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ESTATES OFFICE

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Sent by Email

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27 March 2020

Dear Mr. Cole,

Application Ref.: F/4/20/OUT

Applicant: Redrow Homes Southern Counties and Wates Developments Ltd

Proposal: Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail/ commercial (Use Classes A1-A5) and 1,450 sqm community/ leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding.

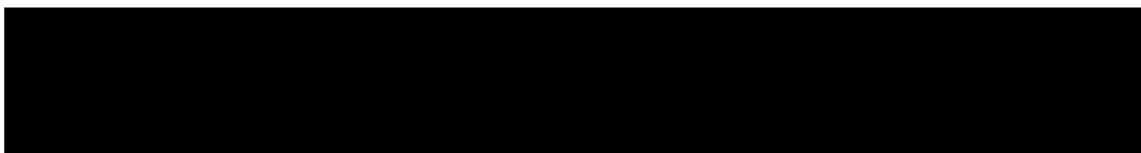
Location: Land at Ford Airfield Ford

I refer to the above planning application by Redrow Homes Southern Counties and Wates Developments.

We object to this development, in its current form, for the reasons outlined below.

As you may be aware, Grundon Waste Management operates a waste management facility at the Ford Circular Technology Park (CTP), which lies immediately adjacent to the Application Site.

Grundon has actively engaged with the Applicant and their planning advisors for a number of years, taking part in various consultation events and workshops, mainly during the Ford Neighbourhood Plan process, which shaped the proposals forming part of this planning application.



During these discussions, Grundon specifically ensured that the Applicant's project team was well aware of the current and future (in planning or permitted) waste operations at the Ford CTP site. The requirement for meaningful buffer zones, particularly between the Ford CTP site operations (existing and future), and any proposed residential and other sensitive uses, were emphasised and informally agreed with the project team as part of that process.

Despite this early cooperation and pre-application discussions, the development put forward as part of this application has failed to take these considerations on board.

Policy W2 of the adopted West Sussex Waste Local Plan seeks to safeguard existing waste management sites and infrastructure from developments that would prevent or prejudice their use. The Ford CTP site is also a Strategic Waste Allocated site (*'Site north of Wastewater Treatment Works, Ford'*) under Policy W10 of the Waste Local Plan, meaning that it is safeguarded from any development either on or adjoining it that would prevent or prejudice its development (in whole or in part) for the allocated waste management use.

The Waste Local Plan considers the Ford CTP site as "*a brownfield site outside the defined built-up area with permission for industrial use*", and as such, envisages that it would deliver a single built facility (up to c.250, 000tpa) or a number of smaller facilities as part of the County waste strategy.

It is clear that having residential areas in such close proximity to the Ford CTP site would most inevitably prejudice the current and future operations at the site. There also needs to be flexibility, particularly in the case of the Strategic Allocated Waste sites such as the Ford CTP, to manage for example differing waste streams, and using differing and new technology, etc. in order to ensure that they can fulfil their strategic role, as intended by the Waste Local Plan.

We also note that new employment use in the form of B1 (business) use, would be introduced immediately adjacent to the eastern boundary of the Ford CTP site, with no buffer zone provided at all or any consideration of the potential impact from the Ford CTP operations on future users of what could be offices in this instance.

The Ford CTP site currently operates as a waste transfer station, which is only part of the development permitted at the site in 2015 for a comprehensive large-scale waste treatment facility handling 200,000 tonnes of waste annually. A subsequent planning permission (2019) also allowed for a new access road to the Ford CTP site off Ford Road, with additional lorry movements associated with the waste management site, compared to what is currently being generated.

An EIA Scoping request for this new proposed development was submitted to Arun District Council (ref. F/19/18/EIS) to determine the topic areas to be included in the EIA. The Council responded to this in January 2019.

In terms of cumulative and in-combination effects, the Council's scoping response confirmed that the EIA should include an assessment of these effects with:

- *Existing completed projects;*
- *Approved but uncompleted projects;*
- *On-going activities;*
- *Plans or projects for which an application has been made and which are under consideration by the consenting authorities;*
- *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 or cumulative and in-combination effects."*

A response from West Sussex County Council (Minerals & Waste Planning Authority) was also included. It confirmed the proximity of the proposed development with waste management sites, including Grundon's Ford CTP site. It highlighted that "*any EIA application should reflect the need to safeguard these important waste uses and ensure that appropriate buffers are incorporated to ensure the proposed development would be both compatible with existing uses and not prejudice*



their ongoing or future development". It went on and stated that "Any EIA submission should take into account both the current and future use of these sites (noting some have yet to be fully implemented and/ or require flexibility to adapt to future demands) and potential for in-combination cumulative effects with the development proposed. In this regard 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".

The applicant was therefore well aware of the presence of the Ford CTP site in this instance, and the fact that not only the current waste management operations needed to be taken in to account and considered as part of its application and EIA, but also those which have been permitted but not developed as yet.

The baseline for the noise and transport impact assessment, for example, only considers the current operations at the site, so does the air quality and dust assessment. The permitted, but not yet developed, activities have not been taken into account. The odour assessment solely considers the Ford Wastewater Treatment Works but not the waste management activities at the Ford CTP site. These assessments also seem to rely on planning conditions controlling the permitted activities at the Ford CTP site for instance, but these controls and limits are valid based on the nearest sensitive receptors being present at the time of the planning consent. We note the correspondence between the project team's air quality consultant and Arun District Council Environmental Health Officer, which confirms that no odour complaints have been received relating to the CTP site. This is no doubt due to the control and mitigation measures in place at the site, but also due to the fact that sensitive receptors are located a reasonable distance away from the waste management site.

The new residential areas proposed as part of this application will be much closer to the Ford CTP site than the residential properties for which the potential environmental impacts from the Ford CTP activities were previously assessed against (and deemed acceptable). Therefore it cannot, and it would be wrong, to assume that these new and closer residential areas would benefit from the current controls and limits in place for the Ford CTP site to the same level of effectiveness as those existing properties. It is for the applicant, within their proposals, to ensure that the potential impacts from the existing and permitted activities at the Ford CTP site are assessed comprehensively and effectively mitigated against.

The EIA is required to assess potential cumulative impacts with other existing development as well as those permitted but not yet developed or built. The application by Redrow Homes Southern Counties and Wates Developments, whilst acknowledging the presence of the Ford CTP site and its waste management operations, has therefore failed to properly consider the planning baseline and the potential cumulative impacts.

The application has failed to undertake any assessment of the impact of their development upon the Ford CTP site and its existing and permitted operations. This means that the decision maker is unable to make a planning judgement on the merits of the application against any impact on the existing and safeguarded allocated waste site.

This raises several issues on the integrity of the planning application and its EIA and their legal compliance.

We would also emphasize that these are matters which need to be satisfactorily addressed and resolved during the determination of this outline application. Applications for outline planning permission seek to determine whether the principle of the proposed development is acceptable, and to establish whether the scale and nature of the development would be acceptable to the local planning authority, before a fully detailed proposal is put forward. There are strong reservations, bearing in mind the issues highlighted above, as to whether the current development footprint and layout, and the uses associated with these, would indeed be acceptable, without

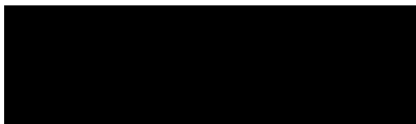


fully taking into account the existing and permitted nearby uses and operations or allowing for meaningful and suitable buffer zones from sensitive receptors.

We are still reviewing the large planning documentation that has been submitted in relation to this application and therefore will make further comments as required in due course.

We should be grateful if you would keep us informed of the progress of this planning application ref. F/4/20/OUT. In the meantime, please do not hesitate to contact us should you require any further information.

Yours sincerely,



Clayton Sullivan-Webb
Managing Director