

From: Amanda Scholes on behalf of Planning.Responses
Sent: 20 January 2021 10:41
To: Planning Scanning
Subject: FW: F/4/20/OUT Land at Ford Airfield
Attachments: Viridor Reg 25.pdf

Amanda Scholes | Receptionist, Department, [Arun District Council](#) | Location: Ground Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Save the environment - think before you print.

From: Raymond Cole <Raymond.Cole@arun.gov.uk>
Sent: 19 January 2021 16:01
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: F/4/20/OUT Land at Ford Airfield

Please could you upload this e-mail and attachment to the application folder F/4/20/OUT as a further representation letter objecting to the proposed development?

Thank you

Raymond Cole
Principal Planning Officer
Directorate of Place

T: 01903 737598
E: raymond.cole@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Ian John <[REDACTED]>
Sent: 19 January 2021 15:21
To: Raymond Cole <Raymond.Cole@arun.gov.uk>
Cc: Claire Potts <Claire.Potts@arun.gov.uk>; Strategic <Strategic@arun.gov.uk>
Subject: F/4/20/OUT Land at Ford Airfield

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017(AS AMENDED)

Application No: F/4/20/OUT
Registered: 25th February 2020
Site Address: Land at Ford Airfield Ford
Grid Reference: 499204 102967
Category: Plan App with EIA
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.

Please find attached a further representation in respect of the application detailed above and the most recent consultation exercise.

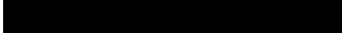
Regards
Ian

Ian John Director of Planning, Permitting & Estates



Viridor House, Priory Bridge Road, Taunton, Somerset, TA1 1AP
www.viridor.co.uk

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Viridor House
Youngman Place
Priory Bridge Road



Viridor House, Priory Bridge Rd, Taunton TA1 1AP



Date: 19 January 2021

Mr Raymond Cole
Arun District Council
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

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 and the recent Regulation 25 submission, and my letters of the 12th June and 27th March 2020 concerning this application. Since my previous representations, Ford Energy from Waste Limited has submitted a detailed planning application for the redevelopment of the Ford Strategic Waste Site.

I should be grateful if you would take account of the additional representation below.

Cumulative Schemes

The Cumulative Schemes Plan referenced 01G excludes:

1. The application submitted by Ford Energy from Waste Limited for the development of the Ford Strategic Waste Site for a Waste Sorting and Treatment Facility (WSTF) and Energy Recovery Facility (ERF)

2. The Potential Commercial and Employment land allocated on the far eastern edge of the most recent consultation version of the Ford Masterplan.

Both theses schemes should feature on the Cumulative Schemes Plan and should both form part of the Cumulative Impact Assessment. Without their inclusion the Cumulative Impact Assessment is deficient.

Noise

The additional noise assessment provided by 24Acoustics does not assess the compatibility with the development proposed in the Ford Energy from Waste Limited application.

The noise mitigation relied on by the applicants and detailed in the ES Addendum looks completely unrealistic. The mitigation proposed includes:

- Gardens not to face industrial properties
- No habitable rooms of residential properties to face industrial sources

The applicant should be asked to provide more detail on how the residential properties can be configured to ensure no habitable rooms face any of the industrial sources in the vicinity of the site.

It is imperative that if permission is forthcoming that planning conditions requiring the detail of the noise mitigation scheme to be approved and implemented before any properties are occupied. The conditions should also ensure that all the mitigation measures are maintained long into the future.

Air Quality and Permitting Assumptions

Environmental Statement Addendum

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.

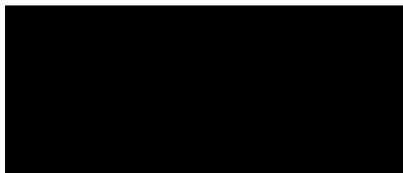
It is difficult to understand why the applicant in para 2.14 of the Environmental Statement Addendum continues to assume that there will be no emissions from a site where the activity has the benefit of an Environmental Permit. This is especially surprising given the content of the reports provided by the applicant's air quality advisors, Hoare Lea. Modern Permits have conditions that require emission levels to be of a level that do not '*cause pollution outside of the site*'. The monitoring point for compliance with these conditions are the nearest sensitive properties. This does not mean or require that there will be no emissions at the site boundary and the fact that there are emissions does not automatically mean that they are polluting ones.

Clearly moving sensitive properties closer to a Permitted activity than is currently the case (as proposed by the applicant), runs the very real risk that those properties could be affected by emissions from that site, even though those emissions currently cause no concern. To expect Permit requirements to apply to new sensitive properties that are in closer proximity than existing

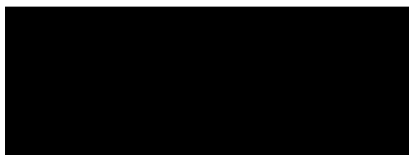
sensitive properties is an ill-founded approach and ignores the Agent of Change principle set out in paragraph 182 of the NPPF.

I should be grateful if you would confirm receipt of this response and keep me informed of any developments related to this application.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Ian John
Director of Planning, Permitting & Estates

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