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Date: 12 March 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 consultation on the Waste Infrastructure Statement.

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

Representation

Consistent with the requirements of Arun DC's Regulation 25 request, the Waste Infrastructure Statement produced by the applicant overlooks the fact that a very significant planning application has been submitted on adjoining land in the form of Ford EfW's proposal for an Energy Recovery Facility and Waste Sorting and Transfer Facility. The details of this application were in the public domain for a significant amount of time before Arun DC's Regulation 25 request was issued. Whilst there is of course no certainty that Ford EfW's proposals will secure planning permission, they do provide a detailed representation of the type of development that could be built

on the site. It is acknowledged that Ford EfW's scheme is currently being redesigned, however, the characteristics and emissions profile of the revised scheme will remain very similar. As a result it is difficult to see how Arun DC will be able to assess compliance with both its policies and West Sussex's policies that look to protect future waste development on the allocated site. It also effectively means that the Ford EfW proposals are being largely ignored and that doesn't seem the right approach.

Nevertheless, the Waste Infrastructure Statement finally appears to acknowledge that mitigation is required to ensure that the operation of existing and future waste activities in the area around the site are protected. However, the Waste Infrastructure Statement and the planning application both stop short of detailing the precise nature of mitigation required, leaving that to the detail of a reserved matters/conditional submission at a later date.

This leaves a problem for both the masterplan and the parameters plans, as they propose housing in locations which may not be acceptable once the detailed designs have been drawn up.

Whilst we naturally have concerns over this approach (for the reasons highlighted above and in previous representations), if Arun DC consider that this is an acceptable approach, it must ensure that any resulting permission has a condition attached to it that clearly establishes the requirement for detailed noise mitigation measures to be designed into the final scheme. The applicant has proposed this approach and has suggested some wording. In our view the wording of the condition needs considerable further work, as it currently falls short of the requirements for planning conditions.

The following reworded condition should be given further consideration as a replacement for the one proposed:

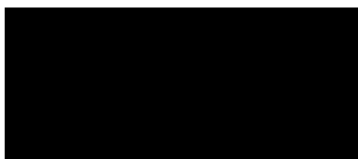
Possible Condition

Notwithstanding the land use and density parameter plan (RG-M-123K), a detailed noise mitigation scheme to ensure that noise sensitive properties are protected and current and future waste activities in the area are not prejudiced shall be submitted for the written approval of the LPA. No properties shall be occupied in relation to any application until the noise mitigation scheme has been approved and implemented in full. The noise mitigation scheme shall provide details of the different noise sources in the area and the proposed mitigation relevant to those sources. The mitigation measures to be considered by the mitigation scheme shall include but shall not be limited to those referred to in Section 4 of the Waste Infrastructure Statement, 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 directly facing noise source*

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

Yours sincerely,



Ian John,
Director of Planning, Permitting & Estates