

Ford Airfield

Environmental Statement Addendum

**Prepared on behalf of Redrow Southern Counties and Wates
Developments Ltd**

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1. BACKGROUND

- 1.1 In February 2020, Redrow Homes Southern Counties and Wates Developments Ltd (the “Applicants”) submitted an outline planning application (Ref. F/4/20/OUT) to Arun District Council (ADC) for the following:

‘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’

- 1.2 An Environmental Statement (ES) was prepared to accompany the planning application in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations)¹.

ADC’s Request for Further Information

- 1.3 Following a review of the ES submitted with the planning application, in accordance with Regulation 25 of the EIA Regulations, ADC has requested ‘further information’ to be provided to assess the likely significant effects of the Development, as set out in Appendix A1: ADC Regulation 25 Letter.
- 1.4 As set out in Appendix A1, ADC has requested that further environmental information is provided in relation to 5 topic areas: Transport, Odour, Noise, Waste Management and Ecology.
- 1.5 This ES Addendum has been prepared to address the Regulation 25 request. It will be advertised and published for consultation in accordance with the EIA Regulations and the ES and ES Addendum together comprise the environmental information on which the planning application should be determined.
- 1.6 Table A1 below summarises the additional information requested for each topic area and whether this information changes the conclusions of the submitted ES. Each topic area is

¹ *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017* (as amended) (2018 no. 695 and 2020 No.505)

discussed further in Section 2 of this ES Addendum.

Table A.1: Summary of Additional Information Requested by ADC and impact for submitted ES

Topic	Additional Information Requested by ADC and Included in this ES Addendum	Change to conclusions of submitted ES (Yes/No)
Transport	The full information requested by West Sussex County Council, as the local Highway Authority, in its response to consultation dated 17 April 2020: • Technical Note ITB13091-029 Sustainable Accessibility; • Technical Note ITB13091-030 Highway Safety and Network Impact; and • ITB13091-009E Framework Travel Plan; and • Road Safety Audits.	No
Odour	Information identified in the Environmental Health Officer's response to consultation dated 28th August 2020: • An assessment of the potential odour from Wicks Farm biogas digester, • An assessment of the potential odour from Besmoke Ltd; • An assessment of the potential odour from Grundon Waste Management Site. • An assessment of the potential cumulative impacts. The results of further investigation into odour emissions from waste-water treatment works recommended by Southern Water in its response to consultation dated 30 March 2020.	No
Noise	Clarification of the matters listed under heading Noise in the Environmental Health Officer's response to consultation dated 8 July 2020, including details of the effects on HM Prison Ford as an additional noise sensitive receptor.	No
Waste Management	The information requested by West Sussex County Council, in its response to consultation dated 25 June 2020: Request for assessment of the potential impact on, and of, current and future (permitted) waste management sites, particularly the adjacent Circular Technology Park	No
Ecology	The information requested by the Council's Ecology Advisor in their response to consultation dated 19 March 2020: Request for further information as part of the mitigation strategy to restrict human and dog access and to screen movement on the adjacent public footpaths.	No

Changes to the Development

- 1.7 Since the submission of the outline planning application and the accompanying ES, changes have also been made to the Development through the provision of 2 playing fields, in addition to those currently operated by Arun Sports, to the east of the Flying Fortress. This has the additional knock-on benefit of also increasing the distance between the residential properties and the site occupied by Grundons to the immediate east of the Site.
- 1.8 The change to the Development is shown in the updated Parameter Plans (Figures 3.1A to 3.3A). The Illustrative Masterplan, (whilst not part of the Reg 25 submission) has also been updated (refer to Figure 3.4A).
- 1.9 Given the nature of the change to the Development, there would be no likely significant effects not identified or identifiable at the time of the planning application's submission in February 2020 which could occur as a consequence of the design amendment.

Changes to the prevailing baseline conditions and cumulative development

- 1.10 There have been no material changes to the baseline environment on the Site since the submission of the ES in February 2020.
- 1.11 Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

- 1.12 Table 2.5 of Chapter 2 EIA Methodology of the February 2020 ES provides a list of the schemes (including permitted waste management sites) which were included as part of the cumulative assessment for the ES. These were agreed with ADC through the EIA Scoping exercise. The Applicant is not aware of any additional cumulative developments near to the Site which could have the potential to result in likely significant effects since the submission of the February 2020 ES.

- 1.13 There is an extant consent (WSCC/096/13/F) for a thermal waste treatment plant, including a Materials Recycling Facility and Residual Waste Treatment building, which is located to the immediate east of the Site. The extent to which this consent has been implemented is not known, however it could be built out at any time. The site is hereafter after referred to as the 'existing Grundon Waste Management site'.
- 1.14 An additional assessment of the likely significant effects of the fully consented waste site with the Development has therefore been undertaken and is summarised in Section 2 of this ES Addendum. Its location of the permitted scheme is shown on Figure 2.1A Cumulative Schemes Plan.

Methodology

- 1.15 The following terminology is used throughout the ES Addendum:
- The planning application submitted in February 2020 for which the original ES was prepared: the "Outline Application";
 - The proposals assessed by the ES in February 2020: the "Development";
 - The site proposed to be developed: the "Site";
 - The ES submitted alongside the application in February 2020: the "February 2020 ES"; and
 - This document, which updates the ES: the "ES Addendum".

2. TECHNICAL TOPICS

Transport

- 2.1 Section 1 of Appendix A1 (ADC Regulation 25 Letter) concerns the full information requested by West Sussex County Council (WSCC), as the local Highway Authority, in its response to consultation dated 17 April 2020.

Response

- 2.2 Two Technical Notes (ITB13091-029 Sustainable Accessibility and ITB130091-030 Highway Safety and Network Impact) and a revised Framework Travel Plan (ITB13091-009E) were issued to WSCC on 5th August 2020 by the Project Transport Consultant (i-Transport).
- 2.3 The purpose of the Technical Notes and revised Framework Travel Plan was to respond to the matters raised in the WSCC consultation response and which incorporate associated matters raised in the Network Rail consultation response. Technical Note ITB13091-029 Sustainable Accessibility (accompanied by the revised Travel Plan) focusses on matters relating to the accessibility of the Site by sustainable modes of transport and Technical Note ITB130091-030 Highway Safety and Network Impact focusses on matters relating to the impact of the Development on highway safety and network capacity.
- 2.4 WSCC provided a second response to the application on 12th October 2020, and as part of this response Stage 1 Road Safety Audits (RSA) were requested for all highway schemes/improvements. A total of six RSAs have been prepared, in accordance with the adopted WSCC Road Safety Audit Policy.
- 2.5 The two Technical Notes, Revised Framework Travel Plan and the Road Safety Audits have been provided as Appendices A2 to A5 of the ES Addendum. The documents do not change any of the likely significant effects reported in the February 2020 ES.

Odour

- 2.6 Section 2 of Appendix A1 (ADC Regulation 25 Letter) concerns the information identified in the Environmental Health Officer's response to consultation dated 28th August 2020, which comprise a request for an assessment of the potential cumulative odour impacts from Wicks Farm biogas digester, Besmoke Ltd and the Grundon Waste Management Site.

- 2.7 Appendix A1 (ADC Regulation 25 Letter) also requests the results of further investigation into odour emissions from the waste-water treatment works recommended by Southern Water in its response to consultation dated 30 March 2020.

Response

- 2.8 A Cumulative Odour Impact Assessment has been undertaken by the Project Air Quality Consultant (Hoare Lea) to assess the potential cumulative odour impacts from Wicks Farm biogas digester to the north of the Site, Besmoke Ltd to the west of the Site and the Grundon Waste Management site to the east of the Site (refer to Appendix A6).
- 2.9 Following a review of the available information, the assessment identifies that there is no evidence that there is likely to be a significant odour impact on the proposed residential receptors due to the operations of Besmoke Ltd or Wicks Farm biogas facility.
- 2.10 A combination of operational activities, existing complaints data and conclusions from sniff tests have been used to determine the impacts at the Development from Besmoke Ltd. Using appropriate Air Quality Management guidance, the odour effect at the time and place of sampling was negligible and it is considered that other potential residential receptors, that may be located downwind of Besmoke Ltd would experience negligible odour effects. Furthermore, Besmoke Ltd has been operating for a significant amount of time with limited complaints and none of the complaints to ADC directly mention odour. It is therefore considered that odour impacts from this facility at the Development will be not significant.
- 2.11 The Wicks Farm biogas facility has not yet been constructed and therefore not operational. Reference has been made to the odour assessment (ref J2611/1/F1) undertaken for the planning application (WSCC/026/16/F). Appendix A6 states that when considering the potential low magnitude of the emission source from the facility, the distance from the proposed potential residential units and the frequency of wind in the direction of the Development, the potential for loss of amenity due to odour is considered to be negligible.
- 2.12 With regard to the Grundon's facility, as stated above and set out in Appendix 8.6, there is an extant consent (WSCC/096/13/F) for a thermal waste treatment plant, including a Materials Recycling Facility and Residual Waste Treatment building; the extent to which this consent has been implemented is not known, however it could be built out at any time. In that event, Condition 31 secures the facility must operate under a negative pressure and keep the doors closed when reasonably practicable. Notwithstanding this condition, and more importantly, the existing use of the Circular Technology Plant is subject to an Environmental Permit which

states that “*emissions from the activities shall be free from odour at levels likely to cause pollution outside the site*”.

- 2.13 We maintain our position that as a point of principle it is clearly stated in paragraph 183 of the NPPF 2019 that:

*“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). **Planning decisions should assume that these regimes will operate effectively.**”* [our emphasis]

- 2.14 As set out clearly in paragraph 183 above, given there is an existing Environmental Permit, the planning decision for this application should assume that the permitting regime operates effectively and therefore Grundon’s facility are not emitting odour outside the site. If the council were concerned of a breach, the permit could be enforced against by the Environment Agency under separate legislation.

- 2.15 Therefore, for the Grundon Waste Transfer Station, in the context of the planning consent and Environmental Permit, the odour impacts are considered to be negligible. As such, there are no cumulative odour impacts from Besmoke Ltd, Wicks Farm biogas digester and the Grundon Waste Transfer Station on the Development. The results of the cumulative odour assessment (Appendix A6), do not therefore include any additional likely significant effects from those reported in the February 2020 ES.

- 2.16 Hoare Lea has also submitted a letter of response on 5th November 2020 to the technical Note produced by Atkins on behalf of Southern Water (refer to Appendix A7). The letter provides responses to the key findings raised by Atkins in relation to the Odour Impact Assessment submitted as Appendix 11.1 of the February 2020 ES. The report clarifies that Southern Water were consulted early in the odour assessment process and all emissions inputs were agreed by Southern Water. No response has been received to date from Southern Water.

Noise

- 2.17 Section 3 of Appendix A1 (ADC Regulation 25 Letter) concerns clarification of the matters listed under heading Noise in the Environmental Health Officer’s response to consultation dated 8 July 2020, including details of the effects on HM Prison Ford as an additional noise sensitive receptor.

Response

- 2.18 A note dated 7 September has been prepared by the project noise consultant (Acoustic 24) which sets out a response to the consultation points raised by the EHO in July 2020 (Refer to Appendix A8). This includes consideration (under point 2) of the potential noise impacts of the Development on HM Prison Ford. 24 Acoustics has reviewed the potential impacts at HM Prison Ford and confirm that the impacts are equivalent to those which were assessed at Nelson Row (Receptor E), as set out in paragraph 12.76 of Chapter 12 Noise and Vibration submitted with the February 2020 ES. The residual effect of operational noise from commercial sources on HM Prison Ford is considered to be minor adverse to negligible which is the equivalent effect to the existing sensitive receptor E.
- 2.19 The updated assessment does not therefore change any of the likely significant effects reported in the February 2020 ES.
- 2.20 The Environmental Health Officer responded to the letter in Appendix A8, by email on 9 November 2020, confirming that she has noted and has no further comments in relation to her comments 2, 4, 5, 6, 8 and 9. With regard to comment 3 the Environmental Health Officer confirmed that the matter can be controlled via good management. With regard to the remaining matters in her comment 1 and 7, a further email was received on 19 November 2020, to which the response of 24 Acoustics is set out below:

In terms of dwellings facing Yapton Road and Ford Lane there is no indication of how many dwellings would require the mitigation and to what extent and therefore it is not possible to make an adequate assessment of the likelihood of impact on amenity as it is not known how many of the dwellings will be affected.

Response: See detailed response to comment 7 on letter dated 7th September 2020. As this is an outline application, the detailed site layout has not been finalised and it is not necessary/appropriate to identify exact dwellings to be subject to the identified mitigation measures. This matter could be conditioned on any outline planning consent, to require noise mitigation to be secured alongside/as part of the reserved matters application.

With regard to dwellings to the east of Ford Industrial Estate, the acoustic report states that HD White has daytime operating hours, and that no sites on the estate carry out night-time working. However, it is necessary for Environmental Health to consider not just the class use at present of the industrial estate units, but the worst case scenario for those class uses, should the occupiers change in the future and then the resultant potential impact on dwellings. Insufficient information has been provided for this assessment to be made.

Response: *The current operating hours of the industrial units are restricted to daytime hours only, under the relevant planning consents. Any change in occupancy would be required to operate in line with the operating hours of these consents. It is not considered reasonable or appropriate to assess potential future changes to operating hours, that would need to be secured by planning permission.*

With regard to dwellings to the north of Ford Industrial Estate, Environmental Health remains of the opinion that a rating of +10dB, as it is considered to generate a significant adverse impact, is not acceptable, even with mitigation as described.

Response: *See detailed response to comment 1 on letter dated 7th September 2020. BS 4142: 2014 advises that the assessment of the noise impacts is dependent on the context. Where new residential dwellings are introduced to an area of existing industrial noise, it is generally the case that residents are more tolerant of the noise compared to where a new industrial source is introduced. With windows open, internal noise levels within habitable rooms would be in line with BS 8233: 2014. External noise levels within gardens would also be comfortably below 55 dB LAeq.*

The acoustic report states that it is 'anticipated' that noise levels within gardens would be in the order of 50-55dB but this is not certain and therefore it is considered that insufficient information has been provided to allow this assessment to be made.

Response: *Indicative calculations have been undertaken to predict noise levels within gardens, accounting for distance losses and acoustic screening from the new dwellings. Calculations confirm that noise levels within the closest gardens to the roads would be in the order of 50 to 55 dB LAeq, 16 hour.*

- 2.21 The relevant email correspondence between Acoustic 24 and the ADC's Environmental Health Officer is included as Appendix A.9.

Waste Management

- 2.22 Section 4 of Appendix A1 (ADC Regulation 25 Letter) concerns the information requested by WSCC, in its response to consultation dated 25 June 2020. Section 4 states that the February 2020 ES has failed to fully consider the potential impact on, and of, current and future (permitted) waste management sites, particularly the adjacent Circular Technology Park site operated by Grundon which has permission for a substantially larger facility than currently exists. The assessment should consider the potential impact of the approved use of this strategic waste site and other waste sites in the vicinity of the Development to ensure that

suitable mitigation is included before the Development is completed. The assessment should consider impacts such as HGV movements, visual, noise, odour, dust and air quality, with reference to assessments carried out as part of relevant applications for the waste management sites and updated where appropriate to take account of changes in baseline conditions and proximity to sensitive receptors proposed.

- 2.23 Appropriate buffers and mitigation should be built into the Development (informed by a thorough assessment of potential interactions with neighbouring waste uses), with suitable separation distance provided between sensitive uses and the waste sites, to ensure that the Development would be both compatible with existing waste uses and not prejudice their ongoing operations. All mitigation relied upon should be clearly detailed and easily identified on the proposed masterplan.

Response

- 2.24 In terms of the Circular Waste Technology Park (Grundon Waste Management site), there is an extant consent (WSCC/096/13/F) for a thermal waste treatment plant, including a Materials Recycling Facility and Residual Waste Treatment building; the extent to which this consent has been implemented is not known, however it could be built out at any time.
- 2.25 Additional assessments have been undertaken of the remaining part of the 2015 planning consent (WSCC/096/13/F) which to date has not been built, to establish the potential cumulative effects arising from the scheme. The additional cumulative scheme is shown on Figure 2.1A (Scheme Q). The permitted scheme includes buildings up to 22m in height and a dual stack up to 50m in height located in to south of the site.
- 2.26 An additional cumulative assessment has been prepared by the Project Air Quality Consultant (Hoare Lea) (refer to Appendix A10). The results of the assessment show that taking account of the fully consented Grundon Waste Management site, the annual mean Nitrogen Dioxide and particulate Matter concentrations will be well below the objectives and therefore there will be no significant cumulative impact on the proposed receptors.
- 2.27 An additional cumulative assessment has been prepared by the Project Landscape Consultant (LDA Design) (refer to Appendix A11). The assessment considers that there would be an additional cumulative effect with the delivery of the Development and the fully implemented Grundon Waste Management site. Greater effects than for the Development alone would arise on the following receptors if the Development and the Waste Management site were developed.

- Wide areas of LCA: 29 North of Yapton Coastal Plain;
- Intermediate areas of LCA: 31 Climping South Coastal Plain;
- Intermediate areas of public rights of way and local roads of Ford;
- Intermediate areas of public rights of way and local roads north of Yapton;
- Medium scale effects to National Cycle Route 2;
- Medium scale effects to West Coast Railway; and
- Medium scale effects to A259.

2.28 As stated in Appendix A.11, the greater effects would be created as a consequence of the build out of the fully implemented Waste Management site (Scheme Q), rather than from the Development.

2.29 The additional Noise cumulative assessment has been prepared by the Project Noise Consultant (24 Acoustics) and is included in Appendix A12. The assessment demonstrates that the noise impact from the consented Grundon Waste Management Site (WSCC/096/13/F) upon residential and non-residential elements of the Ford Airfield Development would be acceptable. This would be on the basis of inclusion of the following mitigation measures as outlined in the technical memo note prepared by 24 Acoustics (refer to Appendix A.12)::

- Gardens located to not face the industrial sources, i.e. acoustically screened by the dwellings; and
- Orientation of dwellings so that no habitable rooms are directly facing the industrial sources.

2.30 In terms of traffic associated with the 2015 planning consent (WSCC/096/13/F), the cumulative assessment of the February 2020 ES included an assessment of the New Access Road associated with the Grundon Waste Management site (refer to Scheme P in Figure 2.1A (ref: WSCC/027/18)). The traffic associated with the New Access Road (WSCC/027/18) was included in the traffic data assessed and has therefore been accounted for in the February 2020 ES.

2.31 In terms of the potential impact of current waste management sites surrounding the site, the Noise Impact Assessment (Appendix 12.1) of the February 2020 ES, addressed the potential impact of noise from operations from the Ford Airfield Industrial Estate, located to the west of the Site, including from Booth Engineering and HD White. The assessment considered the noise impact at the closest proposed residential receptors to the industrial estate. Mitigation is recommended in the form of a 3m high acoustic barrier/bund along the northern and eastern boundaries of the Site.

- 2.32 Appendix A12 clarifies that noise from Ford Airfield Industrial Estate has been assessed based on noise measurements undertaken at the boundary of the Site. This is considered a robust approach and is reasonable for an outline application. It is recommended that the 3m barrier/bund proposed for the northern and eastern boundaries of Ford Airfield Industrial Estate is extended along the southern boundary (as shown in blue in Figure 1 of Appendix A12). Using the noise levels measured on the Site boundary, the acoustic screening from the barrier will ensure that noise levels in the grounds of the proposed primary school external to the school building are no greater than 50 dB LAeq, 30 min. This will allow acceptable internal noise levels to be achieved in classrooms, with windows open, to meet the requirements of BB93. In addition, noise levels from operations on Ford Industrial Estate will result in noise levels less than 50 dB LAeq at the existing and proposed sports facilities and this is considered acceptable in planning terms.

Ecology

- 2.33 Section 5 of Appendix A1 (ADC Regulation 25 Letter) concerns information requested by the Council's Ecology Advisor in their response to consultation dated 19 March 2020. There are habitats adjacent to the Site that are used by Bewick swans who are protected as part of the Arun Valley SPA. Further information is requested as part of the mitigation strategy to restrict human and dog access and to screen movement on the adjacent public footpaths.

Response

- 2.34 A Shadow Habitat Regulations Assessment (HRA) was submitted as Appendix 9.7 of the February 2020 ES, which details the Appropriate Assessment process and a discussion of the findings relating to mitigation, under Section 5 of the document. An updated assessment has subsequently been prepared which includes further information on the mitigation strategy in relation to Bewick Swans, including through increasing public awareness and undertaking Monitoring Surveys. More detailed mitigation specifications will be provided in a detailed mitigation strategy document to be submitted as part of the reserved matters application. This will include detailed fencing and planting specifications, design and location of interpretation boards and information leaflets and detailed timescales of proposed monitoring surveys.
- 2.35 By including an outline of the proposed mitigation strategy, there is scientific certainty that impact on Bewick's Swan can be mitigated in principle, with the specifics to be determined at reserved matters stage.

- 2.36 The updated Shadow HRA is included as Appendix A13 of this ES Addendum. The updated assessment does not change any of the likely significant effects reported in the February 2020 ES.

3. CONCLUSION

- 3.1 The aim of the ES Addendum is to respond to ADC's request for further information under Regulation 25 of the EIA Regulations. The further information does not alter the assessment of likely significant effects reported in the February 2020 ES. Therefore the conclusions of the February 2020 ES remain valid. The February 2020 ES and this ES Addendum comprise the environmental information on which the planning application should be determined.