

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

21 September 2021

Our Reference: 264101

Dear James

## Application reference: WSCC/011/21

Further to our meeting on 25 August where you raised several queries, we have put together the following response that we hope you will find helpful, by way of an informal update.

### Building measurements, area covered

Whilst the dimensions are already provided on the submitted drawings, for ease of reference please see the attached table that sets out the dimensions and gross external area (GEA) of each element.

### Records of current HGV movements

Please see the attached spreadsheet that sets out the data from Grundon's records over the period from January 2021 to July 2021. It provides the number of HGVs per day (one-way) based on the weighbridge records. It shows that over the period there has been a gradual increase in daily HGV movements probably as a result of the relaxation of COVID restrictions.

Obviously, the effects of the pandemic have supressed activity and this has been gradually recovering. In July 2021, there were on average 46 one-way HGV movements Monday – Friday and an average of 8 on Saturdays.

In addition, note that in previous years, when the site was receiving inputs diverted from another site as well as its own normal activity, the records would show that the movements would have been significantly greater.

## Hours of operation discrepancy between current permission and the proposal

LONDON 23 Heddon Street London W1B 4BQ

#### BIRMINGHAM

Enterprise House 115 Edmund Street Birmingham B3 2HJ

#### BOURNEMOUTH

Everdene House Deansleigh Road Bournemouth BH7 7DU

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Noted that ref: WSCC/096/13/F Condition 27 limits use of plant and machinery outside the hours of 07:00 and 20:00 Monday to Saturday and not at any time on Sundays, Bank Holidays or Public Holidays.

These are the hours of operation which the WTS is currently operating in line with.

The current application proposes that most deliveries and collections will be received/made between 06:00 and 20:00 hours Mondays to Fridays and 08:00 and 18:00 hours on Saturdays, and the WSTF will also operate from 06:00 to 20:00 Mondays to Fridays, 08:00 to 18:00 on Saturdays.

There is a discrepancy between the AM start time (6am instead of 7am) and the end time on a Saturday (6pm instead of 8pm).

However, the extra hour on weekdays allows for traffic to be spread out better throughout the day which should also help to avoid build ups at busy junctions during peak periods and will avoid build ups on-site meaning that incoming HGVs can be processed more efficiently.

# Gabion/flint walls clarification; which are knapped flint, which are rock filled gabions

See the attached drawing clarifying that the knapped flint faced gabions are those that face outwards towards the site boundary, and the rock gabions are those that face internally.

## Quantities/% of IBA and APCr

Both the IBA and APCr will be removed from Ford ERF and will be sent offsite for specialist recovery/recycling.

Lakeside EfW, also owned by the Joint Venture, <u>achieved zero waste to landfill in</u> <u>2017</u>. The same targets would be set for Ford ERF.

The quantities at Ford ERF are:

IBA 55,869 tonnes per annum

APCr 13,191 tonnes per annum

## Volume of excavated material

The estimated amount of cut is 46,300m3 and the estimated fill is 62,500m3.

As a worst case scenario we have assumed that all excavated material would be removed from site to free up space for construction. However, we would expect the EPC contractor to make use of this material, where possible, for bund construction and/or engineering fill.

# Check paragraph 14.75 reference to site hoarding against what the CEMP says



The submitted CEMP does not refer to the 2.4m temporary hoarding that will be in place during the construction period. However, this hoarding is included in the mitigation as clearly stated in the ES. Noting that the CEMP is a working document that will be updated, this will be specifically referred to in the next revision document. A planning condition would be appropriate to have a CEMP submitted for approval prior to start on site.

## Confirm/clarify regarding overlap of construction and operational periods

The construction and operational assessments are separate and completed to different assessment methodologies, standards and criteria. It is therefore not possible to provide an assessment to a defined assessment methodology to consider both construction and operational noise. However, based on the predicted construction noise levels, the construction noise would be the main audible noise from the site as the construction noise would mask the operational noise.

# *Clarify significance of effect vs magnitude of change with ref to paragraphs 14.36 and 14.38 (table 14.5)*

Paragraph 14.36 of the ES states that a potential significant noise effect is indicated when construction noise exceeds the threshold level. Paragraph 14.38 states that Table 14.5 "details the significance of effects", and the table provides a description, a magnitude of impact, and the adverse effect level expressed.

Paragraph 14.36 refers to a 'potential' significant effect being 'indicated'. The methodology assesses whether this potential indication is likely to be realised, with reference to relevant guidance.

Note that paragraph 14.13 states:

"In line with the NPSE, PPG introduces the following concepts:

- Significant observed adverse effect level (SOAEL): This is the level of noise exposure above which significant adverse effects on health and quality of life occur
- Lowest observed adverse effect level (LOAEL): this is the level of noise exposure above which adverse effects on health and quality of life can be detected
- No observed adverse effect level (NOAEL): this is the level of noise exposure where noise can be heard, but does not cause any change in behaviour, attitude or other physiological response
- No observed effect level (NOEL): this is the level of noise exposure below which no effect at all on health or quality of life can be detected ".

These relate to the adverse effect levels in the final column of table 4.5.



From this it can be seen that the SOAEL (significant effect) occurs for moderate magnitudes and above. Whilst above the threshold, the LOAEL (low effect) that occurs at slight magnitudes, does not lead to significant adverse effects.

Note that figure 4.4 also shows that a magnitude of moderate or above is significant.

## Paragraph 14.23 of the ES refers to DMRB standards but the R25 response says there are no standards for assessing traffic induced vibration

DMRB LA111 relates to road construction and does not provide an assessment methodology for operational road vibration.

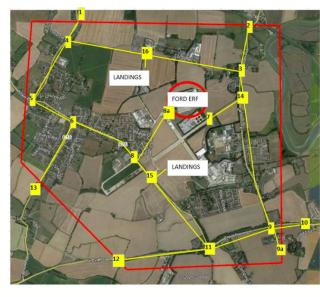
Operational vibration is specifically scoped out of the standard because DMRB relates to road construction, and any road under construction will not be operational until construction ends. Once construction ends it is assumed that the road will be smooth and therefore there will be no vibration when operational, so there is no need to assess operational vibration for the road construction projects to which the DMRB relates.

However, the standard does include construction vibration so this is why vibration is mentioned in paragraph 14.23 in the context of the DMRB standard.

The R25 response is correct in stating that there are no specific standards for assessing traffic induced vibration.

# Table 14.17 does not seem to show data for the stretch of road from the site access to Horsemere Green Lane, just from south of there to the A259

The data for Church Lane relates to the links 14-9 and 9-14 as shown on the link diagrams in the Transport Assessment and Figure 15.1 of the ES, 14 being the site access and 9 being the A259 roundabout, capturing the whole of Church Lane. See extract from Figure 15.1 of the ES below.



From	То	Link ID	Name
1	4	1_4	North End Rd SB
4	1	4_1	North End Rd NB
4	16	4_16	Ford Ln EB
16	4	16_4	Ford Ln WB
16	3	16_3	Ford Ln EB
3	16	3_16	Ford Ln WB
2	3	2_3	Station Rd SB
3	2	3_2	Station Rd NB
3	14	3_14	Ford Rd SB
14	3	14_3	Ford Rd NB
14	7	14_7	Ford Rd Access
7	14	7_14	Ford Rd Access
8	8a	8_8a	Rollaston Park (EB)
8a	8	8a_8	Rollaston Park (WB)
14	9	14_9	Church Lane SB
9	14	9_14	Church Lane NB
9	11	9_11	A259 Crookthorn Ln WB
11	9	11_9	A259 Crookthorn Ln EB
9	10	9_10	A259 Crookthorn Ln EB
10	9	10_9	A259 Crookthorn Ln WB
9	9a	9_9a	Crookthorn Ln SB
9a	9	9a_9	Crookthorn Ln NB
11	15	11_15	B2233 Yapton Rd NB
15	11	15_11	B2233 Yapton Rd SB
11	12	11_12	A259 Grevatt's Ln WB
12	11	12_11	A259 Grevatt's Ln EB
15	8	15_8	B2233 Yapton Rd NB
8	15	8_15	B2233 Yapton Rd SB
8	6	8_6	A259 Burndell Rd WB
6	8	6_8	A259 Burndell Rd EB
6	13	6_13	Bilsham Rd SB
13	6	13_6	Bilsham Rd NB
6	5	6_5	B2233 Main Rd WB
5	6	5_6	B2233 Main Rd EB
5	4	5_4	North End Rd NB
4	5	4_5	North End Rd SB



As the two-way flow data are needed for noise calculations, the flows for the northbound and southbound contributions were summed, however, the description in table 14.17 associated with this refers to 'Church Lane south of Horsemere Green Lane'.

This reference is not accurate, and we confirm that the noise assessment against this heading includes the total flow from south of the site access road down to the A259 roundabout and vice versa, in line with links 14-9 and 9-14 from the Transport Assessment data that was used to carry out the noise assessment.

## HGV tracking information

In addition to the above, please find attached the HGV swept path information for the site access junction, which will be of interest to Stephen Gee, perhaps you could pass this on to him with the commentary below.

The tracking shows two-way 44T 6 axle HGVs do potentially clash on the turn owing to the width at the neck of the access road, in circumstances where both inbound and outbound vehicles arrive at the junction together.

However, these types of HGVs frequently use the access today and there is no record that any accidents have occurred. This is why the applicants' Designers' Response disagrees that there is a problem and therefore also disagrees that there is a resulting need to modify the existing access road junction.

We note that the access road was quite recently approved (WSCC/027/18/F) and the issue was not raised at the time this was approved. Indeed, the WSCC highways response to the planning application (also attached) states that "It was observed on site that the existing access already has space for two HGVs to pass each other..." and that "the increase in the number of HGV movements should not affect road safety".

The current position is that up to 120 HGV one way movements (240 two way) are allowed each day through this existing junction to and from the Circular Technology Park, based on the approved, constructed and operational design of the access road.

Nor are we aware that the same issue has been raised by other live applications using the same access and junction, such as that for the Ford Strategic Site that includes employment land that could attract HGVs of a similar size. Such HGV traffic associated with the development of the Ford Strategic Site would be additional to the approved levels visiting the Circular Technology Park.

Given that two-way HGV movements of this type happen today and no accidents are recorded, it is considered that, in practice, HGV drivers effectively manage any conflict themselves, should this occur.

The proposed ERF will simply use an existing approved and operational junction layout within an approved HGV movements cap. The proposals for the ERF do



not cause any changes to the vehicle types that use the junction. The operation of the current junction today with movements of HGVs in and out indicates that there are no real practical difficulties for HGV drivers using the junction. This does not indicate a need for any changes to the junction to address the tracking results.

Do let me know if you have any further queries or wish to discuss the content of this letter.

Yours sincerely,

Steve Molnar Technical Director

Enc.

cc Ian John, Viridor Energy Limited Paul McLaughlin, Ford EfW

Building / Enclosure	GEA (Gross External	Key Dimensions
	Area) sqm	(Length x Width) m
ERF – Reception Hall	2741.9	73.5 x 37.3
ERF – Bunker Hall	2285.8	73.5 x 31.1
ERF – Stair Core	34.7	8.6 x 4.0
ERF – Boiler Hall	1991.1	73.5 x 30.2 (L shaped)
ERF – Lift and Stair Core	65.3	10 x 6.5
ERF – FGT	2066	73.5 x 30.2 (L shaped)
ERF – Silos Drive Through Enclosure	289.2	36.6 x 7.9
ERF – IBA Enclosure	596.9	31.9 x 18.8
ERF – Turbine Hall	1290.3	41.8 x 30.9
ERF – ACCs	1581.9	56.5 x 28
ERF – Sub Total	12943.1	
Workshop Block and Admin Reception Grnd Flr	1078.5	68.5 x 16.1 (L shaped)
Workshop Block and Admin Reception 1st Flr	674.8	43.6 x 16.1
Workshop Block and Admin Reception 2nd Flr	757.6	41 x 47.3 (Complex Shape)
Workshop Block and Admin Reception 3rd Flr	451.9	41 x 18.8 (L shaped)
Workshop Block and Admin Reception 4th Flr	451.9	41 x 18.8 (L shaped)
Workshop Block and Admin Reception 5th Flr	650.8	41 x 18.8 (L shaped)
ERF Fire Water Tanks	3 x 78.5 (235.5 total)	10 (diameter)
ERF Pump House	72.5	9.3 x 7.8
-		
Diesel Tank	19.6	5 (diameter)
Ammonia Tank	7.1	3 (diameter)
Substation / Transformer EIC Container	30	10 x 3

Substation Control Rm.	15	5 x 3
Waste Sorting and Transfer Facility	2627.5	60 x 43.8
WSTF Office and Welfare Grnd Flr	30	10 x 3
WSTF Office and Welfare 1 <sup>st</sup> Flr	30	10 x 3
WSTF Pump House Store and Generator	78.8	20.2 x 3.9
WSTF Fire Water Tank	28.3	6 (diameter)
Fuel Tank (by WSTF)	24.3	8.2 x 3
Secondary Fuel Tank (by WSTF)	1.5	1.5 x 1
Ad Blue (by WSTF)	4.3	2.9 x 1.5
Vehicle Wash Tank (by WSTF)	21.5	7.2 x 3
Weighbridge Gatehouse	50.2	16.6 x 3.2 (L shaped)
Rain Water Harvesting Tank	12.1	3.5 x 3.5
Total	20296.8	

## Ford Circular Technology Park

## Weighbridge records

January 2021 to July 2021

HGV's per day (one way)

## January 2021

Date	HGVs (One-Way)
04/01/2021	31
05/01/2021	26
06/01/2021	30
07/01/2021	27
08/01/2021	27
09/01/2021	1
10/01/2021	
11/01/2021	23
12/01/2021	18
13/01/2021	21
14/01/2021	25
15/01/2021	18
16/01/2021	
17/01/2021	
18/01/2021	20
19/01/2021	18
20/01/2021	27
21/01/2021	18
22/01/2021	22
23/01/2021	3
24/01/2021	
25/01/2021	21
26/01/2021	21
27/01/2021	26
28/01/2021	21
29/01/2021	24
30/01/2021	2
31/01/2021	

## February 2021

Date	HGVs (One-Way)
01/02/2021	27
02/02/2021	26
03/02/2021	25
04/02/2021	27
05/02/2021	20
06/02/2021	6
07/02/2021	
08/02/2021	29
09/02/2021	29
10/02/2021	43
11/02/2021	34
12/02/2021	29
13/02/2021	2
14/02/2021	
15/02/2021	28
16/02/2021	29
17/02/2021	34
18/02/2021	27
19/02/2021	30
20/02/2021	5
21/02/2021	
22/02/2021	29
23/02/2021	25
24/02/2021	28
25/02/2021	27
26/02/2021	38
27/02/2021	6
28/02/2021	

## March 2021

Date	HGVs (One-Way)
01/03/2021	37
02/03/2021	27
03/03/2021	27
04/03/2021	35
05/03/2021	30
06/03/2021	6
07/03/2021	
08/03/2021	32
09/03/2021	32
10/03/2021	37
11/03/2021	28
12/03/2021	38
13/03/2021	12
14/03/2021	
15/03/2021	35
16/03/2021	31
17/03/2021	31
18/03/2021	32
19/03/2021	39
20/03/2021	9
21/03/2021	
22/03/2021	30
23/03/2021	31
24/03/2021	32
25/03/2021	41
26/03/2021	52
27/03/2021	10
28/03/2021	
29/03/2021	37
30/03/2021	29
31/03/2021	43

## April 2021

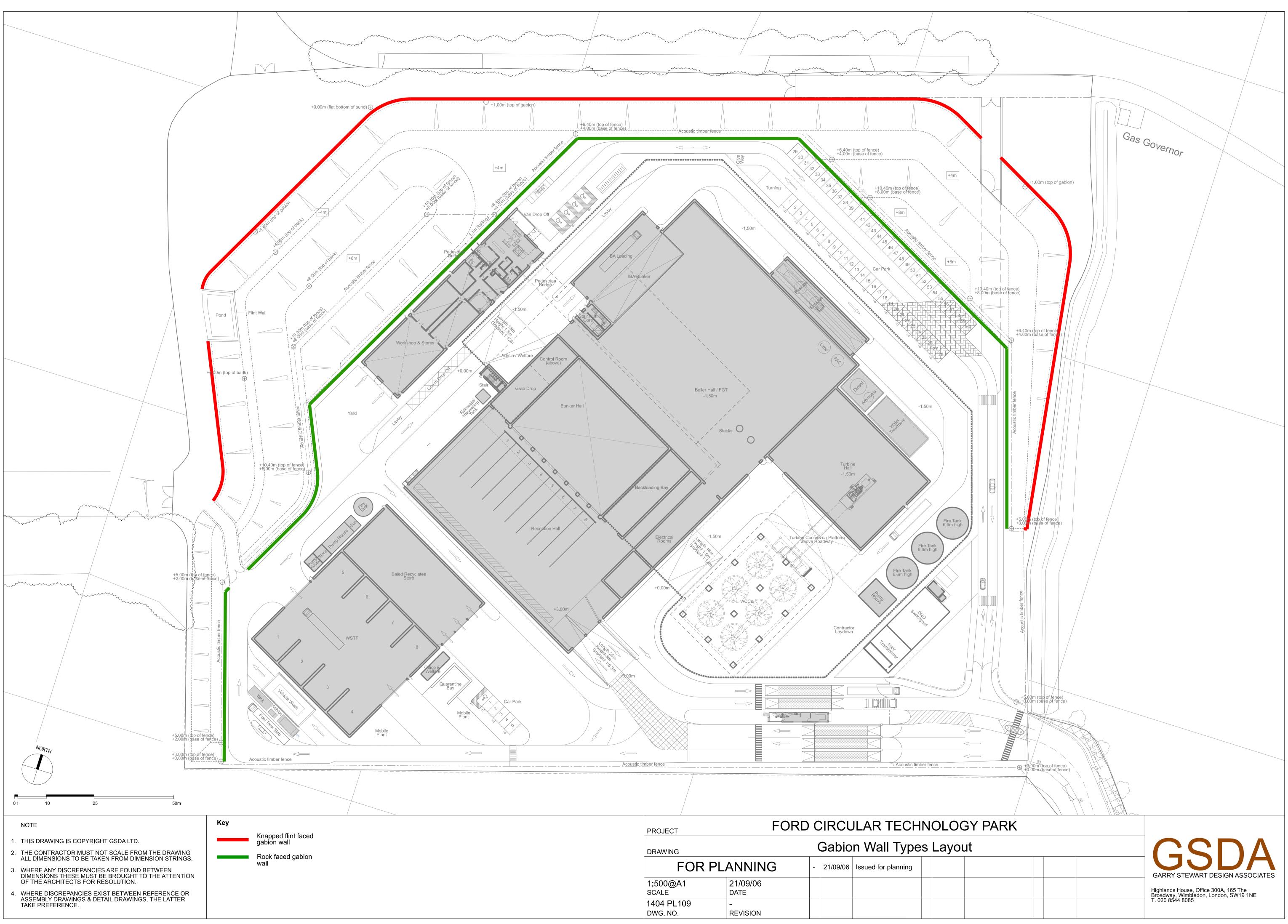
Date	HGVs (One-Way)
01/04/2021	40
02/04/2021	
03/04/2021	16
04/04/2021	
05/04/2021	
06/04/2021	50
07/04/2021	41
08/04/2021	46
09/04/2021	48
10/04/2021	18
11/04/2021	
12/04/2021	43
13/04/2021	34
14/04/2021	45
15/04/2021	37
16/04/2021	50
17/04/2021	10
18/04/2021	
19/04/2021	51
20/04/2021	53
21/04/2021	51
22/04/2021	43
23/04/2021	45
24/04/2021	9
25/04/2021	
26/04/2021	38
27/04/2021	53
28/04/2021	44
29/04/2021	48
30/04/2021	42

## May 2021

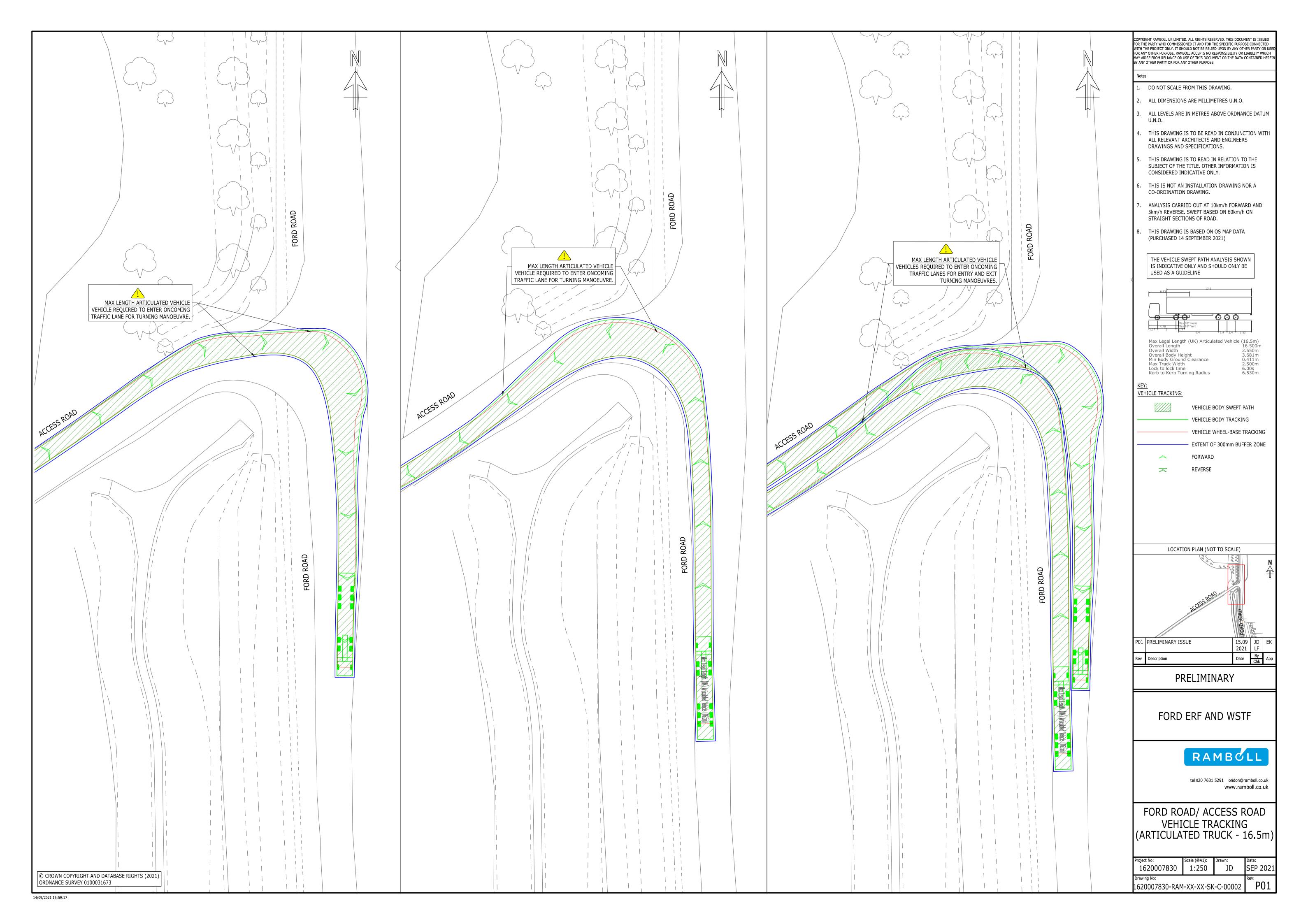
Date	HGVs (One-Way)
01/05/2021	8
02/05/2021	44
03/05/2021	
04/05/2021	
05/05/2021	50
06/05/2021	47
07/05/2021	46
08/05/2021	9
09/05/2021	
10/05/2021	44
11/05/2021	39
12/05/2021	49
13/05/2021	51
14/05/2021	45
15/05/2021	15
16/05/2021	
17/05/2021	46
18/05/2021	35
19/05/2021	45
20/05/2021	38
21/05/2021	48
22/05/2021	11
23/05/2021	
24/05/2021	48
25/05/2021	43
26/05/2021	42
27/05/2021	43
28/05/2021	50
29/05/2021	7
30/05/2021	
31/05/2021	

Date	HGVs (One-Way)
01/06/2021	46
02/06/2021	41
03/06/2021	42
04/06/2021	51
05/06/2021	7
06/06/2021	
07/06/2021	52
08/06/2021	44
09/06/2021	43
10/06/2021	46
11/06/2021	45
12/06/2021	9
13/06/2021	
14/06/2021	46
15/06/2021	37
16/06/2021	45
17/06/2021	43
18/06/2021	40
19/06/2021	6
20/06/2021	
21/06/2021	36
22/06/2021	42
23/06/2021	47
24/06/2021	49
25/06/2021	53
26/06/2021	10
27/06/2021	
28/06/2021	47
29/06/2021	37
30/06/2021	45

01/07/20213702/07/20215103/07/2021804/07/20214506/07/20213907/07/20215308/07/20215210/07/20215210/07/2021911/07/20214013/07/20214614/07/20215415/07/20214716/07/20214717/07/20211218/07/20214520/07/20214522/07/20214323/07/20215224/07/2021325/07/20214127/07/20213828/07/20214630/07/20214630/07/20214631/07/20214631/07/20214631/07/20214631/07/20214631/07/20214631/07/20219	Date	HGVs (One-Way)
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PROJECT	FOR	DC	CIRCL	JLAR TECH	NOLOGY P
DRAWING			Gabio	on Wall Type	es Layout
FOR	PLANNING	-	21/09/06	Issued for planning	
1:500@A1 SCALE	21/09/06 DATE				
1404 PL109	-				
DWG. NO.	REVISION				



## WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	County Planning Team		
	FAO: James Neave		
FROM:	Highways, WSCC		
DATE:	04/07/2018		
LOCATION:	New Circular Technology Park (former Ford Blockworks), Ford Airfield Industrial Estate, Ford, Arundel, BN18 OHY		
SUBJECT:	WSCC/027/18/F-Proposed new access road.		
DATE OF SITE VISIT:	04/07/2018		
RECOMMENDATION:	✓ Advice	Objection	
	Modification	No Objection	
	More Information	Refusal	
S106 CONTRIBUTION TOTAL:	N/A		

## Background

The Local Highway Authority (LHA) has been consulted for comment on the proposed development a new access road to serve the existing Grundon plant at the New Circular Technology Park (CTP), Ford.

The application seeks to provide access via an established service road connecting the airfield with Ford Road through construction of a new link road. The applicant also seeks to vary the Section 106 legal agreement for the wider CTP site (ref WSCC/096/13/F) which will result in an increase in movements to the site on the following basis:

- Increase the number of weekday HGV movements permitted from 120 daily movements (60 HGVs) to 240 daily movements (120 HGVs) during the week
- Increase the number of Saturday movements from 60 daily movements (30 HGVs) to 120 daily movements (60 HGVs)
- Increase hours and days of HGV movements to/from the site (to include Sundays and Public Holidays)

The LHA previously commented on a similar proposal at this site in August 2017 under application number WSCC/030/17/F. More Information was requested on the following matters:

- Stage 1 Road Safety Audit
- Non-Motorised User Audit
- Clarify anticipated vehicular movements so that it is consistent across all submission documents
- Vary the agreed signage strategy so that it relates to the proposed routing

The latest proposals are supported by way of a revised Transport Statement (TS), which has been assessed when compiling the response below. The LHA have undertaken a site visit on the 4<sup>th</sup> July 2018 to the site and surrounding road network to assess the access and capacity of the Local Highway Network. The site visit took place towards the end of the peak morning period.

## Access and Stage 1 Road Safety Audit (RSA)

The access to and from the highway will be achieved via a new access road served by the existing access to the Viridor site and all vehicles accessing the site would use the existing access off Ford Road. It was observed on site that the existing access already has space for two HGVs to pass each other in the access, including two right turning vehicles and visibility at the junction is adequate for a road covered by the National Speed Limit (60mph).

As outlined in the Capacity section below the proposals are expected to increase movements on to the site with an additional 240 movements per day (120 in and 120 out). During AM and PM network hours, it is anticipated that the site will generate 18 movements in the AM peak (9 in and 9 out, all of which would be HGV movements) and 26 in the PM peak (9 in, 17 out, of which 18 would be HGV movements).

The RSA undertaken has been undertaken in accordance with HD19/15 parameters. The Audit Team has considered the above and it was considered that the right turn lane on Ford Road, is of reasonable design and that the increase in the number of HGV movements should not affect road safety. Based on the submission of the RSA the LHA are satisfied with the junction onto Ford Road.

## Capacity

The submitted TS presents a worst case scenario of 240 daily movements (120 in and 120 out). The Applicant has not sought to increase the overall permitted throughput of the waste facility, the applicant suggesting the increase in HGV movements would provide flexibility as to the type of HGVs that can access the site. For example, this may result in fewer large articulated and a greater number of smaller, rigid body type HGV. This is contrary to the currently approved Delivery and Servicing Management Plan relating to the wider CTP, which promotes larger vehicles to minimise trip volumes.

The possible extension of working hours would assist in spreading departures and arrivals over a greater period, replicating the Ford Material Recycling Facility (Viridor) timings and thus reducing the impact of the additional movements that would have occurred should they have been concentrated into the currently permitted time period.

During AM and PM network hours, it is anticipated that the site will generate 18 movements in the AM peak (9 in and 9 out, all of which would be HGV movements) and 26 in the PM peak (9 in, 17 out, of which 18 would be HGV movements).

### Network Capacity

The WSCC Transport Assessment Methodology requires network capacity testing to be undertaken where a development leads to an increase of 30 or more movements through a junction during any hour. This threshold represents the level of vehicular movement where a 'material' impact may occur, and thus requires assessment. Even as a worst case scenario (with 240 movements) the proposed development would be unlikely to exceed this threshold during any hour. However, the Applicant has nonetheless undertaken capacity testing of the site access and the A259 Church Lane roundabout.

The site access is shown to work well within theoretical capacity, with no queuing or congestion experienced on any arm. The junction modelling demonstrates that the Ford Road/ Viridor site access operates with plenty of spare capacity in 2024 with the additional development traffic. There will be no congestion or delay as a result of the revised access arrangements for the CTP at Ford Airfield in either the 2017 or 2024.

The Church Lane roundabout is shown to be operating close to theoretical operating capacity, with a ratio to flow capacity of 0.986 (98.6%). The proposal would lead to a slight increase in vehicle delay/queuing. Vehicular delay would increase by up to 11 seconds during peak network conditions, and vehicle queue would be increased by no more than 1 vehicle. It should be noted that the impact assessment has been

undertaken on manual count data obtained in 2015 and TEMPro has been used to apply growth associated with committed development and growth during the intervening period. However, no allowance has been made for traffic growth associated with the Arun Local Plan which is now at an advanced stage. In addition, no allowance has been made for mitigation proposed through the Local Plan Transport Evidence.

Entry widening improvement to the roundabout is proposed as part of the emerging Arun Local Plan, in order to mitigate the cumulative impact of development traffic.

Notwithstanding the deficiencies in the modelling exercise, the National Planning Policy Framework dictates that development should only be refused where the impact is considered to be severe. The number of hourly movements would not constitute a level at which material impact would occur, therefore the impact is not considered to be severe. Improvement of the roundabout is not necessary to accommodate the worst case traffic generated by the alterations proposed by this application.

### Summary and Further Information Required

Following the addition of the TS the LHA are satisfied with the capacity data and the RSA provided by the applicant. However the one area missing from the applicant is the submission of a:

• Non-Motorised User Audit

Given this was requested previously and as the application has not changed significantly in this time the LHA consider the submission of the this information important before issuing a recommendation.

### Jamie Brown West Sussex County Council – Planning Services