



# Slinfold Parish Council

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6<sup>th</sup> February 2019

Dear Sirs,

**Re: - Planning Application DC/18/2730 and associated applications DC/17/1955 and DC/18/2023 – Cordek**

Further to our emails dated 25<sup>th</sup> January and 1<sup>st</sup> February 2019, and further to the Parish Council meeting on 31<sup>st</sup> January 2019, Slinfold Parish Council would like to raise a **strong objection** to DC/18/2730 and now has significant issues and concerns with DC/17/1955 and DC/18/2023.

Our concerns are as follows:-

**DC/17/1955 - Demolition of three existing B1/B8 industrial/warehouse buildings (Units 3-7). Erection of two replacement B1/B8 industrial/warehouse buildings and extension/alterations to existing hardstanding area.**

1. The Design and Access Statement only mentions the following “Within the **Plant Room** there will be a high efficiency gas fired boiler which is solely to serve the manufacturing processes within the building” (the term **Plant Room** only appears in DC/18/2023 as does the Plant Room)
2. The plan shows external plant to the south of Unit 7 and the Energy Statement states “*Within the plant room of Building 7 there is to be a high efficiency gas fired boiler which is solely to serve the manufacturing processes occurring within the building*”

Documents also state that residual heat will be used to heat Unit 7.

**From the submitted plan detailing the external plant to the south of Unit 7 it's not clear how that would ever have worked as there are no links shown between the plant and Unit 7. The internal Plant Room only appears in DC/18/2023**

3. We have established that work on the Downs Link to facilitate the gas supply to the boiler was planned at least as early as February 2018 so it is unclear

why the Plant Room, Cooling Tower and Pump Room were not detailed in the original application

4. There is no mention of the scale of plant needed to support production or the size of the gas boiler

HDC did not request details of what the external plant would be but attached condition 6 to the application.

HDC did request that external plant be relocated but it wasn't done under this application. Reasons are unclear.

There is no mention of what is coming down the line, only a boiler is mentioned and no mention of plans for a Medium Combustion Plant.

**DC/18/2023 - Variation of condition 1 to approved application DC/17/1955 (Demolition of three existing B1/B8 industrial/warehouse buildings (Units 3-7). Erection of two replacement B1/B8 industrial/warehouse buildings and extension/alterations to existing hardstanding area.) Alterations to floor plans and elevations and re-location and enlargement of external plant room.**

1. The Variation of Condition Form under DC/18/2023 states "Minor Plan and elevation amendments"
2. The Planning Notice for DC/18/2023 (which moves the plant room and introduces significant new plant) states the following:

*"DC/18/2023: Variation of condition 1 to approved application DC/17/1955 (Demolition of three existing B1/B8 industrial/warehouse buildings (Units 3-7). Erection of two replacement B1/B8 industrial/warehouse buildings and extension/alterations to existing hardstanding area.) Relating to floor plans. The property is a Listed Building".*

That text description makes no mention of the relocation of the plant room, the cooling enclosure, the pump room or new louvres to the north of Unit 7

3. The new cooling enclosure, pump room and internal plant room are only shown in the site plans
4. The hand written Variation of Condition form, which for reasons that are not clear, was submitted a year after the original application (04/09/2017), is twice dated 20/09/2017 and then amended to 2018
5. We understand that work on the Downs Link to facilitate the gas supply to the new boiler was planned at least as early as February 2018. Why was a planning application not submitted at the same time detailing the plant?
6. There is no evidence of, if, where and when the planning notice was displayed or residents advised or statement to the effect that residents need not be informed

7. The Parish Council has been contacted by a number of residents stating that they have not been consulted or notified of this amendment, nor in fact the earlier application(s)
8. E-mail correspondence from the agent supporting the Variation of Condition only states "The external plant noted on the application drawings doe DC/17/1955 as being to the south of unit 7 will now be to the north end of unit 7 i.e. close to the 'centre' of the site, and more distant from neighbours". It **does not** detail the change in equipment and introduction of the cooling enclosure, pump room and internal plant room

HDC deem these to be non-material amendments. The detail only becomes available when HDC request it.

The equipment list for Unit 7 is as follows:

#### **EXTERNAL PLANT COMPOUND**

Gas boosters (in acoustic housing)  
Cooling tower  
Condense drain pumps

#### **BUILDING 7 PLANT ROOM**

Gas fired pre-boiler  
Gas fired boiler  
High level extract fans  
Electrical panel  
Motor control panel  
Water softening plant  
Water softening tank  
Osmosis plant  
Osmosis pump  
Air compressors  
Pumps

The EQUUS Noise report **does not cover** all of this equipment.

9. The Parish Council does not view these amendments as **non-material**. Even if they could be classed as non-material on their own, when taken in the wider context of DC/18/2730 and DC/17/1955 they are introducing considerable change and should have been the subject of a separate planning application and consultation and at the moment appear to be in conflict with HDC Policy 33
10. In further e-mails HDC ask "With regards to the plant, is this being relocated to the inside the building (in the plant room? Hence the louvres) or, is this for separate new plant machinery in addition to the approved plant remaining on the exterior, but to the north? This would certainly change how we look at this condition, though this would still be included on the decision notice"
11. HDC have removed condition 6 included in DC/17/1955 from DC/18/2023. Condition 6 included the requirement "*and shall include a scheme of attenuation measures to ensure the rating level of noise emitted from the*

*proposed building services plant is 5dB less than background when measured from the nearest noise sensitive dwelling”*

*And have just retained “The plant shall be implemented in accordance with the approved details and attenuation measures, and shall be permanently retained and maintained in working order for the duration of the use and their operation.”*

This is concerning as the noise issues could be worse under DC/18/2023

Again, there is no mention of what ultimately is being planned and no mention of the Medium Combustion Plant. At this point details were clearly known and the gas supply had been implemented.

### **DC/18/2730 - Installation of a chimney to north of Unit 7**

1. The plans still show the original External Plant to the south of Unit 7
2. The Parish Council has been contacted by a number of residents stating that they have not been consulted or notified of this amendment
3. Flue dispersal data has not been provided
4. Visiting the site, part of the chimney already looks to be in place. Given the layout of the site and the dip that the building sits in, the top of the flue is not far above the road level and neighbouring properties.
5. The Environment Agency states **“Medium Combustion Plants and Specified Generators are a major source of air pollutants that may cause harm to human health and the environment”**. The new EA standard states that MCPs should operate a minimum distance of 900m from any MCP to a Natura 2000 site (SAC or SPA). This indicates how very toxic to plant and wildlife the emissions from this type of MCP are.
6. The prevailing wind will take the plume directly over Slinfold
7. There are no proposals for mitigating the emissions. The PC would like to understand what abatement technology (both Primary and Secondary) HDC is going to require in order to lessen the impact on the local community
8. The PC would like to understand what the background level of NOx in various parts of the Parish are and if HDC intend to put in place any monitoring of the levels?
9. The PC would also like to understand the impact to human health, wildlife, the natural environment including the ancient woodland and orchards that are around the site.

**It is only on this final application that full details become clear**

From the facts available on the Planning Portal this appears to have been a well-orchestrated process to hide what is ultimately being implemented. A manufacturer who is spending a significant amount of money on new buildings would know the type of plant required at the outset to support the manufacturing processes. It all has to be ordered and built. Given the installation of the gas supply was well in hand prior to the Variation of Condition submission it can only be assumed that full details of the MCP were known at this time. Full details should have at least provided at this point.

Cordek are in an excellent position for a renewable energy solution and mitigation yet not one single mention is made of their concern for the environment.

The Parish Council is therefore requesting that the consultation period for DC/18/2730 is extended and impacted residents and nearby businesses advised. The environmental and noise impacts need to be fully understood and evaluated by an external body before a decision is taken.

We would further request that the approval for DC/18/2023 be revisited in the light of our overwhelming concerns in relation to this application.

We look forward to hearing from you

Yours sincerely  
SLINFOLD PARISH COUNCIL

*M Burroughs*

Mary Burroughs  
Clerk to the Council