

Arun District Council
First Floor,
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

23885/A5/LA/RS

Date: 27 May 2020

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

Dear Raymond,

RE: APPLICATIONS FOR PLANNING PERMISSION AT FORD AIRFIELD (REF: F/4/20/OUT & F/5/20/PL)

I refer to the above applications validated on 25 February 2020. The statutory period for consultees to respond the applications has now expired.

From an analysis of the consultee responses, on behalf of the applicants, Wates Development Limited and Redrow Homes, we have made the following comments as set out below. Any suggested conditions have been reviewed, in regard to the 6 tests in paragraph 55 of the National Planning Policy Framework (NPPF).

RESPONSE TO CONSULTEE COMMENTS – MARKET APPLICATION

- **Environmental Health**

Comments dated 2 March 2020 raise the following three questions which we provide our response to below:

- 1) Please may the applicant confirm whether there is to be any lighting installed?

Response: Yes, further details can be provided through an appropriately worded condition.



FS 29637

Registered in England
Number: OC342692

Barton Willmore LLP
Registered Office:
The Blade
Abbey Square
Reading
RG1 3BE
F/ +44 (0)118 943 0001

- 2) Please may the applicant confirm whether there will be any provision for the charging of electric vehicles?

Response: Firstly, we would like to clarify whether the provision of charging of electric vehicles is in relation to the Market application or Masterplan application. This response was submitted in relation to the Market application.

If this question is related to the Masterplan application our response is yes, details are likely to consist of electrical charging points being provided on a mixture of individual properties and on certain streets. As this application is outline, we suggest an appropriately worded condition is imposed for this, requiring details to be provided on a phase by phase basis.

- 3) Please may the applicant confirm whether there are any proposed changes to the days and/or times of the market?

Response: Yes: as identified in the Planning Statement, the days of the market will remain the same, with use as a car boot sale on Thursdays and Sundays; and use as a car boot sale and farmers market on Saturdays. However, the hours of operation are proposed to vary to reflect how the market needs to operate, as follows:

- No access to the market site prior to 4am.
- No access to the market trading area prior to 6.30am.
- No trade to take place on Thursday and Saturday prior to 7.30am and Sunday prior to 8.30am.
- All trading to end at 3pm and all vehicles to be removed by 4.30pm on Thursday, Saturday and Sunday.
- No public address, loud speaker or other amplification system to be used.

The Environmental Health consultee also recommends 4 conditions:

- 1) No construction / demolition activities shall take place, other than between 08:00 to 18:00 hours (Monday to Friday and 08:00 to 13:00 hours (Saturday) with no noisy work on Sunday or Bank/Public Holidays.

Response: We are comfortable with these hours of construction.

- 2) No sound reproduction or amplification equipment (including Public Address (PA) systems, tannoy, loudspeakers, etc.) which is audible outside the site boundary shall be installed or operated on the site.

Response: The Planning Statement confirms that no public address, loudspeaker or other amplification equipment will be used, so we are happy with this restriction.

- 3) No development shall take place before a scheme has been submitted to and approved in writing by the Local Planning Authority, which specifies the provisions to be made for the control of noise emanating from the site. Thereafter, the use of the proposed development shall not commence until the approved scheme has been fully implemented.

Response: We are not convinced this condition is necessary given the above; this condition could be unnecessarily onerous. There is separate environmental health legislation that exists if there was ever to be an issue of noise emanating from the uses permitted, for which it is not for the planning system to intervene with. Attached to a previous permission on the Market site (F/10/07), Condition 7 states: 'the level of noise emitted from the site shall not exceed 55db (A) over any 15 minute period on a Saturday as measured on the north-western boundary of Ford Airfield adjacent to Rollaston Park.' We suggest a similar approach could be utilised on the current application.

- 4) If groundworks are proposed as part of this development, the following condition is also recommended:

Prior to commencement of the development hereby approved (or such date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved in writing by the Local Planning Authority:

- 1) A Preliminary Risk Assessment which has identified: all previous (historical) uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.
- 2) A Site Investigation Scheme based on (1) above to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) Based on the Site Investigation Scheme and the detailed risk assessment (2), an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 4) A Verification Report providing details of the data that will be collected in order to demonstrate that the works sets out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Response: We are comfortable with this approach.

RESPONSE TO CONSULTEE COMMENTS – MASTERPLAN APPLICATION

- **Environment Agency**

Comments received dated 18 March 2020 supports chosen area of allotments in the Flood Zone 2 & 3. Suggests contact ADC regarding surface water drainage and proposed surface water pumping stations.

Response: Our drainage consultants JNP Group are in contact with your drainage colleagues on this matter.

- **Southern Water**

Comments dated 30 March 2020 indicate the Odour Assessment Technical Report is inaccurate and references guidance. It also suggests that some of the residential development is within the 1.5 OdU contour of an existing WTW and SW will object to any proposed development within 1.5 OdU of a WTW. They recommend the final development layout to be subject to further investigation into odour emissions at Ford WTW as well as other waste processing facilities and agreed with all stakeholders prior to commencement.

Response: Our Odour consultants, Hoare Lea, have advised that there is precedent of residential development within the 1.5 OdU contour and feel the objection would be unfounded. We would accept that ongoing odour surveys continue to inform the development within the parameters identified for the application and Environmental Statement. We would obviously also request that the Southern Water STW is operated in accordance with its environmental permit so as to avoid any unnecessary odour spills (we have had it brought to our attention that the doors which aim to contain odour have previously been left open by operators). I would suggest that a discussion is held with ourselves, Southern Water, your Environmental Health colleagues and Hoare Lea to discuss this and hopefully agree a way forward.

Southern Water attaches a plan of sewer records showing the approximate position of a public foul rising main crossing which they state needs to be determined on sight by the application before the layout is finalised, requesting certain buffers and restrictions. They suggest 2 conditions:

- 1) The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public sewers, prior to the commencement of development.
- 2) Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.

Response: Whilst we are content with the approach suggested in Condition 1, we propose Condition 2 should be worded to secure a site wide drainage strategy (as provided within the application material); and then the proposed means of foul and surface water sewerage disposal secured in detail prior to commencement of development on a phased basis through the development once detailed surveys have been undertaken.

- **West Sussex County Council**

Comments dated 17 April 2020 state additional information is required in order to assess the application. In summary the following is required:

- Consideration of additional policy- Arun Parking SPD and WSCC cycle design guide;
- Access/Highway Improvements – Confirmation of Yapton Road access ICD and RSA/Designers Responses;
- Yapton Road – 4th Arm consideration;
- NMU links to Yapton – Further NMU consideration;
- Horsemere Green Lane – Further NMU consideration;
- Ford Lane – Extent of pedestrian improvements clarified;
- Ford Road/Station Road – Further information on effective widths of shared use provision; - Further details on Footpath 206 and secured funding;
- Equestrian facilities – identification of any facilities to be provided; ARUN DISTRICT COUNCIL F/4/20/OUT - Public Transport – Supporting information from bus companies to be provided; - Ford Station – Consideration of facilities;
- PIA – Update data and expand scope;
- Employment Access – confirm consideration of WSCC/027/18/F HGV movements; - Junction Modelling – Provide plans with parameters utilised;
- North End Road/B2233 Mini Roundabout – consideration of pedestrian improvements secured within Y/91/17;
- North End Road/B2233 Mini Roundabout and Bilsham Road / Burndell Road – provide costings to allow consideration of a financial contribution or works. - Church Lane – provide a 2031 scenario; - Horsemere Green Lane – provide modelling sensitivity testing;
- Level Crossing impacts – provide commentary on the impact on adjoining junctions; - Ford Rail Bridge – Details of how the application will support its delivery;
- Travel Plan – update in line with comments;
- Contributions – set out levels to be provided and any further information on when these would be provided.

Response: Our transport consultants iTransport are in contact with WSCC on the above matters and will advise once we have heard from them.

- **Sport England**

Comments dated 23 March 2020 propose the following 4 conditions:

Condition 1

- a) No development shall commence on the proposed sports pitches until the following documents have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England:
 - i) A detailed assessment of ground conditions (including drainage and topography) of the land proposed for the playing field quality; and
 - ii) Where the results of the assessment to be carried out pursuant to (i) above identify constraints which could adversely affect playing field quality, a detailed scheme to address any such constraints. The scheme shall include a written specification of the proposed soils structure, proposed drainage, cultivation and other operations associated with grass and sports turf establishment and a programme of implementation.
- b) The approved scheme shall be carried out in full and in accordance with the approved programme of implementation. The land shall thereafter be maintained in accordance with the scheme and made available for playing field use in accordance with the scheme.

Response: Our Drainage Consultants, JNP Group, are reviewing the above and will advise.

Condition 2

No development shall commence on the proposed sports pitches until a schedule of playing field maintenance including a programme for implementation for a minimum period of [ten] years starting from the commencement of use of the development [or other specified time period] has been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. Following the commencement of use of the development the approved schedule shall be complied with in full.

Condition 3

No development shall commence on the proposed sports facilities until details of the design and layout of the proposed natural turf pitches and the associated change facilities and car parking have been submitted to and approved in writing by the Local Planning Authority after consultation with Sport England. The natural turf pitches, change facilities and car parking shall not be constructed other than in accordance with the approved details.

Condition 4

Use of the sports pitches shall not commence until a community use agreement prepared in consultation with Sport England has been submitted to and approved in writing by the Local Planning Authority, and a copy of the completed approved agreement has been provided to the Local Planning Authority. The agreement shall apply to the natural turf pitches, associated change facilities and car parking, and include details of pricing policy, hours of use, access by non-club uses [non-members], management responsibilities and a mechanism for review. The development shall not be used otherwise than in strict compliance with the approved agreement.

Response: Whilst these proposed conditions may be acceptable in their objective, we would suggest that any such conditions request details / agreement on a phase by phase basis when the appropriate phase delivers open space.

- **Network Rail**

Comments dated 27 April 2020 place a holding objection on the proposals and request availability to discuss in a virtual meeting. The response highlights issues at level crossing and the accumulative impact of developments in the area. A further response is expected on the impact at Ford Station.

Response: We are not aware of the reason behind such a holding objection. We have requested our transport consultants, iTransport, engage with Network Rail but in the absence of more information, we do not consider this objection should hold back the grant of planning permission.

- **Greenspace**

Greenspace (ISS Facility Services Landscaping) comments dated 1st April 2020 state: no objection in principal of development, but objects to landscape. They recommend that considerable further detail is required on all landscape aspects relating to this site from layout, included provision, mitigation and detail proposals, recommending no objection in principal to the development of this site for residential purposes, but a landscape objection until the above information is confirmed, sufficiently detailed and submitted for approval.

Response: As this is an application for outline planning permission, further details will be submitted at the detailed design staged (Reserved Matters) which will address these comments. Until then, we consider that such an objection would be unreasonable; indeed requesting detailed design at the outline application stage would also be unreasonable. If, however, there are particular matters of clarification appropriate to this outline stage that are needed to enable the application to be approved, then do let me know.

- **Ecology**

Comments dated 3 March 2020 confirm that they are happy with the ES / survey work but no mitigation strategies have been included. They highlight that if there is a mitigation report available please can this be submitted for the application. Comments include areas of Arun Valley SPA, Bats, Badgers, Dormice, Otters, Water Voles, Nesting birds, Reptiles, GCN, other species and Net Biodiversity Gain.

Response: We are awaiting a response from our ecological consultants, ECOSA, and will advise. It may be an appropriately worded condition is placed on the planning permission requiring details and a mitigation strategy on a phased basis.

- **Engineer**

Comments dated 6th April 2020 has no concerns subject to further detail on drainage and therefore suggest the following condition:

- 1) Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposals systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDs Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing BRE 365, or similar approved, will be required to support the design of any infiltration drainage. No building / no part of the extended building shall be occupied until the complete surface drainage system serving the property has been implemented in accordance with the agreed details and the details agreed shall be maintained in good working order in perpetuity.

Response: We are awaiting a response from our Drainage Consultant, JNP Group, on this proposed condition. As highlighted above, we would suggest such detailed matters be dealt with on a phased basis across the site. Any proposed drainage conditions should also be dealt with together for ease of reference and discharge.

- **Grundon / Viridor / Ford Waste from Energy**

Object.

They highlight that the plans included in the planning application for Ford Airfield Market reconfiguration (such as the proposed site plan or the proposed access arrangements) do not show the Ford CTP site new access road. They are concerned over the increased traffic at the junction Hunterford with Ford Road due to only having one access to the market. They suggest that the TA submitted only considers current operations and associated vehicle movements at the Ford CTP site but do not take into account the recently permitted additional lorry movements as part of the CTP new access road. They raise concerns around the proposed layout, in particular the proposal for the new overflow car park immediately to the east of the CTP sites new access road.

Response: We are aware of the aspirations of Grundon / Viridor for a new facility on this site, which are not subject to a planning application; and we can therefore only consider the current operations and consented development. We have asked our transport consultants, iTransport, to advise on this response including their comments on the Ford CTP site new access road and the TA information on current operations and associated vehicle movements at the Ford CTP site. We will advise as soon as we have heard.

In light of the above, I would suggest the best way forward would be for an online meeting with you to discuss the above and agree a way forward, including engagement with consultees as suggested above.

I look forward to hearing from you in this regard.

Yours sincerely,

ROBIN SHEPHERD
PARTNER