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bartonwillmore.co.uk
7 Soho Square
London
W1D 3QB

Raymond Cole
Principal Planning Officer
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

19th July 2021
Our Reference: 23885/A5/NP

Dear Raymond,

RE: FORD AIRFIELD – STATEMENT OF CONFORMITY

We write on behalf of the Applicants, Redrow Homes Southern Counties and Wates Developments Ltd, with respect to the as yet undetermined outline planning application (reference F/4/20/OUT) for Ford Airfield development ('the Development'), submitted to Arun District Council ('ADC') in February 2020.

This letter sets out further information and proposed minor alterations to the submitted Environmental Statement 'ES' documents and confirms that the conclusions of the ES (February 2020) as updated by the ES Addendum (November 2020) remain valid.

Background

The application comprises:

'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'

The Development falls within Category 10(b) of Schedule 2 of the *Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)*¹ as an urban development project which includes more than 150 dwellings.

¹ The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 SI No.571) (as amended in 2018 by SI No. 695 and in 2020 by SI No.505)



An ES was prepared in accordance with the EIA Regulations to accompany the planning application, which was submitted in February 2020, and which can be accessed here:

https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=F/4/20/OUT

Following submission of the planning application, in accordance with Regulation 25 of the EIA Regulations, ADC requested 'further information' be provided to assess the likely significant effects of the Development. Further environmental information was requested in relation to 5 topic areas: Transport, Odour, Noise, Waste Management and Ecology. In addition, changes were made to the Development through the provision of two playing fields, which increased the distance between the residential properties and the site occupied by Grundons to the immediate east of the site, resulting in updates to the parameter plans submitted as part of the February 2020 ES. In light of this, an Addendum to the ES was submitted to ADC in November 2020, which is also available on the above link.

July 2021 Proposed Amendments to the ES, as updated by the ES Addendum

Further minor amendments are required to the parameters for the Development (Figure 3.1A to Figure 3.3A) of the February 2020 ES, as updated by the November 2020 ES Addendum, following the completion of additional odour assessment (associated with the Waste Water Treatment Works (WWTW) to the east of the Site) and following revisions to the proposed drainage strategy for the Development. The revised parameters are shown on Figure 3.1B to Figure 3.3B provided at Appendix 1. The minor amendments include:

- Re-positioning of attenuation basins in the southern part of Site, including along the frontage of Yapton Road;
- Repositioning the developable parcels in the southern part of Site;
- Minor reduction in the overall developable area on the Site; and
- Minor revision to densities.

Changes to prevailing baseline conditions and cumulative development

The ES and ES Addendum were prepared in 2019 and 2020. The assessment of effects considered a phased demolition and construction period. There have been no material changes to the baseline conditions since the submission of the February 2020 ES, as updated by the November 2020 ES addendum.

Schedule 4 of the EIA Regulations requires consideration of a proposed development cumulatively with other existing and/or approved development. Guidance on the consideration of cumulative effects in the EIA screening process is set out in the PPG, which echoes the requirements of the EIA Regulations:

"each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."

Cumulative development was considered as part of the February 2020 ES and the November 2020 ES Addendum and the Applicants are not aware of any additional approved developments near to the Site that have been approved since the submission of the ES and ES Addendum which could have the potential to result in likely significant effects on the environment in cumulation with the Development.

Validity of Likely Significant Effects

A review of the environmental topics included in the February 2020 ES, as updated by the November 2020 ES Addendum, in support of the outline planning application for the Development

has been undertaken as part of this statement of conformity exercise. The aim has been to establish whether any likely significant effects not identified or identifiable at the time of the planning application's submission could now occur as a consequence of the minor amendments to the parameters for the Development (Appendix 1). The scope of the ES comprised the following topics:

- Population and Human Health;
- Landscape and Visual Effects;
- Archaeology and Built Heritage;
- Biodiversity;
- Transport & Access;
- Air Quality and Odour;
- Noise and Vibration;
- Agricultural Land
- Water Resources and Flood Risk; and
- Ground Conditions.

The February 2020 ES, as updated by the November 2020 ES Addendum, identified that the Development would result in the following residual beneficial effects:

Table 1: Beneficial Effects

Topic	Effect
Population and Human Health	Moderate beneficial effects, from employment generation during construction and operation of the Development and through increase spending from the new population following completion of the Development.
	Moderate beneficial effects as a result of an increase in housing provision and education provision in the area following completion of the Development.
	Minor beneficial effects on primary healthcare, primary education and on wider human health on completion of the Development
Biodiversity	Minor beneficial effects from the provision of new ecological habitats on the Site and opportunities for nature, including bats, birds and amphibians.
Archaeology and Built Heritage	Minor beneficial effects on non-designated heritage assets resulting from a programme of archaeological evaluation trenching followed by mitigation excavation and recording.
Transport & Access	Minor beneficial effects in terms of pedestrian and driver delay (B2233 Yapton Road West of North End Road and Yapton Road North of Oystercatcher junction) following completion of the Development.

The February 2020 ES, as updated by the November 2020 ES Addendum, identified that the Development would result in the following residual adverse effects:

Table 2: Adverse Effects

Topic	Effect
Landscape and Visual	Up to major effects resulting from changes to the landscape and views during the construction and operational phases of the Development.
Biodiversity	Minor adverse effects on brown hare and harvest mouse due to some loss of existing habitats, albeit new habitats would be provided.
Transport & Access	Minor adverse effects on pedestrian and driver delay (Yapton Road North of Oystercatcher junction and Church Lane South of Horsemere Green Lane) during construction and on accidents and safety during the construction and operational phases of the Development.
Noise and Vibration	Some minor adverse effects from traffic and commercial noise during operation.
Agricultural Land	Major adverse effects due to the loss of Grade 2 agricultural land and minor adverse effects due to the loss of subgrade 3a agricultural land.

Topic	Effect
Water Resources and Flood Risk	Minor adverse effects on surface water flooding and the foul water sewage system during construction and on water quality during construction and operation.

The assessment of significant effects in relation to the technical disciplines included in the February 2020 ES, as updated by the November 2020 ES Addendum, are not materially influenced by the minor amendments and therefore the assessments set out in the ES, as updated by the ES Addendum, remain valid.

The amendments to the Parameter Plans (Appendix 1) will affect each of the technical assessments in the following ways:

- **Population and Human Health:** The changes to the parameter plans will not affect the significance of the environmental effects arising from the Development with respect to population and human health. As the overall quantum of residential units remains the same and the quantum of non-residential floorspace remains the same, there is no change the significance of effects and conclusions of the assessment prepared for the February 2020 ES, as updated by the November 2020 ES addendum.
- **Landscape and Visual Effects:** The proposed amendments to the parameters will result in no change to the significance of effects within the ES regarding landscape and visual receptors. The main amendment to the Development in relation to landscape and visual will be pulling back development further north from Yapton Lane to accommodate larger attenuation basins along the frontage of the Site. As vegetation cannot be planted within the proposed attenuation basins, views to the proposed dwellings albeit slightly further from receptors along Yapton Lane, will still be visible above and through roadside vegetation. As such, significance of effects as set out in the February 2020 ES, as amended by the November 2020 ES Addendum, will remain the same.
- **Archaeology and Built Heritage:** The amended parameter plans do not increase the potential effects on below ground non-designated archaeological heritage assets. The revised parameters also do not increase the potential effect on the setting and significance of any designated heritage assets in the vicinity of the Site. Consequently, the assessment of potential impacts on heritage assets as presented in February 2020 ES, as updated by the November 2020 ES addendum, remain valid for the revised development parameters.
- **Biodiversity:** The amendments to the parameters will include the addition of green infrastructure along the frontage of Yapton Road, and therefore additional habitat areas. However this will not have any material implication for the significance of effects as a whole. The minor repositioning of development parcels and change in densities will have no impact on the significance of effects and therefore no change to the conclusions of the Biodiversity ES chapter completed as part of the February 2020 ES, as updated by the November 2020 ES addendum.
- **Transport & Access:** The nature of proposed amendments will not affect the significance of the environmental effects arising from the scheme with respect to transport. As the overall quantum of residential units remains the same and the quantum of non-residential floorspace remains the same, the trip generation remains appropriate. The amendments to the scheme do not materially affect severance, pedestrian and driver delay, fear and intimidation or accidents and safety.
- **Air Quality and Odour:** Overall, the nature of the changes will not affect the significance of the environmental effects arising from the Development with respect to air quality. This is the result of there being no change to the development traffic numbers which would warrant any re-assessment.

In terms of odour, additional odour modelling assessment work has been undertaken in order to understand the impact of odour emissions on the Development associated with the WWTW to the east of the Site. A set back of 3 European Odour Units (oue)/m³ contour distance from the WWTW has been agreed separately with ADC as reflected in the updated parameter plans.

As no residential units will be located within the 3 oue/m³ contour, the impacts at receptors located outside of the contour remain as per the previous assessment and there is no change to the conclusions of the ES Chapter completed for the February 2020 ES.

- **Noise and Vibration:** Repositioning of the developable parcels in the southern part of Site, will result in a minor change to noise levels in this area of the Development, adjacent to the recycling facility (operated by Viridor). This is addressed in an updated Noise Impact Assessment provided separately, however there is no bearing on the significance of effects outlined in the Noise and Vibration ES chapter. Furthermore, the amendments do not change to the development traffic numbers which would warrant any re-assessment. Overall, the conclusions of the Noise and Vibration ES chapter of the February 2020 ES, as updated by the November 2020 ES Addendum, remain the same.
- **Water Resources and Flood Risk:** In terms of the proposed drainage strategy for the Development, the February 2020 ES chapter advised that pumping stations would be necessary and that shallow infiltration drainage would be investigated further. Following further site investigation, the strategy is now to serve the north of the site by infiltration and use gravity underdrained swales in the south of the Site with no surface water pumping. This is reflected in the updated parameter plans and includes the re-positioning of attenuation basins in the southern part of Site, including along the frontage of Yapton Road. The amended Drainage Strategy (which is being submitted separately to ADC) does not impact on the significance of effects or conclusions with respect to Water Resources and flood risk, which remain as per the 2020 February ES, as amended by the November 2020 ES Addendum.
- **Agricultural Land and Ground Conditions:** Given the nature of the amendments to the parameters for the Development, these will not have any bearing on the significance of the environmental effects and conclusions of the assessments for agricultural land and ground conditions.

Conclusion

The potential for significant effects relating to proposed minor amendments to the parameters for the Development have been considered. The conclusion of further works is that no likely significant effects, that were not identified or identifiable at the time of the preparation of the February 2020 ES, as updated by the November 2020 ES Addendum, have been identified.

As also set out within this letter, there have been no material changes to the baseline environment and no additional cumulative development have been identified.

It is therefore considered that the conclusions of the February 2020 ES, as updated by the November 2020 ES Addendum, remain valid and that the information provided with this statement of conformity comprises non-substantive clarification.

Yours sincerely,

NEIL PURVIS

Associate Environmental Planner

APPENDIX 1 UPDATED PARAMETER PLANS



Site Boundary

Area within which Residential Development is permitted - 1,500 dwellings maximum, typically 2-2½ storey - 3 storey maximum:

Lower Density: 20-35 dph

Medium Density: 27.5-42.5 dph

Higher Density: 35-50 dph

Area within which Employment is Permitted
- Building Height: up to 15m high

Access to Employment

Zone within which Primary School and Nursery must be located - up to 3 storey

Zone within which Local Centre must be located.
- Up to 4 Storey. Including Residential, Retail, Commercial, Leisure and Community Floorspace.

Green & Blue Infrastructure including Open Space, Buffer Planting and SuDS

Existing Sports Arena / Flying Fortress

Project
FORD AIRFIELD

Drawing Title
LAND USE & DENSITY
PARAMETER PLAN

Date	Scale	Drawn by	Check by
14.08.19	1:5,000@A1	SM	SG
Project No	Drawing No	Revision	
23885	RG-M-123	L	



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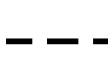
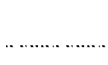
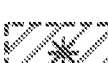
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-  Site Boundary
-  Primary Vehicular Access Points
-  Corridor within which the Spine Road will be Delivered
-  Access to Employment
-  Existing and Proposed Non Vehicular Access Points
-  Retained Existing Public Footpath
-  Area within which Built Development is Permitted, also to Include Incidental Open Space, Drainage and Infrastructure
-  Green & Blue Infrastructure including Open Space, Buffer Planting SuDS and Private Sports Facilities at Arun Sports and Flying Fortress'
-  Existing Sports Arena / Flying Fortress

Project
FORD AIRFIELD

Drawing Title
ACCESS & MOVEMENT
PARAMETER PLAN

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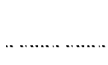
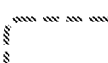
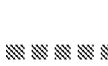
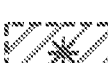
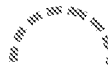
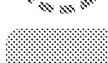
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-  Site Boundary
-  Open Space including SuDS, Allotments and Formal Sports
- Net Open Space provision to be minimum 14.85Ha
-  Buffer Planting (Excluded from Open Space Calculation)
-  FS Formal Sport Provision (Included in Open Space Calculation)
-  Area within which Attenuation is Permitted (The Net Area of Drainage is not included in the Open Space Calculation)
-  Retained Existing Public Footpath
-  Area within which a Neighbourhood Green is Permitted - Minimum 0.2Ha
-  Alignment of the Arundel to Chichester Canal to be reflected in the Development Layout
-  Existing Sports Arena / Flying Fortress
-  Green Gateway to the Development
-  Area within which Built Development is Permitted, also to Include Incidental Open Space, Drainage and Infrastructure

Project
FORD AIRFIELD

Drawing Title
GREEN & BLUE INFRASTRUCTURE
PARAMETER PLAN

Date	Scale	Drawn by	Check by
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23885	RG-M-121	N	



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