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23885/A3/JS

9 February 2021

BY EMAIL: Raymond.cole@arun.gov.uk

Dear Raymond,

RE: FORD AIRFIELD OUTLINE APPLICATION F/4/20/OUT

On behalf of our clients, Redrow Homes and Wates Developments, I am pleased to provide further information in respect of the application for residential development at Ford Airfield.

Together with this covering letter, please find attached the following:

- Updated Waste Infrastructure Statement
- Drainage Technical Note

Waste Infrastructure Statement

As per our meeting with yourself and Environmental Health on 15 December 2020 and following a meeting with WSCC Waste and Minerals department on 6 January 2021, the Waste Infrastructure Statement has been updated to include the following:

- Summary of the baseline assessments undertaken, highlighting where the relevant detailed technical work can be found in accompanying reports.
- Confirmation that all existing operations and extant schemes have been assessed, including a summary of the assessments which conclude that the proposed development would not prejudice the operation of any existing or extant scheme.
- Summary of assessments made for the relationship of non-residential uses and safeguarded sites, confirming their suitability in the locations shown on the parameter plans.
- Section 4 summarises the proposed noise mitigation strategy for the site, demonstrating that the parameter plans include suitable buffers to nearby industrial noise sources and safeguarded sites. This also sets out the design/layout-led noise mitigation proposed within the relevant residential and non-residential parcels on the parameter plans, including

illustrative plans and sections to demonstrate how the noise mitigation can be achieved in these areas.

- Draft condition wording to secure detailed noise assessment at reserved matters stage to inform the layout of relevant residential parcels, in broad accordance with the mitigation measures contained in Section 4.

Through the above updates to the Waste Infrastructure Statement, it is demonstrated that the proposal and proposed parameter plans have taken due consideration of neighbouring safeguarded waste sites and would not prejudice their operation in the future.

Drainage Technical Note

In addition to the above, please find attached a Drainage Technical Note which provides greater detail to enable definitive conditions to be agreed on the outline application, avoiding ambiguity within the detailed reserved matters phases. The report includes:

- Comprehensive winter soakaway testing and groundwater monitoring
- Survey of off site sewers which discharge surface runoff from the runway to the River Arun
- A detailed assessment of existing catchment areas, points of discharge and historic culverts which may have crossed the site
- Drainage solution optioneering, and detailed designs and calculations.

Regulation 25 consultation responses

Finally, we have undertaken a review of the Regulation 25 consultation responses, and in addition to that set out above, provide the following comments:

- In relation to ecology and landscape, the assessments submitted confirm that the outline proposal can achieve policy compliance. Detailed strategies are not a matter for consideration at outline stage and can be secured by condition and through the reserved matters.
- In response to Sport England, the detailed layout of sports pitches is a matter for consideration at reserved matters stage. It is confirmed that there is sufficient space within the area marked on the parameter plans for the sports pitches to be provided.
- In relation to the comments received from the Bridleways Group, the Masterplan Document has been updated to include a potential east-west equestrian link that connects Yapton to the River Arun. This could be brought forward in the event the council identify a wider equestrian strategy. However, in relation to this outline application, a wider strategy has not yet been identified. Therefore, an equestrian link through the site does not connect to any current or intended equestrian route, and therefore at present has not been demonstrated by the council to be necessary to permit the development or reasonable to condition on any outline consent (paragraph 55 of the NPPF 2019).

With regard to the comments received from Grundons, these primarily relate to the noise assessments submitted with their extant consent. We provide the following response:

- In assessing the proposed residential development against WSCC/096/13/F, it is reasonable to assume the noise assessments pursuant to that consent are robust. Further, the extant consent must be implemented in accordance with the details submitted, including all conditions. In this regard, WSCC/096/13/F includes the following conditions that secure noise emission from the site:
 - o Condition 23: secures a noise management plan, which has been approved and includes consideration of HGV movements and requires silencing measures.
 - o Condition 28: secures the rating of noise from the site to no greater than 35dBA at the nearest residential properties.

- Condition 29: requires a noise survey of the gasification plant to confirm that it meets condition 28, and if it does not, requires the operations to stop and a mitigation scheme be approved.
 - Condition 30: secures all plant, equipment, machinery and **vehicles** to be fitted and operated **at all times with silencing measures** to a standard not less than up to date manufacturers UK specification.
- In the event the extant scheme is implemented in full, the above conditions would require that the scheme is carried out in accordance with these conditions, which were based on the noise assessment submitted. Any intensification of the site or additional noise generated that does not comply with the above conditions would be subject to enforcement and control through that consent.
- Therefore, it is not the role of this application to re-model the approved scheme under WSCC/096/13/F, and is not necessary or appropriate to include assumptions about non-compliance with conditions, intensified use of the site or additional noise generated that is beyond the scope of the secured permission. Therefore, the approach taken under this application to assess the proposal against the submitted noise contours for the extant consent at Grundons is appropriate and robust.
- Paragraph 3.52 of the Waste Infrastructure Statement clarifies the comment made regarding the method for determining the typical daytime background noise levels; in summary, the background noise levels are robust.
- Through the layout/design measures identified in Section 4 of the Waste Infrastructure Statement, the noise assessment has confirmed that a reduction in noise levels to meet appropriate standards and acceptable living conditions is achievable. The applicants are happy for a condition to be secured on the permission to require noise mitigation reports at reserved matters stage.

Summary

I trust the above is helpful to the council in the determination of the application and addresses the comments raised by the respective consultees.

We would welcome the opportunity to discuss any remaining matters with you at your earliest convenience, to progress the application to a positive determination and support the council in bringing the site forward to deliver much needed homes.

Yours sincerely,



ROBIN SHEPHERD
Senior Planning Partner

Encs.