



Ashington Parish Council

Clerk to the Parish Council: Mrs. K. Dare, Honeysuckle House, London Road, Ashington, Pulborough, West Sussex, RH20 3JR, Telephone 01903 893740
Email: karendare@tiscali.co.uk www.ashingtonpc.org.uk

To: MWDF, West Sussex County Council

Date: 09 February 2010

Re: MWDF Background Paper 6 – Potential Open Composting site at Broadbridge Farm, Ashington (W/HO/8)

Councillors are keen to point out that they are in favour of recycling green waste and other recycling/sustainability projects (as opposed to an unsustainable landfill type activity), but feel that this site at Broadbridge Farm is not suitable for the proposed development, and therefore wish to object to the site's inclusion in the current draft MWDF Plan for the reasons listed below.

Proximity to the village – health & pollution risk

The Potential Operator provided the following information to the Parish Clerk

- The Potential Operator accepts that the site is only 230metres from the nearest house but state that their planned site layout will ensure that the compost processing areas are located 330metres from the nearest house
- A 3m high bund will be built around the site
- Composting is mainly done via open 'windrows' where piles of rotting vegetable matter are left in the open air and turned mechanically at regular intervals.

Given this information and following discussion at the Parish Council meeting on 4th February 2010, and subsequent research of published Government and expert views Councillors wish to make the following comments:

- **Health risk – Humans and farm animals**
 - From material researched and from the House of Commons debate in 2008, it seems to be well accepted that harmful elements exist in open composting sites, and the only matter that is unclear is how far wind borne elements can travel; the 'unsafe' range varying from 250m to 1km depending on the 'expert' source used.
 - It must be remembered that there are farm buildings (office, barns and farmyard) less than 100m from the proposed site. The farm owner would routinely be exposed to high levels of odour and airborne particles all of the time that he is working on the farm as would any employees at the nearby sewage works (50 metres), allotments (5-100m) and at the various horse stables (190 and 306m) along the track behind Big Plant Nursery, Hole Street. The Environment Agency state that an open composting

site must not be located within 250metres of a household or workplace – surely the farm is a workplace?

- The site is very close to well used public footpaths and tracks, and would thus put users of ‘sustainable transport links’ at risk.
- Each turning of the compost releases clouds of fungals spores, principally *Aspergillus fumigatus*, an important human pathogen and allergen. Those clouds are rapidly dispersed into the air and diluted such that a safe distance from the composting site should be achievable. However, a quick literature search reveals that a ‘safe’ distance cannot be agreed amongst the industry experts– the ‘safe’ distance in the UK is taken as 250metres, however, there is strong evidence that the health of people living 500metres or more from these sites can be seriously affected. Newspaper articles contend that composting is not yet carried out under completely safe conditions, a story based on a recent research paper found that risk analyses at most UK locations where composting is carried out are inadequate.
(<http://www.aspergillus.org.uk/secure/articles/pdfs2/composting2009.pdf>)
- A recent article in the Daily Telegraph notes that ‘14 people living within 300metres of the site went down with infections of the lung’ referring to a compost site near Stourbridge in the West Midlands (which has since been closed down). Thus proving that health concerns are not just academic projections, but have been proven in the real world to cause real problems.
<http://www.telegraph.co.uk/health/healthnews/5661156/Health-fears-over-council-composting-schemes.html>
- Aspergillus does not solely affect humans; **birds and animals can also develop aspergillosis**, and some plant diseases and food spoilage may be due to aspergillus infection. The proposed site is to be located on a working beef cattle farm and mycotic (fungal) infection of cattle by aspergillosis can cause placentitis and abortion in almost all domestic animals. Keeping beef cattle in fields and cow sheds much less than 250 metres from the proposed site could result in an increase in abortion rates amongst the cattle, contamination of their meat which, if eaten can lead to serious illness in humans. The long term future of the farm for beef production would be bleak.
- Farmers go to great lengths to store animal feedstuffs properly thus preventing the growth of *Aspergillus fumigates* and yet this proposal seeks to introduce a constant source of the airborne fungus onto a working beef cattle farm.
- There are also stables in close proximity, where a number of horses would be put at risk.
- Aspergillus can also affect wild animals including deer. Deer are frequently seen in the fields surrounding the proposed site.
- Closed composting systems significantly reduce the risk to animal and human health.
- Odour
 - Is the fact that the site boundary is 230metres from houses acceptable given that WSCC policy states a minimum of

250metres? Isfield have a similar site 700 metres from their village and were plagued by smells when it first opened. This facility will be half that distance from Ashington. The Parish Council would need more information about potential smells and their likely impact on the village. DEFRA report (in Good Practice and Regulatory Guidance on Composting and Odour Control for Local Authorities) that compost-derived and microbial volatile organic compounds (MVOC) can be found at distances of up to 800m from composting facilities. The DEFRA report highlights that 'In uncovered windrow systems, there is a considerable risk of odours being released, especially during turning and for some hours after turning and odour 'complaints can extend over distances of 500m and more'

- DEFRA comment that 'Since odour emissions from open air facilities are more difficult to control, it is expected that contained systems will be recommended and so predominate in the future.' And 'Using open maturation rather than enclosed has been noted as a cause of complaints from members of the public.'
- Leachate pollution
 - All composting processes involve the production of leachate. This is often high in dissolved nitrogenous and sulphurous material and can be a major source of odour production. The site is on a slope and there is potential for leachate/run off to enter the stream adjoining the site and flow into nearby fishing lakes.
- Noise Pollution
 - There is a potential for noise pollution from the machinery operating at the site as well as the additional lorries on the A24. Ashington Community Plan 2010 (which is based on a 2009 survey of all Ashington residents) lists noise reduction from the A24 and reducing the number of lorries through the village as the 4th and 5th highest priorities for the Parish Council to address.
 - This development would result in a significant increase in noise when the Parish Council is mandated to secure a reduction.
- Visual appearance in a rural area
 - it is understood that the 'windrows' will be 3m high – this is a tall structure in an otherwise flat rural landscape, and thus the countryside amenity value for residents and users of the footpaths would be significantly reduced. In addition, undoubtedly there will be lighting at the site, which will pollute the surrounding countryside, and indeed in all possibility the village itself.
 - In all likelihood there will be 'wind socks' (or other wind direction equipment) around the site. These will surely stick up above the 3m high windrows (possibly 5-6m high) and be a visible intrusion within a countryside location. The site will be prominent in view from the A24 footbridge and the public footpath adjacent to Broadbridge Farmhouse.

- Sewage
 - Defra recommend that sewage sludge is **not** to be disposed of at an open windrow composting site. It is expected that the location of the proposed open composting site next to the Ashington sewage works is co-incidental rather than for the easy disposal of sewage sludge.

Unsuitability of the road network

Details from the Potential Operator were supplied to the Parish Council about the routing to and from the proposed site:

- The existing road up to Broadbridge Farm will be the main entrance to the site
- Access to and from the site will be solely from the southbound carriageway of the A24 only ie Hole Street slip road off. Lorries will travel along Hole Street, turn left at the junction and then immediately right up Broadbridge Farm road. A new road will be constructed from the sewage plant road, across the field, to the east of the sewage works and into the proposed site. The existing road to this point is only wide enough for one vehicle.
- All vehicles leaving the site will be required to turn left onto Hole Street and right onto the A24 southbound carriageway via the slip road
- For vehicles wishing to travel north they will have to go down to Washington roundabout and turn round.
- Vehicles travelling north on the A24 and wishing to enter the site will have to exit the A24 at the north of Ashington, go all the way round Billingshurst Road roundabout and back onto the A24 southbound carriageway and off at Hole Street. Therefore travelling past Ashington twice – north then south. The lorries will be too big to exit the A24 northbound at the Mill Lane slip road and turn right under the flyover.
- It should also be noted that Hole Street, which forms part of the proposed route, is already subject to a restriction banning lorries along part of its length for safety reasons given its narrow width, and is also subject to speed restrictions for the same reasons. This road is used extensively by horseriders accessing their stables lower down Hole Street. In addition it is a popular route for cyclists using the country road network, all of which makes any use of this road by lorries totally inappropriate.
- Olus will enter into a routing agreement so that this is the only route lorries should travel.
- Lorries will be 10tonnes and there will be an average of 34 per day in and out = 68 lorry movements average

Given this information Councillors made the following comments:

- Sub standard A24 junctions and other road dangers
 - The Hole Street road junctions (on and off) are not slip roads – they are far too short, narrow and bends are too tight for large, slow moving lorries as evidenced by regular destruction of the black and white chevron signs and the Hole Street nameplate sign at this junction. Horsham District Council and WSCC are well aware of these problems. Indeed, the existing road signage on the A24 southbound carriageway approaching Hole Street

shows a junction rather than a slip road indicating that vehicles have no slip road in which to slow down. This will lead to vehicles using the main carriageway to slow down, causing serious hazards behind them.

- WSCC Route Safety Strategy report for the A24 Findon to Dial Post is due to be published in mid February. This must surely highlight the sub-standard junctions at Hole Street? Everyone in Ashington knows that:
 - coming off the A24 southbound carriageway at Hole Street is a short, tight turn; which as commented above, will necessitate lorries using the inside lane of the A24 to slow down
 - on to the A24 at the slip road must be treated as a 'Give Way' rather than a slip road as it is impossible to build up enough speed (even in a fast car) to merge with traffic safely; which will result in lorries using the inside lane of the A24 to try to build up speed
- The effects of which will be to cause a risk of accidents for fast moving vehicles using the A24 itself, as they will move from inside to outside lanes to avoid slow moving lorries.
- There is an inherent risk with all LGVs having to turn right into the proposed site – the road layout would need to be carefully designed with traffic islands and it is questionable whether the road is wide enough for a central island to be included
- For vehicles travelling north and coming off the A24 at the Billingshurst Road roundabout the Parish Council has always had concerns about the slip road design and cambers. According to a recent report commissioned by Thakeham Village Action in response to the Laybrook landfill site planning application 'The two roundabouts do not meet current roundabout design (the Government's Design Manual for Roads and Bridges) standards and from casual observation there is the potential for laden LGVs to overturn as they will be able to enter and negotiate the roundabouts at too high a speed'. The report also states that 'There appears to be insufficient deflection for traffic entering the circulatory areas on certain arms of the junction, and this allows traffic to enter and circulate the central islands at too fast a speed. This may not cause too many safety problems for the majority of traffic but high entry and circulatory speeds are known to cause problems for Large Goods Vehicles'
- WSCC documents mention a 'potential new access from the A24'. Given the sub standard junctions at Hole Street it may be necessary to build completely new on and off slip roads to access the site – the cost would be huge, farmland would be lost, Broadbridge Farm would effectively be split in two, public footpaths affected etc. This would only provide access for southbound traffic and would not improve access for northbound vehicles.
- The current plans to build a new access road from Hole Street and across farm fields is detrimental to the countryside.

- It is widely accepted that there are major safety problems on the A24, and the funding to solve them is not currently available. Routing more lorries along an already dangerous road is unacceptable.
- With WSCC encouraging more and more traffic, especially lorries, to use the A24 it is becoming noisier and even more dangerous for vehicles to use these junctions safely. Traffic flow rates have increased, vehicles are travelling faster and gaps in the traffic are more difficult to find.
- The A24 junction with the A283 (Washington roundabout) has a poor accident history. In a five year period Sussex Police have recorded twenty-seven collisions resulting in personal injury at this location. In addition the A24 between the A272 and the A283 (Washington roundabout to Buck Barn crossroads) has been the scene of a very large number of collisions at various locations. WSCC as the Highway Authority will be aware of the poor safety record in this area and it is assumed it will have casualty reduction proposals in a programme of remedial measures. Until these works have been undertaken it is suggested that it would not be in the public interest for either the Highway or Planning Authority to contemplate allowing the introduction of any major increase in traffic flow on this section of road. (information courtesy of the recent report commissioned by Thakeham Village Action in response to the Laybrook landfill site planning application)
- The existing road to Broadbridge Farm is not wide enough for two lorries to pass each other safely. The road would need to be widened to 7.3m (2x3.65m wide lanes). An additional width of 2m would be required to reconstruct the existing public footpath. It is doubtful whether there is sufficient width available as it is bounded on one side by the A24 and on the other by an existing road culvert.
- Rogue lorries
 - How will the operator stop vehicles from turning right out of the site and coming up through the village to head north on the A24?
 - Everybody knows that lorries do not follow routing agreements and that there are no resources (WSCC, Traffic Regulation Orders or Police to enforce routing agreements)
 - Potentially lorries from the A283 Steyning could cut through Water Lane, Wiston (past Wiston Tea Rooms) to access the site (rather than negotiate Washington roundabout and travel all the way north on the A24 to the Billingshurst Road junction and then south down the A24 to the site) – what will be done to stop this? WSCC is already aware that this is used as a rat run by significant numbers of lorries at present.
 - There is no access to the site from the northbound carriageway – concerns are that northbound traffic will try to find shortcuts rather than follow the approved route.
 - If vehicles accessing the site are low enough then they could pass under the A24 flyover adjacent to the site entrance. If they

- can do this then they will surely take the route under the flyover and through the village in order to come into our out of the site.
 - Physical barriers would be needed to protect Ashington Village and Wiston
- Noise
 - The additional lorry movements on the A24 will add extra noise. Ashington Community Plan 2010 lists noise reduction from the A24 and reducing the number of lorries through the village as very high priorities. The village already suffers from loss of amenity due to the noise from the A24.
- Visibility Splays
 - there is limited visibility to the north under the A24 flyover from the farm entrance
 - visibility is poor when turning right from Hole Street towards the A24 slip road
- Detrimental impact on existing users of Broadbridge Farm road
 - The current road up to Broadbridge Farm is well used as a footpath for walkers with dogs, pushchairs, children etc. It is a popular family route and this will seriously be affected by lorries.
 - the first section of the route is a public footpath and there is no information about how the footpath can be protected from the lorry movements.
 - Many people visit the duck pond at the farm to feed the ducks and geese, look at the newborn calves in the Spring and it is unlikely that they will do this if a working compost site is within an few metres. It is accepted that the public have no 'rights', eg public footpath, to do this but many do use Broadbridge Farm road for recreational activities with children.

Cumulative Impact

- WSCC will shortly be considering a proposed landfill site at Laybrook Brickworks. Ashington Parish Council are vigorously opposing this application, and many of the reasons for the objection are the same as those given above in relation to the proposed Broadbridge Farm site, in particular the unsuitability of the road network for high volumes of LGV traffic. Either one of these sites will have a devastating effect on the village, as detailed in the statements of objection but cumulatively the impact would ruin the village
- In recent years Ashington has faced the possibility of landfill at Rock Common (Washington) and Laybrook Brickworks, have had a landfill site & sand extraction operating at Washington, various operating waste sites on the edge of Storrington. It is unreasonable even to contemplate that Ashington could be surrounded on all sides by waste facilities.

Risk of Traffic Pollution in the wider geographical area

- Storrington is having its air quality measured as the pollution levels are higher than considered acceptable. Potentially some of the lorries to & from the site could come through Storrington and exacerbate the pollution. An Air Quality Management Area (AQMA) is under

consideration for Storrington which is some 3miles (5km) south west of the site.

Ashington Parish Council has concluded that the development, in its present form, will detrimental to the amenity of local residents and consequently objects to the proposed development. Ashington residents already suffer from significant loss of amenity due to the incessant noise, 24 hours per day, from the nearby A24, and the additional loss of amenity and risk to health as a result of this proposal will irreversibly harm the village.

Finally, the Parish Council is concerned about the short notice given to Councils to respond to these important documents, and may wish to supplement this objection if new information comes to light.

Karen Dare

Karen Dare
Clerk
Ashington Parish Council