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20th January 2021

Southern Water
Southern House
Yeoman Road
Worthing
BN13 3NX

Case Officer: Raymond Cole
Telephone: 01903 737598
Email: raymond.cole@arun.gov.uk

Dear Sir/Madam,

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management Procedure) (England) Order 2015 - Article 5

Application No: F/4/20/OUT
Site Address: Land at Ford Airfield Ford
Description of works: 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. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application may affect the setting of a Listed Building. This application falls within CIL Zone 1 - Zero Rated.

Thank you for your internet representation made on 19th January 2021 which has been recorded as an objection with the comments as follows:

OWPC33066

Southern Water (SW) owns and operates Ford WTW, adjacent to the proposed development area. Paragraph 2.16 of the Environmental Statement Addendum (ESA), states that no response has been received from SW. We confirm that on 27/11/2020 we sent a further response to Hoare Lea's letter of 5/11/2020. Their response on 2/12/2020 stated "We will review the document and discuss with our project team and will be in touch in due course regarding how we propose to progress."

No further responses have been received. As such, we regard issues raised in previous reviews as remaining largely unresolved and potentially significant.

Atkins' review identified several points of contention and the odour assessment deviates from what SW would consider an appropriate assessment. A robust and conservative assessment is considered essential on the basis that on-site odour emissions were estimated and not measured.

Although not exhaustive, the following are potentially major concerns and are, as of the close of the consultation period, unresolved.

1. Source Emissions - Odour Control Units (OCU) The assessment understates odour emissions. Modelled emissions were between 10-25% of typical emission concentrations from single stage OCU units.
2. Source Emissions - Area Sources The assessment understates odour emissions. Modelled emissions from the largest odour emitting area source, the Activated Sludge Plant, are not considered to be conservative. The selected emission rates are classified as 'Low' when compared to the commonly adopted UKWIR wastewater odour emission rates. Actual emissions may reasonably be twice the modelled value in line with 'typical' emissions defined by the UKWIR research.
3. Source Emission Sizes The dimensions of the modelled emission sources are approximately 10% smaller than actually on the site.
4. Meteorological Data Results of a meteorological sensitivity study has been requested to ensure that the chosen meteorological data is appropriate.
5. Cumulative impacts The cumulative impact of odour from the WTW and surrounding industrial uses has been discounted within the ESA. We feel it is optimistic to assume that any environmentally permitted facility will be completely odour free and would encourage the Council to take a pragmatic view regarding the potential for cumulative impacts.
6. Future WTW expansion Arun Local Plan (2011-2031) Policy H SP2c SD8 at Ford states that development proposals must "not prejudice the operation of or the expansion of the treatment plant as required to accommodate future growth in the District."

We have found no evidence that any consideration or allowance has been given to the potential future operation of the works.

As a result of growth allocated in the Local Plan, Ford WTW will receive a higher loading of wastewater flows which may generate additional odour. An email to the Council from the Environmental Health Officer (28/8/2020) states 'any further developments at the existing WWTW could not occur if this means there is an increase to the odour loading-Allowing the houses as part of this development so close will curtail and restrict any expansion of the WWTW' SW shares this concern and is keen to ensure that current proposals are required to address the above mentioned policy criterion of the Local Plan.

Each of the above is likely to result in an increase in the size or shape of the odour contours used to inform layout. We recommend a site survey and revised odour assessment are conducted prior to any decision on the application, using the more conservative assessment parameters recommended by SW. This will help to ensure a sound and sensible approach is taken to safeguarding Ford WTW's ability to continue to accommodate future growth in Arun district.

Your views as made above will be considered before the application is determined.

Please be aware that Planning Services operate an 'open file' policy and will publish your comments including your name and address on the website. Please make sure that you have only provided information that you are happy will be published in this way. If you have supplied information belonging to a third party, you must make sure you have their permission to do so. If you do not wish your comments to appear on the website or on the file you will need to confirm this by emailing to planning@arun.gov.uk and I will arrange for it to be destroyed although this means that the content will then be disregarded.

The majority of applications are determined under delegated powers by officers. Further information on the decision making process can be found on the website at [:https://www.arun.gov.uk/planning-decision-process](https://www.arun.gov.uk/planning-decision-process).

Some applications will be determined by the Development Control Committee, and I shall write and inform you of the date of the meeting and the procedures for public speaking if this is the case. However, if your representation has been received after the agenda for the meeting has been finalised and the notifications have been generated, you will not receive notification. In this case, you will need to track the progress of the application on the council's website <https://www.arun.gov.uk/weekly-lists>

Any comments that are received after the agenda has been finalised will be separately reported to the

members of the Development Control Committee.

Regardless of how the application is determined I will notify you of the decision.

Yours sincerely



Neil Crowther
Group Head of Planning

For details of how the Council will deal with your data please refer to our privacy notices on the website
www.arun.gov.uk/planning-privacy-statements

If you have provided an email address, all correspondence including the decision notice will be sent by email. It is therefore important that you keep us informed if this changes during the course of this application.