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ESTATES OFFICE

Sent by Email

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12th March 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).

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Further to our previous objections to these proposals, we have now reviewed the Waste Infrastructure Statement (WIS) dated February 2021.

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 premises in such close proximity to the Ford CTP site will inevitably prejudice the current and future operations at the site.

Paragraph 3.21 of the WIS makes reference to noise contours provided within the Environmental Statement Addendum Appendix A.12 of planning permission ref. WSCC/096/13/F and confirms that the majority of homes would fall within the noise contour of less than 35dB $L_{Ar,Tr}$. Condition 28 of WSCC/096/13/F requires that the noise rating level from the Grundon waste transfer station at the boundary of the nearest sensitive residential premises (not habitable rooms) does not exceed 35dBA at any time. Therefore, their very own assessment demonstrates that Condition 28 of WSCC/096/13/F would not be operable and as a result would prejudice the current waste operations at Ford CTP.

The noise contour plans which the Applicant refers to are taken from a noise assessment which was prepared in support of planning application WSCC/096/13/F. This noise assessment was 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 which would of course result in significantly more residential premises experiencing rating levels in excess of 35dBA at their boundaries.

In addition to this, 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 which again would result in more residential premises experiencing rating levels in excess of 35dBA at their boundaries.

As set out within our previous representations, we continue to have major doubts regarding the suitability and deliverability of the noise mitigation measures relied upon by the Applicant. The Applicant continues to rely upon mitigation measures which could seemingly achieve 10dB attenuation of noise levels although the WIS does not provide any evidence to support these assumptions.

It is worth noting that the indicative illustrations shown on page 30 of the WIS do not show any acoustic mitigation at the boundary with Ford CTP. Elsewhere within The Landings development acoustic barriers and/or acoustic bunds have been proposed

alongside boundaries with other sources of noise however it is unclear why this has been ruled out along the boundary with Ford Circular Technology Park.

Finally, whilst we welcome the proposed condition in Section 4.9 of the WIS, we do not believe it is sufficiently robust and therefore propose the following alternative wording:

Notwithstanding the land use and density parameter plan (RG-M-123K), prior to commencement on site, a detailed noise mitigation scheme shall be submitted to and approved in writing by the LPA to ensure that all noise sensitive properties are protected and that current and future waste activities in the area are not prejudiced. The detailed noise mitigation scheme shall provide details of all noise sources in the area and the proposed mitigation relevant to each noise source. The mitigation measures to be considered by the mitigation scheme will include but shall not be limited to those referred to in Section 4 of the Waste Infrastructure Statement dated February 2021, namely:

- Appropriate buffer zones between noise sources and noise sensitive properties (e.g. residential, care home)*
- Acoustic barriers in the form of acoustic fences and landscaped mounds*
- Orientation of dwellings and gardens so that no habitable rooms are facing Ford Circular Technology Park*

The proposed layout of any noise sensitive properties must demonstrate how 10dB of noise reduction as demonstrated in the memorandum note of 24 Acoustics dated 24 November 2020 (between the noise levels incident at the dwelling façades directly facing Ford Circular Technology Park, and the noise levels at incident at the façades of the habitable windows) will be achieved across the development, to ensure that future occupiers are not impacted by the current and future waste activities at Ford Circular Technology Park.

The scheme shall also include precise details of how any proposed mitigation will be maintained for the duration that any of the noise sensitive properties are occupied.

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

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