

## **Appendix 6.1: Formal Transport Scoping Request and WSCC Highways Response**

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**Project Title:** Resource Recovery and Renewable Energy Facility, Wealdon Brickworks  
**Project No:** JNY8741  
**Date:** 23 August 2016

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### **Introduction**

- 1 This Transport Scoping Report has been prepared by RPS Planning and Development on behalf of Britaniacrest Recycling Ltd. It sets out a proposed scope for the transport related assessments for a Resource Recovery and Renewable Energy Facility at Wealdon Brickworks, West Sussex.
- 2 It follows the submission of an EIA Scoping Report to West Sussex County Council (WSSC) in November 2015 which included the proposed methodology for assessing the environmental effects of transport. This Transport Scoping Note expands upon this proposed methodology.
- 3 The response from WSSC Highways to the EIA Scoping Report set out that a Transport Assessment Report may be required and that the scope for this should be agreed in advance. More details on the vehicle movements generated by the proposals are now available and these can now inform the assessment and submission requirements.
- 4 These are set out below along with the proposed scope of transport related assessment and submission.

### **The Site and Access**

- 5 The site lies within the larger 24.4 ha Warnham and Wealden Brickworks area. To the east of the application site is the new Mechanical Biological Treatment Facility operated by Biffa in partnership with WSSC. Weinerberger operate the Warnham Brickworks to the south of the site.
- 6 To the north are some ponds located on land believed to be owned by the Council. The land is currently vacant, although there is a long-standing undetermined application for a Materials Recovery Facility (MRF) on the site. Beyond this lies the Brookhurst Wood Landfill site.
- 7 Access to the site is taken from Langhurstwood Road and it is understood that previous planning consents on site have required this to be improved.
- 8 The site access road is subject to a 10mph speed limit and is generally 6.7 metres wide. It forms the minor arm of a simple priority junction with the western side of Langhurstwood Road, which is subject to a 40mph restricted speed limit and is a rural single carriageway road. There is no street lighting along Langhurstwood Road and there are no footways. At its southern end, Langhurstwood Road forms a junction with the eastbound carriageway of the A264 via a left-in / left-out arrangement with associated acceleration and deceleration tapers.

- 9 There are no facilities provided for right turn movements into and out of Langhurstwood Road on the A264 and so u-turns must be made at junctions to the east and west to accommodate these. The A246 links to the A24 to the west at the Great Daux Roundabout, and with the M23 / A23 junction 11 to the east. The A246 has a derestricted national speed limit within vicinity of the site.
- 10 All HGV movements associated with the current and consented operations on site are required to route to and from the south via the A264. All HGV operational traffic to the proposed EfW will route in accordance with this, via the A264 and to / from the site via Langhurstwood Road south of the site access.

### **Existing Development and Planning History**

- 11 Britaniacrest recently obtained planning permission (ref WSCC/018/14/NH) for a Waste Transfer Facility at the Wealdon site and construction of the facility has commenced. The proposed Resource Recovery and Renewable Energy Facility would be built in addition to the Transfer Facility if permission is granted and would take its feedstock directly from it.
- 12 The Site currently hosts a transfer station/materials recycling facility which processes construction, commercial, industrial & domestic waste, and processes inert materials, wood and green waste, as well as carrying out transfer and eventually baling operations. It has a total capacity of up to 200,000 tonnes per annum. The Site also has parking facilities for between 25 and 30 HGVs and skip storage.
- 13 The County Council granted planning permission for a Mechanical and Biological Treatment (MBT) plant on 1 December 2009 (Ref: WSCC/055/09/NH) to the east of the Site. The MBT plant operates under WSCCs Materials Resource Management Contract (MRMC). An application for B2 (general industrial)/B8 (storage/distribution) uses on the southern part of the site was also won by others on appeal in 2011, which covers approximately 3.0 hectares (14/03/11 Appeal Ref: APP/Z3825/A/10/2141926/NWF).

### **Development Proposals and Traffic Generation**

- 14 The proposed facility will utilise sorting, segregating and the latest thermal treatment technology to treat collected waste from commercial, industrial and/or municipal sources to help meet future demand in the growing market for renewable energy.
- 15 All waste inputs to the proposed facility will be sourced from the Waste Transfer Facility located on-site. This means that all waste inputs to the proposed facility will already be on-site as part of the wider sites extant consent.
- 16 No waste inputs to the proposed facility will be sourced from off-site. There will therefore be no requirement for any additional waste related HGV movements to transport waste from off-site over and above the wider sites extant consent. There will be a requirement to transport consumables via HGV. However, these are low as set out further below.

### ***Waste Transfer Facility Extant Consent***

- 17 On 1<sup>st</sup> July 2014 WSCC granted planning permission for a Waste Transfer Facility under planning permission reference WSCC/018/14/NH. Condition 22 of this permission states:

**“No more than 123 HGVs (delivering wastes to the site) shall enter the site between the hours of 07.00-16.30 and no more than 123 HGVs**

(removing wastes or materials from the site) shall exit the site between the hours of 07.00-18.00 on Mondays to Fridays inclusive; and

No more than 60 HGVs (delivering wastes to the site) shall enter the site between the hours 07.00-12.00 and no more than 60 HGVs (removing wastes or materials from the site) shall exit the site between the hours of 07.00-18.00 (of which no more than 8 HGVs shall exit the site between 16:30-18:00) on Saturdays.

No HGVs (delivering wastes to the site or removing wastes or materials from the site) shall enter or exit the site on Sundays, Bank Holidays or Public Holidays.

**Reason: To accord with paragraphs 109, 120 and 123 of the NPPF (2012) in the interests of the amenity of the locality and of local residents.”**

18 This limits the number of daily HGVs to 246 two-way HGV movements on a weekday and up to 120 two-way HGV movements on a Saturday.

19 Condition 29 of the permission states:

**“No more than 200,000 tonnes of waste shall be managed at the site in any one year. A record of the annual quantities (in tonnes) of wastes delivered to the site and the consequent numbers of goods vehicle movements generated in any one year shall be maintained by the applicant at all times and made available to the County Planning Authority upon request.**

**Reason: To accord with paragraphs 109 and 123 of the NPPF (2012) to enable the County Planning Authority to monitor the level of traffic generated by the permitted use and ensure adequate control of the development so as to protect both local amenity and the local environment.”**

20 Owing to current market conditions and available waste arisings within the local area, Britaniacrest more recently sought to amend these two conditions via an Application for Variation to Conditions 22 and 29.

21 Planning Application WSCC/021/15/NH therefore sought the following:

**“Amendment of Conditions 22 and 29 of planning permission WSCC/018/14/NH to increase site throughput from 200,000 tonnes per annum to 230,000 tonnes per annum, and increase associated HGV movements at Former Wealden Brickworks (Site HB), Langhurstwood Road, Horsham, West Sussex, RH12 4QD.”**

22 This was consented with Condition 22 of this permission stating:

**“No more than 142 HGVs (delivering wastes to the site) shall enter the site between the hours of 07.00-16.30 and no more than 142 HGVs (removing wastes or materials from the site) shall exit the site between the hours of 07.00-18.00 on Mondays to Fridays inclusive; and**

**No more than 70 HGVs (delivering wastes to the site) shall enter the site between the hours 07.00-12.00 and no more than 70 HGVs (removing wastes or materials from the site) shall exit the site between the hours of 07.00-18.00 (of which no more than 9 HGVs shall exit the site between 16:30-18:00) on Saturdays.**

**No HGVs (delivering wastes to the site or removing wastes or materials from the site) shall enter or exit the site on Sundays, Bank Holidays or Public Holidays.**

**Reason: To accord with paragraphs 109, 120 and 123 of the NPPF (2012) in the interests of the amenity of the locality and of local residents.”**

23 And Condition 29 stating:

**“No more than 230,000 tonnes of waste shall be managed at the site in any one year. A record of the annual quantities (in tonnes) of wastes delivered to the site and the consequent numbers of goods vehicle movements generated in any one year shall be maintained by the applicant at all times and made available to the County Planning Authority upon request.**

**Reason: To accord with paragraphs 109 and 123 of the NPPF (2012) to enable the County Planning Authority to monitor the level of traffic generated by the permitted use and ensure adequate control of the development so as to protect both local amenity and the local environment.”**

24 As a result, the Application for Variation to Conditions permits the Waste Transfer Facility to generate up to 284 two-way HGV movements on a weekday and up to 140 two-way HGV movements on a Saturday.

***Traffic Generation of Proposed Resource Recovery and Renewable Energy Facility***

25 As set out above, the proposed Resource Recovery and Renewable Energy Facility would be built in addition to, and incorporate the Transfer Facility if permission is granted and it would take its feedstock directly from it.

26 Given that it will take its feedstock directly from the Transfer Facility, no waste inputs to the proposed facility will be sourced from off-site and there will therefore be no requirement for any additional HGV movements to transport waste from off-site over and above the wider sites extant consent.

27 In order to understand the traffic generation of the proposed Resource Recovery and Renewable Energy Facility, the below firstly sets out its estimated traffic generation assuming it was a standalone facility (i.e. assuming the Transfer Facility did not exist).

28 This can then be compared to the consented HGV movements at the Transfer Facility and if it is found to be lower then it can be concluded that there would be no increase in HGV movements at the wider site.

29 The number of vehicle movements generated by the Proposed Resource Recovery and Renewable Energy Facility during its operation is related to the following:

- The number of staff required for operation and maintenance at the site; and
- The number of HGV movements required to service it, either:
  - bringing materials to the site;
  - exporting materials from the site;
  - leaving the site having off-loaded (in the case of waste carrying vehicles).

30 The calculation of trip generation considers the size of the facility and type of waste to be treated within the facility as follows:

- Maximum facility throughput 180,000 tonnes per annum (tpa) comprising:
    - 30,000 tpa municipal solid waste (MSW); and
    - 150,000 tpa commercial and industrial (C&I) waste.
- 31 It is anticipated that all waste arriving to the facility will be from locations within West Sussex, East Sussex, Hampshire and Surrey.
- 32 The operation of the site will be undertaken by 50 people.
- 33 The site has two distinct operating modes:
- Energy Generation (electricity and heat), Materials Recovery and Waste Preparation . 24 Hour operations for 365 days per year; and
  - Waste Reception . Monday to Friday 0730 to 1800 and Saturday 0730 to 1300 (279 full working days per year).
- 34 Staffing levels at the site will be one Site Manager, 6 support staff (weighbridge, administration and security), 5 shift teams for the energy plant of 4 persons per team, together with a waste operational team of 14 persons. The 5 shifts are needed to cover 24-hour operation, 7 days per week, using a rotating shift pattern and a spare shift to cover holidays and absences. Maintenance will be covered by 2 shifts of 12 hours per day with a total complement of 5 persons.
- 35 During the course of any one day the number of people on site will be:
- Site Manager: 1;
  - Support Staff: 6;
  - Plant Shift Operations: 8;
  - Maintenance: 5;
  - Materials Recovery & Preparation: 12;
  - TOTAL: 32.
- 36 All parking will be retained on site. Provision will be made for overlapping shifts.
- 37 The arrival profile of the operational staff is provided in Table 1. For a worst case, this assumes single occupancy car travel. Although access to the site will be possible by other modes of transport, for the purposes of this assessment all staff movements are assumed to be by single occupancy car. Car sharing will be promoted as part of the sites travel plan, however.

**Table 1: Car Movements due to Operational Staff (two-way movement)**

Staff	Work Hours	Staff No	Car movements (two-way)
Shift Teams	0600 . 1600	7	14
	1500 . 0100	7	14
	0100 . 1100	7	14
Management, administration Maintenance & Security	0800 . 1700	5	10
	0730 . 1730	3	6
	1300 - 2300	3	6

- 38 The analysis indicates that on a daily basis the site will attract a total of 64 two-way car movements associated with staff. The number of car movements are unlikely to exceed more than 8 car trips into the site during the AM peak hour (3 staff start work at 07:30 and 5 staff start work at 08:00) and 8 car trips out of the site during the PM peak hour (5 staff finish work at 17:00 and 3 staff finish work at 17:30).

- 39 HGV movements servicing the site (assuming waste is sourced from off-site) will be generated by the transportation of waste material into the site, and the transportation of recovered materials and residues waste from the site.
- 40 C&I waste (assuming waste is sourced from off-site) will mostly be delivered by direct delivery, but some will be brought in from transfer stations. For the purposes of this estimation (assuming waste is sourced from off-site), it is likely that 70% of C&I could be by direct delivery and 30% could be from transfer stations.
- 41 Municipal solid waste (MSW) (assuming waste is sourced from off-site) would be sourced from one or more contractor(s) to waste collection authorities (WCAs) or the Waste Disposal Authority (WDA). For the purposes of this estimation (assuming waste is sourced from off-site), it is anticipated that 50% could arrive from transfer stations and 50% by direct delivery.
- 42 The number of one-way daily HGV movements generated by the delivery of C&I and MSW into the facility (assuming waste is sourced from off-site) are shown in Table 2. For the purposes of this assessment the payloads of the HGVs have been estimated as follows:
- C&I from a WTS . 20 tonnes;
  - C&I by direct delivery . 10 tonnes;
  - MSW from a WTS . 20 tonnes; and
  - MSW by direct delivery . 10 tonnes.
- 43 Operation of the facility will be 24/7/52 with only a full shutdown expected no more than once every five years. The waste will arrive at the plant, however, on normal working days only with none arriving on Sundays and national holidays . the equivalent of 279 total full working days per year (including Saturday mornings as half days). The site has storage facilities for up to 5 days, providing sufficient capacity to cover holiday periods and enabling continuous operation of the facility.
- 44 The number of one-way HGV movements related to the import of waste to the facility (assuming waste is sourced from off-site) is summarised in Table 2 and estimates 56 HGV deliveries per day (112 two-way HGV movements per day).

**Table 2: HGV Movements due to Import of Waste (one-way movement)**

Waste Type	Annual Tonnage	Vehicle Payload	No. of Annual HGVs	No. of Daily HGVs
C&I Direct	105000	10	10500	38
C&I from WTS	45000	20	2250	9
MSW from WTS	15000	20	750	3
MSW Direct	15000	10	1500	6
Total	180000		15000	56

- 45 The operation of the facility requires the import of materials to supplement the combustion process and the export of materials either recovered from the waste prior to thermal treatment or residues resulting from the thermal treatment process. These materials will be imported and exported over the equivalent of 279 full working days as assumed for the delivery of waste.
- 46 The materials imported into the facility are summarised in Table 3. Quick Lime and Activated Carbon will be imported via HGVs carrying 20 tonnes per load, whilst the liquid imports will be via HGV tankers carrying approximately 2,500 gallons (11,365 litres).

47 Table 3 shows that all the materials imported into the facility amount to up to 2 HGV deliveries per day (4 two-way HGV movements per day).

**Table 3: Vehicle Movements due to Imported Operations Materials (one-way movement)**

Input	Tonnage per Year	Litres per Year	No. of Annual HGVs	No. of Daily HGVs
Lime	4000		200	1
Activated Carbon	150		8	0.02
Hydrochloric Acid		55000	5	0.02
Caustic Soda		70000	6	0.02
Fuel Oil		350000	31	0.1
Ammonia		400000	35	0.1
Total				1.24

48 The export of materials from the facility are summarised in Table 4, and include recovered materials and residues from the thermal treatment. Recovered materials will be exported by articulated HGVs, carrying the tonnage shown in Table 4 to give daily exports of some 12 HGVs from the site (24 two-way HGV movements per day).

**Table 4: Vehicle Movements due to Export of Materials during Operation (one-way movement)**

Output	Annual Tonnage	HGV Payload	No. of Annual HGVs	No. of Daily HGVs
Glass	2400	25	96	0.3
Ferrous	14000	25	560	2
Non-Ferrous	2500	15	167	0.6
APCr	15000	25	600	2.2
Bottom Ash	36000	25	1440	5.2
Reject	10000	22	454	1.6
Total	71900		2954	11.9

49 The HGV movements relating to materials imported and exported from the facility (assuming waste is sourced from off-site) are given in the above Tables as one-way movements either into the facility or out of the facility as appropriate.

50 The traffic on the highway network will consist of two movements, one into the facility and one out of the facility. Hence, the total number of HGV movements generated by the facility on the highway network (assuming waste is sourced from off-site) would be 140 two-way HGV movements per day.

***Proposed Resource Recovery and Renewable Energy Facility Incorporating the Waste Transfer Facility***

51 The above sets out how the Waste Transfer Facility has an extant consent that permits up to 246 two-way HGV movements on a weekday, which was recently varied to permit up to 284 two-way HGV movements on a weekday.

52 The proposed Resource Recovery and Renewable Energy Facility would generate up to 140 two-way HGV movements per day if it was a standalone facility.



- 53 However, this proposal will integrate the Waste Transfer Facility into the design of the proposed Resource Recovery and Renewable Energy Facility. All waste to the proposed Resource Recovery and Renewable Energy Facility will arrive via the Waste Transfer Facility.
- 54 Therefore, the Waste Transfer Facility has an extant consent to generate more HGV movements than is required for the proposed Resource Recovery and Renewable Energy Facility.
- 55 This demonstrates that if the proposed Resource Recovery and Renewable Energy Facility was consented then there would be no requirement for any additional HGV movements at the site.
- 56 The proposal will integrate the Waste Transfer Facility into the design of the proposed Resource Recovery and Renewable Energy Facility, therefore, the proposal will not result in any increase in HGV movements at the site.

**Construction**

- 57 It is expected that construction of the facility would take place over a 31 month period and that during that time the average number of workers on site will be 50. The level of work is anticipated to fluctuate over the 36 months relative to the construction programme. The peak level of workers on site is likely to be in Months 7-9 and will peak at 182 people.
- 58 Car sharing will be encouraged, but this is unlikely to exceed 1.5 persons per car on average, for which the peak level of movements translates to 122 car trips to and from the site per weekday and an average of 34 car trips to and from the site per weekday.
- 59 Normal hours of working during construction will be Monday to Friday 0730 to 1900 hours and Saturday 0800 to 1600 hours. The profile of worker arrivals will be linked closely to the construction hours with some 70% of workers arriving between 0700 and 0730, then 10% arriving between 0730 and 0800 hours, with the remaining 20% arriving between 0800 and 0900 hours.
- 60 It is likely that workers will leave the site between 1600 and 1900 hours. The distribution is likely to be less peaked than in the morning period with 50% likely to leave between 1600 and 1700, 40% leave between 1700 and 1800 hours and the remaining 10% leaving between 1800 and 1900 hours. The envisaged car movements for the peak levels and for the average level are shown in **Table 5**.

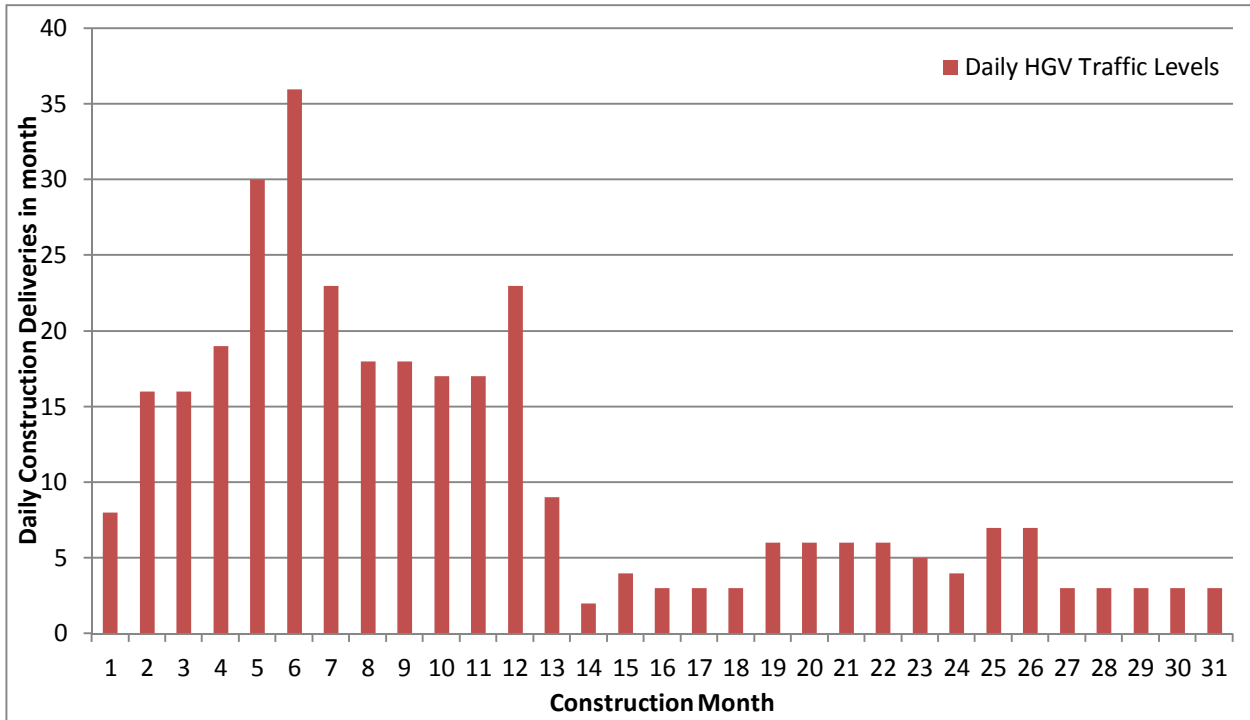
**Table 5: Construction Worker Car Movements**

Time Period	Peak Construction Month Car Movements	Average Construction Month Car Movements
0700 - 0800	98	27
0800 . 0900	24	7
1600 . 1700	61	17
1700 . 1800	49	14
1800 - 1900	12	3

- 61 The construction profile for the import and export of materials to the site has been considered in relation to the construction build programme and the numbers of loads determined. Current estimates suggest approximately 3,000 HGVs (6,000 two-way HGV movements) will be required over the 31 month period.

62 A typical profile of HGV movements over the 31-month construction (pre-commissioning) period for daily HGV movements has been estimated by the applicant and is provided in **Figure 1**. To calculate the daily HGV traffic levels it has been assumed that site work will be carried out over 22 days in each month.

**Figure 1: Profile of Construction HGV Traffic During Construction**



63 The construction HGV traffic levels would likely peak around Month 6 of construction with approximately 36 daily HGV arrivals at the site during the month. This equates to 72 two-way HGV movements per day. The hours of operation are projected to be between 0730 and 1900. However, it is anticipated that the majority of HGV movements will occur between 0900 and 1700, giving approximately up to 4 two-way HGV movements per hour in/out of the site. At the peak net construction traffic, there would be 18 HGV arrivals or 36 two way HGV movements a day. Over the 31-month period of the main construction, there would likely be an average of 9 HGV deliveries per day (18 two-way HGV movements per day).

**Assessment Requirements of Development Proposals**

***Submission Documents***

64 The development proposals have already been identified as being EIA development and an Environmental Statement Scoping Report has already been submitted, which confirmed the proposed inclusion of a chapter dealing with Traffic and Transport.

65 The above sets out that the proposal will not result in any increase in HGV movements at the site. Staff car movements will be low and their number during the weekday peak hours would be negligible. On this basis, it does not justify the preparation of a Transport Assessment Report.

- 66 The construction HGV movements will be relatively low throughout the day and will be negligible in terms of the weekday peak hours. Construction staff car movements would be generated during weekday peak hours, however, these are low and would be temporary. In any event, they should be borne in mind with the extant consent associated with the Transfer Facility. On this basis, it does not justify the preparation of a Transport Assessment Report.
- 67 On the basis of the above, it is not proposed to prepare a Transport Assessment Report. A Traffic and Transport chapter will be prepared within the Environmental Statement. It is proposed that this will set out full details of the above traffic generation and demonstrate that traffic flows will remain within their extant consent during the facilities operation and be negligible, and within the sites extant consent, during its construction.

### ***Scope of Assessment***

- 68 On the basis that the proposed facility will not result in an increase in HGV movements, it is proposed that the Traffic and Transport chapter of the Environmental Statement will set out full details on the traffic generation of the operational facility to demonstrate this.
- 69 Upon demonstrating no increase, there will be no requirement to undertake any assessment, therefore none will be undertaken.
- 70 The construction traffic flows will be relatively low and within the sites extant consent. However, it is recognised that these should be considered differently to those generated during its operational phase.
- 71 Therefore, as part of the Environmental Impact Assessment process, the magnitude of change of traffic flows along Langhurstwood Road and the A264 as a result of the construction vehicles will be assessed.
- 72 Local transport related information is available from the ES that was prepared for the Waste Transfer Station and from the Transport Assessment that was prepared for the B2/B8 building. The traffic survey data and the traffic flows contained within these documents will be used and it is not proposed to undertake any new traffic surveys along the adjacent road network.
- 73 The construction traffic flows are not considered to be at a level that would require environmental impact assessment. However, such assessment will ensure a robust submission. The WTS application set out a 2014 traffic baseline position and it is proposed to utilise this with the application of local TEMPRO traffic growth rates to prepare a 2018 base year suitable for undertaking environmental impact assessments upon Langhurstwood Road and the A264.
- 74 Guidance on undertaking the Environmental Impact Assessment of traffic generated by development proposals (including construction traffic flows) is set out within the IEMA publication *Guidance Note No. 1. Guidelines for the Environmental Assessment of Road Traffic* March 1993.
- 75 The guidelines suggest that assessments should be undertaken for highway links where traffic flows are predicted to increase by more than 30% as a result of proposed development. The guidelines suggest that in sensitive locations a 10% threshold should be used as a basis for undertaking assessments.
- 76 Table 2.1 of the Guidelines goes on to state that when assessments are required the following should be considered:
- Noise;
  - Vibration;

- Visual Impact;
- Severance;
- Driver Delay;
- Pedestrian Delay;
- Pedestrian Amenity;
- Accidents and Safety;
- Hazardous Loads;
- Air Pollution; and
- Dust and Dirt.

77 The environmental effect of road traffic resulting from the construction process will be assessed upon Langhurstwood Road and the A264 in accordance with the above IEMA guidelines.

78 As part of the accidents and safety element, the latest available three years of Personal Injury Accident data will be obtained and analysed along Langhurstwood Road between and including its junctions with the site access and the A264 (including the acceleration and deceleration lanes).

79 Additionally, a review of local transport related policies will be included to demonstrate accordance.

### **Cumulative Assessment**

80 It is noted that the response from WSCC Highways to the EIA Scoping Report set out the potential cumulative impact of this proposal with Land North of Horsham.

81 Given that the proposed facility will not result in an increase in HGV movements, there is no requirement to consider such a cumulative assessment. Therefore, a cumulative assessment of the operational facility with Land North of Horsham is not proposed.

82 To ensure a robust assessment of the proposed facility, the environmental effects of its construction is proposed. However, this will be undertaken for a 2018 period when such traffic will be generated and it is highly improbable that Land North of Horsham would be progressed through the planning process.

83 It is therefore not proposed to consider Land North of Horsham, or any other proposal, as part of a cumulative assessment.

### **Summary**

84 This Transport Scoping Report has been prepared by RPS Planning and Development on behalf of Britaniacrest Recycling Ltd to set out a proposed scope for the transport related assessments for a Resource Recovery and Renewable Energy Facility at Wealdon Brickworks, West Sussex.

85 The above has set out that the proposed facility will not result in an increase in HGV movements in comparison to the extant permissions on site.

86 This scoping note seeks agreement to the following:

- On the basis that the proposed facility will not result in an increase in HGV movements, a Transport Assessment will not be prepared;
- It is proposed that the Traffic and Transport chapter of the Environmental Statement will set out full details on the traffic generation of the operational facility to demonstrate this;
- the magnitude of change of traffic flows along Langhurstwood Road and the A264 as a result of the construction vehicles will be assessed within the Traffic and Transport chapter of the Environmental Statement;
- Local transport related information from the ES that was prepared for the Waste Transfer Station will be used to establish a 2018 baseline scenario using local TEMPRO growth rates;

- New traffic surveys along the adjacent road network will not be undertaken;
- The Environmental Impact Assessment of traffic generated by the construction vehicles will be assessed using guidance set out within the IEMA publication *Guidance Note No. 1. Guidelines for the Environmental Assessment of Road Traffic* March 1993;
- The latest available three years of Personal Injury Accident data will be obtained and analysed along Langhurstwood Road between and including its junctions with the site access and the A264 (including the acceleration and deceleration lanes) in order to consider accidents and safety; and
- No cumulative assessment will be undertaken.

## Ben Maliphant

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**From:** Ian Gledhill  
**Sent:** 14 September 2016 11:23  
**To:** Ben Maliphant  
**Subject:** RE: Scoping Request: Proposed Resource Recovery and Renewable Energy Facility at Wealden Brickworks RH12 4QD

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Ben, apologies for the delay in responding. This arrived with me shortly before I went on leave.

I have read through the scoping note. I would make the following observations in respects of the associated numbered points within the note.

15. This is noted. There would need to be further discussion with the Planning Authority as to how exactly this would be secured. At present the restriction on HGV movements applies only to the consented uses on the site; it's unclear how this would be extended and in essence tied to cover the use now proposed.

27. I recognise the purpose of this and the immediately following sections. However the point remains that it's intended to use material being brought to the site as part of consented uses.

Even so, if the consented waste use were not implemented, it is acknowledged that the energy from waste plant would not result in any additional movements beyond those already permitted. This is on the understanding that the planning permission for the waste processing use is rescinded.

If there is the possibility of the two waste uses being independent of each other (as suggested in point 27) these would otherwise have to be treated as independent rather than being linked (i.e. what happens if both uses come forward and operate independently of each other) and the potential resultant increased in HGV movements identified.

56. The statement within this point needs to be changed. Based on the information in points 45-47, additional HGV movements, albeit a very small number, will be required to bring material to the site to aid the combustion process.

65. On the basis that the proposed use and permitted waste uses are linked, it's agreed that a TA would not be required. However, as stated above there needs to be a means of linking the two uses together. If there is no guarantee that the uses can be linked, these need to be treated as potentially operating independently of each other. I would suggest that this matter is referred to the Planning Authority to investigate and agree the means of linking the two uses together.

68-79. This section relates to the scope of the EIA. Whilst drawing on the transport statement/assessment work, the scope of these sections should be agreed with the Planning Authority.

82. This should be agreed with the respective Planning Authority through the agreement of the EIA Scope. In terms of the highway safety and capacity impacts, notwithstanding the potential link to the permitted waste use on the site, it's acknowledged that based on the

information available the proposed energy from waste plant would come forward ahead of the North Horsham development. A planning application has now been submitted for North Horsham (DC/16/1677). Full details, including phasing, are available on the Horsham DC website. Reference would still need to be made to the North Horsham development and the infrastructure proposed even if this isn't included in the formal assessment given that this is a strategic development immediately adjacent to the proposed use.

I trust this assists.

Kind regards

Ian Gledhill

<p><a href="#">Ian Gledhill</a> BSc MIHE MCIHT  Principal Planner - County Highways, <a href="#">West Sussex County Council</a>   Location: Ground Floor Northleigh, County Hall, Chichester, PO19 1RH Internal:                     External: E-mail:</p>
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**From:** Ben Maliphant  
**Sent:** 25 August 2016 10:37  
**To:** ENV Preappadvice  
**Cc:** Ian Gledhill; David Archibald; Jenka Kaslik  
**Subject:** Scoping Request: Proposed Resource Recovery and Renewable Energy Facility at Wealden Brickworks RH12 4QD

Hi,

Following discussions with Ian Gledhill, please find attached our Pre-Application Advice form and two relevant scoping documents in relation to a proposed [Resource Recovery and Renewable Energy Facility at Wealden Brickworks](#).

I look forward to your response although please let me know if you need any more information etc. In the first instance, if you could confirm receipt of this email and attachments I would be very grateful.

Kind Regards,  
Ben

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**Ben Maliphant BSc (Hons)**  
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