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ESTATES OFFICE

Sent by Email

Mr. Raymond Cole

Planning Department
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Email: [REDACTED]@grundon.com

19th June 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 (the Applicant) and the recent submission of a Waste Infrastructure Statement (The Statement) by Barton Willmore on behalf of the Applicant.



England)

We maintain our objection to this development, in its current form, for the reasons outlined below.

The Statement attempts to demonstrate how the proposals can be successfully delivered without prejudicing the operations of existing waste facilities such as Ford Circular Technology Park (Ford CTP) however, it fails to address any of the concerns raised in our previous representation dated 27th March 2020 and it fails to address how it will avoid prejudicing future waste operations at the safeguarded waste site.

Paragraph 3.11 of the Waste Infrastructure Statement recognises the existence of screening from vegetation around the northern, eastern and western boundaries of the Ford CTP site, but it fails to assess the condition of any existing vegetation or to model the levels of visual, acoustic and olfactory screening it offers in relation to the proposed development from current, extant or proposed waste infrastructure consents.

Paragraphs 3.17 – 3.21 of the Waste Infrastructure Statement make reference to '*significant odour on an ongoing basis from the existing Grundon facility.*' It should be noted that we strongly reject the unsubstantiated claim made by Barton Willmore that significant off-site odours, reportedly experienced by local residents, arise from our existing operations at Ford CTP. We also strongly reject any claims that waste is stored or discarded externally at Ford CTP.

The existing operations at Ford CTP take place in strict compliance with our environmental permit, which is issued and monitored by the Environment Agency. The Environment Agency has not requested an Odour Management Plan as the current distance between our facility and the nearest sensitive receptor is considered to be sufficient to prevent nuisance from arising. We do, however, apply vigorous controls to ensure waste is handled in such a way that potential for nuisance (if any, and if unavoidable) is minimised.

It should also be recognised that any conditions attached to the planning permission and environmental permit for those existing operations at Ford CTP were applied in order to protect those existing sensitive receptors that were known at the time of application and could be identified by regulatory bodies such as West Sussex County Council, Arun District Council and the Environment Agency. To expect those requirements to apply to new sensitive receptors which are in much closer proximity than existing sensitive receptors is an unsound approach and ignores the Agent of Change principle set out in paragraph 182 of the NPPF.

Notwithstanding the unsubstantiated comments received at the public exhibition, it is noted the applicant is nonetheless proposing to erect a significant number of new residential properties in much closer proximity to our facility than existing and we suggest that this has the potential to become a long running source of friction between the new community and the Ford CTP safeguarded facility.

It is in recognition of the potential for new developments, such as that proposed, to effectively sterilise existing key essential infrastructure, that the principle of Safeguarding was developed.

Paragraph 3.26 confirms that the Applicant is of the belief that '*residents who are new to an area of existing industrial noise will be more tolerant of the noise than those settled in an area in which new industrial noise is introduced.*' This approach is deeply flawed, without substance and provides us with no reassurance that the existing, permitted and future operations at Ford CTP would not be affected by the proposed development. It is difficult to understand what measures, if any, could be put in place to protect any waste management operations at Ford CTP were this approach to be accepted.

From the information provided within the Waste Infrastructure Statement it remains unclear where the Applicant has considered the potential construction and operational impacts of any permitted or future waste management operations at Ford CTP.

The site currently benefits from extant consent for the development of a new Energy from Waste facility. This is a significant and regionally important facility which is key to helping deliver waste recovery capacity to West Sussex and neighbouring authorities. The applicant has failed to assess the impact of this consented facility on the proposed development. We would expect, as a minimum, modelling of the impact of this facility on noise, odour and visual impacts at the proposed residential properties.

This is a significant and important body of work which must be undertaken to properly assess the suitability of the proposed scheme; whether mitigation is required; the form it should take; and whether mitigation is feasible given the very close proximity to the consented facility.

We have attempted to engage with the Applicant and their planning advisors at every stage of the planning process over 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, we specifically ensured that the Applicant's project team was well aware of the current and future 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.

We are, therefore, surprised that the proposed development occupies only approximately 50% of the land allocated within the Arun Local Plan and Ford Neighbourhood Plan and consequently fails to provide an appropriate buffer zone between the application site and any of the existing waste management facilities in the local area

We would question why only half of the allocated land is being utilised and whether the developer has ambitions to return for additional development at some future stage. The current scheme densities necessitates locating proposed residential properties unacceptably close to Safeguarded facilities. We are of the opinion suitable buffers can be provided by utilising the full extent of the land allocation, as originally envisaged

Although the Statement seeks to address potential impacts arising out of waste uses, we would expect the applicant to also assess the impact of the extant B2 use at hangers 1 & 2 at Ford CTP. Both were previously used for concrete block manufacturing, but it is not inconceivable that they could be put to an alternative use which, given the absence of any conditions limiting noise, or hours of operations, could have a significant impact on the proposed residential properties.

It is recommended that, as a separate body of work, the applicant assesses the impact of this extant industrial use on the proposed residential properties and explores whether mitigation is possible and/or feasible.

Finally, we also note that the Statement focuses primarily on the compatibility of the residential development to the west of Ford CTP however, it fails to provide any form of assessment on the compatibility of the B1 use, which would be introduced immediately adjacent to the eastern boundary of the Ford CTP site, with no buffer zone provided at all.



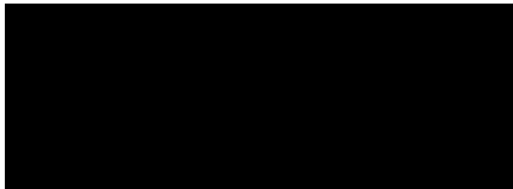
We are, and have consistently remained of the view, that it is possible to deliver the scale of scheme proposed by the applicant through a carefully considered masterplan which respects a suitable buffer and which we suggest should be based on 250m. We have offered, on numerous occasions, to work with the applicant to help design a scheme which is robust in its accommodation of the Safeguarded waste site.

A 250m buffer is achievable through use of all land allocated, but this might prejudice any ambitions the applicant may have to bring forward further development proposals at a future date.

Based on the information provided to date, we have no option but to maintain our objection to the Outline Planning Application.

We should be obliged if you would keep us informed of the progress of this planning application. In the meantime, please do not hesitate to contact us should you require any further information.

Yours sincerely,



Veronique Bensadou
Interim Head of Estates and Senior Planner