

F/15/20/WS - Planning Policy Strategic Comments.

August 2020

In considering any future planning application, as per the proposals subject to public engagement: <https://www.fordctp.co.uk/> the following matters relating to the strategic approach within the Arun Local Plan should be taken into consideration:

Waste Local Plan 2014 (WLP)

The proposed site is located on WSCC and SDNPA's Waste Local Plan 2014 (WLP) waste site allocation (Policy W10 Strategic Waste Allocations). And as such its development is guided by specific principles set out in paragraph 7.3.9 of the plan.

In accordance with Policy W10 of the WLP, the allocation site is safeguarded from non-waste development, as long as it is meeting the development principles of the policy. These are based on the overall aim towards self-sufficiency within the County in terms of waste production and disposal.

Arun Local Plan (2011-2031)

The Arun Local Plan includes a strategic housing allocation which is also located on Ford Airfield, SD8. The site is currently subject to an outline planning application for 1500 houses (F/4/20/OUT). This waste proposal must therefore work together with the outline housing site to ensure a coordinated approach to:

- Addressing cumulative transport impacts (Arun Local Plan policies: T SP1 Transport and Development; T DM1 Sustainable Travel and Public Rights of Way and T SP3 – Safeguarding the Main Road Network). The proposal must consider impacts from HGV and employee traffic and deliver appropriate mitigation. Consideration will also need to be given to contributions towards the bridge at Ford or A259 corridor improvements as set out in the Arun Transport Study Enterprise Bognor Regis Update 2017 and the Arun Transport Study: Waste Site Allocation Transport Addendum 2013. The assessment of the site must consider whether waste is transported from greater distances to the site or whether it will take local waste and appropriate mitigation.
- Importantly though, it should be noted that there is an area to the north east (shown on policy Map 2), which is safeguarded for a bridge to cross the level crossing at Ford within policy T SP3(l). This will therefore need to be taken into account through the consideration of cumulative impacts for noise and air quality.
- Addressing the principles of policy WM DM1 safeguarding this waste facility and infrastructure and recycling and recovery of materials on site
- Decentralised energy connectivity – can the housing site SD8 at Ford be connected to the power generation from the proposed site? This is especially important considering the declared climate emergency and the content of NPPF 2019 paragraphs 150 and 151, especially the emphasis in 151 b) of the NPPF in terms of co-location of creators and users. As reiterated below this should be done without causing detrimental effects to air quality or future occupiers

- Connecting walking and cycling routes through the housing allocation to arrive at the site for work where possible to be in line with policies T SP1 and QE DM3 of the ALP and the declared climate emergency, especially for or due to the apprenticeships to be introduced
- Delivering a green link using existing public rights of way and repurposing the historic Portsmouth to Arundel Canal (see the Arun District Council Bognor Regs GI Framework study, endorsed at Planning Policy Sub Committee on 25 February 2020 as a material consideration which identifies this as a project to connect the coast to the South Downs National Park and provide an important recreational route through the district.
<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n14967.pdf&ver=15366>)
- The sites must work together on landscape, amenity and air pollution matters to ensure both proposals work together to ensure that adverse impacts are avoided or appropriately mitigated on adjacent landuses in terms of health amenity and safety in particular, Policy QE DM3. There is significant new residential growth in the area including the provision of a new secondary school which will also need to be taken into consideration.
- Based on the nature of the proposal, the landscape character of the site may change from a partially open and derelict site to one with a built-up, operational facility, even when accounting for the smaller buildings to the rear. As noted in the scoping report and photo montage, this change also has the potential to affect the surrounding landscape character areas from which the site is visible.
- Further, there is potential for changes to views from the South Downs National Park and the close by conservation areas. It is suggested that the scale of the proposed buildings and the stack mean that these effects could be significant. Consequently, a landscape and visual assessment will be required as part of any application in order to fully assess the impacts of the proposal. It is suggested that native thick hedging and trees along the northern boundary may help to ease the impact. Additionally, treatment along the western boundary should be enhanced to reduce impacts on residents and users of the neighbouring strategic site. There is some useful information provided by the County Council and ADC (within its evidence base) which will be of assistance to the applicants.
- The development must be designed to adapt to the effects of climate change and adhere to policy ECC SP1. In particular, the consideration of using SUDS to help with flooding issues and water quality. Consultation with Southern Water will be essential because of proposals for the Ford WWTW upgrade to facilitate growth through infrastructure connectivity to surrounding developments as well as integrating an sustainable energy recovery facility.
- Sustainable travel must be delivered through the provision of a Travel Plan, in accordance with policies In particular, the proposal needs to be assessed for its impact upon traffic travelling north-south using the A27 and south on the A259 to understand the level of contribution to highway mitigation that may be required (including potential to contribute towards bridging the railway at Ford or upgrades to the A259 between Littlehampton and Bognor Regis.
- Historic conservation and impacts on landscape character are important. Whilst it is stated that there are no designated built heritage assets on the site, it is worth noting that there are a number of features present related to the development of the airfield. This includes Sections of the runway, parts of the taxiways/perimeter road and some structures, including hangars. The scoping report notes that the 'site is a large area of concrete apron that is occupied by two hangars of World War II or early post-war date, that were formerly in use as Ford

Blockworks'. Some of these could potentially be heritage asset based on the definition in the NPPF

- On a wider scale, in relative proximity to the site, the following heritage assets can be found around:-
 - Yapton Church Lane and Main Road/Church Road conservation areas which contain listed buildings and locally listed buildings
 - Listed buildings such as, Atherington House, Ford Place, Southdown House and The Lodge and three churches at Yapton, Ford and Climping (all of which are listed at grade I).
 - Scheduled Monuments of Tortington Priory (to the north of the site) and Mediaeval Earthworks at Church Farm (to the south).
 - Locally Listed Buildings such as 1&2 Ford Cottages
 - Remnants of the Portsmouth and Arundel Canal
 - The historic hillside town of Arundel with many listed buildings (the size of the building and stack is such that it might be visible from the town/various assets in the town).
 - There is Potential for changes to the setting of these assets, which will mean that further assessment will be required. This will have to be undertaken in accordance with the NPPF and the Planning Practice Guidance, as well as Historic England's Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment and Good Practice Advice in Planning Note 3: The Setting of Heritage Assets.
- The provision of open space must be delivered in accordance with the Arun District Public Open Space, Playing Pitches and Built Facilities SPD
- Consideration of bio-diversity - the northern section of the site is located within the 2nd Impact Risk Zone of Arun Valley and so potentially impacts to both the designated site and any species or land that could be functionally linked to it. It therefore needs to comply with the content of policy ENV SP1 and paragraph 17.26.
- Combined with the climate emergency and the requirement for net biodiversity gain, we consider that this must be considered within supporting documentation to ensure compliance with the Conservation of Habitat and Species 2017.
- Information contained within the HRA of the LP may help as a basis before the specific survey work, as previously set out in detail by Natural England.
- Policies within Chapter 21 of the ALP (Quality of the Environment), will need to be addressed in particular, QE SP1, the overall aims along with the need for, as mentioned above, provision for pedestrian and cyclists plus provision of electric charging points are further emphasised within policy QE DM3 (Air Pollution). To do this therefore air, noise, odour and lighting reports will be required to support any application. Documents that may help in terms of providing the Sussex specific requirements can be found at <https://www.arun.gov.uk/renewable-energy-climate-change>.

Neighbourhood Planning

As well as the higher tier plans, the Ford Neighbourhood Development Plan was 'made' on 9th January 2019. Any proposal therefore will also need to comply with the following NDP policies:

- Policy EH1: Protection of trees and hedgerows
- Policy EH2: Renewable Energy

- Policy EH4: Surface water management
- Policy EH5 Grade 1, 2 and 3a Agricultural Land
- Policy EH7: Light Pollution
- Policy EE3: Protection of existing businesses (increase in HGV movements, the access to and from Ford Road
- Policy EE6: Communications infrastructure
- Policy EE7 Sustainable Commercial Buildings (this policy is for commercial buildings which this could be classed as)
- Policy EE10 Quality of Design of commercial buildings (this policy is for commercial buildings which this could be classed as)

These can be found on the Arun District Council website at

<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n13295.pdf&ver=13438>