heritage features, for which views are also an important aspect, are also well considered in the assessment sheets VR21-VR23.

78. Clarify consideration given to the impact of the built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north.

Where this effect occurs, it has been taken into account in the assessment. There are relatively few instances where the built form would clearly break the horizon in relation to views towards the South Downs. Mostly, other features such as intervening trees and existing buildings also break the skyline so where this effect occurs, it is mostly unlikely to be immediately perceived. as discussed in the assessment sheets particularly VR20, VR19, but in some instances (see VR 18 for instance) it is acknowledged that it will be more noticeable.

Regarding the proposals breaking the 'offing', this occurs in views from the South Downs, but as stated in the assessment sheet text, there are a number of buildings, three high rise blocks, Bonor Regis Butlins and the Littlehampton gasholder which all break the offing. The overall scale of the panorama and its diversity of features means that the proposals would be a relatively small component of the overall view and one more feature breaking the offing at a distance.

With reference to the full comments of the ADC Environmental Health Officer (dated 21st May 2021) you should consider/address the following:

79. Consideration of additional air quality mitigation measures such as those listed below, particularly those focusing on reducing emissions from vehicles coming to and from and being used on the site itself:

- *Providing a public transport subsidy for employees;*
- *Ensuring all new commercial vehicles comply with the latest European Emission Standards;*
- *Implementing a fleet strategy that reduces emissions;*
- *Using ultra-low emission service vehicles;*
- *Investing in local walking and cycling initiatives;*
- *Contributing to the cost of on-street EV recharging;*



- *Contributing to unfunded measures identified in air quality action plans*
- *Implementing a low emission strategy;*
- *Contributing to local low or zero emission vehicle refuelling/recharging infrastructure;*
- *Contributing to low emission bus service provision or waste collection services*
- *Contributing to local bike/e-bike hire schemes; and*
- *Funding incentives for the take-up of low emission technologies and fuel.*

The purpose of the proposed development is to help prevent non-recyclable waste being sent to landfill or exported overseas for disposal and make a vital contribution to the security of UK energy generation. The ERF will treat 275,000 tonnes of non-recyclable waste and generate 28 MW (net) of energy to supply the national grid. The WSTF will support this by treating 20,000 tonnes of household and commercial waste per year. A waste transfer station has been operated on the site since 2015 and as such there are already vehicles accessing the site.

The emissions mitigation calculation was calculated based on the net change from the existing operations as if the proposed development was not to go ahead the site would continue to be used as a transfer station and hence the level of vehicles would remain the same.

The EHO has noted that they would expect to see additional mitigation measures such as those listed in their response. Many of these are unrealistic for a development of this nature. However, we can confirm that the following are included:

- The operators will ensure that all new vehicles will comply with the latest European Emissions Standards, this will be implemented via the Operator's fleet strategy to reduce emissions
- Solar panels are included in the design to provide zero carbon electricity - this is in addition to the electricity generated by the ERF
- Bike racks and suitable facilities will be provided to encourage travel by bike.
- All car parking spaces will be equipped with EV charging points, rather than phasing

With reference to the comments of Historic England (dated 14th May 2021), and WSCC Environment and Heritage (dated 4th May 2021) you should consider/address the following:

80. Additional Viewpoints and Visualisations from St Andrews Church Ford, including those used for the previous application (for comparison).

A range of locations for viewpoints were considered during the pre-application discussions with WSCC officers (19 November and 3 December 2020), including the County Archaeologist.

The selection of the viewpoints used for the assessment of effects on St Andrew's Church, Ford, was part of this discussion. The submitted



viewpoints and visualisations, taken from the church car park and from the river embankment to the south, reflect the outcome of these discussions. The new view, from further south along the riverbank, was specifically requested, and the submitted viewpoints and visualisations were agreed to be better as representative viewpoints than those used in the previous application.

Whilst Historic England was not part of this dialogue, the County Archaeologist was fully aware of their comments on the previous (now withdrawn) application, and it can be taken that the viewpoint selection took this into account.

81. Additional visualisations from within Yapton Conservation Area, particularly from the church.

A range of locations for viewpoints were considered during the pre-application discussions with WSCC officers (19 November and 3 December 2020), including the County Archaeologist.

The selection of potential viewpoints from within Church Lane Yapton Conservation Area (for clarity, there are two conservation areas in Yapton), and from the spaces and footpaths around the church, was part of this discussion. The submitted viewpoints and visualisations reflect the outcome of these discussions. The view from the church has been photographed, but it was found that the intervening vegetation and development would mean there was no view of the proposals. Similarly, the majority of the conservation area has no clear views of the proposals. The submitted viewpoints 24 and 35 and visualisations were agreed to be representative.

As the viewpoints included as part of the assessment were all agreed following extensive discussions and a specific heritage location review with the County Archaeologist in relation to Yapton, we feel those efforts to reach a consensus on approach are a relevant consideration, notwithstanding that Historic England was not involved.

The applicants do not see the benefit of providing additional viewpoints in these circumstances.

82. A Visualisation and Viewpoint from the field to the north east of Viewpoint 25 to represent the full extent of the Climping Deserted Medieval Settlement (northern area) Scheduled monument.

A range of locations for viewpoints were considered during the pre-application discussions with WSCC officers (19 November and 3 December 2020), including the County Archaeologist.

The selection of viewpoints from Climping generally, including the deserted settlement, was part of this discussion. The submitted viewpoints and visualisations reflect the outcome of these discussions. The submitted viewpoints and visualisations were agreed to be representative.



As the viewpoints included as part of the assessment were all agreed following extensive discussions and a specific heritage location review with the County Archaeologist in relation to Climping, we feel those efforts to reach a consensus on approach are a relevant consideration, notwithstanding that Historic England was not involved. In relation to this location, it was agreed in view of the substantial amount of intervening development and vegetation, that a view was not necessary.

The scheduled areas of earthworks at Climping are more than 1km from the site. The two separate field parcels are one to the south of the church and rectory and the northern area immediately adjacent to the prison boundary wall. The ES conclusion of no effects was based on the nature of the asset and its setting, its distance from the site and lack of historic connection, and the physical and visual separation created by the intervening built development and vegetation. The pre-application consideration of viewpoint locations did not suggest any need for additional views from this area. Any predicted visibility of the proposals would be seen in the context of the prison estate (on both sides of the Ford Road), and other development at the industrial estate and sewage works. Such marginal visual changes are the basis of the conclusion of the ES that there would be no effects on this asset.

The applicants do not see the benefit of providing an additional viewpoint and visualisation in these circumstances.

83. Additional visualisations from Tortington Augustinian Priory.

A range of locations for viewpoints were considered during the pre-application discussions with WSCC officers (19 November and 3 December 2020) including the County Archaeologist.

The selection of viewpoints from Tortington generally, including the former Priory site, was part of this discussion. The submitted viewpoints and visualisations reflect the outcome of these discussions. The submitted viewpoints and visualisations were agreed to be representative.

As the viewpoints included as part of the assessment were all agreed following extensive discussions and a specific heritage location review with the County Archaeologist in relation to Tortington, we feel those efforts to reach a consensus on approach are a relevant consideration, notwithstanding that Historic England was not involved. In relation to this location, it was agreed in view of the substantial amount of intervening vegetation enclosing the feature, that a view was not necessary.

Tortington Priory is at 3km distance from the site. The scheduled area of archaeological remains is part of a private garden of a house and the advice received in pre-application discussion was also that no specific visualisation was required to allow an assessment of effects. Note that the County Archaeologist's response to the withdrawn application states that "the priory is well screened by mature trees on its southern and south-western boundaries. No viewpoint is available from the site, but referring to the perceived height of the new buildings and stack (in VP28 800-metres to the



south west of Tortington and so much nearer the site) the new buildings and stack would be unlikely to be visible through the screen of trees around the Priory.”

The applicants do not see the benefit of providing additional visualisations in these circumstances.

84. Provision of an assessment of the impact on the Grade I, St Mary Church (Yapton) and the Yapton Conservation Area, to include consideration of views of the church and Conservation Area within the landscape setting.

The effects of the proposed development on St Mary’s Church, Yapton are considered in ES chapter 10 paragraphs 10.80-81, 10.104, 10.119 and residual effects table 10.4, and effects on the Church Lane Yapton conservation area are considered in paragraphs 10.82-83, 10.105 and 10.120. The assessment referred to the photographs in figure 10.9 and VPs 24 and 35 and included consideration of the changes to views of the church and the village within the landscape setting. As noted above under point 81, the locations chosen for the viewpoint photographs around Yapton were the subject of extensive pre-application discussion.

The applicants do not agree that further assessment of the effects on these designated assets is necessary.

With reference to the comments of West Sussex Fire and Rescue Service (dated 4th May 2021) you should consider/address the following:

85. Please clarify the position of fire hydrants, and whether these would be replaced/retained.

Please refer to Appendix 4, Fire Prevention Plan, that was submitted as part of the Environmental Permit application and shows the indicative location of the fire hydrants.

In your letter of the 2nd July 2021 you note that in addition to the specific consultation responses referred to above (and selected matters identified), that we should review all consultation responses and third-party representations received in respect of the planning application and provide responses to the key issues raised. A review has been undertaken and a response to the following issues is provided as follows, leaving aside any issues that have already been addressed in responses above.

WSCC landscape architect response to the planning application dated 4 May 2021

References are made to headings and to paragraph numbers in the 4 May document.



Section 1: Comments

Para 1.4 context/baseline assessment vii. tranquillity:

The WSCC landscape respondent's opinion is that the site is generally tranquil. We disagree based on our experience of the site and Ford Airfield generally, gained on several site visits. This is an operational waste management site, Ford airfield is surrounded by roads, and there are also active industrial uses to the north, south and west.

The NE Evaluation Framework for Natural Beauty includes the following regarding 'Relative Tranquillity':

Contributors to tranquillity –Presence and/or perceptions of natural landscape, birdsong, peace and quiet, natural-looking woodland, stars at night, stream, sea, natural sounds and similar influences

Detractors from tranquillity –Presence and/or perceptions of traffic noise, large numbers of people, urban development, overhead light pollution, low flying aircraft, power lines and similar influences.

The site cannot be said to be characterised by these contributors. The detractors are more akin to the experience of being on the site, regarding traffic, presence of urban development, and similar influences.

We therefore disagree with the respondent's judgement on this matter and conclude, based on site experience, the nature of the site and the NE guidance, that the current site could not reasonably be described as 'tranquil'.

Section 4: The landscape softworks

Paragraph 4.1 refers to the height of the buildings being 'slightly' reduced.

This does not reflect the proposals, that in comparison with the withdrawn scheme are about 25% lower relative to ground level (from 51.2 m down to 38.5 m) a drop of 12.7 m, which is a significant reduction.

Paragraph 4.3 query about the access route under the bund.

This route is included because there is an existing legal right of way for vehicles on that line across the site, and to keep this available requires the route through the bund, rather than stopping the bund short of it, so that the bund's screening function is not impaired. This access is a legal/land-related issue, not related to the ERF/WSTF proposals per se.

Paragraph 4.7 asks for more details of the flint walls/gabions, pond, and choice of materials.

A suitably worded planning condition would be appropriate to secure such further details as may be required.



Section 9: Landscape baseline

Paragraphs 9.6 to 9.7 quote selectively from the WSCC LCA for Chichester to Yapton Coastal Plain and also Lower Arun Valley LCA. Paragraph 9.8 says that a more detailed examination taking account of the quoted characteristics in 9.6 and 9.7 may have resulted in a different weighting of sensitivity of receptors and affected final significance.

We disagree. Our general response is that the LVIA has considered all the relevant characteristics together, including those quoted by the WSCC respondent (where relevant), to come to a balanced view of sensitivity in the round.

The LVIA process involved detailed examination of all the relevant published character assessments and was augmented by extensive site visits and so we are confident that the sensitivity weightings take all information into account, including these selected quotes where relevant. The process of assessing sensitivity is set out transparently for each receptor in the assessment sheets.

Looking at the specific quotes selected by the WSCC respondent for the Chichester to Yapton LCA, we have the following comments:

Characteristics:

Long views to Arundel, the Downs and to the distinctive spire of Chichester Cathedral. The proposals will be visible in some long views to Arundel and the Downs from the vicinity of the site. We consider that these long views will remain a characteristic of the LCA as the mere fact of visibility of the proposals will not change this.

The relatively open character of much of the area allows long views so that village church towers are important landmarks in views. None of the views of the proposals appear to significantly affect the appreciation of church towers in the landscape. St Andrews, Ford, has a very small tower, but the tower is not prominent or an important landmark.

Key issues:

Introduction of large scale industrial buildings and glasshouses with distribution sheds. The proposals are for large scale buildings, which is an identified issue for this LCA. However, we note that the accompanying land management guidelines in the LCA encourage bold tree planting associated with large agricultural buildings, glasshouses and industrial buildings to attempt to assimilate them into the landscape more satisfactorily. This approach is part of the ERF/WSTF proposals, so the LCA guidelines have been followed in this respect. Also note that the landscape guidelines for commercial and industrial development (in WSCC 2005, Landscape Strategy) include to ensure that the design of buildings and structures is of high quality with clean, elegant lines. It should consider massing, form, height, colour, and ensure that the design, layout and ground modelling of new development takes account of the “grain” of the adjoining landscape. We consider our design has done this successfully. It has clean and elegant lines, all of the considerations mentioned have been taken



into account, and the grain of the landscape is reflected in the horizontal emphasis of the design to mirror the flatness of the surroundings.

Key sensitivities:

Key views to the South Downs, Chichester Cathedral and Arundel. The proposals have taken these views into account, regarding the South Downs and Arundel, and noting that long views to Chichester Cathedral are not relevant in this case.

Given all of the above, we consider that the comments of the WSCC landscape respondent regarding the Chichester to Yapton LCA have all been satisfactorily addressed.

We also add that for the lower Arun Valley LCA the highlighted "key issues" in 9.7 of the WSCC response are as follows, with our comments (although noting these are in the LCA landscape and sensitivities section, not the key issues section as stated by the respondent). We note that except where explicitly mentioned, such as in long views towards external features, the sensitivity is not about what might be seen from within the character area, looking out beyond its boundaries, but refers to the actual LCA itself.

Loss of pastoral character of the valley. Presumably this relates to the meadow grazing areas in the valley, as these are the only characteristic pasture areas. Even if pastoral is more widely interpreted to mean agricultural/countryside, this local character will not be lost because of the ERF/WSTF proposals, which are not located in this character area.

Any large-scale housing/commercial development. The proposals will not be within this LCA so do not introduce these uses to the area and therefore cannot affect this sensitivity.

Loss of long views to Arundel and the Downs. The proposed ERF will not be prominent in most views towards Arundel and the Downs from within this LCA. Importantly, although the proposals may appear as a new element in some views, the views will not be lost.

We consider that the comments about Lower Arun Valley LCA are therefore not relevant.

Section 10: Assessment of landscape effects

Paragraph 10.1 says that where the LCAs are considered out of date additional surveys should be taken.

The LVIA already presents updates on the LCAs where relevant, as indeed the area around the site is affected considerably by recent and ongoing and allocated development that would change the LCA descriptions and sensitivity. By contrast, the WSCC landscape comments do not fully or adequately acknowledge the changes that have occurred and that our assessment presents. This is apparent throughout section 10.



Paragraph 10.4 and 10.5 referring to design and character issues.

The acknowledgement in 10.4 of the high quality of the design is welcomed. However, some of the other assertions in the paragraph are not accurate. This includes the reference to the effect of the proposals on the area's 'rural' character, when it is clear that the site and its surroundings are affected by existing development and are identified for further strategic development (waste management and housing/mixed use, including employment buildings) that do not have a rural character, and the site and the strategic housing allocation that surrounds it are indeed within the urban area boundary identified in the adopted Arun Local Plan.

Any remaining rural character of this area will therefore inevitably be altered through the implementation of the adopted development plan for the area.

Whilst recognising this change in 10.5 the respondent overplays the 'rural' point and fails to fully acknowledge the impact of planned change on landscape character.

Also in 10.4, there is reference to the changes in landform (meaning the proposed earthworks) having a negative impact on the flat landscape and (with the buildings) interrupting long views north.

However, the new landform will be clad in trees and is designed to appear as a woodland. Blocks of woodland and tree belts are characteristic in the landscape so once the planting is established the planted earthworks will not appear alien. Notably this approach has already been taken on the nearby Southern Water Wastewater Treatment Works site, where there are planted earthworks. No particularly important views north will be blocked to the extent that where the Downs and/or Arundel are currently visible they will no longer be so.

Paragraphs 10.6 and 10.7 say there is no consideration of panoramic views and the sensitivities of the S Downs LCA.

This is not correct. The point relates to two aspects. First 10.6, is that there is no account taken of the reference in the WSCC LCA assessment to 'long views towards Arundel and the South Downs'. This is covered in our response to point 9.8 above.

Second, in 10.7, is the implication that panoramic views from the SDNP have not been fully considered. However, the landscape assessment sheets for the SDNP character areas L14, L15, L16 and L17 all include detailed discussion of the effects on the panoramic views. In addition, the visual receptor assessment sheets VR12, VR13, VR21 and VR22 discuss visual impacts particularly in relation to the panoramic views.

Paragraph 10.8 refers to lack of consideration of night time effects of the plume.

This is a minor issue as the plume will be present for only a small amount of time and we see no benefit in providing more information about this.



Paragraph 10.9 refers to no acknowledgement of views of the S Downs from the marine LCA

This is covered in assessment sheet L18 and the reasoning is clearly set out. Given the distance of the proposals from marine viewpoints we consider that this is not worthy of further attention.

Section 12: Assessment of visual effects

Paragraph 12.1 questions the viewpoint assessment methodology.

This is clearly explained in the LVIA. The assessment of visual effects is entirely in line with the GLVIA guidance, and our reasoning and professional judgement of the impacts is set out clearly in the assessment sheets.

We agree with the WSCC point that 'a development of this scale would take up a large proportion of the view composition in viewers close to the site'. However, the proposals occupy a similar footprint to the existing industrial presence at the site, i.e. we are not starting with a pristine rural landscape.

The assessment of magnitude of change must be considered relative to the existing view and for the close views, taking account of the existing industrial buildings, we are confident our assessment of the magnitude of change is reasonable and transparently explained.

Paragraph 12.2 refers to the vertical elements in panoramic views being likely to be particularly noticeable "when seen against the rolling downs or the horizontal offing".

The nature of a panoramic view is that it is widescreen and includes masses of visual information, that fills to the limits of peripheral vision. The introduction of new elements means these new elements are competing against a vast array of existing elements in a view, and indeed are diluted in this context. In this instance, much of what is seen in the panoramic views is built development. Vertical elements are seen in the distance in such views, form a tiny proportion of the view, and will be difficult to pick out even on the clearest days, and generally, in the more distant views from the Downs towards the sea, the detail would often be lost in common weather conditions, and invisible on hazier days. Describing the vertical elements as 'particularly noticeable' in such views overplays the impact that would be experienced from these locations, which we believe is fairly illustrated in the photomontages.

Section 13: Visualisations

Paragraph 13.1 refers to the lack of visualisations showing the plume.

The plume is taken account of in the assessment so although not shown in the visualisations, it is considered in coming to a judgement on significance of impact.

We note that the extant permission, if built out, would also have a plume at times so there is no difference in what could be present at the site in that respect.



Section 14: The planning statement

Paragraph 14.3 of the WSCC landscape response refers to the proposals being a generally well-designed place, a relatively compact and carefully considered design which attempts to minimise its visual impact as far as possible. This is a welcome recognition of the quality of the design and the efforts that have been taken to address the site context.

However, we disagree with the assessment of impacts against policy as set out in section 14 generally.

We disagree with the assessment of the proposals against policy W11 as set out in 14. 6. Indeed the content of 14.3 referred to above, that recognises the quality of the design and the efforts that have been taken to minimise visual impact suggest that it is agreed that the matters raised in policy W11 have been addressed as fully as possible. The impacts that are present (and we disagree with the WSCC landscape response on some aspects of what these are, as noted in sections above) are not unacceptable when weighed in the balance with other important policy matters.

The WLP recognises that the nature and scale of waste development in general can mean that there is likely to be adverse impact on character and seeks to have this at an acceptable level.

We note a reference in 14.7 to the proposals having "arguably higher quality buildings" than industrial buildings in the area already. This use of "arguably" downplays what has been achieved in design terms, and we consider that they are undoubtedly of considerably higher quality than other industrial buildings present in the locality.

In response to 14.9 regarding policy W12, we consider that the proposals have fully addressed the items listed in the policy to arrive at a design that is the best possible. No stone has been left unturned and the assertion that the proposals do not adequately take these matters into account is not well founded.

The landscape respondent again acknowledges the well-designed proposals, but points to height and mass, lighting and plume, and effect on landscape characteristics, as reasons why the proposal is contrary to W12.

However, the fact that the respondent considers the proposals to be well designed and attempt to address key constraints rather indicates that matters raised by policy W12 have actually been taken into account, which is what the policy requires. This includes seeking the best possible solution for integrating with the adjoining land uses and having regard to local context. These aspects have not been ignored or barely addressed, they have been front and centre of the design process.

In 14.10 regarding policy W13 and the SDNP, the respondent says that proposals will undermine the objectives of the SDNP, referring to the LVIA that finds a significant adverse effect in one viewpoint. This is not a satisfactory



conclusion to arrive at based on one viewpoint. It is not explained how this undermines the objectives.

WSCC heritage response to the planning application dated 4 May 2021

There are several points where the comments from WSCC do not correspond with, and sometimes actively contradict, advice previously received from the WSCC heritage officer in pre-application discussions. They do not appear to take account of the pre-application discussions on the selection of viewpoint locations for visualisations.

The conclusions on the assessment of effects on specific assets agree with the submitted ES, including Atherington House, Ford Place, Southdown House, The Lodge, Ford Lane, St Andrew's Church, Ford and St Mary's Church, Climping, and the related medieval village earthworks.

Referring to Atherington House, the respondent states that the pastoral character of the listed building's setting would be severely eroded by the scheme.

We consider that this description of the setting is inaccurate and misleading. To say that the setting has a 'pastoral' character implies it is either pasture/grazing land or perhaps that it represents an idealised view of the countryside. The land between the house and the application site is currently a large arable field and does not have any special characteristics that would lend it to be held up as a countryside idyll.

Again on Atherington House, the respondent refers to potential for harm to the setting resulting from environmental factors, such as noise, dust, fumes, light and vibration from increased traffic. However, there is no evidence that noise, dust, fumes, light or vibration would result in any such harm.

The respondent also refers to the reduction of the market value of the house because of the proposed development and claims a subsequent difficulty in its ability to sell as a desirable residential dwelling in the future. It is claimed that this has the real potential to put the long-term conservation and future viable residential use of the Listed building in jeopardy.

This is not a justified concern. Chapter 9 of the ES addresses house prices as part of the community and social effects and provides evidence to show that the proposed development will have a negligible effect on house prices and housing supply in the local area that will not be significant, both in terms of existing properties and future developments.

Geoarchaeology

The scoping opinion issued by the West Sussex County Archaeologist dated 10.2.20 clearly requested that the application should be supported by a desk-based assessment of the geoarchaeological potential at the site. A recognised industry specialist in this field within Archaeology South East produced the necessary report which was included as a technical appendix to the ES.



The potential identified several metres of possible geoarchaeological significant deposits that should at a practicable time be the subject of further assessment in tandem with the geotechnical site assessment required for engineering purposes.

This is the proportionate industry standard to assessing such deeply buried strata on sites that are considered to hold potential.

The ES makes allowance for specific geoarchaeological mitigation work where development foundations reach depths more than 2 metres.

All work can be dealt with through a planning condition whereby geoarchaeology can be specifically stipulated as being required in the future mitigation of the archaeological resource of this site.

Historic England response to the planning application dated 14 May 2021

There are errors in the response, which states that no additional visualisation has been provided for St Andrew's Church, whereas there is a new view from the car park (VP23). The response also misrepresents the ES conclusion on effects on Arundel Castle, which finds a slight impact (whereas the phrase 'small-negligible', as stated in their letter, refers to the magnitude of change, not the impact).

However, overall, the conclusion is that the development will result in less than substantial harm to some heritage assets. This is in line with the findings of the ES.

The Historic England conclusions on the assessment of effects on specific assets agree with the submitted ES for several assets but raise several points in relation to other assets.

On St Andrew's Church, Ford, Historic England state that "It is difficult to ascertain the level of harm using the information provided" and that the revised location for VP14 makes it "difficult to compare the relative harm caused by the new proposal". However, the response also asserts that no additional visualisations have been provided so has failed to take account of the new VP from the church car park (VP23). The statement at the end of the letter that the information on this asset is insufficient should therefore be discounted.

Historic England identify low levels of harm to Lyminster conservation area and to Tortington Priory. They also assert effects to the conservation area at Arundel and the cathedral because of visual changes. No alternative level of harm to the setting of Arundel Castle is proposed to contest the slight impact identified in the submitted ES.

Historic England also identify an effect on "rural" historic landscape character of the surrounding area, an assessment that ignores the current mixed character as shown on the HLC data from WSCC (given in figure 10.2 of the ES), and the presence of the existing development at the site, the airfield, the prison, industrial estates, WWTW, indoor leisure facilities, and the planned future development in the area.



I trust the above responses, attached appendices and the ES Addendum cover all the issues raised, however, if you have any queries please contact either Steve Molnar or myself.

Yours sincerely,

EC. Robinson

Emma Robinson
Technical Director

Enc.

cc Ian John, Viridor Energy Limited
 Paul McLaughlin, Ford EfW
 Steve Molnar, Terence O'Rourke Ltd