

From: Peter Cleveland
Sent: 03 April 2014 11:20
To: 'James Neave'
Cc: Nat Slade
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Hi James

Please find attached my response to the additional information provided. I have combined my response with Nat Slade's in the attached letter, the relevant attachments referred to are also attached.

Please let me know if you need any clarification on the attached.

Regards,
Peter

Peter Cleveland MSc | Senior Planner, Planning Department, Arun District Council | Location: 1st Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37631 | External: +44 (0) 1903 737631 | E-mail: Peter.Cleveland@arun.gov.uk

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From: James Neave [REDACTED]
Sent: 27 March 2014 09:50
To: Peter Cleveland
Cc: Nat Slade
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Peter,

Thank you for your comments below. Would it be possible for these to be presented in a slightly more formal response (with ADC logo etc), or are you happy for these to constitute the formal comments of Arun District Council?

In addition, I appreciate you highlighting the evolving plans for the Local Plan in terms of potential sites for housing growth, however, would it be possible for the opinion of your Council as to whether the current application would have any impact on such plans, and the extent of that impact (please also could you note the stage/status at which the local plan and any allocations have reached). Also any indication as to whether the Council sustains or removes its objection is welcomed?

I look forward to hearing from you,

Kind regards

James Neave | Planning Consultant, Communities Commissioning, [West Sussex County Council](#) | Location: Strategic Planning Business Unit, 2nd Floor Northleigh, County Hall, Chichester, PO19 1RH

From: Peter Cleveland [<mailto:Peter.Cleveland@arun.gov.uk>]
Sent: 27 March 2014 08:38
To: James Neave
Cc: Nat Slade
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Dear James

Thank you for consulting the District Council on the further information that has been received relating to the proposed Ford Waste Treatment Facility, your ref: WSCC/096/13/F.

Conservation Officer Comments

I have asked the Council's Conservation Officer Martyn White to provide comment on the impact upon nearby heritage assets to address comments which has been raised by third parties. The following comments have been provided to date;

The proposal is for a substantial structure. Care will need to be taken to ensure that a thorough assessment is made to ensure that it does not have a negative impact upon the setting of the various heritage assets.

The NPPF defines setting as being:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

As it currently stands there is little evidence to confirm that this is not the case. Concern is therefore expressed with regards to the setting of those heritage assets positioned close to the structure.

I have asked Martyn for a little more detail to confirm whether or not he would be raising an objection to the scheme and also for some clarity as to which heritage assets are likely to be affected. I will provide any further comment once received.

Cumulative Impact

The Council has not received any planning applications that are likely to result in cumulative impacts, the only recent nearby planning application received related to the part of the former runway which accommodates Ford Market. Permission was sought for a structure to cover the existing market area, this application was refused and is beyond the permitted appeal timeframe, please refer to planning reference F/8/10 for further details.

SHLAA site 71 (or Ford Eco Town) covers the entire Ford Airfield site and is identified within our 2012 SHLAA as having the potential to deliver up to 5000 dwellings. I have attached an extract from the SHLAA which provides some more detail. I have also attached the Agenda going to our Local Plan Sub-Committee (LPSC) on 27th March 2014, it recommends the proposed locations for strategic housing growth within the District on Page 7. In addition you will note that should these recommended sites not be agreed by the Committee that Ford/Yapton is offered as an alternative site. I am happy to provide you with an update on the decision by the LPSC which is to be taken tomorrow night if that would be of assistance.

Stack height

Thank you for highlighting the further information regarding the stack height, I note the comments made from paragraph 5.3 which satisfactorily addresses the district concerns over the justification of its height. There is still concern that there is a visual impact as a result of 50m high stacks, however with the justification given to ensure that air quality impacts are significantly reduced by choosing the stack height of 50m rather than 45m the District would accept the visual impact.

I trust comments regarding the impact upon air quality will be suitably addressed by colleagues within their respective consultation responses to you.

Flying Fortress Car park/Site Access

I can confirm that drawing No. 10353/021 approved under F/1/04 identifies the approved parking layout for the Flying Fortress, and drawing number 11/09/03 approved under F/5/11 is the approved parking layout for the indoor football facility.

I have discussed the issue of parking provision and the restriction it imposes upon the access into the waste facility site with colleagues within our enforcement team. Given that the existing parking arrangement for the flying fortress has been in place since the use commenced (March 2005) the Council would not seek to regularise this position. It is my colleagues view that the approval of the indoor football use did not affect the existing parking arrangements for the Flying Fortress which was already established at the front and side of the site. I have also noted the comments in the letter from Flying Fortress stating that parking is lost to the side of the building to allow service/delivery vehicles to the rear, this needs to be addressed by the operator/owner of the site to ensure they can provide the appropriate level of parking and access for the existing use.

It is our view that the parking issues should be addressed by the land owner to ensure that suitable access and parking can be accommodated for both of the sites. I would therefore confirm our position that we would not be taking enforcement action against the existing parking layout.

I trust these comments are of assistance to you, however should you require any further comment please do not hesitate to contact me.

Kind regards,
Peter

Peter Cleveland MSc | Senior Planner, Planning Department, Arun District Council | Location: 1st Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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From: James Neave [REDACTED]
Sent: 21 March 2014 13:35
To: Peter Cleveland
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Peter,

I understand you are currently on leave at the moment. Upon your return, please could you advise whether you expect to get your comments to me in time, and whether your consultation response will need to be considered by your committee.

In addition, I noted in my last email that the potential parking/access issue at the Flying Fortress (FF) needs further consideration. I have received a letter from the FF noting that parking will be lost as a result of the proposed access which is a material consideration in relation to the current application. In this regard, the currently approved developments (FF and Indoor Football – ref F/5/11 and F/1/04) appear to have parking approved by condition (either through reference to the approved plans, or approval of a submitted scheme). It would seem, however, that the FF scheme has not been implemented as approved? This may be due to the later parking layouts approved for Indoor Football (11/09/03) would seem to make implementation of the FF parking arrangements difficult. In addition, the Indoor Football appears to get access to the rear of the FF via the east of the building, not the west as set out in their approved plan?

The applicant has provided reference to the approved FF parking scheme which includes a plan.

Please can you confirm whether this plan (David Bennett 10353/021) is the approved parking layout for the FF, and 11/09/03 the approved plan for the indoor football. Can you also advise if Arun DC need/intend to regularise the parking arrangements given that the existing layout on site does not appear to represent the approved schemes.

Please feel free to call me to discuss the above it would be more expedient to do so. You will appreciate that I need to deal with this matter swiftly as the application is nearing its determination date.

Kind regards,

James Neave

James Neave | Planner, Communities & Infrastructure, West Sussex County Council | Location: Strategic Planning Business Unit,
2nd Floor Northleigh, County Hall, Chichester, PO19 1RH
[REDACTED]

From: James Neave
Sent: 07 March 2014 09:13
To: Peter Cleveland; Nat Slade
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Thanks Peter, I really appreciate your attention to these matters. If your committee do wish to consider it, please can you advise of any potential issues as early as possible (albeit not the formal comments of the Council).

Many thanks again,

James Neave

James Neave | Planner, Communities & Infrastructure, West Sussex County Council | Location: Strategic Planning Business Unit,
2nd Floor Northleigh, County Hall, Chichester, PO19 1RH

From: Peter Cleveland [<mailto:Peter.Cleveland@arun.gov.uk>]
Sent: 07 March 2014 09:06
To: James Neave; Nat Slade
Subject: RE: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Hi James

Thanks for the email below, I have also received a hard copy of the Reg. 22 further information request so thank you for that also.

I have spoken to our Conservation Officer and will also speak with our Listed Buildings officer to provide a comment conservation area/listed buildings. I will also provide a response on the other points below, and provide a response by 27th March, as long as our committee member do not insist on it being heard at our April DC Committee.

Kind regards
Peter

Peter Cleveland MSc | Senior Planner, Planning Department, Arun District Council | Location: 1st Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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From: James Neave [REDACTED]
Sent: 06 March 2014 15:52
To: Nat Slade; Peter Cleveland
Subject: WSCC/096/13/F - Ford Waste Treatment Facility - Further Information

Peter/Nat,

Further information requested by WSCC has now been received from the applicant regarding this application, available to view on our website;

<http://buildings.westsussex.gov.uk/ePlanningOPS/loadFullDetails.do?aplId=1613>

This has been sent as a consultation through the usual channels, but I thought it would be best to bring it to your early attention.

Peter:

- I have received a number of third party comments with respect to potential views/impacts to nearby conservation areas/listed buildings. Is it possible to include the comments of the ADC Conservation Officer with this latest submission please?
- In addition, questions have been raised about potential cumulative impacts, accordingly, please could you let me know if ADC are aware of any developments that might act cumulatively with these proposals (one third party also mentioned conflict with the SHLAA site 71).
- Please also note the further info specifically addresses the stack height at paragraph 5.3.

- Please see appendix 4 (revised access layouts), this proposal seems to have a direct impact on the Flying Fortress Car-Park that seems not to have been laid out in accordance with ADC approved plans (F/1/04)
- The applicant has re-addressed noise impacts in light of EHO and WSCC acoustic consultant comments (attached)

Nat:

Thank you very much for your previous comments relating to Air Quality. You will note that this further information specifically addresses some of your noise concerns, particularly with regard to night time activities, noise survey methodology, standards used, and potential impacts of HGV noise (see also proposed acoustic fence at appendix 4 of the further information). I realise that the submitted further information is unlikely to affect your previous comments relating to air quality, however, I would be grateful if you could confirm that is the case, and provide new comments with respect to noise and land contamination if necessary (See EA response attached). As always, I would be grateful if you could confirm or otherwise whether you are satisfied with their methodology (particularly with regard to HGV noise) and conclusions, recommending conditions where necessary.

Your comments are requested on or before 27th March 2014.

I look forward to hearing from you, and please do not hesitate to contact me should you have any questions.

Kind regards,

James Neave

James Neave | Planner, Communities & Infrastructure, West Sussex County Council | Location: Strategic Planning Business Unit,
2nd Floor Northleigh, County Hall, Chichester, PO19 1RH

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3rd April 2014

Your Ref: WSCC/096/13/F.

Our Ref: F/19/13

Please ask for:
Peter Cleveland
Strategy Department
Direct Dial: 01903 737631

Dear Mr Neave

Proposed development and operation of a waste treatment facility. This is a County Matter and will be determined by West Sussex County Council.
New Circular Technology Park, Former Ford Blockworks, Ford Airfield Industrial Estate, Ford

Thank you for consulting the Council on the additional information received relating to the above application. I am able to provide the following comments on the additional information provided to address the objections raised by the Council in the response dated 21st January 2014.

Conservation Officer Comments

I have asked the Council's Conservation Officer to provide comment on the impact upon nearby heritage assets to address comments which have been raised by third parties. The following comments have been provided to date;

The proposal is for a substantial structure. Care will need to be taken to ensure that a thorough assessment is made to ensure that it does not have a negative impact upon the setting of the various heritage assets.

The NPPF defines setting as being:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

As it currently stands there is little evidence to confirm that this is not the case. Concern is therefore expressed with regards to the setting of those heritage assets positioned close to the structure.

I have asked Martyn for a little more detail to confirm whether or not he would be raising an objection to the scheme and also for some clarity as to which heritage assets are likely to be affected. I will provide any further comment once received.

Nigel Lynn Chief Executive
Nigel Croad Resources Director and Deputy Chief Executive

Environmental Health
Littlehampton and Bognor Regis
Customer Services Help Points

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Cumulative Impact

The Council has not received any planning applications that are likely to result in cumulative impacts, the only recent nearby planning application received related to the part of the former runway which accommodates Ford Market. Permission was sought for a structure to cover the existing market area, this application was refused and is beyond the permitted appeal timeframe, please refer to planning reference F/8/10 for further details.

SHLAA site 71 (or Ford Eco Town) covers the entire Ford Airfield site and is identified within our 2012 SHLAA has having the potential to deliver up to 5000 dwellings. I have attached an extract from the SHLAA which provides some more detail. I have also attached the Agenda that went to our Local Plan Sub-Committee (LPSC) on 27th March 2014; it recommended the proposed locations for strategic housing growth within the District that can be viewed on Page 7. In addition you will note that should these recommended sites not be agreed by the Committee that Ford/Yapton is offered as an alternative site.

The LPSC have accepted the recommended sites and these will now be considered by Full Council on 30th April 2014. At this stage the local plan is not agreed by the Council, however on the basis of the recommendation of the LPSC, SHLAA site 71 is not currently proposed to accommodate a strategic housing allocation. As such the proposed facility would not impact upon the local plans strategic housing sites as currently presented.

Stack height

Thank you for highlighting the further information regarding the stack height, I note the comments made from paragraph 5.3 which satisfactorily addresses the district concerns over the justification of its height. There is still concern that there is a visual impact as a result of 50m high stacks, however with the justification given to ensure that air quality impacts are significant reduced by choosing the stack height of 50m rather than 45m the District would accept the visual impact.

I trust comments regarding the impact upon air quality will be suitable addressed by colleagues within their respective consultation responses to you.

Flying Fortress Car park/Site Access

I can confirm that drawing No. 10353/021 approved under F/1/04 identifies the approved parking layout for the Flying Fortress, and drawing number 11/09/03 approved under F/5/11 is the approved parking layout for the indoor football facility.

I have discussed the issue of parking provision and the restriction it imposes upon the access into the waste facility site with colleagues within our enforcement team. Given that the existing parking arrangement for the flying fortress has been in place since the use commenced (March 2005) the Council would not seek to regularise this position. It is my colleague's view that the approval of the indoor football use did not affect the existing parking arrangements for the Flying Fortress which was already established at the front and side of the site. I have also noted the comments in the letter from Flying Fortress stating that parking is lost to the side of the building to allow service/delivery vehicles to the rear, this needs to be addressed by the operator/owner of the site to ensure they can provide the appropriate level of parking and access for the existing use.

It is our view that the parking issues should be addressed by the land owner to ensure that suitable access and parking can be accommodated for both of the sites. I would therefore confirm our position that we would not be taking enforcement action against the existing parking layout.

Environmental Health Comments

Air Quality

Please see my previously submitted comments, which are not changed by the additional information.

Operational Noise

I welcome the addition of the proposed acoustic barrier to reduce the HGV noise impact on the Rodney Crescent dwellings during the daytime. The modelled levels are acceptable, assuming they are 1 metre from the façade of the houses. The modelling uses daytime background noise levels only. At night the background levels are lower, and the noise sensitive floor of the house will be the first floor which will be afforded less protection by the barrier than the ground floor is. I therefore recommend that vehicle movements (other than cars) are prohibited by way of condition between 1900 and 0730 hours. I also recommend that if planning consent is granted, a condition is imposed to require the erection of the proposed acoustic barrier and proposed (though apparently unspecified) change to the road surface prior to other construction work commencing.

The report confirms that night time operational noise has been included in the predicted noise levels. However, there has not been further information provided regarding short-duration noise events resulting from night time operations.

Construction Noise

I have also seen the conditions recommended by your own consultants, Acoustic Associates Sussex Ltd. I recommend that the hours in the condition recommended on page 5 of the report dated 5th February 2014 should be changed for the 65dBA limit to the period 0800 – 1800 hours Monday to Friday, and to 0800 – 1300 on Saturdays. And therefore the 45dBA limit should cover 2300- 0800 hours.

Land Contamination

In the Environment Agency's letter reference HA/2013/115069/01-L01 dated 19 December 2013 they recommend the use of three conditions (1-3) which relate to land contamination. I am supportive of their inclusion on planning consent, if it is granted. I would suggest that, to make it clear to the applicant that the site investigation, risk assessment and verification plan required therein should consider human health as well as ground water receptors, I recommend the "Reason" provided for condition 1 is amended to include protection of human health.

Please note that the above comments are offered by officers as additional comments to those made within the Councils earlier objection.

Yours sincerely

Peter Cleveland
Senior Planner



Committee Manager: Carrie O'Connor (Ext 37614)

14 March 2014

LOCAL PLAN SUBCOMMITTEE

A meeting of the Local Plan Subcommittee will be held in the Committee Room 1 at the Arun Civic Centre, Maltravers Road, Littlehampton on **Thursday 27 March 2014 at 6.00 p.m.** and you are requested to attend.

Members: Councillors Haymes (Chairman), Bower (Vice-Chairman), Bicknell, Brooks, Mrs Brown, Charles, Cooper, Mrs Goad, Mrs Hall, Mrs Maconachie, McIntyre, Nash, Oppler and Mrs Smee

A G E N D A

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

Members and Officers are reminded to make any declaration of personal and/or prejudicial/pecuniary interests that they may have in relation to items on this agenda.

You should declare your interest by stating:

- a) the item you have the interest in
- b) whether it is a personal interest and the nature of the interest
- c) whether it is also a prejudicial/pecuniary interest
- d) if it is a prejudicial/pecuniary interest, whether you will be exercising your right to speak under the normal procedure rules applicable to the Committee

You then need to re-declare your prejudicial/pecuniary interest at the commencement of the item or when the interest becomes apparent.

3. *MINUTES

To approve as a correct record the Minutes of the meeting held on 30 January 2014 (attached).

4. ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5. *RESIDUAL HOUSING LOCATIONS

This report presents the recommended actions to accommodate the residual housing supply shortfall. It takes forward the previous Local Plan public consultations and the Council's approved Local Plan and Sustainability Appraisal objectives. Members at a workshop on the 27 February, 2014, took account of these objectives and considered 120 sites in 13 locational clusters. A matrix of the results of this workshop will be uploaded to the website as a background paper for reference. The workshop has informed the recommendations.

If these recommendations are agreed by Full Council on April 30 2014, later meetings of this sub-committee and Full Council will be asked to agree the remaining chapters of the Local Plan. The progress of the plan through to examination will be delayed if additional evidence needs to be obtained prior to public consultation.

6. *LOCAL PLAN UPDATE

This report provides information on Arun District Council's responses to other Local Planning Authorities documents since May 2013. It also provides an update on Arun's Local Plan evidence documents.

Note: *Indicates report is attached for all Members of the Subcommittee only and the press (excluding exempt items). Reports can be accessed through the Council's website at www.arun.gov.uk

Members are also reminded that if they have any detailed questions, would they please inform the Chairman and/or relevant Lead Officer in advance of the meeting.

LOCAL PLAN SUBCOMMITTEE

30 January 2014 at 6.00 p.m.

Present : Councillors Bower (Vice-Chairman, in the Chair), Haymes, Bicknell, Brooks, Charles, Cooper, Mrs Goad, Mrs Hall, Mrs Maconachie, McIntyre, Nash, Oppler and Mrs Smee.

Councillors Dendle, Elkins, Mrs Emberson, Maconachie and Mrs Pendleton were also present at the meeting.

22. Chairman

Councillor Bower advised that he would be chairing the meeting as the Chairman, Councillor Haymes, might need to leave the meeting for personal reasons.

23. Apology for Absence

An apology for absence had been received from Councillor Mrs Brown.

24. Declarations of Interest

The Monitoring Officer has advised Members of interim arrangements to follow when making declarations of interest. They have been advised that for the reasons explained below, they should make their declarations on the same basis as the former Code of Conduct using the descriptions of Personal and Prejudicial Interests.

Reasons

- The Council has adopted the government's example for a new local code of conduct, but new policies and procedures relating to the new local code are yet to be considered and adopted.
- Members have not yet been trained on the provisions of the new local code of conduct.
- The definition of Pecuniary Interests is narrower than the definition of Prejudicial Interests so, by declaring a matter as a Prejudicial Interest, that will cover the requirement to declare a Pecuniary Interest in the same matter.

Where a Member declares a "Prejudicial Interest" this will, in the interests of clarity for the public, be recorded in the Minutes as a Prejudicial and Pecuniary Interest.

There were no declarations of interest made.

25. Minutes

The Minutes of the meeting held on 28 November 2013 were approved as a correct record by the Subcommittee and signed by the Chairman.

26. Local Plan Policies

(In the course of discussing this item, Councillor Bicknell declared a personal interest as an employee of Southern Water. He remained in the meeting and took part in the debate and vote.)

Following the decisions taken by Full Council on 8 January 2014, the Subcommittee was being requested to consider those elements of the Local Plan that did not rely on agreement of the residual housing allocations (which would be considered by the Subcommittee at a later meeting). Agreement was being sought to enable these policies to be part of the Development Plan Document Process, namely 'Publication' under Regulation 19 of the Town & Country Planning (Local Planning)(England) Regulations 2012. These policies would be subject to public consultation on behalf of the government when the remaining policies had also been agreed.

The Head of Planning Policy and Conservation gave a brief overview of the chapters that the Subcommittee would be considering tonight and the Chairman then took Members through the document and sought comment/agreement on a chapter by chapter basis.

Contents and Chapter 1 (Foreword) – agreed.

Chapter 2 (Overview) – agreed.

Chapter 4 (Vision & Objectives) – agreed.

Chapter 5 (The Key Diagram) – agreed.

Chapter 6 (Sustainable Development) – agreed.

Chapter 7 (Settlement Structure, Green Infrastructure and Landscape) – agreed. A typographical error was noted under paragraph 7.3 "...an important early 19 century historic feature(s).."

Chapter 9 (Retail) – agreed.

Chapter 10 (Tourism) – agreed.

Chapter 11 (Soils and Horticultural and Equine Developments) – agreed.

There was some discussion on this chapter which encompassed housing applications for horticultural establishments; empty horticultural dwellings during the winter; and the importance of the horticultural industry as an employment provider in Arun. Members were advised

that talks were taking place between this Council, Chichester District Council, West Sussex County Council and the West Sussex Growers Association and there was a proposal for a horticultural hub under discussion. Comment was made that the development of a Quality Charter would be beneficial to encourage up-skilling and prioritisation of jobs for Arun residents and the Assistant Director of Planning & Economic Regeneration (ADPER) undertook to take that point up with the industry.

Chapter 12 (Housing Delivery) – agreed with amendment of Policy H SP2, Affordable Housing, to read, 1st line “For schemes of 7 units or less....”

Discussion by Members centred around affordable housing and the requirement on developers to provide a percentage of affordable housing within their developments. A view was expressed that 30% for developments of 15 units or more was too low but advice was given by the ADPER that a lot of work had been done by officers in coming to a figure that was both justifiable and viable.

Under Paragraph 12.7.2 a request was made for further information with regard to Gypsy and Traveller Accommodation in Arun. The Head of Planning Policy and Conservation advised that a report was in the process of being prepared and would be circulated to Members shortly.

Chapter 13 (Design) – agreed, with amendment to the wording of paragraph 13.3.24 to address a concern that was raised where front doors opened straight out on to narrow pavements, giving rise to safety issues. Flexibility would be built into the wording to enable officers to negotiate distances. Paragraph 13.3.15 would be amended to read “communal areas will also be required for relaxing and play as well as areas for hanging out washing.”

Comments were made around parking standards and advice given that West Sussex County Council’s standards had to be adhered to. In the course of discussing storage, the ADPER suggested that this would be considered in the Arun Design Guide to advise developers on a good approach to dealing with refuse storage.

Chapter 14 (Health, Recreation & Leisure) – agreed, with amendment to the wording of paragraph 14.1.19. to be reported at Full Council on 11 February 2014, as a view was expressed that the use of “planning permission shall not be granted” did not sit well within the context of the paragraph.

Paragraph 16 (Building Conservation & Archaeological Heritage) – agreed.

Paragraph 17 (Natural Environment) - agreed.

Paragraph 18 (Water) – agreed.

Paragraph 19 (Natural Resources & Minerals Safeguarding) – agreed.

Chapter 20 (Waste Management) – agreed.

Chapter 21 (Quality of the Environment) – agreed.

Chapter 24 (Glossary) – agreed.

Chapter 25 (Health, Recreation & Leisure Technical Appendix) – agreed

A point was raised in respect of monitoring changes to the document and how that would be recorded. However, the ADPER responded by stating that that would not be required as the only changes that would be made, apart from typographical or grammatical amendments, would be those arising from this meeting which would be reported to Full Council on 11 February and, once agreed by Full Council, together with any additional amendments made at that meeting, all the changes would be incorporated into the relevant elements of the Plan, ready for publication. No further changes would then be made to the publication version in respect of the chapters being considered at this stage.

The Chairman then drew Members' attention to the recommendations and the Subcommittee

RECOMMEND TO FULL COUNCIL- That

- (1) the elements of the Local Plan as presented to the meeting be agreed;
- (2) it be noted that a future meeting of the Local Plan Subcommittee will consider the remaining elements of the Plan, including the residual housing allocations and related infrastructure, and make recommendations to Full Council;
- (3) agreement be given to the policies presented being used as a material consideration by the Development Control Committee for determining planning applications and that their use be monitored to determine if amendments need to be made to the policies before submission to Government; and
- (4) the Assistant Director of Planning & Economic Regeneration be delegated authority to make any minor changes to these policies in consultation with the Cabinet Member for Planning & Infrastructure.

(The meeting concluded at 7.30 pm)

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 27 MARCH 2014

Subject : Residual Housing Locations

Report by : Simon Meecham

Report date : 11 March 2014

EXECUTIVE SUMMARY

This report presents the recommended actions to accommodate the residual housing supply shortfall. It takes forward the previous Local Plan public consultations and the Council's approved Local Plan and Sustainability Appraisal objectives. Members at a workshop on the 27 February, 2014, took account of these objectives and considered 120 sites in 13 locational clusters. A matrix of the results of this workshop will be uploaded to the website as a background paper for reference. The workshop has informed the recommendations.

If these recommendations are agreed by Full Council on April 30 2014, later meetings of this sub-committee and Full Council will be asked to agree the remaining chapters of the Local Plan. The progress of the plan through to examination will be delayed if additional evidence needs to be obtained prior to public consultation.

RECOMMENDATIONS

Local Plan Sub Committee recommends to Full Council that:

1. the following strategic locations are taken forward as part of the current Local Plan:
 - a) Barnham/Eastergate/Westergate – 2,000
 - b) Angmering - 600
2. Westbank is taken forward as an Area Action Plan - Development Plan Document to deliver up to 1,000 homes
3. Should (1) and (2) not be agreed in full then one or more of the following sites should be agreed to address any shortfall. These sites which came out lower at the members workshop will need further evidence and public consultation before the remaining chapters of the Local Plan are presented for consideration:

- a) South Fontwell
 - b) Ford / Yapton borders
 - c) Pagham East of the 400m Pagham Harbour Buffer Zone
4. Agree that weight is given in determining planning applications that are submitted to the Council to the degree in which they would contribute to the delivery of strategic infrastructure to support the site specific locations.

1.0 BACKGROUND

- 1.1 The report on the 'Residual Housing Supply' agreed at Full Council on the 8th January 2014, sets out the basis for establishing how much housing Arun is required to identify to meet its objectively assessed needs, taking into account the National Planning Policy Framework and the Planning Practice Guidance. The key input for that report was the agreement at the same Full Council to confirm its housing target for the Local Plan at an average 580 homes per year.
- 1.2 The Residual Housing Supply report also set out the sources of supply from planning permissions, Strategic Housing Land Availability Assessment (SHLAA) sites, windfall sites and contributions from Town and Parish Council allocations. The report concluded that the residual requirement for the plan period was 3,651 homes. The report advised that an additional 5% buffer should be provided for, equating to an additional 435 dwellings, bringing the total to be considered to 4,080 over the plan period. This additional 435 will be considered as part of the National Planning Policy Framework's requirement to plan for contingency through a 'housing implementation strategy'. This document, which is about providing some flexibility in the supply, will be presented as part of submission of the Local Plan to government.
- 1.3 At the same Full Council meeting, members were asked to agree the locations recommended by this sub-committee for the residual housing supply. Council decided to refer the recommendations back the Local Plan Sub-committee to ensure that the locations proposed could be found sound. The debate then widened and it was generally agreed that all known sites across the Local Planning Authority should be reviewed and that this sub-committee was the correct place to determine the strategic locations.

2.0 Members Workshop

- 2.1 To enable all elected members to take part in the review of sites a workshop was held on the 27 February 2014. The workshop was attended by 38 members from across the District. Members were presented with information including the new Wet Spot Maps from the draft Local Flood Risk Management Strategy and pros and cons on

120 potential development sites within 13 broad clusters. They were asked to consider what sites should go forward for the next plan period. Officers gave no opinion or advice other than to explain the maps; members had a full debate on issues related to the sites.

- 2.2 The overall result of the deliberations by members came up with the same three areas for strategic growth that this sub-committee recommended to Full Council in 2013. Namely: Barnham/ Eastergate/ Westergate, Angmering and Westbank These sites together help to deliver the housing, water, transport, economic regeneration and other infrastructure requirements of the Local Plan and are therefore again recommended to be take forward by this sub-committee to Full Council.

Barnham / Eastergate / Westergate and Angmering

- 2.3 The Barnham/ Eastergate/ Westergate and Angmering sites recommended meet the agreed strategic objectives of the Local Plan and have been the subject of public consultation, have land owner support, sound viability assessments and no unresolved issues from the specific consultation bodies in the relevant planning regulations (save parish councils). If Full Council agrees these recommended locations for growth, the Council will seek to resolve any outstanding issues with parish council's and if it can not resolve these then they may be a matter for the Examination in Public to resolve, subject to the opinion of the independent Inspector.
- 2.4 The consultation on the 2012 draft Local Plan included both these sites and under Policy SP8 set out specific requirements from the development to both address existing infrastructure deficits and create new communities. Critical infrastructure to be delivered by these allocations included upgrading the A29, A259 and addressing school provision. Taking account of issues raised in the consultation and other evidence, the Publication version of this policy (SP11) presented to Full Council in May 2013 significantly developed the requirements for development of these sites including waste water, open space, trees, protected species, community facilities, sustainable transport and more detail on road requirements.

Angmering

- 2.5 Members are aware that there are current planning applications for sites within the potential strategic housing location at Angmering. Consultation carried out by the developers on these applications has been extensive. Negotiations on infrastructure delivery have identified a significant need to address dualling the A259 and the potential provision of a new primary school. The cost, viability and deliverability of these elements of infrastructure are significant. Whilst there have been representations from the public and from some members for a direct link from Roundstone Lane, through the potential site, to the

A280, the benefits of dualling the A259 for the district as a whole is higher than the benefits of this link road. Both are unlikely to be deliverable from this amount of development even with the potential large grant from the Coast to Capital Local Enterprise Partnership.

- 2.6 An updated version of SP11 will be incorporated in to the final publication version of the Local Plan. It will take account of the issues developed within the May 2013 version.

Westbank

- 2.7 Westbank has been subject to a number of studies on the basis that there is wide support to see the homes, business, leisure, marine and the historic and natural environments safeguarded. Landowners, the Council and the Environment Agency have been seeking solutions to both safeguard the area and achieve the economic regeneration of the Littlehampton Harbour. In 2012's Local Plan consultation the regeneration of Westbank took the form of enabling development, including housing (under policy DM2). Taking account of representations a specific housing policy was presented in the May 2013 version of the plan. This was presented as a broad location rather than a site specific location because part of Westbank is within Floodzone 3b and part of the point of the policy is to lower that status. The policy was less defined in terms of the actual numbers for homes to be delivered in the Westbank as the actual numbers were more to do with achieving the 'regeneration and safeguarding of the Westbank'.
- 2.8 The trajectory for the Westbank was for it to contribute to the housing supply in years 11-15 in conformity with National Planning Policy Framework and Guidance on putting the most difficult sites towards the end of the plan period. However, this has never meant that the site could not come forward sooner if planning applications, overcoming the constraints, were approved earlier in the plan period.
- 2.9 Given the particular deliverability risks of this location and the need for the Floodzone 3b status to be removed before a site specific allocation of housing numbers can be made, it is proposed that Westbank will be taken forward through an Area Action Plan. An Area Action Plan is a Development Plan Document and will therefore be subject to formal consultation and examination.

Ford/Yapton/Pagham/Fontwell

- 2.10 An area between Ford/Yapton, Pagham (beyond the 400m Pagham Harbour buffer zone) and an area south of Fontwell were the next most popular locations for housing growth. It is not recommended to take these forward as part of the strategic / broad allocations for this Local Plan period as they have not gone forward as part of the iterative process in public consultation, evidence gathering and Sustainability

Appraisal. However, it is recommended that sites that help to deliver the key infrastructure are given material consideration in determining Planning Applications.

- 2.11 If members of this sub-committee determine to use any or all of Ford/Yapton, Pagham (beyond the 400m Pagham Harbour buffer zone) or an area south of Fontwell as part of this Local Plan period, then evidence gathering and first stage public consultation will need to be undertaken. This would put the entire plan on hold for at least a year and would cost in excess of £100,000.

3.0 Conclusion

- 3.1 Members' have overseen a number of evidence studies, public consultations and reviews whilst shaping the Local Plan. The latest members' workshop focussed on the strategic choices of sites to help deliver the residual housing supply. Whilst not all members would necessarily endorse all the strategic locations recommended in this report, the majority view has formed the conclusion for our recommendations.

Simon Meecham – Head of Planning Policy and Conservation

ARUN DISTRICT COUNCIL

LOCAL PLAN SUB-COMMITTEE – 27 MARCH 2014

Subject : Local Plan update

Report by : Simon Meecham

Report date : 11 March 2014

EXECUTIVE SUMMARY

This report provides information on Arun District Council's responses to other Local Planning Authorities documents since May 2013. It also provides an update on Arun's Local Plan evidence documents.

RECOMMENDATIONS

The following actions are recommended:

1. To note the update on documents produced by other local planning authorities and the completion of evidence base studies.

1.0 OTHER AUTHORITIES PLANS

1.1 Since May 2013 there have been a number of strategic documents produced by other local planning authorities. These include:

- The Waste Local Plan (South Downs National Park Authority and West Sussex County Council)
- The Partnership Management Plan 2014-2019 (South Downs National Park Authority)
- Horsham District Planning Framework Preferred Strategy
- Chichester Local Plan Key Policies Pre-Submission

Waste Local Plan

1.2 This has been jointly produced by South Downs National Park Authority and West Sussex County Council and once adopted will become part of the development plan for Arun.

- 1.3 Within Arun District Council this allocates two sites, one north of the wastewater treatment works, Ford and one at Hobbs Barn, Climping. The plan contains development principles for any planning applications that may come forward for these sites.
- 1.4 Following representations made by the Council at each stage of the process, there was an Examination in Public last summer which the Council attended. Following this and a request from the Inspector for a consultation on modifications, the final report stating that it was sound with modifications was received on 17 February 2014. It is expected that WSCC will adopt the plan in April 2014.
- 1.5 Though the Inspector recognized the various objections raised by Arun District Council he considered that these could be addressed at planning application stage rather than the site specific allocation stage that he was considering. The Inspectors report can be viewed at http://www.westsussex.gov.uk/your_council/strategies_policies_and_public/policies/minerals_and_waste_policy/waste_local_plan/examination-in-public_document.aspx#report.

The Partnership Management Plan 2014-2019

- 1.6 This is produced by the National Park and sets the overarching strategy for the management of the National Park for the next five years and beyond.
- 1.7 A public consultation was carried out during August 2013 to which Arun responded. None of these were incorporated into the final document – we understand that the national park authority considered Arun's comments were too detailed for the high level plan. The Partnership Management Plan was agreed and adopted by South Downs National Park Authority in January 2014. Normally Arun District Council would go on to also adopt the management plan – however, given the result of the consultation, this matter will be further investigated and referred to Cabinet.

Horsham District Planning Framework Preferred Strategy

- 1.8 This was consulted on from 16th August until 11th October 2013. A joint response from the Sussex Coast authorities was submitted asking for increased dialogue.
- 1.9 Since this submission there have been a number of meetings with and between the Coastal authorities and the Northern West Sussex authorities.

Chichester Local Plan Key Policies Pre-Submission

- 1.10 Chichester District Council consulted on this document from 8th November until 6th January 2014. In the housing section this outlined

that Chichester would not be able to provide for the full amount of its objectively assessed housing need. Arun sent a response that mentioned cooperative working on evidence studies and that it would not be able to help with Chichester's unmet need.

2.0 PROGRESS OF EVIDENCE DOCUMENTS

2.1 The last update on documents being produced for the Council, forming the evidence base for the Local Plan, was at the 7th March 2013 Local Plan Sub-Committee meeting. Since that meeting the following documents have been completed:

- Gypsy and Traveller Needs Assessment
- Gypsy and Traveller Sites Assessment
- The Local Strategic Statement for Coastal West Sussex and Greater Brighton
- Strategic Housing Market Assessment Validation

2.2 Since May 2013 on-going work includes:

- Matters relating to the objectively assessed housing needs
- Matters relating to the A29 / A259

2.3 The evidence studies and technical work being prepared to inform the emerging Local Plan policies are all on target to be complete in time to inform the preparation of the final Publication version of the Local Plan.

3.0 PUBLICATION AND USE OF THE AGREED LOCAL PLAN

3.1 The agreed chapters of the Publication Version of the Local Plan, taking account of and including the amendments also agreed at the Full Council meeting on 11th February 2014, was issued for internal use on the 21st February 2014.

3.2 The plan at the time of writing this report was being printed and copies will be provided to the libraries and parish councils.

3.3 The policies will be monitored for effectiveness so that any alterations can be recommended to Full Council before public consultation on them

4.0 NEXT STEPS

- 4.1 The Local Development Scheme (document timetables) will be updated following Full Council in April 2014.

Contact: Simon Meecham ext. 37698 simon.meecham@arun.gov.uk

Site ref	Settlement	Site Area (ha)	Parish group
71	Ford	387.57	Villages
Site Address		Type of site	
Ford Eco Town		Mixed	
Current/previous landuse		Planning status	
Residential, Industrial, Agriculture		Not Known	
Description of site			
Ford Airfield is a 350 hectare (865 acre) site lying between the villages of Yapton, Ford and Clymping. The centre of the site is just over 3 miles (5 km) west of Littlehampton, 4 miles (7 km) to the north east of Bognor Regis, and just under 10 miles (16 km) east of Chichester. Large strategic site comprising agricultural land. Disused concrete runway, railway line, various vegetation and trees. Generally flat site.			
Planning history			
The Ford Airfield Vision Group's final submission reports to the Eco-town process were submitted in August 2008 to DCLG. These reports documented the work undertaken by FAVG since April 2008, and were informed by the public consultation, Arun District Council's Select Committee process and the Eco-Town Challenge Panel recommendations. The Government subsequently determined in July 2009 that "this location has not demonstrated the potential to meet the sustainability and deliverability requirements for successful development as an eco-town at this time."			
Policy context			
The site is located outside of the settlement boundary within countryside where development for housing is not generally permitted except in particular circumstances and for specific uses. (Policy GEN3). The site adjoins a strategic gap (Local Plan Policy Area 10) and the setting of Arundel (Local Plan Area 3). The site adjoins Church Lane (Yapton) Conservation Area. The site was shortlisted as a potential site for an eco-town, but the Government has concluded that the location has not demonstrated the potential to meet the sustainability and deliverability requirements for successful development as an eco-town at this time.			
Physical constraints			
Given the previous use of the site part the land may be contaminated, in particular the historic landfill. Parts of the site are within flood zones 2, 3a and 3b, groundwater emergence zone and groundwater flood risk areas. There is a strip of land subject to winter flooding - only one control sluice on the whole of the Little Torting Stream main river. There are areas of the site that are subject to historic surface water flooding. Development of a new settlement would have a major impact upon the local road network and A27 at Arundel which would require major works and a sustainable transport strategy.			
Potential Impacts			
The development of the site would contribute to the coalescence of Yapton, Clymping and Ford. Impact on the strategic gap and impact on the setting of the local area. In a previous Landscape Study conducted in 2006, this area was judged as having a 'Low/ Medium' Landscape Capacity for development. This was based on an assessment of the areas Landscape Value and Landscape Sensitivity. The EDAW Study says the site has an exposed to contained nature. There is likely to be some ecological interest within the site. Any ecological features should be retained and enhanced. A survey should be undertaken to determine the ecological impact of the site, particular consideration should be given to the existing ponds on site.			
Suitability summary			
The site is outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, from the information available, the site could be considered for future housing potential, provided that any development included a comprehensive package of social, employment and transport infrastructure, appropriate to the creation of a new community. There are, however, constraints that will need to be addressed such as impact on the landscape, on the historic environment, on the transport network and flooding constraints. The Government determined in July 2009 that "this location has not demonstrated the potential to meet the sustainability and deliverability requirements for successful development as an eco-town at this time."			
Market appraisal			
This site is in a location that developers find attractive to bring forward housing sites for development. Until mid-2007, the market for housing in this area was buoyant, and sales values relatively high. Land values reached between £1 million and £1.3 million per acre, which was high enough to ensure that any community gain package, including affordable housing and other S.106 obligations, as well as abnormal development costs, could be delivered without either threatening the viability of the scheme, or falling below any alternative use value. Because of the current economic downturn, land values have fallen by about 30%, and many schemes will be delayed until the market recovers, since development would currently be unviable.			
Availability summary			
The owner or agent confirmed that the site is available for development in 2009, and that there are no legal or ownership problems which could limit development. Attempts have been made to confirm availability, but it has not been possible to confirm availability in 2012. Availability unknown, however given the recent inclusion of the site in strategic planning discussions there is a reasonable prospect of the site coming forward for development depending upon the Council's eventual distribution of development strategy.			
Achievability summary			
This site is in a location that developers find attractive to bring forward housing sites for development. There is no economic reason why the site should not be financially viable given that the alternative land use is agricultural, taking account of any community gain package, including affordable housing and other S.106 obligations, as well as abnormal development costs.			

Viability							
Yes - Strong							
Viability summary							
There is no doubt that the site is economically viable. There are no known abnormal costs that are likely to prevent development progressing.							
2011 - 2012	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019
0	0	0	0	0	0	0	0
2019 - 2020	2020 - 2021	2021 - 2022	2022 - 2023	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027
0	0	0	0	0	200	200	200
2027 - 2028	30dph	40dph	50dph	Final density:		Final suggested yield:	
4400	11627	15503	19379	1		5000	
Yield summary							
The site is identified as a strategic development for 5000 dwellings, which could be delivered in the longer term.							
Conclusion							
The site is outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, from the information available, the site could be considered for future housing potential, provided that any development included a comprehensive package of social, employment and transport infrastructure, appropriate to the creation of a new community. There are, however, constraints that will need to be addressed such as impact on the landscape, on the historic environment, flooding constraints and impact on the transport network, including A27. The Government determined in July 2009 that "this location has not demonstrated the potential to meet the sustainability and deliverability requirements for successful development as an eco-town at this time."							
Site plan							
							

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