

**From:** Amanda Scholes on behalf of Planning.Responses  
**Sent:** 20 January 2021 11:08  
**To:** Planning Scanning  
**Subject:** FW: Planning Appl ref. F/4/20/OUT: Representation letter  
**Attachments:** Grundon Representation Lttre to ADC (The Landings F-4-20-OUT) Jan 2021.pdf

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

Internal: 37736 | External: +44 (0) 1903 737500 ext 37736 | E-mail: [amanda.scholes@arun.gov.uk](mailto:amanda.scholes@arun.gov.uk)



Visit Arun's web site at [Error! Hyperlink reference not valid.](#)



Save the environment - think before you print.

---

**From:** Raymond Cole <[Raymond.Cole@arun.gov.uk](mailto:Raymond.Cole@arun.gov.uk)>  
**Sent:** 19 January 2021 17:46  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Subject:** FW: Planning Appl ref. F/4/20/OUT: Representation letter

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](mailto:raymond.cole@arun.gov.uk)

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)



---

Sign up to our newsletter [here](#)



---

**From:** Veronique Bensadou <[REDACTED]>  
**Sent:** 19 January 2021 17:12  
**To:** Raymond Cole <[Raymond.Cole@arun.gov.uk](mailto:Raymond.Cole@arun.gov.uk)>; Planning <[Planning@arun.gov.uk](mailto:Planning@arun.gov.uk)>  
**Subject:** Planning Appl ref. F/4/20/OUT: Representation letter

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

Please see the attached representation in relation to the above planning application and recent submission of further information submitted following Arun District Council's request under Regulation 25 of the EIA Regulations.

I would be grateful if you could confirm receipt by return.

Kind regards,  
Veronique Bensadou

---

Veronique Bensadou  
**Head of Estates**

Grundon Waste Management Ltd  
Grange Lane, Beenham, Berkshire, RG7 5PY

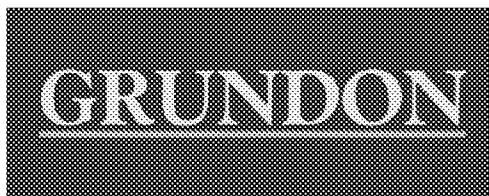


Visit us at [www.grundon.com](http://www.grundon.com)

Find us on: [Twitter](#) / [Facebook](#) / [LinkedIn](#) / [YouTube](#)



Please only print this email if absolutely necessary. Reduce, Reuse, Recycle



www.grundon.com

## ESTATES OFFICE

**Sent by Email**

**Mr. Raymond Cole**

Planning Department  
Arun Civic Centre  
Maltravers Road  
Littlehampton  
BN17 5LF

Email: [planning@arun.gov.uk](mailto:planning@arun.gov.uk)  
[raymond.cole@arun.gov.uk](mailto:raymond.cole@arun.gov.uk)

19<sup>th</sup> January 2021

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

We refer to the above planning application by Redrow Homes Southern Counties and Wates Developments (the Applicant) and the recent submission of further information submitted following Arun District Council's request under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

GRUNDON WASTE MANAGEMENT LTD  
Grange Lane, Beenham, Berks. RG7 5PY

Further to our previous representations to these proposals, we have reviewed the revised scheme and updated assessments.

Whilst we cautiously welcome the inclusion, in the revised Masterplan, of a slightly increased buffer area, between the Ford Circular Technology Park (Ford CTP) and the proposed closest residential properties (to the west of the Ford CTP site), we note that the proposed residential areas are still in very close proximity (some 130m at their closest point) to the Ford CTP site.

As mentioned in our previous representations to this scheme, we reiterate that the Ford CTP site is a Strategic Waste Allocated site ('Site north of Wastewater Treatment Works, Ford') under Policy W10 of the adopted West Sussex Waste Local Plan, and, as such, 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 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. In addition to this, as Strategic Allocated Waste site, there needs to a certain degree of allowance and flexibility in the current and permitted waste operations in order to ensure that the site can fulfil its strategic role, as intended by the Waste Local Plan.

It is considered that the revised scheme continues to fail to adequately consider this, and these proposals for residential areas in such close proximity to the Ford CTP site will most inevitably prejudice the current and future operations at the site.

We note that the current scheme only utilizes part of the Ford Strategic Allocation, as identified in the adopted Arun Local Plan, yet seeks to deliver the full 1,500 dwellings provision identified for the site. The Masterplan Document for this site allocation, received by Arun District Council, and which was the subject of a recent public consultation, clearly shows areas within the allocation that are not covered by planning applications, and seemingly set aside for further employment/ commercial uses. As a result, the current scheme densities inevitably require locating residential properties unacceptably close to the surrounding safeguarded facilities. By utilising the full extent of the land allocation, and siting less sensitive uses in these areas of the Ford Strategic Allocation closest to the Strategic Waste Allocated site and surrounding safeguarded facilities, then more suitable buffers could be provided.

As such, we suggest that uses that are less sensitive to noise should be placed between the Ford CTP site boundaries and the nearest dwellings to provide screening of Ford CTP site activity noise levels to the proposed dwellings at The Landings.

We have some concerns and reservations specifically with regard to the updated noise information provided by the Applicant as part of the Regulation 25 submission. The noise impact assessment that was initially submitted to inform The Landings application did not consider the potential impact of the consented development at the Ford CTP site (under West Sussex County Council consent ref. WSCC/096/13/F). A memorandum report has now been issued (prepared by 24 Acoustics, dated 24 November 2020, reference 6930-5 Rev 3 Ford Airfield) to assess the potential impact of the consented Ford CTP scheme on the latest masterplan for The Landings.

The assessment of the consented scheme at the Ford CTP site is included under the sub-heading '*New Circular Technology Park*' in the memorandum report. The pertinent points are as follows:

GRUNDON WASTE MANAGEMENT LTD  
Grange Lane, Beenham, Berks, RG7 5PY

The operational noise contours that were submitted with application WSCC/096/13/F (Ford CTP waste treatment facility) have been used to determine the daytime and night-time noise levels at the nearest proposed residential properties. The following rating noise levels have been derived:

- Daytime (07:00-23:00) and night-time = 35 to 39 dB  $L_{Ar,Tr}$
- It should be noted that the rating levels do not include any penalties for tonality, impulsivity or intermittency, to the methodology of BS 4142:2014+A1:2019.
- The noise contours produced for the WSCC/096/13/F noise impact assessment were based on the methodology of BS 4142:1997, which did not require on-site activity noise including heavy goods vehicle (HGV) movements to be considered. Therefore, the rating noise levels derived (35 to 39 dB  $L_{Ar,Tr}$ ) only consider noise emissions from fixed plant installations and noise breakout from the waste management buildings, and do not consider on-site HGV movements.
- 10 dB attenuation of noise levels has been assumed by the application of the following mitigation measures:
  - 'Gardens located to not face the industrial sources, i.e. acoustically screened by the dwellings;
  - Orientation of dwellings so that no habitable rooms are directly facing the industrial sources'
- The daytime and night-time background noise levels measured by 24 Acoustics in July 2018 (detailed for measurement location 8 in technical report R6930-3 Rev 2) have been used for assessment of the rating levels.
- In Table 4 of R6930-3 Rev 2, the typical daytime background noise level is reported as 34 dB  $L_{A90,5minute}$ . The typical background noise level used for assessment in Table 11 of R6930-3 Rev 2 is 35 dB  $L_{A90,1hour}$ . Both the noise levels and time intervals are different. The latest memorandum report uses a background noise level of 34 dB  $L_{A90,1hour}$ . It is not clear how these levels have been derived from the background noise level data and which is the correct level to assess against.
- The night-time background noise level of 27 dB  $L_{A90,15min}$  is consistent between both assessments.
- The assessments conclude that with the recommended mitigation measures, i.e. no habitable rooms facing the Grundon site, *"the difference between the BS 4142 rating noise level and the prevailing typical background noise level will be in the region of -5 dB for daytime periods and +2 dB for night-time periods. Under BS 4142 this is considered a low noise impact given the context of the site, and this is therefore considered acceptable"*.

The layout of the proposed dwellings at The Landings is not likely to provide the 10 dB attenuation assumed by 24 Acoustics. It is not likely to be practical to have no windows to habitable rooms facing the Ford CTP site or industrial noise sources. To design a development that would consistently achieve a 10 dB level difference between front and rear façades is unlikely to be possible in this setting. This level of attenuation would likely require continuous rows of terraced housing with no habitable rooms facing the Ford CTP site. We would therefore suggest that the Local Authority conditions this requirement as it is key to achieving reasonable amenity for future residents.

We request that the Applicant for The Landings submits a detailed site layout and scheme of sound insulation, prior to any works on site, to demonstrate how impacts and the likelihood for complaints can be reduced to a minimum for future residents. This

should also demonstrate how the layout has achieved the 10dB attenuation through layout with no habitable rooms facing surrounding industrial noise sources.

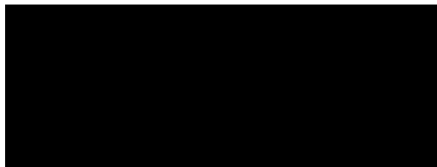
The introduction of The Landings development is also likely to change the future baseline noise levels, due to the dwellings providing screening from the surrounding road network. Therefore, the difference between the future baseline noise levels and the site activity noise may increase and the likelihood for complaints may be greater.

We are still, 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 between residential areas and the Ford CTP Safeguarded waste site. The proposed residential dwellings should be placed at greater distance from the Ford CTP site, to reduce the likelihood for complaints from future residents and to not prejudice existing and future operational activity at the site.

As such, and in view of the above, we maintain our objection to this development in its current form.

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  
**Head of Estates**