

31 January 2019

Please ask for:
David Easton
Strategic Development
01903 737619

Mr N Purvis
Barton Willmore
7 Soho Square
London
W1D 3QB

Our Ref: F/19/18/EIS

Dear Mr Purvis,

RE: Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Scoping Opinion

I write with reference to the scoping opinion submitted under reference F/19/18/EIS on the [date]. The following letter will provide a summary of the consultation responses received but should be considered as attachments and are available in full on the Arun District Council website. Below is the Council's formal Scoping Opinion.

Proposal: Up to 1,500 dwellings, up to 37,000 sqm of employment floor space, a local centre including retail, commercial and community facilities, primary school, nursery, a care/retirement home, healthcare facilities, public open space, new sports pitches and facilities, & associated access, infrastructure, landscape & ancillary works.

Site Address: Ford Airfield, Ford

Applicant: Barton Willmore

Reference: F/19/18/EIS

1. Classification of the proposed development and requirement for an Environmental Impact Assessment

1.1 The development falls within Schedule 2, Column 1, Part 10 (b), as it relates to an urban development project which exceeds the thresholds of 5ha and 150 dwellings.

1.2 The following forms the Scoping Opinion of Arun District Council, based on the information provided in the Environmental Impact Assessment Scoping Report dated November 2018 and following a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Scoping Opinion

2. Location

- 2.1 The site is located within Arun District and falls within the parish of Ford. The main settlement of Ford is situated to the north-east of the site, with Climping village located to the south-east and Yapton village centre to the north-west. Littlehampton is situated approximately 1.5km to the east of the site with Bognor Regis located approximately 5.1km to the south-west.
- 2.2 Ford Lane runs along the northern boundary of the site and beyond this to the north and north-west are agricultural fields. Ford Train station is located approximately 700m to the north-east via Ford Lane and Ford Road. A number of listed buildings are situated within 100m of the northern boundary of the site at New House Farm (north of Ford Lane) and Atherington House (south of Ford Lane). The Church Road Conservation Area is situated approximately 610m to the west of the site and features a number of listed buildings.
- 2.3 Ford Road is situated along the eastern boundary of the site with agricultural land situated to the east and the River Arun. The River Arun is situated approximately 440m to the east of the site boundary.
- 2.4 The western boundary of the site abuts Yapton Road with a shooting range and agricultural land situated further to the west. The western boundary also abuts Rollaston Park (a residential estate) and Ford Airfield Industrial Estate.
- 2.5 The southern boundary of the site abuts Horsemere Green Lane which features residential development to the south. To the south east of the application site is Rudford Industrial Estate, Ford Materials Recycling Centre and HMP Ford.
- 2.6 Situated approximately 2km to the south-east of the application site is Clymping Beach SSSI. Whilst to the north are Arundel Park SSSI (4.1km), Fairmile Bottom SSSI (4.8km) and Arun Banks SSSI (6.8km). To the south-west are Felpham SSSI (5.2km) and Bognor Reef SSSI (6.8km).
- 2.7 Approximately 10.36km to the north-east of the application site is the Arun Valley SPA/Ramsar site, whilst approximately 11.75km to the south-west is Pagham Harbour SPA/Ramsar site.
- 2.8 A Waste Water Treatment Works (operated by Southern Water) is present within the centre of the site as well as a Waste Management Facility (Operated by Grundon). Both of these facilities are located outside of the site boundary.

3. Site Description

- 3.1 The site measures approximately 94.42ha in area and is predominantly flat. The site features the former runways of the airfield which are now used on Sundays for the Ford Market. There are two large buildings on the northern arm of the runway which are used as The Flying Fortress play centre and Arun Sports Arena. A large proportion of the site is in agricultural use with hedgerows and trees acting as field boundaries.
- 3.2 A perimeter track runs around the perimeter of the site providing connectivity between Ford, Yapton and Climping. Two existing vehicular access are available for accessing Ford Market via Ford Road (to the east) and Yapton Road (to the west). Further access is available to the Flying Fortress, Arun Sports Arena and Grundon via Rollaston Park.
- 3.3 Public Right of Way (PROW) 175 crosses the southern portion of the site linking Yapton Road with Ford Road via Rudford Industrial Estate. Public Rights of Way 170,

363, 366, 366-1 and 200-3 cross the northern portion of the site. These paths link Yapton Road and Church Road with Ford Lane and Ford Road and link in with the wider PROW network heading north and east of the site.

3.4 The site is identified as falling within Flood Zone 1 on the Governments 'Flood map for planning' and as such is identified as having a low probability of flooding.

3.5 There are no Schedules Monuments, Conservation Areas or listed buildings situated within the site.

4. Proposal

4.1 The proposed development is anticipated to comprise of up to 1,500 dwellings, up to 37,000 sqm of floorspace, a local centre including retail, commercial and community facilities, primary school, nursery, a care/retirement home, healthcare facilities, public open space, new sports pitches and facilities and associated access, infrastructure, landscaping and ancillary works.

4.2 The Scoping Report (submitted by the applicant) provides additional details on the proposed development identifying that it is anticipated that the new residential dwellings will be up to 3 storeys in height.

5. Scope of the Environmental Statement

5.1 Every Environmental Statement (ES) must provide a full factual description of the development and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise to. The ES should, wherever possible avoid the use of jargon and be written in plain English.

5.2 Every ES must also contain all the information set out in Schedule 4 to the EIA Regulations, along with such information as is reasonably required to assess the effects of the project. The ES should therefore contain:

- a full description of the development;
- measures to avoid/reduce/remedy significant adverse effects;
- data to identify and assess the main environmental effects;
- an outline of the main alternatives, options and sites considered; and
- a non-technical summary.

5.3 The following sets out Arun District Council's views as to what main/significant areas will need to be considered within any forthcoming ES. It does not prevent Arun District Council from further requests for information at a later stage under Regulation 22 of the EIA Regulations, if deemed necessary.

Population and Human Health

5.4 The measures identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' in relation to population and human health are considered acceptable.

Landscape and visual impact

5.5 Advice has been sought from the Council's Greenspace Team on the proposed Landscape and Visual Assessment (LVIA). Natural England have also been consulted and provided advice on the scope of the EIA in relation to Landscape and Visual Character. It was identified that Natural England encourage the use of Landscape

Character Assessment (LCA), based upon the good practice guidelines produced jointly by the Landscape Institute and Environmental Assessment in 2013.

5.6 It was also identified by Natural England that the EIA process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit. The assessment should also refer to the relevant National Character Areas which can be found on the Natural England website.

5.7 Subject to accordance with the above, it is considered that the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is agreed.

Archaeology and Built Heritage

5.8 The Council's Ecological Advisor has been consulted in relation to the EIA Scoping Report and has advised that the Heritage Desk-Based Assessment and the report on the geophysical survey already produced comprise a comprehensive review of the likely archaeological interest at the site. It is identified that these reports should be included in any EIA and that there would be nothing gained from any further assessment at this stage. It is also agreed that the archaeological potential that has been identified should be evaluated by trial trenching ahead of determination of the planning application for the proposed development.

5.9 This conclusion is reiterated by Historic England in their consultation response. But it is advised that the conclusion within the desk-based assessment and the geophysical survey that any remains "likely to be of no more than local significance" (para 4.3) is not considered demonstrable at this point. It is concluded that remains could possibly be of regional or even national significance could be present on the site. It should also be noted that should any non-designated assets be discovered which are of equivalent significance to a designated asset, in accordance with NPPF paragraph 194 (footnote 63).

5.10 The Council's Conservation Officer has also been consulted and identified that the Scoping Report identifies five listed buildings within the vicinity of the eastern side of the site, with the conclusion that the development site is "*considered to lie beyond the setting of all (of the assessed) designated heritage assets (with the exception of Atherington House) as there is no inter-visibility between them and the site*" (Paragraph 5.4 of the EIA Scoping Report).

5.11 The Conservation Officer has concluded that it is unclear how this assessment was made, especially given that the definition of setting does not solely relate to a visual relationship. It is therefore, advised that the good practice advice contained within 'Planning Note 3' from Historic England is used to inform the desk top assessment. Therefore, it is concluded that heritage should not be ruled out of further assessment until more detailed assessment has been undertaken on the heritage assets situated within the wider area.

5.12 This point was again reiterated within the consultation response from Historic England who identified that the "*development's impact on the character of the historic landscape as a whole should be assessed*" and that the published guidance on the setting of the heritage assets (Historic England Good Practice in Planning Note 3) should be consulted.

5.13 It was also identified by Historic England that the heritage significance of Ford Airfield should be assessed and evaluated in relation to other (designated and non-designated) historic airfields across the country.

5.14 Subject to the above points being addressed, it is considered that the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Biodiversity

5.15 The Council's Ecological Advisor in their consultation response has identified that due to the scale of the development an EIA will be required. It was also stated that they were happy with the content for the EIA as established within the 'Environmental Impact Assessment Scoping Report (November 2018)'.

5.16 'The Environmental Impact Assessment Scoping Report (November 2018)' identifies under paragraph 6.3 that there are no European or nationally designated sites on or directly adjacent to the site, not within two kilometres of the site boundary and that the site does not lie within the impact zone of any nearby international designated sites. However, it was identified within the consultation response from Natural England that;

"...the Ford allocation site is partly within the Arun Valley IRZ (impact risk zone). Therefore, the EIA should include an assessment of the potential loss of foraging habitat for Bewick's swans."

5.17 It was also advised by Natural England that information should be provided on the habitats on the application site and their potential suitability for foraging swans, including cropping rotation (if the site is in arable cultivation). Detail should also be included on the characteristics of the site that might make it suitable or unsuitable for foraging swans, for example the openness of the site and whether there are long sightlines. This information should be accompanied by a full wintering birds survey.

5.18 It was also advised by Natural England that the Environmental Statement should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and wider consideration should be given to the context of the site in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

5.19 Therefore, subject to the above points and those identified within the consultation response from Natural England (5th December 2018) being addressed the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Transport and Access

5.20 West Sussex County Council (WSCC) highways have been consulted in relation to the scoping opinion and have advised that "the scope of the approach to assessment is deemed acceptable and the guidelines in the IEMA guidance, Guidance for the Environmental Assessment of Road Traffic have been adopted.

5.21 Highways England (HE) have been consulted and have advised that any assessment should be undertaken in accordance with the DfT Circular 02/2013 and that this includes a robust assessment of the vehicular impacts with and without development for full occupation and a future year assessment (either 10 years after the development is operation or at the end of the Local Plan period, whichever is later). It is also highlighted that any transport modelling would also need to accurately reflect the Local Plans of neighbouring authorities.

5.22 Subject to the above points and continued consultation with WSCC and HE on the preparation of the Transport Assessment it is considered that the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Air Quality

5.23 Comments have been received from the Council's Environmental Health Team who have confirmed that Air Quality should be scoped in and this should take into consideration proposed and existing uses and the impact of these upon existing and proposed residential uses.

5.23 It was identified within the consultation response from Natural England (5th December 2018) that the planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation. It was identified that the assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and modelling can be found on the Air Pollution Information System (www.apis.ac.uk) and the Environment Agency website.

5.24 Therefore, subject to the above points being taken into consideration the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Noise & Vibration

5.25 Environmental Health have identified that the potential impact of noise and vibration commercial/industrial sites (both current and proposed) and the potential impact of those uses on residential properties (both current and future).

5.26 Therefore, subject to the above point being taken into consideration the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Agricultural Land

5.27 Natural England in their consultation response have identified that the applicant should consider the following issues as part of the Environmental Statement;

- The degree to which soils are going to be disturbed/harmed as part of this development and whether 'best and most versatile' agricultural land is involved.
- If required, an agricultural land classification and soil survey of the land should be undertaken.
- The Environmental Statement should provide details of how any adverse impacts on soils can be minimised.

5.28 The proposed scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable subject to the above points from Natural England are taken into consideration.

Water Resources and Flood Risk

5.29 The Council's Drainage Engineer has been consulted and have advised that winter ground water monitoring will be required at appropriate depths and locations for October to March (inclusive). Due to the location of the site (within a Secondary A and principal aquifer) it is expected that treatment in line with CIRIA C753 to be included within surface water drainage design before discharge via infiltration. If infiltration is found to be unviable and water is to be discharged to ditch and ultimately to the River Arun treatment of surface water in line with CIRIA C753 prior to discharge. Potential impacts upon water quality should be addressed in the surface water drainage design.

5.30 Surface water storage would not be accepted within Flood Zone 2 as the free capacity requirement for surface water would not be guaranteed due to the risk of fluvial inundation. It should be noted that the scheme must take account of the effects of climate change upon flood zones and drainage proposals.

5.31 Subject to the above points it is considered that the scope of the EIA as identified within the 'Environmental Impact Assessment Scoping Report (November 2018)' is acceptable.

Cumulative Impacts

5.32 The 'Environmental Impact Assessment Scoping Report (November 2018)' has included an assessment to identify schemes for cumulative and in-combination effects. This should include;

- i. Existing completed projects;
- ii. Approved but uncompleted projects;
- iii. On-going activities;
- iv. Plans or projects for which an application has been made and which are under consideration by the consenting authorities;
- v. Plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

5.33 The additional below application should be considered when assessing cumulative and in-combination effects.

Scheme Name & Application Number	Scheme Details	Planning Status	Approximate Distance from the Site
Y/1/17/OUT – Bonhams Field, Main Road	Outline application with some matters reserved for the erection of 56 dwellings.	Approved 08-12-2017	Approximately 1km to the west.
Y/62/18/OUT – Clays Farm, North End Road	Outline application with some matters reserved for 33 No.	Awaiting determination	Approximately 900m to the west.

Y/44/17/OUT – Land at Stakers Farm, North End Road	dwelling. Outline application for 70 No. dwellings.	Approved subject to s106 14/12/2018	Approximately 1km to the west.
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5.34 Any additional scheme that arise after this Opinion is issues may also need to be added into the cumulative impacts.

5.35 It has also been identified within the consultation response from the County Planning – Minerals & Waste Planning Authority it was identified that it will be important for baseline assessments to consider a 'worst case' scenario i.e. that all developments are used to their full permitted capacities, in particular in terms of HGV movements, visual, noise, odour dust and air quality impacts.

Contaminated Land

5.36 The Council's Environmental Health team have reviewed the 'Geo-environmental and Geotechnical Site Assessment' (ref.: 29228-R01, dated November 2018) and have advised that contaminated land should be scoped into the Environmental Impact Assessment.

Items falling outside the scope of the scope of the Environmental Statement

5.36 Sport England have advised that the impact of a development on sports facilities or activities would not normally fall within the scope of an Environmental Statement. However, it was identified that any subsequent planning application should consider the implications for sport in the context of NPPF Para's 96 and 97, local plan policy and any strategic evidence set out in the local playing pitch and/or built facilities strategies within the normal supporting documentation for a planning application.

General guidance on assessing the need to protect, enhance and provide sports facilities can be found at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-applications/>

Other comments

5.37 The Parish Council have been consulted on the Scoping Opinion but no comments have been received. Three letters of representation were received raising the following points;

- No need to for a development of this scale as no demand for mass housing.
- There are many properties for sale in Yapton and Ford, they are on the market for a long time due to lack of demand.
- Policy H SP2c of the Arun Local Plan identifies that Ford (SD8) will accommodate at least 1,500 dwellings but does not specify the land area or quantum of the other component uses to be accommodated.
- HELAA identifies a suggested yield of 2,439 dwellings and not 1,500 as stated.

The above sets out the requirements for the formal Environmental Statement submission. Should you have any specific queries concerning the above please do not hesitate to contact me to discuss.

Yours sincerely,



Claire Potts
Strategic Development Team Leader

