

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

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

I refer to the above Outline Planning Application by Redrow Homes Southern Counties and Wates Developments (the Applicant) and the recent Regulation 25 submission. I would be grateful if you could take account of the representation below in addition to our previous representations dated 19th January 2021, 11th June 2020 and 27th March 2020.

From our review of the Waste infrastructure Statement submitted in support of the Regulation 25 submission, it is clear that the Applicant continues to ignore Policy W10(d) of the Waste Local Plan (2014) which makes it abundantly clear that the strategic waste allocation at Ford Circular Technology Park must be safeguarded from any development that would prevent or prejudice its development (in whole or part) for allocated waste management uses.

The Waste Infrastructure Statement only considers existing and consented uses at Ford Circular Technology Park despite the submission of planning application ref. WSCC/036/20 for the comprehensive redevelopment of Ford Circular Technology Park. Whilst a decision is yet to be made on planning application ref. WSCC/036/20 it remains a distinct possibility that a development of this very nature *could* secure planning permission within the plan period of both the Waste Local Plan (2014) and Arun Local Plan (2019). This would therefore appear to be short-sighted and potentially very detrimental to the delivery of the aspirations set out within the Waste Local Plan (2014) and Arun Local Plan (2019) as compliance with key policies has not been fully considered.

By way of comparison, planning application ref WSCC/036/20 provides a comprehensive assessment of the potential cumulative effects with other proposed and consented developments including planning application ref. F/4/20/OUT.

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 Applicants. In addition to this, it is considered that the proposed condition offered by the Applicant in Section 4.9 of the Waste Infrastructure Statement is not sufficiently precise. We would therefore suggest the following wording as an alternative:

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.

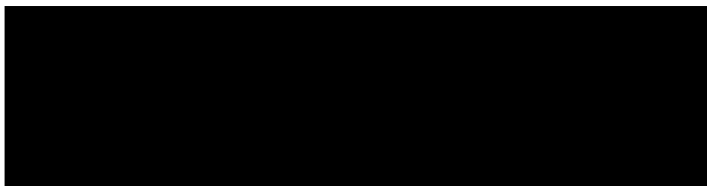
Based on the information provided to date, we have no option but to maintain our objection to the application.

As per our previous representations, we would strongly encourage both Arun District Council and the Applicant to work with all adjoining waste management operators to develop a scheme that works for everyone. We remain willing to attend any meeting with you and the developer to discuss the issues in more detail.

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

I look forward to hearing from you.

Yours sincerely,



Paul McLaughlin MRTPI MCIWM
Project Manager
Ford Energy from Waste Limited