

Report following a request for further information, negotiations or consultation

REF NO:	F/4/20/OUT
LOCATION:	Land at Ford Airfield Ford
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. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application may affect the setting of a Listed Building. This application falls within CIL Zone 1 - Zero Rated.

The application was deferred at the Planning Committee on 24 November 2021 for the following reasons:

1. Further consideration of the trigger points for the Section 106 agreement; and
2. The discrepancies identified within the odour assessment.

1. Please see attached Heads of Terms.

An objection was received from WSCC as Local Education Authority on the 7 January 2022. This objection was due to the inability to expand the existing secondary school provision to accommodate the secondary pupils arising from the proposed new development and the lack of an allocated or secured site for the delivery of the new secondary school.

However, this development alone does not generate the need for a new secondary school by itself. The applicants have agreed to make the necessary and proportionate financial contributions towards the delivery of a new secondary school in accordance with the adopted position. Therefore, in this case the developer should not be penalised because WSCC have been unable to secure a site for the secondary school. It has been agreed with WSCC that we will revisit looking at potential secondary school sites, but it is unreasonable to reject this application solely on the absence of a secured school site when an appropriate contribution has been secured towards its delivery.

2. Following deferral of the planning application by Members on 24 November 2021 the applicant provided a response dated 8 December 2021 to the initial comments from Phlorum (the independent odour consultant appointed by the LPA). Further comments were provided by the applicant on 13 January 2022 following a meeting between the applicants odour specialists and the independent specialists appointed by the LPA. These are available in full through the Arun District Council website.

These responses sought to clarify a number of points which were raised as concerns by Phlorum in their original review of the odour assessment and informed the subsequent Odour Assessment Review dated February 2022 undertaken by Phlorum.

The primary concern raised by Phlorum within their latest response concerns the evidence used to

inform the conclusions is heavily weighted towards modelling rather than onsite odour survey observations. Discrepancies remain between the odour modelling and onsite observations (sniff testing) and this discrepancy has not been explained such that the model results could be considered robust. Therefore, it is recommended by Phlorum that until such time as further work is undertaken to provide observational data which better supports the model, that a precautionary principle is applied. This precautionary principle means that it should be considered likely that unacceptable odours would affect the proposed residential units within 300m of the aerated sludge plant (ASP) to the west of the Waste Water Treatment Works (WwTW).

As such, in order to address these concerns a condition is proposed which would prevent any development taking place within 300m of the ASP which would introduce high sensitivity receptors. A high sensitivity receptor would be defined as land where users can reasonably expect enjoyment of a high level of amenity; and people would reasonably be expected to be present here continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land e.g. residential dwellings, schools (excluding playing fields) and hospitals.

The use of the proposed condition would ensure that appropriate observational data was secured prior to any development which would introduce high sensitivity receptors within 300m of the ASP. As such, subject to the use of this condition it is considered that there would be no unacceptably adverse odour impacts upon residential amenity of future occupiers. The condition has been included as part of this recommendation as Condition No. 35.

Southern Water in their consultation response raised concerns with the proposed 3 OUE/m³ (odour units) (98th Percentile) criterion requesting that a 1.5 OUE/m³ is adopted. This was considered by Phlorum in their response who advised that use of the 3 OUE/m³ was appropriate for WwTW given that the majority of the odours identified through sniff testing within the vicinity of the WwTW would not constitute highly offensive odours (e.g. not septic effluent or sulphurous smells). The most common odours identified through sniff testing were associated with the ASP, which generally has a more earthy/moderately offensive odour.

In addition to the above issues on odour the update report in support of the original officers report summarised concerns raised by Grundon's in respect of the proposed development. The primary concern in regards to odour related to the applicant being the agent of change and the impact of introducing a new land use would have upon the continued operation of the strategic waste site.

Therefore, it was stated that the applicant was responsible for managing the impact of that change. With the application proposing residential development it was stated that there could be a significant adverse effect on future occupiers of that development from any nearby existing sources of potential nuisance. With insufficient evidence provided to clearly demonstrate that the applicant has considered this effectively.

This matter was considered by Phlorum as part of the independent review of the odour assessment and it was concluded that the assessment approach adopted by the applicant was reasonable and appropriate, given that highly sensitive residential uses will be located at least 100m from the facility's boundary, upwind of the prevailing wind. In addition to this, three onsite surveys were undertaken, downwind of the facility, which detected no odours associated with the operation of the facility. Therefore, in this case the approach adopted by the applicant has demonstrated that the proposed residential development would not impact upon the continued operation of the waste facility.

Therefore, subject to the inclusion of the proposed condition the development would accord with Policies QE SP1 and H SP2c of the Local Plan and policies W2 and W10 of the Waste Local Plan.

RECOMMENDATION: That delegated authority is granted to the Group Head of Planning in consultation with the Chair and Vice Chair authority to:

- a. Grant outline planning permission subject to conditions; and
- b. Subject to a Section 106 Agreement, the terms of which are substantially in accordance with those set out in the heads of terms with any minor amendments authorised by the Group Head of Planning

REPORT UPDATE

Application No: F/4/20/OUT

Reason for the Update / Changes

Reason for Update/Changes:

1. Odour

The officer's recommendation report regarding odour identified that the Council would be appointing an independent contractor to review the odour assessment submitted in support of the application. The Local Planning Authority (LPA) appointed Phlorum who have undertaken an independent review of the Odour Assessment and provided the Council with their comments.

Phlorum have confirmed that the Odour Assessment submitted in support of the application was carried out in accordance with best practice guidance and adopted a methodology agreed with both Southern Water and Arun District Council's Environmental Health Team. However, the Institute of Air Quality Management (IAQM) guidance states that:

"It should be emphasised that the result from a model should not be used to try to 'prove' the absence of an existing adverse odour effect (e.g., nuisance) when strong empirical evidence from complaints analysis, community response data, and sensory tests (by appropriately trained persons) show otherwise. To do so would be to mistake the model for the reality of the situation, rather than a simplified version of it."

The independent review of the Odour Assessment concludes that it has not brought together the results of the sensory tests and the dispersion modelling to discuss how the masterplan has been informed by both. As the only location where, robust observations have been made (i.e., to the north-east of the WwTW) is also a location where the dispersion model appears to under-predict, this suggests that the model might not be a suitable tool, on its own, for developing a constraints plan. As such, the current layout is understood to have not been developed using an appropriate weight of evidence, relying instead upon the dispersion model.

Therefore, it has been recommended that the applicant should explain why the odour contour extends further to the south rather than the north-east. This appears off as south-westerly winds are more common than winds from the north, which is corroborated by their ground-based observations (sniff tests).

It is also identified that it is important to understand how, if at all, the sniff tests have been used to inform the masterplan/whether the cordon sanitaire (100m buffer) around the WwTW has been defined solely based on the results of the dispersion model. Observational data should be given considerable weight in informing the masterplan, and it appears that this data might not have been fully discussed and integrated into conclusions.

Given when the review document was received from the independent contractors appointed by the Council the applicants have not had the opportunity to respond to the matters raised. Given these outstanding matters it is considered that a recommendation for approval cannot be made by Officers at this time. Therefore, the recommendation should be amended to read as follows:

It is recommended that the application is deferred to allow for the further review of the Odour Assessment and dispersion modelling.

2. Updated Consultation Response from the Conservation Officer.

An updated consultation response was submitted by the Conservation Officer on the 19th November 2021 which provides additional comments regarding the developments impact upon nearby designated and non-designated heritage assets. Regarding the nearby designated heritage assets, the setting and significance of these assets has been considered by the Conservation Officer and deemed as acceptable.

Comments have also been provided regarding the Canal and western arm of the former runway. In terms of the route of the canal the Conservation Officer has advised that:

"in order for the former canal route to be successfully incorporated into the public realm strategy (including provision of information boards explaining its former significance), that greater information will need to be provided as part of any reserved matters applications. This will need to ensure that the route is not simply an access road for houses, but a suitable marker of the historic route/asset. Previously I have noted reference to the use of the route elsewhere as a 'greenway' and would assume that this would form the basis of this section of the route as well. At present the level of information provided suggests that the proposal cannot be considered to be harmful."

Whilst, in relation to the runway it has been advised that:

"The additional information provided regarding the runway and its significance is helpful, and I believe that the retention of the north-south element that falls within the site, along with the removal of only part of the western arm helps to reduce its impact. Further, the use of part of the removed western arm as open space (albeit I note the width is reduced) will help to ensure that its former line will be preserved is a positive feature.

I also note the reference to the impracticality of retaining the runway surface due to its potentially friable nature and saturation with unsafe substances. As noted in the additional statement, retention of the runway surface would not enhance the proposals already set forward. However, I am of the opinion that the existing materials, characteristics of the surface and the appearance can be incorporated into a new surface treatment within the open space. Such detailed issues are a matter for the reserved matters application."

Therefore, the Conservation Officer has advised that the development will not impact the setting of the listed buildings and non-designated heritage assets, and as such, no harm to their overall significance has been identified.

3. Letter of objection from Grundon 22nd November 2021

Below is a summary of the comments raised in this representation full comments are available on the Arun District Council website.

- The applicant is an agent of change introducing a new land use that is likely to affect the continued operation of the strategic waste site and the applicant is therefore responsible for managing the impact of that change. As the application is proposing residential development it should be considered that there

could be a significant adverse effect on future occupiers of that development from any nearby existing sources of potential nuisance. There is insufficient evidence to demonstrate that the applicant has considered this effectively.

- The location of new homes should not place restrictions on existing site operations or permitted operations. It is clear from the response dated the 11th March 2021 that WSCC continues to object to the proposed development as it would be contrary to policies W2 and W10 of the Waste Local Plan.
- We are concerned that matters relating to the agent of change principle have not been adequately addressed through the Officer's report.
- It is bold and reckless to conclude that Southern Water no longer wish to maintain their objection given their lack of communication.
- Grundon's is the subject of an Environmental Permitted (EP) which seeks to control pollution to levels to be at levels below that which would be considered likely to cause pollution. However, the EP relates to the site in its current state with no residential development close to the site boundary, not a situation which brings residential development much closer to this boundary (approximately 139m away).
- Odour levels that would not be considered likely to cause pollution could be experienced outside the site boundary in current circumstances as there are no sensitive receptors. If sensitive receptors are introduced as is proposed, then this could lead to complaints that in current circumstances would not occur.
- As the agent of change the applicant should have carried out a comprehensive cumulative odour survey and assessment as requested by the Environmental Health Officer with regard to the extant waste management uses and used this information to provide sufficient set back of new residences from the site boundaries of those existing waste facilities.
- The report for F/5/20/PL identified the market application as a prerequisite for these proposals this suggests that this application (F/4/20/OUT) should not therefore be decided before there is a decision on the Ford market application.
- It is not clear how the improvements to the junction with Ford Road will be secured.
- It is unclear how the comments from Historic England have been addressed.

4. Joint representation from the Friends of Ford to Hunston Canal, Sustrans and Arun District Bridleways Group

Below is a summary of the representation which can be found in full on the Arun District Council website.

- Disappointed at the lack of commitment from the developers to properly reflect the heritage of the old canal by designing in expressed local desires that the old route be properly reinstated and re-purposed for the 21st century as a multi-user greenway.
- Para. 100 of the National Planning Policy Framework (NPPF) identifies that "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better access for users". At the very least a north-south and an east/west route legally available to all users should be being provided, and we would ask that a condition is imposed to that effect.
- A new Greenway along the old Ford to Hunston Canal is a project with strong local support.
- More people in the community would use such routes daily for exercising, than who would ever use facilities such as football pitches.

5. Update regarding the Secondary School Site

An update has been provided by the agent in regards to this matter:

"We understand that the landowners of the land proposed for a Secondary School at Ford have made

progress in their discussions with WSCC. As willing landowners, positive discussions between WSCC and the landowners continue around the mechanisms for the transfer of the land to WSCC, all of whom remain committed to the preferred outcome. Whilst progress has been slower than initially anticipated, this is not unusual for school provision where WSCC needs to secure land for its delivery.

This matter is obviously outside of the planning applications for The Landings, where the developers will make s106 contributions toward secondary education akin to other developments in the area. The secondary school will serve a much wider area; but we have made provision for road and pedestrian / cycle connections between The Landings and the secondary school in the Masterplan, which has been agreed in the Masterplan document. The applicants are therefore assuming that the Secondary School will be brought forward by WSCC in the preferred location.

There is understood to be a continued will of all parties involved to secure a positive outcome, without delay; and there is nothing we have been informed of that is likely to hinder the delivery of the secondary school in this location. The expectation is that WSCC will progress the secondary school as a matter of priority following the grant of planning permission at The Landings."

6. Clarification of details contained within the officer's report.

a) The officers report identifies a residential development density of 30 dwellings per hectare. This should be 35 dwellings per hectare.

b) The summary of the consultation response from WSCC as Local Highway Authority identifies that contributions should be provided in accordance with the Arun Transport Study apportionment report 2020.

However, this does not reflect the comments provided in the consultation response of the 5th November which identify the following contributions:

Section 106 Contributions

- £301,000 towards the A27 Ford Roundabout
- £37,500 towards additional parking facilities at Ford Railway Station
- A Travel Plan
- £5,000 for the auditing of the travel plan
- £15,000 towards the provision of offsite real time passenger information

The following 4 contributions are recommended to be grouped together to fund these measures in a manner which would expedite delivery of some of the mitigation works identified in the local plan transport study.

- £600,000 towards the A259 Oyster Catcher
- £97,000 towards the A259 Comet Corner
- £515,000 towards the A259 Corridor Improvement
- £15,000 towards the A259 Lyminster Bypass to A280 junction

In addition to these contributions the following works are required to be delivered:

- Construction of the Yapton Road Access (drawing no. GA-001 Rev E) prior to the 1st or 501st occupation.
- Construction of the Ford Road Access (drawing no. GA-004 Rev B) prior to the 1st or 501st Occupation.

- Improvements to Ford Road/Commercial Site Access (ITB13091-GA-066) prior to the commencement of commercial floorspace.
- Ford Lane/North End Road Improvement (GA-028 Rev C) prior to the 751st Occupation.
- B2233/North End Road Improvement (GA-026 Rev B) prior to the 501st Occupation.
- Bilsham Road/B2233 Improvement (GA-027 Rev C) prior to the 251st Occupation.
- Horsemere Green Lane Pedestrian Access Improvements (GA-058 Rev B) alongside the introduction of the Yapton Road Access or prior to the 101st Occupation.
- Church Lane Pedestrian/Cycle Connection (GA-600 Rev A) Prior to the opening of the Yapton Road Access should CM/1/17 not have been implemented.
- Rollaston Park & Burndell Road Pedestrian Improvements (GA-041 Rev A, GA-200, GA-201 Rev A, GA-202 Rev A, GA-203 Rev A & GA-204) prior to the 1st Occupation.
- Yapton Cycle Route Improvements (GA-059, GA-060 & GA-061) prior to the 101st Occupation.
- Ford Road - Station Road Pedestrian/Cycle Connection to Station (GA-006 Rev B, GA-007 Rev B, GA-008 Rev A, GA-009 Rev A & GA-010 Rev B) prior to the 250th Occupation.
- Footpath Connection (Ford Road to River Arun public right of way) (GA-400 Rev A) (includes works outside the highway) prior to the Occupation of commercial floorspace or 751st Occupation.

c) The officers report through the principle identifies that the development is in accordance with policy H SP2. However, it should be clarified that this is subject to the endorsement of the masterplan through the consideration of the proposals by the planning committee. However, it is the view of officers, as identified through the recommendation report, that the Masterplan document (subject to detailed design) would meet the requirements of policy H SP2 of the Arun Local Plan.

d) Highways and Access

i) It should be clarified that the proposals impact upon the A27 has been considered through the Arun Transport Study and by National Highways. It has been identified that a financial contribution should be secured towards the agreed scheme of works on the A27 Trunk in line with the adopted Local Plan or other such scheme of works to similar of more beneficial effects (which could include an Arundel Bypass scheme should one process for which this development site would benefit).

Therefore, as confirmed through National Highways consultation response the proposed development has been deemed acceptable and will not materially affect the safety, reliability and / or operation of the Strategic Road Network as set out in the Department for Transport C2/13 para's 9 & 10 and NPPF paragraph 111.

ii) The final paragraph of the Highways & Access section identifies that the proposal would be policy complaint 'subject to the outstanding details being provided to and agreed with WSCC'. However, immediately prior to the officer's recommendation being published the outstanding information was provided to WSCC Highways and their consultation response of the 5th November (summarised in the recommendation report) confirms that there are no outstanding details.

e) Heritage Assets

Reference was not made within the recommendation report to paragraphs 203, 204 and 205 of the NPPF which state:

Paragraph 203 identifies that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss of the heritage asset.

Paragraph 204 states that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Paragraph 205 states that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

The recommendation report has taken into consideration the significance of non-designated heritage assets and drawn a balanced judgement having had regard to the scale of the loss as is required by paragraph 203.

In terms of paragraph 204 in this case the application site is a strategic allocation within the local plan, and it is considered that it is sufficiently likely that the development will progress. Finally, in terms of paragraph 205 the recommendation report identifies that the route of the western arm of the runway would be retained as open space with a heritage walk to be secured using an appropriately worded condition. Therefore, it is considered that the proposal would accord with paragraph 205 of the NPPF.

f) Infrastructure Provision

i) The infrastructure development plan for this site identifies that an on-site 3G pitch should be provided as part of this development. However, the Arun District Council Sports Strategy has superseded this with an off-site contribution being secured.

ii) In terms of education the report sets out the required financial contribution for each facility. However, those to be delivered on-site could be delivered by the developer in which case there would be no financial contribution secured.

iii) It is identified in the report that the financial contributions towards healthcare will be directed towards off-site healthcare facilities. This is contrary to policy SA2 of the Ford Neighbourhood Development Plan. However, this aligns with the adopted approach by the CCG for the delivery of primary healthcare in Arun.

iv) It has been agreed with WSCC that the financial contribution towards Ford Lane/North End Road can be flexible to allow for the delivery of alternative highway arrangements. This would allow for the delivery of a roundabout in this location. However, the CIL regs would not allow the Council to secure full funding to deliver a roundabout in this location as it would go beyond what has been assessed as necessary to mitigate the impact of the development upon the operation of this junction.

7. Amendments to Conditions

Whilst the recommendation has been amended to deferral of the application there are some amendments required to conditions.

Condition 4 - The plan reference in regards to the 'Ford Airfield Geometry - Eastern Access onto Ford Road' should be amended once confirmed.

Condition 5 - Bullet point three of the phasing condition should be amended to read "Vehicular access

from Ford Lane, Yapton Road and Ford Road".

Condition 7 - The word allocation is replaced by the word application.

Condition 28 - Added "for that dwelling".

Condition 32 - Reference to Condition 28 amended to Condition 29.

Officers Comment:

1. No comments.

2. No comments.

3. In response to the letter of representation the following comments are made:

- The representation challenges the conclusions of the recommendation report in regards to odour generation from Grundon Waste Transfer Station. This matter will need to be considered further prior to the determination of the application.

- The representation also raises concerns that this application is being determined ahead of planning application F/5/20/PL. However, whilst the two applications are certainly related in nature the determination of F/5/20/PL prior to this application is not necessary. It is acknowledged that the approval of F/5/20/PL will regularise the operation of Ford Market and reflect the loss of the western arm of the runway. But it is not necessary in principle or policy terms.

- Concerns have also been raised in regards to the comments from Historic England. Further information has been submitted by the applicant to address the concerns of Historic England and the Council's Conservation Officer. This information has been considered by the Conservation Officer who has confirmed that the developments impact upon the designated and non-designated heritage assets is acceptable.

4. The application seeks outline permission and as such the detailed masterplan is purely indicative at this time. Details of pedestrian and cycle linkages within the site are a matter for consideration at detailed design stage. It is considered that the parameter plans provide adequate opportunity to provide strong pedestrian linkages across the site and into the wider area.

The path of the former canal is also identified on the parameter plans with the alignment to be reflected in the layout. This will also be covered by Condition 7 (Design Code) which states that the design code will demonstrate how the detailed proposals will reflect the contents of the Masterplan Document. The Masterplan Document includes more detail on the approach to be taken with the canal and how it should be reflected within the internal movement/landscaping proposals, including pedestrian/cycle connections up to the boundary of the site with Grundon, then up the western edge connecting with the footpath network. Given that the Design Code will need to be approved prior to the submission of the reserved matters application it is considered that sufficient measures are in place to ensure that the development will respect the canal and ensure strong sustainable links across the site.

5. No comments.

6. No comments.

7. No comments.

RECOMMENDATION: It is recommended that the application is deferred to allow for further consideration of the odour impacts.

Notes: Changes to recommendations, conditions and / or reasons for refusal will always be reflected in the recommendation section of the attached Officer's Report.

PLANNING APPLICATION REPORT

REF NO: F/4/20/OUT

LOCATION: Land at Ford Airfield
Ford

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. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application may affect the setting of a Listed Building. This application falls within CIL Zone 1 - Zero Rated.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION

The application seeks outline planning permission 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".

Approval is sought for access to the site as part of this application. The appearance, landscaping, layout and scale of the proposed development are reserved matters.

The application comprises a comprehensive set of plans, drawings and documents, including an Environmental

Statement.

While there have been amendments to the Use Classes, for planning applications such as this one that was submitted before 1 September 2020, the Use Classes in effect when the application was submitted must be used to determine the application.

SITE AREA	86.63 hectares
RESIDENTIAL DEVELOPMENT DENSITY	30 dwellings per hectare (average)
TOPOGRAPHY	Predominantly flat.
TREES	None of any significance affected by the proposed development. The trees to be removed to form the proposed means of access to the site are of low quality and have little potential to contribute to local character.
SITE CHARACTERISTICS	<p>The site is bound by Ford Lane to the north, a former runway, waste management and agricultural uses to the east, Horsemere Green Lane to the south and Yapton Road, Rollaston Park and agricultural land to the west.</p> <p>Much of the land is in agricultural use. However, a large proportion of the concrete runways of the former Ford Airfield remain. The southern and eastern runways, which adjoin the application site, are used for car boot sales, a farmers' market and market uses on Thursdays, Saturdays and Sundays.</p> <p>The former airfield accommodates several waste management uses, which adjoin the application site. These include a wastewater treatment works (operated by Southern Water), a waste transfer station (operated by Grundon) and a recycling facility (operated by Viridor). The access road to these three uses is included in the eastern part of the site from Ford Road.</p> <p>In the central part of the site, there is the 'Flying Fortress' (indoor children's play area) and the 'Arun Sports Arena' (indoor five-a-side football facility). The access to these facilities is from Rollaston Park.</p> <p>The whole of the site lies within the Parish of Ford. It adjoins the Climping Parish boundary at Horsemere Green Lane and Yapton Road. It touches the Yapton Parish boundary at its western-most point, on the course of the former Portsmouth and Arundel Canal.</p> <p>There are several Public Rights of Way (PROW) which pass through the site (Path Numbers 363, 363_1, 366, 200_3 and 175). These provide footpath connections between Yapton and Ford Lane, or eastwards to Ford Road, and Yapton Road to Ford Road (via Rudford Industrial Estate).</p>
CHARACTER OF LOCALITY	The site is located between the villages of Yapton, Ford and

Climping. It is approximately 3km to the north west of Littlehampton town centre and 4km south west of Arundel town centre. The South Downs National Park boundary lies approximately 2km to the north of the site.

The site is approximately 0.7km south of Ford railway station and 0.4km west of the River Arun.

RELEVANT SITE HISTORY

F/12/18/WS	New access road - This application is a County Matter Waste Application & will be determined by West Sussex County Council (EIA)	No Objection 23-07-18
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F/5/20/PL	Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works.
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F/12/18/WS - This road provides the existing means of access to the eastern part of the site.

F/5/20/PL - The reconfiguration of Ford Market is a prerequisite to the proposals the subject of this outline application. The related application (F/5/20/PL) is the subject of a separate officers' report.

REPRESENTATIONS

REPRESENTATIONS RECEIVED:

Ford Parish Council

The Ford Neighbourhood Development Plan seeks to ensure that a co-ordinated approach for the whole site is pursued. The airfield application, market application and Ford Energy from Waste application should follow a joint and co-ordinated approach.

A new footpath/cycleway is required from the western entrance to the site, along the length of the runway to Ford Road and onwards across the fields, to the River Arun.

Land to the south of the Ford Road access should be identified and made available for self-build homes for local people.

Funding for healthcare should be spent on facilities in the Ford Parish, enabling the Avisford Surgery to expand where most existing residents of Ford are registered.

YAPTON PARISH COUNCIL - Support with reservations

(i) Has strong reservations about the impact of traffic generated from this scheme on both Yapton and surrounding parishes. A permanent solution to the traffic congestion in Ford, Clymping and Yapton is sought, which would ensure safer village centres and traffic directed to towards A-roads, away from

unclassified roads such as Ford Lane. There is a lack of information on any mitigation measures to relieve the added congestion at both Ford and North End level crossings.

(ii) The western edge of the proposed development will cause erosion of the physical and visual gap between the two parishes, resulting in coalescence and the loss of individual village identity. The opportunity to provide green infrastructure between the villages must not be lost.

(iii) There is a desire to improve off-road connectivity and secure links with the existing cycleway network. The upgrading of existing public rights of way should be landscaped to maintain their rural appearance.

(iv) The scheme should reflect the rural character of the outer parts of the former airfield.

(v) The proposed housing mix should accommodate parish needs, which include a demand for bungalows.

(vi) It is expected that contributions will be secured through a s.106 agreement towards both the new primary school and Yapton Church of England Primary School, a new medical centre and a secondary school to meet the needs of those in the 'Six Villages' area alone.

CLYMPING PARISH COUNCIL - Object

(i) Will lead to coalescence of Ford and Clymping contrary to the local plan which seeks to maintain the separate identity and amenities of existing settlements.

(ii) The Transport Assessment does not adequately assess the impact of traffic within Clymping (e.g. road safety and air pollution) and does not include any proportionate mitigation proposals.

- The traffic forecast to leave the site in the morning peak hour is not credible, particularly in a location with limited access to public transport and employment.

- The lack of capacity at the level crossings mean traffic will move south through Clymping.

- The secondary school is expected to attract students from Middleton, Felpham and Littlehampton who will access the site through Clymping.

- The impact at the Oystercatcher Junction (Yapton Road/A259) will be severe and an improvement has yet to be defined.

- The proposed layout precludes the opportunity to construct a future road from the A259 west of The Oystercatcher, through the airfield, over the railway and to the A27.

- The traffic impact on Horsemere Green Lane will be severe and has been ignored in The Transport Assessment. There will be conflict between motorists and pedestrians and cyclists on this route given the lack of suitable footpaths and cycleways. Horsemere Green Lane will also be used by traffic from the west in order to access Ford Market.

- Proposals to improve the pavement on the eastern side of Church Lane are recognised, but no controlled crossing is proposed.

(iii) There should be an archaeological survey of the entire site given the recent findings on land to the south of the airfield.

MIDDLETON-ON-SEA PARISH COUNCIL - Object

Will make traffic congestion on the A259 considerably worse. The results of the A259 feasibility study need to be implemented before any work is undertaken on this site.

FELPHAM PARISH COUNCIL - Object

(i) Impact of traffic on surrounding roads, particularly the A259;

(ii) Cumulative impact of traffic from other development at Clymping;

(iii) Impact of additional traffic at level crossings and pedestrian crossings;

(iv) Impact on the A27 and the proposed Arundel bypass;

(v) Impact on healthcare facilities to be addressed via s.106;

(vi) Does not address plans to expand the adjacent waste recycling facility;

(vii) Does not confirm the amount of affordable housing that will be delivered;

(viii) The scale of development will overwhelm the parishes of Ford and Yapton;

(ix) Not demonstrated that the proposed community facilities are sustainable or wanted;

- (x) Impact on local listed buildings has not been demonstrated;
- (xi) Further information needed to demonstrate biodiversity net gain; and
- (xii) Lack of coordination with other strategic developments.

WALBERTON PARISH COUNCIL

Fully support the comments by Ford Parish Council that a co-ordinated approach for the whole site is pursued. The airfield application, market application and Ford Energy from Waste application should follow a joint and co-ordinated approach.

The land not shown to be developed in the built-up area should be designated for specific use, e.g. agriculture, woodland or local green space.

REPRESENTATIONS

Below is a summary of the issues raised through letters of representation. Representations have been made by 52 individuals or organisations (70 Objections, 2 No Objection and 2 in Support).

The objections include the following comments:

- The application ignores Policy W10(d) of the Waste Local Plan (2014) which safeguards the strategic waste allocation at Ford Circular Technology Park from any development that would prevent or prejudice its development for waste management uses.
- The application considers only existing and consented uses at Ford Circular Technology Park and largely ignores the Ford Energy from Waste proposals for an Energy Recovery Facility and Waste Sorting and Transfer Facility (WSCC/036/20 & WSCC/011/21).
- There are doubts regarding the suitability and deliverability of the noise mitigation measures relied upon by the applicants.
- The proximity of proposed housing to the Ford Circular Technology Park will inevitably prejudice the current and future operations at that site.
- The proposed development uses only part of the Ford Strategic Allocation yet seeks to deliver the full housing provision. As a result, residential properties will be located unacceptably close to safeguarded waste management facilities. If the full extent of the allocation was used, more suitable buffer zones could be provided to protect sensitive properties from noise and odour.
- Noise from the industrial estate.
- Lack of confidence that the development will be coordinated with proposals at Ford Circular Technology Park, Drove Lane and Bilsham Road.
- A need to take account of a large sewer that leads to the waste-water treatment works.
- Smell from the Waste-Water Treatment Works.
- Lack of provision for equestrians.
- The proposals should improve provision for pedestrians, cyclists and horse riders to access the countryside and the facilities that they need.
- All footpaths through the site should be upgraded to bridleway status.
- A need to provide safe crossing points for equestrians on Yapton Road and Ford Lane.
- A commitment to provide bridleway routes is needed at the outline stage.
- The need to enable equestrians to get a) to Byway 197 at Climping, b) to and over the railway line at Ford to go northwards and c) to path 206 between Arundel and Littlehampton.
- No defined route from west to east for non-motorised users.
- More thought should be given to the use of footpaths crossing the site for connectivity between the parishes.
- Insufficient acknowledgement of the route of the historic canal.
- The line of the canal to the east of the Grundon site has been omitted.
- Only a small section of the canal has been recognised with an abrupt end, whereas it should continue beyond the Grundon site. There is an opportunity to extend the route around the north of the Grundon

site and reconnect with the eastern portion of the canal route.

- There is an opportunity to include a water feature within the open space to acknowledge the canal heritage.
- The Ford to Hunston Greenway proposal by Sustrans and others, along the route of the canal, should be included to provide non-motorised users with access to Yapton and beyond.
- The location of the additional sports pitches is inconsistent with the provision of a through route.
- Application lacks sufficient detail on how it will support sustainable transport.
- Cycle parking should be as easy to get to as the car.
- There needs to be a commitment to bring the existing path, alongside the road to Ford Station, up to a standard described in LTN/20.
- There are no improvements to parking at Ford Station.
- All houses should be provided with fast chargers for electric vehicles.
- There should not be a main vehicular north-south route through the development site.
- Horsemere Green Lane not included in the list of local roads and junctions considered in the Transport Assessment.
- Not in agreement with the Transport Assessment or the conclusions derived from it.
- A new road should be considered between the A259 (west of The Oystercatcher) and the Yapton Road access to the proposed development.
- The possible future improvements to key junctions on the A259 are not yet either programmed or funded.
- The application is considered premature pending certainty on both the funding and the timing of essential A259 highway improvements.
- The application does not include provision for a possible north-south route within the masterplan.
- The traffic generation figures provided fall considerably short of reality.
- Further traffic modelling needs to be carried out to determine the effects on Horsemere Green Lane.
- Traffic impact on Horsemere Green Lane will be severe.
- It is uncertain what other developments were included in the traffic model.
- The effect of increased traffic flows on the Ford Road railway crossing.
- Much reliance is placed on promoting modal shift towards cycling and walking when the reality is that the majority of trips will continue to be made in private vehicles.
- The primary and secondary schools should be located closer together in order to share facilities and in the southern part of the site where there would be better access from Yapton Road.
- Carbon dioxide emissions from transporting children to schools.
- Vehicular access to the secondary school site should be provided within 'The Landings' and not from completed housing developments in Yapton.
- There is not the road or public service infrastructure for this development.
- Little reference is made about health provision.
- A 60-bed care home is not supported.
- Will totally change the character of the area and people's way of life.
- The Eco-town was rejected and so should this proposal.
- Overdevelopment of the area.
- Should be greater emphasis on maintaining a green gap between the site at Ford and Yapton and Clymping.
- No spatial separation that would help Climping retain its separate identity, contrary to the Climping Neighbourhood Plan.
- Insufficient provision of landscaping and biodiversity.
- Loss of arable land and effect on the Skylark population.
- Loss of Grade 2 agricultural land.
- Cannot keep losing countryside.
- The proposed houses are not zero carbon.
- Risk of flooding.

The representations in support make the following comments:

- There is no policy that makes delivery of the strategic allocation dependent on a bridge over the railway at Ford and/or a connection to the proposed A27 Arundel Bypass, nor any policy that requires the development to make a contribution towards the same.
- Permission should be granted subject to legally appropriate conditions and a s.106 agreement at the earliest possible opportunity and without further delay.
- 'The Landings' will link the fragmented village together.
- The partnership between the Community Land Trust and housing association is a good idea to help the local community.

COMMENTS ON REPRESENTATIONS RECEIVED:

The representations are noted and have been taken into account in the Conclusions section of this report.

CONSULTATIONS

- National Planning Casework
- WSCC Strategic Planning
- Environment Agency
- Network Rail
- NHS Coastal West Sussex CCG
- Strategic Projects
- Highways England
- Sussex Police-Community Safety
- Engineering Services Manager
- Engineers (Drainage)
- Ecology Advisor
- Sport England South East
- Surface Water Drainage Team
- Environmental Health
- Parks and Landscapes
- Arboriculturist
- Southern Water Planning
- Economic Regeneration
- Planning and Housing Strategy
- WSCC Strategic Planning

CONSULTATION RESPONSES RECEIVED:

Below is a summary of the consultation responses provided in regards to the proposed development. Full comments from each of the consultees are available through the Arun District Council website.

HIGHWAYS ENGLAND - No Objection

On the basis that the Council will require a financial contribution towards the agreed scheme of works on the A27 Trunk Road in line with the adopted Local Plan, or other such scheme of works of similar or

greater benefit, Highways England find the proposals acceptable and will not materially affect the safety, reliability and/or operation of the strategic road network in this location and its vicinity.

WSCC LOCAL HIGHWAY AUTHORITY

Additional information was sought, in relation to the following matters:

- Consideration of cycle route provision in line with Local Transport Note (LTN) 1/20 Cycle Infrastructure Design;
- Discussions with WSCC PRoW;
- Stage 1 Road Safety Audits for all Schemes/improvements;
- Public Transport Details; and
- Contributions / Delivery of works / phasing of works.

Comments received 05.11.2021

Cycle Infrastructure Design LTN 1/20

- Considerations of the offsite cycle connections have been provided by the applicant, due to the constraints of the existing highway boundary limited enhancements to the proposed routes can be made however where feasible the off road route to Ford Station has been widened to 3.2m. Future routes within the development should be developed in accordance with the guidance contained within LTN1/20.

WSCC PRoW

- The WSCC PRoW team have provided comments to the LPA.

Road Safety Audit

- Stage 1 RSAs have been carried out on all schemes and the recommendations accepted by the designed and agreed with WSCC.

Public Transport Details

- Whilst limited details have been provided the applicant has indicated that the development would provide either;

(a) A 30 minute frequency service between Barnham and Littlehampton that routes through the development and provides access to Barnham Station; or

(b) The diversion of the 700 Coastliner Route through the development site in addition to a 30 minute frequency morning and evening peak period shuttle service between the site and Barham Railway Station.

- As part of this service provision, bus stop infrastructure is to be provided in the site and will be brought forward as part of the subsequent Reserved Matters Applications. Given that there will need to be a good level of occupancy to make such a link viable, I would suggest a trigger of 33% occupation (prior to occupation of the 501st dwelling).

- As no firm details are available about the phasing of the development in creating a link that the 700 service could utilise and the previously proposed trigger for both accesses being 1st and 750th occupation. It is recommended that both accesses should be delivered by the 501st Occupation in line with the provision of the bus service.

- Prior to delivery of either of the above services future residents would be able to utilise the existing bus stops.

Contributions

- Contributions are to be provided in accordance with the Arun Transport Study apportionment report 2020.

Ford Road Access

- Following the provision of a stage 1 RSA associated with WSCC planning application WSCC/011/21 the issue of HGVs over running has been brought to WSCC attention. As the development would

increase vehicle flows above existing consented levels through the junction and increase the level of conflict it is expected that the finding of the safety audit would also need to be addressed by this application and as such the applicant has identified a scheme within land under their control which would be delivered to address the issue within the RSA.

No objection is raised subject to the identified S106 contributions and conditions.

WSCC PUBLIC RIGHTS OF WAY

The impact of the development on the public use, enjoyment and amenity of Public Rights of Way (Footpaths 175, 363, 366 and 366_1) is a material consideration. Upgrading the existing footpaths to bridleway status would provide walkers, cyclists and equestrians with a safe off-road route that could tie in with any schemes to link access to the River Arun to the east and Public Rights of Way north to Arundel and south-east towards Littlehampton. Such enhancements should be considered for the benefit of the development, local community and visitors to the area. They would also improve access to local business, schools and tourism.

NETWORK RAIL

Concerned about the impact of the proposed development and the cumulative impact of developments in the area on the Yapton and Ford level crossings. Some level crossings would benefit from closure in this area and Network Rail is keen to work with the Council to ensure it occurs. The development provides an opportunity to secure a significant contribution towards the provision of a road bridge over the railway at Ford, which is safeguarded in the Local Plan.

Network Rail also seeks the provision of continuous, direct, and safe footpaths and cycle paths between the development and Ford Station, as part of a wider network, together with financial contributions towards additional car parking and cycle parking facilities at Ford Station.

ENVIRONMENT AGENCY

The majority of the proposed development is within Flood Zone 1. There is a small area in the north-east corner that is within Flood Zones 2 & 3. It is proposed that allotments be located in this area, which is supported.

WSCC LEAD LOCAL FLOOD AUTHORITY - No objection

The Surface Water Drainage Strategy included with this application states that permeable paving and attenuation basins with a controlled discharge to the watercourse would be used to control the surface water runoff from the site. Surface water pumping is not sustainable and other SuDS will need to be considered in this respect.

All works to be undertaken in accordance with the LPA agreed detailed surface water drainage designs and calculations for the site, based on sustainable drainage principles.

ADC DRAINAGE ENGINEER

The applicant has listened to our concerns and has now provided an outline of a gravity surface water drainage solution. Conditions are proposed.

NATURAL ENGLAND

Without appropriate mitigation the development would have an adverse effect on the integrity of the Arun Valley Special Protection Area (SPA). Mitigation measures need to be secured as set out in the Appropriate Assessment (AA). These measures involve the use of fencing and planting of hedgerows along footpaths that pass through suitable Bewick's swan habitat to reduce recreational disturbance associated with the development and mitigate the likely significant effects. It is advised that an appropriate planning condition or obligation is attached to any planning permission to secure these

measures.

ADC ECOLOGY ADVISOR

A lot of survey work has been undertaken relating to protected sites, species and habitats on site. Bewick swans are protected as part of the Arun Valley Special Protection Area (SPA). The Shadow Habitats Regulations Assessment in relation to Bewick Swans is satisfactory. However, no other mitigation strategies have been discussed and there is a lack of information on how green infrastructure will be incorporated into the scheme. The Blue and Green Infrastructure Parameter Plan indicates substantial gaps in the hedgerows/planting around the boundary of the site, which will have an impact on commuting bats. Information on biodiversity net gain needs to be provided prior to determination.

WSCC MINERALS & WASTE - Objection

The County Council fully recognise the importance of, and in principle policy support for the development confirmed by its allocation in the Local Plan. However, as required by policies W2 and W10 of the Waste Local Plan, policies WM DM1, QE SP1 and H SP2c (SD8) of the Arun Local Plan and policy EE3 of the Ford Neighbourhood Plan, any development of the site must ensure that existing and allocated waste management facilities/sites be safeguarded from inappropriate neighbouring development that could prejudice the operation and/or future development, and ensure new development is safeguarded from the impacts of incompatible land uses.

The applicant has not demonstrated that the proposed development, in particular the proximity of noise sensitive uses to existing and allocated waste management sites, could be delivered without prejudicing the operating of existing waste management facilities.

SOUTHERN WATER - Objection

The illustrative masterplan of the site shows some residential development within the 1.5 OdU (odour) contour of the waste-water treatment works. The Odour Assessment Technical Report has not been agreed with Southern Water and further investigation into odour emissions from the waste-water treatment works is required. The assessment does not deal satisfactorily with the cumulative impact of odour from the waste-water treatment works and surrounding industrial uses. It is optimistic to assume that any environmentally permitted facility will be completely odour free. The revised Waste Infrastructure Statement fails to demonstrate that there has been any consideration of the future expansion of the Ford waste-water treatment works, as required by Policy H SP2c of the Local Plan.

ADC ENVIRONMENTAL HEALTH OFFICER - Objection

Noise - there is concern about the impact of noise from adjoining industrial and waste management sites on the amenities of the occupiers of the proposed dwellings, including noise levels within gardens.

Odour - there is concern that the odour assessment does not appear to take into account any future increase in capacity at the Southern Water Waste Water Treatment Works. The proximity of the proposed housing could restrict its expansion. There is also the potential for odour from the Grundon waste management site to have an impact on the proposed residential use. The odour assessment must consider not only the potential sources of odour but the potential cumulative impacts too.

Air Quality and Dust - it is agreed that a dust management plan and construction management plan be secured through the use of planning conditions

Conditions - other conditions are recommended to limit the hours of construction activities, to deal with the risks associated with land contamination and any asbestos if present, and to control external lighting.

ADC HOUSING STRATEGY & ENABLING MANAGER

The scheme should provide 450 affordable dwellings, of which 75% (338) should be rented and 25%

(112) should be intermediate tenure. The preferred mix of affordable housing is 35% 1-bed, 40% 2-bed, 20% 3-bed and 5% 4-bed.

Ongoing discussion with the Ford Community Land Trust and their chosen Registered Provider partner is encouraged. A formal agreement with the Community Land Trust will ensure that the needs of the local community are fully met in parallel with the requirements of the Council.

WSCC INFRASTRUCTURE

Education: No primary/secondary/further secondary schools within the catchment area of the proposal have spare capacity to accommodate the children generated. Contributions requested as follows:

Early Years and Primary - A financial contribution and land for a 2FE primary school, including nursery places.

SEND - A financial contribution and land to provide special education facilities at the new primary school or a financial contribution to expand provision at Cornfield School.

Secondary - A formula based financial contribution and land towards phase 2 of a new secondary school in Arun or expansion at Ormiston Six Villages Academy should the new school not progress.

Further Secondary - A formula based financial contribution towards phase 2 of a new sixth-form, or restructure of the sixth-form to cater for the additional student population at St Philip Howard Catholic High School Sixth-Form.

Library: A community space is required on site to accommodate a Tier 7 facility plus a financial contribution towards the new facility, or a contribution towards the expansion of facilities at Littlehampton Library should the new Tier 7 facility not proceed.

Fire and Rescue: A formula based financial contribution is required towards the redevelopment of Littlehampton Fire Station.

WSCC - FIRE & RESCUE

Recommend the imposition of conditions to secure the provision of fire hydrants.

NHS WEST SUSSEX CLINICAL COMMISSIONING GROUPS

It is predicted that new residents will register at The Croft surgery or the GP premises in Yapton, which are the primary care sites to support the proposed development. The CCG has a new build scheme at The Croft site in progress (part funded by future s.106 receipts) and the option to extend or utilise a new build in Yapton. A contribution is sought towards off-site healthcare infrastructure at The Croft Surgery and/or GP premises supporting Ford at Yapton.

HISTORIC ENGLAND

Do not object to the application in principle. But consider that significant further work by the applicant is required to demonstrate that conservation and enhancement of heritage assets has been adequately achieved, and harm to the historic environment has been avoided, minimised, and appropriately justified, as detailed in the NPPF.

Not satisfied that the scope and quality of the historic environment assessment is sufficiently robust to inform the decision-making process.

Consider that the application does not meet the requirements of the NPPF 2019 (paragraphs 184, 189 and 200). Additionally, it is considered that the application does not meet the requirements of Local Plan

Policy H SP2 clause m.

ADC CONSERVATION OFFICER

More detail could have been provided, such as an assessment of the settings of the listed buildings and description of their significance. Inclusion of the route of the former canal in the open space and the opportunity for it to be linked to other strategic allocations in the western part of the district is welcomed. The route should appear through the entire development. Some locally listed buildings or structures appear not to have been considered in the submitted assessment.

ADC ARCHAEOLOGY OFFICER

The archaeological interest of the site should be further evaluated by trial trenching in order to identify anything of importance whose significance should be properly preserved from the effects of development. Condition recommended to ensure that the site is evaluated ahead of development.

SPORT ENGLAND

- (i) The retention of existing sports facilities accords with Sport England's planning objectives.
- (ii) Supports the inclusion of land for formal sports pitches. Reference should be made to the playing pitch strategy to establish the detailed arrangement of the playing field land. Its provision, long-term management and maintenance and related changing facilities should be secured through a s.106 agreement.
- (iii) It is recommended that financial contributions towards artificial grass pitches, indoor sports facilities and swimming pools, also be secured through a s.106 agreement.
- (iv) The principles of 'Active Design' have been incorporated in the illustrative material accompanying the application, which shows a very strong framework of connected routes for walking and cycling and green spaces for formal and informal sport and recreation. The open spaces and pedestrian/cycle routes should be secured, through a s.106 agreement, as early as possible in the development phasing to embed active travel habits in the new resident population as it grows.
- (v) The use of model conditions is recommended.

ADC GREENSPACE

Recommended that the Masterplan for the site be endorsed before applications come forward for determination. No objection in principle to the development of this site for residential purposes, but further detail is required on the landscape aspects.

- (i) The public open space on the east side of the site, adjoining existing industrial premises, should be considered against good design principles; not just to avoid development in odour zones.
- (ii) Green infrastructure is required throughout the development.
- (iii) Provision needs to accord with the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD adopted in January 2020.
- (iv) A clear indication of the proposed future management of the open space must be set out.
- (v) Measures to enhance biodiversity are required.
- (vi) A full and detailed landscaping scheme will be required.
- (vi) Clarification is sought on the form of recognition given to the line of the former canal, which passes through the site of the proposed sports pitches.

ADC ARBORICULTURE

The proposed development is achievable without significant loss of established tree and hedgerow cover that is of public amenity and/or landscape value. The loss of trees and hedgerows of low-moderate value can be adequately mitigated with an ambitious and detailed soft landscape plan. As the detailed layout evolves for phases of the development, each application will need to be supported by an Arboricultural Impact Assessment and Method Statement Report, including a Tree Protection Plan identifying which trees are to be removed, which trees are to be retained and measures to protect them throughout the development. A condition has been recommended to achieve this.

SUSSEX POLICE

No major concerns with the proposals. However, additional measures to mitigate against identified local crime trends and site-specific needs should be considered. A financial contribution (£251,301.58) is sought towards the provision of police infrastructure (i.e. additional officers/staff, premises, vehicles and ANPR camera).

COMMENTS ON CONSULTATION RESPONSES:

Below are the officers comments in response to specific consultee comments.

ADC Drainage Engineer:

Following receipt of an updated drainage strategy in July 2021, ADC's Drainage Engineer has advised that they were pleased to see that the applicant had now provided an outline of a gravity surface water drainage solution and recommended the use of conditions on any planning permission granted.

Southern Water:

A revised odour assessment report was submitted by the applicants in July 2021, following additional sampling carried out at the site in May 2021. Southern Water have been consulted on the latest assessment and their comments were required by the 23rd August 2021. Despite chasing these outstanding comments no communication has been received from Southern Water in regards to this matter. As such, in the absence of any comment it is assumed that their concerns have been addressed through the update odour assessment.

Environmental Health:

An update response has been provided following discussions with the developer and the submission of the update odour assessment in July 2021. It has been confirmed by Environmental Health that the use of a suitably worded condition would be adequate to address their concerns in regards to noise. They have also advised that they are unable to provide comment in regards to the odour assessment and recommended that independent assessment is undertaken to confirm the conclusions of this report. The Council are currently in the process of securing an independent contractor to undertake this review and as such delegated authority is sought for the determination of this application subject to the satisfactory outcome of this review.

POLICY CONTEXT

Designations applicable to site:

Policy H SP2c Ford (SD8) Strategic Allocation

Built-up Area Boundary

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

AHSP2	AH SP2 Affordable Housing
DDM1	D DM1 Aspects of form and design quality
ECCSP1	ECC SP1 Adapting to Climate Change
ECCSP2	ECC SP2 Energy and climate change mitigation
EMPSP1	EMP SP1 Strategic Economic Growth
ENVDM1	ENV DM1 Designated Sites of Biodiversity or geographical imp
ENVDM4	ENV DM4 Protection of trees

ENVDM5	ENV DM5 Development and biodiversity
ENVSP1	ENV SP1 Natural Environment
HDM1	H DM1 Housing mix
HDM2	H DM2 Independent living and care homes
HERDM1	HER DM1 Listed Buildings
HERDM2	HER DM2 Locally Listed Buildings or Structures of Character
HERDM5	HER DM5 Remnants of the Portsmouth and Arundel Canal
HERDM6	HER DM6 Sites of Archaeological Interest
HERSP1	HER SP1 The Historic Environment
HSP1	HSP1 Housing allocation the housing requirement
HSP2	H SP2 Strategic Site Allocations
HSP2C	H SP2c Inland Arun
HWBSP1	HWB SP1 Health and Wellbeing
INFSP1	INF SP1 Infrastructure provision and implementation
INFSP2	INF SP2 New Secondary School
LANDM1	LAN DM1 Protection of landscape character
OSRDM1	Protection of open space,outdoor sport,comm& rec facilities
OSRSP1	OSR SP1 Allotments
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QEDM3	QE DM3 Air Pollution
QEDM4	QE DM4 Contaminated Land
QESP1	QE SP1 Quality of the Environment
SDSP1	SD SP1 Sustainable Development
SDSP1A	SD SP1a Strategic Approach
SDSP2	SD SP2 Built-up Area Boundary
SKILLSSP1	SKILLS SP1 Employment and Skills
1	
SODM1	SO DM1 Soils
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TDM2	T DM2 Public Parking
TSP1	T SP1 Transport and Development
TSP2	T SP2 Littlehampton to Arundel Green Link
TSP3	T SP3 Safeguarding to Main Road Network
WDM1	W DM1 Water supply and quality
WDM2	W DM2 Flood Risk
WDM3	W DM3 Sustainable Urban Drainage Systems
WMDM1	WM DM1 Waste Management
WSP1	W SP1 Water

[Ford Neighbourhood Plan 2019 Policy BUA1](#)

Ford Neighbourhood Plan 2019 Policy EE3
 Ford Neighbourhood Plan 2019 Policy EE4
 Ford Neighbourhood Plan 2019 Policy EH1
 Ford Neighbourhood Plan 2019 Policy EH3
 Ford Neighbourhood Plan 2019 Policy EH4
 Ford Neighbourhood Plan 2019 Policy EH5
 Ford Neighbourhood Plan 2019 Policy GA1
 Ford Neighbourhood Plan 2019 Policy GA3

 Ford Neighbourhood Plan 2019 Policy H2
 Ford Neighbourhood Plan 2019 Policy H4
 Ford Neighbourhood Plan 2019 Policy H6
 Ford Neighbourhood Plan 2019 Policy LC1
 Ford Neighbourhood Plan 2019 Policy LC2
 Ford Neighbourhood Plan 2019 Policy SA1
 Ford Neighbourhood Plan 2019 Policy SP1

West Sussex Waste Policy W10 Strategic Waste Allocations
 West Sussex Waste W2 Safeguarding Waste Management Sites
 West Sussex Waste W23 Waste Management within Department
 Built Up Area (BUA) boundary
 Protection of existing businesses
 Support for new commercial uses
 Protection of trees and hedgerows
 Buildings and structures of character
 Surface water management
 Grade 1, 2 and 3a Agricultural Land
 Footpath and cycle path network
 Streets and Access Ways to serve new development
 Housing Mix
 Recreational Space
 Integration of New Housing
 Support Independent Living
 Healthcare facilities
 Ford Airfield
 Spatial Plan for the Parish

PLANNING POLICY GUIDANCE:

NPPDG National Design Guide
 NPPF National Planning Policy Framework
 NPPG National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11 Arun Parking Standards 2020
 SPD12 Open Space, Playing Pitches & Indoor & Built Sports Facilities
 SPD13 Arun District Design Guide (SPD) January 2021

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011-2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Ford Neighbourhood Development Plan 2017-2031 was made on 9th January 2019. Relevant neighbourhood plan policies have been taken into account and are addressed in the Conclusions section

of this report.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

Section 70(2) of TCPA provides that -

2. In dealing with an application for planning permission, the authority shall have regard to:
- the provisions of the development plan, so far as material to the application, a post-examination draft neighbourhood development plan, so far as material to the application,
 - any local finance consideration, so far as material to the application, and
 - any other material considerations.

The proposal is part of a strategic allocation within the built-up area boundary and the application has adequately demonstrated that it would accord with the requirements of policies H SP2 and H SP2c of the Arun Local Plan (2011-2031).

The proposal also makes adequate contributions towards necessary infrastructure, required in accordance with policy INF SP1 of the Arun Local Plan (2011-2031).

OTHER MATERIAL CONSIDERATIONS

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

CONCLUSIONS

PRINCIPLE

As a site that is allocated for development through policy H SP2c (SD8) of the Arun Local Plan 2011-2031 (ALP), as well as policy SA1 of the Ford Neighbourhood Development Plan (FNDP), the proposals are considered automatically to be sustainable development in accordance with paragraph 11c of the NPPF. Both the ALP and the FNDP allocate the site for residential dwellings for a development of at least 1,500 units to be delivered as part of the strategic housing site (SD8) at Ford. The application site occupies a substantial portion of the Ford strategic allocation in Policy H SP1 and the 1,500 proposed dwellings would meet the number of units required within the plan period.

In accordance with policy H SP2 of the ALP the development must be comprehensively planned and have regard to a masterplan endorsed by the Council for the respective areas which incorporates high quality imaginative design giving a sense of place and a permeable layout. In order to demonstrate the principle of the proposal it will be necessary to consider it against the criteria set out within policy H SP2c (SD8).

A masterplan for the Ford Strategic Site Allocation was considered by the Development Control Committee at its meeting held on 3rd February 2021, where it was resolved:

"That authority be delegated to the Director of Place to endorse 'The Landings' Masterplan Document following:

A. The receipt of an amended document that satisfactorily demonstrates:

1. Improved provision for pedestrians, cyclists and equestrians, and
2. The historic alignment of the canal; and

B. Confirmation that there is agreement between a recognised education provider and the landowners regarding the transfer of land for the delivery of a new secondary school at Yapton/Ford."

An amended Masterplan Document that satisfies the Committee's requirements in respect of provision for pedestrians, cyclists and equestrians and in dealing with the historic alignment of the canal was received on 9th August 2021. It is the view of the Local Planning Authority (LPA) that this amended masterplan meets the requirements of A.1 and 2 above. With the additional consideration of sustainable modes of transport ensuring that the proposal has demonstrated compliance with policy H SP2c (SD8) (a) of the ALP.

West Sussex County Council, as local education authority, is understood to be involved in ongoing discussions with the landowners regarding the secondary school site but at this time the matter remains unresolved. Therefore, given that point B remains outstanding formal endorsement of the Masterplan through delegated authority has not been possible. Despite the school issue remaining outstanding the masterplan as proposed is deemed to meet the requirements of policy H SP2c (SD8) for the purposes of informing any reserved matters applications. Should the school issue be resolved through the identification of a different site then the Council would expect any reserved matters applications to reflect the implications of such a change..

The submitted Masterplan Document, shows residential located on the western portion of the site, with education, leisure and community uses clustered centrally within the site and 9,000 sqm of employment floorspace located to the east of the waste water treatment works.

The illustrative masterplan submitted in support of the application shows an area for the local centre adjacent to the Flying Fortress and Arun Sports Arena and an enlargement of the existing playing field. South-west of the local centre, an indicative area of land is identified for the provision of a primary school which is of sufficient size to accommodate a 2-form entry primary school in accordance with policy H SP2c (SD8) (b). The proposed community hub would incorporate retail, commercial and community facilities including a Tier 7 library facility in accordance with the requirements of policy H SP2c (SD8) (c).

The illustrative masterplan clearly demonstrates how the application site could deliver 1,500 dwellings in a manner which takes account of surrounding constraints. Odour contours and noise generating uses which are sited in close proximity to the application site have been identified and have informed the indicative layout with areas inappropriate for residential development having been identified. Open space has been incorporated towards the centre of the site providing sports pitches to address the requirements of HSP2c (SD8) (d). In addition to providing these key facilities this open space will provide a buffer between the proposed dwellings and neighbouring uses. Consideration has also been given to the orientation of dwellings within the indicative masterplan demonstrating how design and layout could be used to further mitigate any potential harm to the amenity of future occupiers. This has adequately demonstrated that the proposed residential development could come forward in a manner which would not prejudice the operation of the treatment works as required by H SP2c (SD8) (j).

In addition to this, open space has been incorporated on the north-western portion of the site and along the southern boundary adjacent to Horsemere Green Lane in order to provide visual and physical

separation between the proposed development and the established settlements of Yapton and Clymping to avoid coalescence between the settlements as required by policy H SP2c (SD8) (i).

The indicative masterplan has sought to address the historic character of the site through the incorporation of open space and road alignment to reflect the orientation of the existing south-western arm of the runway. In addition to this a buffer is provided to protect the historic alignment of the Portsmouth to Arundel canal demonstrating that the proposed development can be accommodated on this site whilst reflecting the history of the site in accordance with policy H SP2c (SD8) (h).

The illustrative masterplan has been prepared on the basis that the land to the north-west of the application site has been identified as the preferred site for the new secondary school. It is possible for a potential access to be provided to the secondary school approximately 800m to the north-west of the local centre (as shown through the indicative masterplan). Although this point of connection has not been specifically identified on the access and movement parameter plan it does demonstrate that the location of the proposed secondary school and its proximity to the heart of the new community that this application would create has the potential to work well. However, as has been identified above the land required to deliver the new secondary school has not yet been secured by WSCC. Therefore, if delivery of the secondary school in the preferred location is not possible to achieve and an alternative location needs to be found, then additional pedestrian and cycle connections within the site may need to be identified as part of any Reserved Matters application.

The proposed employment uses located on the eastern part of the site are intended to be accessed via the existing access from Ford Road which serves Ford Market and the waste management uses which currently operate from the site. This employment provision is deemed to be acceptably located in principle and will ensure that the development meets the requirements of Policy H SP2c (SD8) (g).

A portion of the application site in the north-western corner of the application site, to the south of Ford Lane is not part of the strategic allocation and as such falls outside of the Built-up Area Boundary (BUAB) and within the countryside (C SP1). The illustrative masterplan shows this land as providing allotments, surface water attenuation and public open space and as such its use would be classified as informal recreation and as such would accord with policy C SP1 (b) of the ALP.

Policy SP1 of the FNDP identifies that proposals a minimum of 1545 new dwellings and supporting infrastructure and village centre community facilities will be supported if they are sited within the settlement boundary. As identified above part of the application site would fall outside of the defined settlement boundary. However, as shown on the indicative masterplan this area would be for informal recreation and does not incorporate any built form. Except for this piece of land, the application site lies within the built-up area boundary and as such is in accordance with local plan policy SD SP2 and policy BUA1 of the FNDP.

As identified above there remains no agreement between the landowners and a recognised education provider as was required for delegated endorsement of the submitted masterplan. As has been identified above the indicative masterplan has demonstrated that a scheme in compliance with the requirements of policy H SP2c (SD8) of the ALP as well as Policy SA1 of the FNDP can be delivered on site. Therefore, the principle of development is acceptable and in accordance with policies SD SP1, H SP1 and H SP2 of the ALP.

DESIGN

The application is for outline permission with all matters reserved save for access. As such the application is accompanied by indicative plans which show how the site could be delivered given the identified constraints. Therefore, detailed consideration of design falls outside the scope of this

application. However, it is important to consider how the Council can ensure that the development achieves high design standards at detailed design stage.

The Arun Design Guide was adopted on the 25th January 2021 and is now a material consideration in determining planning applications. The Design Guide cannot be applied entirely to this outline application given that details of design are not the subject of consideration for this outline application. However, it is relevant to the importance of applying relevant conditions to ensure high quality design is achieved at reserved matters stage.

The National Design Guide (January 2021) forms part of the Government's collection of planning practice guidance. Paragraphs 20-21 of the Design Guide explain how good design should pay regard to place and context and that 'a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings'. Part 2 of the Guide sets out ten characteristics for good design, namely Context, Identity, Built form, Movement, Nature, Public spaces, Uses, Homes and buildings, Resources and Lifespan.

Therefore, in this case Condition 7 has been included as part of the recommendation and will secure a design code which will ensure that a high quality distinctive and coherent development which features a high quality of design is secured. This condition also requires that the design code is prepared with effective community engagement. Therefore, it is considered that the condition will ensure a development that accords with the aims and objectives of paragraphs 128 and 129 of the NPPF.

HOUSING MIX & AFFORDABLE HOUSING

Policy H DM1 of the Arun Local Plan seeks to secure a mix of dwelling types and sizes, including affordable housing units, as does policy H2 of the Ford Neighbourhood Development Plan. The former states, "for developments of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations". The policy seeks to secure the provision of some serviced sites for the development of self-build homes and a proportion of the housing designed to meet the needs of older people too. The local self-build register indicates that there is interest in Yapton, Ford and Climping for the provision of 31 plots for self-builders (as at September 2021).

The Planning Statement accompanying the application includes an indicative overall housing mix, but the mix within specific phases of development is likely to vary. The illustrative masterplan shows indicative locations of housing and open spaces and demonstrates that a range of house types and densities are capable of being delivered.

Policy AH SP2 of the Arun Local Plan states that the Council will require a minimum of 30% of the total number of units proposed on site to be provided as affordable housing on the same site on all developments of 11 residential units or more. The applicants are proposing to provide 450 of the 1500 dwellings as affordable housing, with a tenure split of 75% rented and 25% intermediate housing, which accords with the policy.

There is high demand for affordable housing throughout the Arun District for both rent and low-cost home ownership. As at March 2021, there were 1,045 households in housing need on the Council's housing register.

With reference to the 'Provision of Accommodation suitable for older people and people with disabilities', agreed at the Planning Policy sub-committee 27th February 2019, the Council's policy is that for schemes greater than 51 units - 50% of units should be designed to m4(2) standard and 2 per 50 units designed to m4(3) wheelchair accessible standard. The expectation would therefore be that a minimum

of 225 of the affordable dwellings be designed to m4(2) and that an additional 18 affordable dwellings be designed to m4(3).

The Council's Housing and Enabling Officer has highlighted the greatest need in the District to be for 2 bed (4 person) homes and advised that the mix should be as follows:

Rented

104 x 1 bed home

150 x 2 bed home

68 x 3 bed home

16 x 4 bed home

Intermediate

34 x 1 bed home

50 x 2 bed home

22 x 3 bed home

6 x 4 bed home

The proposed affordable housing should be constructed to be indistinguishable from the market housing and should be pepper-potted throughout the development in clusters of no more than 20 homes.

The number and tenure split of the affordable housing is to be included in a Section 106 Agreement. There is an opportunity for the affordable dwellings to be managed on the site by the Ford Community Land Trust (CLT) and on this basis the CLT has been listed in the Section 106 Agreement as an approved provider and potential deliverer.

The proportion of homes designed to meet the needs of older people and people with disabilities can be secured adequately using suitably worded conditions.

It is intended for a number of custom-build plots to be secured as part of the S106 agreement which requires the submission of a scheme as part of the phasing strategy.

HIGHWAYS AND ACCESS

The application is supported by a Transport Assessment, a Framework Travel Plan and plans containing details of each proposed access. The plans, drawings and documents have been examined by National Highways and by West Sussex County Council as local highway authority.

The application proposes two points of vehicular access to the residential element of the development, via Ford Lane and Yapton Road. In addition to this a single point of vehicular access will be used to provide access to the employment element of the development from Ford Road. There is no internal vehicular link proposed between the residential and employment elements of the proposals.

Vehicular access from Yapton Road consists of a 4-arm roundabout, two arms will provide for the continuation of traffic along Yapton Road to both the north and south, a third arm will provide access to the development with the fourth arm serving the agricultural fields adjacent to Yapton Road. The roundabout has been designed with specific road conditions and average traffic speeds taken into account with forward visibility splays of 120m having been provided on the Yapton Road approaches to the roundabout.

Vehicular access from Ford Lane will also take the form of a 4-arm roundabout with two arms providing for the continuation of traffic along Ford Lane, with the third arm providing access to the development

and the fourth arm providing access to the consented anaerobic digestate plant to the north of Ford Lane. Again, the roundabout has been designed with road specific conditions in mind having undertaken an assessment of vehicle speeds on Ford Lane and as such forward visibility splays of 120m have been provided on the Ford Lane approaches to the roundabout.

The main spine road through the site will link the Ford Lane and Yapton Road accesses and is to be provided as a 30mph road. Therefore, the development arm of the roundabouts have been designed accordingly providing forward visibility extending to a minimum of 90m.

Vehicular access from Ford Road to the employment provision will be provided through the utilisation of the existing access to Ford Airfield. This junction also provides access to the Waste Water Treatment Works (WWTW), Viridor and Grundon. It has originally been identified that this access could accommodate manoeuvres by Heavy Goods Vehicles (HGV) but an RSA has subsequently identified that HGV's accessing the site would block the access posing a risk to highway safety. As such a revised access drawing has been provided (Drawing no. ITB13091-GA-068) which demonstrates how the design of the junction could be amended to ensure the safe operation of this junction. A condition has been included as part of this recommendation requiring that these measures are implemented prior to the commencement of the employment development which will be served via this access.

A detailed assessment of traffic impacts of the proposed development has been undertaken as part of the Transport Assessment and concluded that the proposed development is likely to generate approximately 537 two-way vehicular movements in the morning peak and 577 in the evening peak hour which equates to around an additional 10 movements per minute on the highway network. The assessment identifies a 19.6% increase on the North End Road/B2233 junction which equates to between 211-227 additional vehicular movements. The development has been identified as having smaller impacts on the A259 junctions, with the largest impact identified as being an 8.1% increase in traffic on the A259/Yapton Road Junction.

The traffic generation at the site has then been modelled on the junctions surrounding the development and where it is identified that the junctions would operate over design capacity, improvements have been proposed to offset the impacts of development upon the operation of the junctions. These mitigation measures have been set out below and will be secure through the S106 agreement with appropriate triggers to ensure these enhancements are implemented to avoid harm upon the operation of the highways network.

WSCC have been consulted on the proposed development and in their consultation response of the 5th November 2021 confirmed that all outstanding matters had been addressed and they raised no objection to the application subject to securing S106 contributions and inclusion of appropriately worded conditions in regards to car parking, cycle parking, EV charging and Construction Management.

National Highways have been consulted and have confirmed that Arun District Council and our consultants have worked extensively with National Highways and colleagues from WSCC Highways to examine the impacts of the Councils adopted Local Plan Proposals. The Transport Assessment which supports the adopted Local Plan identified key mitigations required on both the local and strategic road networks. It was agreed between all parties that strategic development would fund those highway mitigations.

On the basis that financial contribution from this development towards the agreed scheme of works on the A27 in line with the adopted Local Plan (or other such scheme of works to similar of more beneficial effects) is secured then National Highways would find the proposals acceptable and that they will not affect the safety, reliability or operation of the strategic road network (SRN).

The Heads of Terms for the S106 Agreement includes financial contributions towards several projects in accordance with the Arun Local Plan. These contributions are as follows:

- A27 Ford Road Roundabout - £301,000
- A259 Oystercatcher junction - £600,000
- A259 Comet Corner junction - £97,000
- A259 Corridor Improvement Bognor Regis-Littlehampton - £515,000
- A259 Lyminster Bypass to A280 junction - £15,000

The draft Heads of Terms also contain obligations to secure the following highway works or improvements which have been agreed with WSCC:

- Yapton Road Access
- Ford Lane Access
- Rollaston Park/Burdell Road - A scheme of pedestrian improvements to enhance crossing provision.
- Ford Lane Pedestrian Connection with enhanced crossing point and 2m wide footway.
- Church Lane Pedestrian/Cycle Connection - A scheme of footway and cycleway improvements on the eastern side of Church Road to improve conditions for pedestrian and cyclists and provide a connection to the National Cycle Network Route 2.
- Ford Road and Station Road Cycle Scheme - Improved pedestrian/cycle connection to the station.
- Ford Lane/North End Road Improvement - Widening of the junction to provide left hand turn lane and delivery of 1.8m wide footway and dropped kerb and tactile paving to tie in with existing pedestrian provision.
- B2233/North End Road - A roundabout improvement at the junction to enhance the operational capacity of the junction and improved pedestrian crossing provision.
- Bilsham Road/B2233 - A Section 106 financial contribution to WSCC to enable a scheme of comprehensive improvements to be brought forwards in accordance with the Arun Local Plan and Infrastructure Delivery Schedule.
 - Yapton Cycle Route Improvements - on carriageway cycle lanes to indicate cycle priority.
 - Horsemere Green Lane - To provide pedestrian access from site along with the delivery of a 2m public footway and enhanced pedestrian crossing points.
 - Footpath 206 Connection.

Discussions have been ongoing during the life of the application regarding the appropriate financial contribution towards the Ford Road Bridge. Policy T SP1 (g) of the Arun Local Plan identifies that the Council will support transport and development which 'provides improved crossing points over the railway line to improve transport links between the coast and the A27, in particular at Ford'.

Given the language used this does not place an onus on the applicant to provide these links, but rather identifies that such proposals would be supported should they come forward. The Transport Assessment submitted in support of the application identifies that the development would not give rise to unacceptably adverse impacts upon the operation of the existing Ford and Yapton level crossings, which would continue to operate in a satisfactory manner. Nor would the development result in any unacceptably adverse environmental harm by virtue of additional vehicles queueing at the level crossing. The transport assessment has been the subject of consideration by West Sussex County Council as Highway Authority who have raised no objection to these conclusions.

However, it is the view of the LPA that there is adequate justification to seek the developer to make a financial contribution towards the preparation of a scheme and the submission of a planning application for the delivery of the road bridge should it come forward. The sum proposed is £350,000. Network Rail in their consultation response have been generally supportive of this approach. Therefore, it is intended for this contribution to be secured through the S106 agreement.

The proposed employment uses would be accessed from Ford Road via the existing Hunterford access which currently serves the Ford Market and existing waste management uses. The proposed employment uses and associated traffic generation were taken into consideration through the Transport Assessment, which has been the subject of consideration by WSCC as Highway Authority who have raised no objection to the conclusions of the Transport Assessment and its impact upon the operation of the highways network.

While no commitment has been made from a bus operator to route one of its services through the site, the applicant is willing to enter into a planning obligation that requires a scheme for the provision of a local bus service to be agreed with the County Council and implemented at an appropriate stage of the development.

Therefore, subject to the outstanding details being provided to and agreed by WSCC it is considered that the applicant has demonstrated that the proposed development would accord with Policy T SP1 of the Arun Local Plan and Policies GA1 and GA3 of the Neighbourhood Development Plan.

RESIDENTIAL AMENITY

Policy QE SP1 of the Arun Local Plan requires the location of existing and commercial uses, including waste management uses to be taken into consideration when assessing proposals for development sensitive to noise, light, odour and outputs to air. This is to ensure that land allocated for these uses are protected and to ensure that the amenity of new developments and facilities is safeguarded from the impacts of incompatible land uses.

Odour

Policy H SP2c of the Arun Local Plan requires development proposals in the Ford Strategic Allocation to take into account the siting of Ford Wastewater Treatment Works, including the outcomes of an odour assessment, and not prejudice the operation or expansion of the treatment plant as required to accommodate future growth in the District.

The illustrative masterplan uses the odour contours, to identify areas suitable for development. Southern Water advised in their original consultation response that the odour assessment deviates from what it would consider an appropriate assessment. Therefore, the developer in consultation with Southern Water and the Council's Environmental Health team agreed a methodology for further sampling and odour assessment work to address these concerns.

Odour samples were collected from the site for analysis in May 2021 and updated modelling work has been undertaken. The modelling work was carried out following the agreement of the Council's Environmental Health Team and Southern Water as to the correct methodology. The result of this work has been set out in the 'Air Quality - Quantative Odour Assessment'.

Both the Council's Environmental Health team and Southern Water were consulted on this revised odour work (which was originally submitted to the Council in August) and neither party have provided the Local Planning Authority with comments on the revised odour assessment. The deadline for comments from Southern Water on these details was the 23rd August 2021 and despite the best endeavours of the Council these comments remain outstanding. In the absence of comments from Southern Water on the revised documentation it is presumed that they no longer wish to maintain their objection following the further assessment undertaken in accordance with the agreed methodology.

The Council's Environmental Health Officer has stated that there is also the potential for odour from the

Grundon waste management site that could have an impact on the proposed residential use. The odour assessment has considered this with Section 4.4 identifying that Grundon Waste Management Waste Transfer Station (WTS) is subject to environmental permit (EPR/DB3304HB) that requires any odour released from the site boundary to be at levels below those that would be considered likely to cause pollution.

West Sussex County Council Minerals and Waste team in their consultation response raised concerns regarding odour impacts and the conclusions of the applicant regarding the control of odour impacts through the environmental permit. However, in their consultation response of the 11 March 2021 it was confirmed that given the distances involved to the nearest proposed sensitive residential receptors, and odour mitigation measures required/possible for waste management uses of the site, that provided Environmental Health officers were satisfied, it was not considered that potential for odour from existing/allocated sites would be preventative to the proposed residential development.

Following the comments of Environmental Health the Council have sought to appoint an independent odour specialist to review the submitted 'Air Quality - Quantitative Odour Assessment'. The Council have been unable to secure an independent specialist to review this information at the time of preparing this recommendation but a report update will be provided ahead of the committee in regards to this matter.

However, given that the methodology was agreed in consultation with Environmental Health and Southern Water and that residential and employment development proposed would be located outside of the 30µg/m³ it is considered that odour from neighbouring uses would not adversely impact upon residential amenity of future occupiers. Nor would the development of the site prejudice existing or allocated waste management facilities.

Therefore, subject to the confirmation from the Council's independent odour specialists the proposals are deemed to accord with Policies QE SP1 and H SP2c of the Local Plan and policies W2 and W10 of the Waste Local Plan.

Noise

Policy QE DM1 of the Arun Local Plan states that to safeguard the continued use of existing industrial and commercial uses and to protect amenity, noise sensitive development should not normally be permitted where:

- High levels of noise will continue throughout the night, especially during the hours when people are normally sleeping.
- There is a likelihood of complaints about noise from industrial development.

As set out in the Revised Waste Infrastructure Statement, the Environmental Statement and Environmental Statement Addendum, a noise assessment has identified a number of industrial noise sources surrounding the application site. These include:

- Ford Industrial Estate (particularly H D White);
- Ford Circular Technology Park; and
- Viridor Materials Recycling Facility.

The survey and modelling work contained in the Noise Impact Assessment and Environmental Statement Addendum has been used to inform the parameters for the residential development on the site. The land use parameter plan shows a 100m buffer zone between the Circular Technology Park and the nearest residential development.

A 3m high acoustic barrier is also required along the boundary with the Ford Industrial Estate.

In addition to the buffers and acoustic barrier, in those areas nearest to the noise sources, mitigation is proposed in the form of:

- Gardens located not facing the industrial sources (i.e. screened by the dwellings); and/or
- Dwellings orientated so that no habitable rooms directly face industrial sources.

The number of dwellings and extent of the area to be subject to such mitigation would be dependent on the final detailed layout, which is not a matter for consideration under this outline application.

To secure these principles for detailed consideration at the reserved matters stage, the applicants have suggested the use of a condition on the outline planning permission.

In response to consultation on the revised Waste Infrastructure Statement, WSCC Minerals & Waste have stated:

"Whilst the proposed mitigation is welcomed, the extent of sensitive receptors that need to be subject to such requirements is cause for concern. Although indicative illustrations seek to demonstrate how such orientations could be achieved, given the extent of areas affected, and types of development proposed (e.g. care homes, primary school, high density residential areas), concerns are raised as to the practicality of such orientations being achievable without significant impact on the layout and deliverability of the scheme...".

"It is also questionable whether the applicant's proposed condition would be sufficiently precise (particularly if mitigation were to be delivered in phases), and/or appropriate. Further, for the avoidance of doubt, the County Planning Authority would wish for any outline masterplan (and/or land use plans) to be based on required buffers and to detail both specific noise mitigation features (e.g. barriers) and highlight any areas requiring controlled orientation for noise mitigation".

The concerns of WSCC are noted and have been taken into consideration in the preparation of this recommendation report. However, in this case it should be noted that the application is in outline and as such matters of detailed design are not the subject of consideration at this time. The applicant has provided an indicative layout as well as identified buffer zones and areas of the site where additional mitigation measures are likely to be necessary to avoid unacceptably adverse noise impacts upon the residential amenity of future occupiers.

The proposed condition has been negotiated with the Council's Environmental Health Team who have confirmed that the condition is appropriate to ensure that the reserved matters application ensures that noise impacts are either designed out or adequately mitigated. However, the reserved matters proposals should seek to design out noise impacts in the first instance.

The application proposes employment uses on land to the east of the Waste Water Treatment Works. By virtue of its location the proposed employment development would not give rise to any unacceptably adverse impacts upon existing or proposed residential development.

Therefore, on this basis, the proposals subject to the proposed condition are deemed to accord with Policies QE SP1 and QE DM1 of the Local Plan and are not deemed to conflict with Policies W2 and W10 of the Waste Local Plan subject to appropriate design at reserved matters stage.

AIR QUALITY

The Environmental Statement submitted in support of the application has considered the air quality impacts of development having taken into consideration road traffic exhaust emissions associated with vehicles travelling to and from the site. These assessments have concluded that there will be no

significant effects on human health, nor would there be any significant effects within any air quality management areas. Therefore, no further air quality mitigation has been identified as required.

The Environmental Health Officer has requested a condition be imposed requiring the submission and approval of a Construction Management Plan that includes dust mitigation measures.

A condition would also be appropriate to ensure the provision of electric vehicle (EV) charging points, to mitigate any adverse impact of the development on local air quality, in accordance with the ADC Parking Standards SPD and because new petrol and diesel cars and vans will not be sold beyond 2030.

It is considered that, subject to the imposition of conditions requiring the submission of a Construction Management Plan and the provision of EV charging points that the proposed development would comply with Policy QE DM3 of the Local Plan, in terms of air quality.

CONTAMINATED LAND

Chapter 15 of the Environmental Statement contains a land contamination assessment. The assessment that was carried out indicated that the site is largely free from contamination. Based on the current appraisal, any contamination would be localised and therefore considered to be a minor adverse risk to site users and the environment during the operational phase until additional investigation is carried out to clarify the risk.

The Environmental Health Officer has requested the use of conditions to deal with the risks associated with land contamination. Subject to the imposition of such conditions, the proposed development complies with Policy QE DM4 of the Local Plan.

ECOLOGY AND BIODIVERSITY

The application has been accompanied by a Phase 1 ecological assessment, wintering bird surveys and protected species surveys. The Council's Ecologist has been consulted on the proposal who has provided advice regarding bats, badgers, dormice, nesting birds, great crested newts and other species including hedgehogs, brown hares, and harvest mice.

It has also been identified by the Council's Ecological Advisor that in line with policy ENV DM5 of the ALP information on Biodiversity Net Gain needs to be provided prior to determination. However, in this case given that the application is in outline only there are too many variables to secure this information in detail. Therefore, it is considered that the use of an appropriately worded condition to secure this detail at reserved matters stage would be appropriate.

Concerns were also raised in relation to apparent gaps within hedgerows along the boundaries of the site and the impact that this could have on commuting bats. However, it should be noted that the application is in outline and landscaping remains a matter for consideration at reserved matters stage. Therefore, this will need to be considered and addressed during detailed design and would be covered by the proposed landscaping conditions.

Therefore, the use of a suitably worded conditions in regards to landscaping and ecological enhancements will ensure the developments accordance with policy ENV DM5 of the ALP and policy EH1 of the FNDP.

A shadow Habitats Regulations Assessment, dated 6th November 2020, was submitted by the applicants as the recreational use of functionally connected land, or functionally linked land, could lead to Likely Significant Effects on the Arun Valley Special Protection Area (SPA). Natural England had previously

raised concerns that the site could be functionally linked land for Bewick's swans, which are a designated feature of the SPA.

The shadow Habitats Regulations Assessment is adopted by the Council to fulfil its duty as competent authority. Section 5 of the document contains the Appropriate Assessment, and the Council agrees with the conclusion in paragraph 5.3. That is to say:

"The proposed development should provide mitigation through restriction of human and dog access to areas of habitat suitable for Bewick's swan and screening of movement on adjacent public footpaths in order to allow a conclusion of no Likely Significant Effects of the development on the Arun Valley SPA, either alone or in combination with other plans and projects."

The Bewick Swan mitigation measures will be secured through the use of an appropriate planning condition, in accordance with advice from Natural England. This approach is also supported by the Council's Ecologist.

TREES

Policy ENV DM4 of the Arun Local Plan states: "Where there are existing trees on or adjacent to a development site, developers shall be required to provide:

- d. Land and tree surveys
- e. A tree constraints plan
- f. An arboricultural impact assessment to include a tree protection plan and arboricultural method statement

These will ensure that development is planned to take a comprehensive view of tree issues at an early stage in the design process and that development works do not have a negative impact on existing trees."

The application was supported by an arboricultural assessment and method statement as well as tree protection plans. The arboricultural assessment and method statement identifies that most of the trees to be lost due to the development are low category due to their poor condition or small size. It identifies that there is sufficient space to secure tree planting to more than compensate for the loss of any existing trees. It also advises that all the significant tree cover will remain intact should a scheme similar the indicative layout come forward. It is also identified that if adequate precautions to protect the retained trees are specified and implemented, then the development proposals will have no impact on the contribution of these trees to the local character of the area.

These documents have been examined by the Council's Tree Officer. He has noted that the proposed accesses on Ford Road and Ford Lane have no obvious conflict with existing trees and that the proposed access on Yapton Road will result in the loss of sections of hedgerow and low/moderate value hedgerow trees which is tolerable. He has also advised that the loss of trees and hedgerows of low-moderate value within the site can be adequately mitigated with an ambitious and detailed soft landscape plan.

Measures to protect trees that are to be retained on the site and details of the landscaping scheme are capable of being secured through the use of appropriately worded planning conditions.

The proposed development is therefore considered to accord with policy ENV DM4 of the ALP and policy EH1 of the FNDP.

LOSS OF AGRICULTURAL LAND

The site of the proposed development comprises approximately 74.47ha of agricultural land classified as "best and most versatile" (Grades 1, 2 and 3a land in the Agricultural Land Classification system). From the Environmental Statement for this proposal, the Agricultural Land Classification survey categorised the land for this development as 77.5% Grade 2 land (very good quality) and 10% Subgrade 3a land (good quality). Due to the nature of the development, the potential loss of and damage to the soils during construction is considered to be irreversible.

Paragraphs 174 and 175 of the NPPF state that: "Planning policies and decisions should contribute to and enhance the natural and local environment by: recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland", and "Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries".

Natural England has advised that "in order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management". Consequently, it recommends that the developers use an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site.

In Chapter 13 of the Environmental Statement, there is mention of soil preservation, damage reduction and a Soil Resource Plan. These measures should all be adopted and strictly enforced. Natural England has also drawn attention to a 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' and has recommended that this be followed. A Soil Resources Plan will be secured through the use of an appropriately worded condition.

The application site has been allocated for residential development under policies H SP1 and H SP2c of the Arun Local Plan and has been the subject of significant assessment prior to allocation. Alternative options for the location of this strategic allocation have been explored and subjected to a Sustainability Appraisal process to select the most sustainable sites.

The Arun Local Plan (2011-2031) Sustainability Appraisal recognised that most of the undeveloped coastal plain within the District is high grade agricultural land and that the majority of the strategic allocations would have a significant negative effect on the objective of avoiding the loss of 'best and most versatile' (BMV) land. The loss of BMV is one factor in the site selection and decision-making process.

Policy SO DM1 of the Arun Local Plan states that development will not be permitted on this type of land unless 'designated by this plan' or unless the need for the development outweighs the need to protect such land in the long term. As the site is a strategic allocation within the Local Plan the proposal would not be the subject of assessment under policy SO DM1 of the ALP or policy EH5 of the FNDP.

SURFACE WATER DRAINAGE

Policy W DM2 of the Arun Local Plan requires the submission of a site-specific Flood Risk Assessment (FRA) to demonstrate that the development will be safe, without increasing flood risk elsewhere and reduce flood risk overall. It requires the design of new site drainage systems to consider flood flow

routing and to utilise temporary storage areas.

A Flood Risk Assessment and Drainage Strategy was submitted with the application. This was updated in February 2021 and a further update was submitted in July 2021 and this revised strategy is reflected in the revised parameter plans submitted in support of the application.

It is proposed that the northern part of the site will discharge surface water runoff into the ground through an infiltration basin, infiltration drainage and soakaways. The southern part of the site will discharge surface water to two watercourses in the south-west of the development located adjacent to Yapton Road. The discharge flows from the development will be restricted to a greenfield runoff rate and attenuation basins will be provided close to the outfalls. It is stated that "shallow drainage systems and SuDS will be provided, where possible, within the development parcels which will reduce raising finished ground levels across the site, which is currently gently sloping and flat in some areas".

ADC's Drainage Engineer has reviewed the latest strategy and commented that they were pleased to see that the applicant had now provided an outline of a gravity surface water drainage solution and recommended the use of conditions on any planning permission granted.

Subject to the use of conditions, the proposed development is considered to accord with policies W DM2 and W DM3 of the Arun Local Plan and policy EH4 of the FNDP.

FOUL DRAINAGE

Policy W DM1 of the Arun Local Plan requires the applicant to demonstrate that adequate foul water drainage capacity exists or can be provided as part of the development. Where adequate capacity does not exist, there will be a requirement that facilities are adequately upgraded prior to the completion and occupation of development.

Southern Water has been consulted in relation to this application and have advised that no foul water from the site shall be discharged into the public system until offsite drainage works to provide sufficient capacity within the foul network to cope with additional flows are complete. Southern Water is currently in the process of designing and planning delivery of offsite network reinforcements. Southern Water seeks to limit the timescale for such works to a maximum of 24 months from a firm commitment of the development. This may be addressed through the use of a suitably worded planning condition.

HERITAGE ASSETS

Paragraph 194 of the NPPF requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets'

importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 195 of the NPPF requires the local planning authority to identify and assess the particular significance of any heritage asset that may be affected by a proposal, taking account of the available evidence and any necessary expertise.

Paragraph 197 of the NPPF states that in determining applications, the local planning authority should take account of the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. This is irrespective of the degree of potential harm.

Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal.

As explained in the archaeology and built heritage chapter of the environmental statement, there are no designated heritage assets located within the site.

The deserted medieval village of Climping scheduled monument lies over 500m to the south-east of the site. The site lies beyond the setting of the scheduled monument. There is no intervisibility and no historic or associative connections between the site and the scheduled monument and as such the proposed development is not deemed to give rise to any harm to the significant or setting or the designated heritage asset.

Four listed buildings have been identified in Climping, three listed buildings in Ford, nineteen listed buildings and one conservation area in Yapton. In the majority of cases, there is no intervisibility and no historic or associative connections between the site and these listed buildings. Three listed buildings have been identified for particular attention.

Atherington House is the closest listed building to the application site and is located to the north-west of the proposed development. The Grade II listed building is located to the south of Ford Lane and is described as a large L-shaped 17th/18th century house.

The significance of the building derives primarily from its architectural interest with a lesser historic interest element. Its setting comprises of its garden and Ford Lane, which its north elevation faces. The heritage statement also identified that there are views out to the west from the house across an arable field, the western half of which is within the red line area of the Site boundary area. This field is identified as forming part of the setting of the house and that it has 'a mildly positive contribution to its significance'. This is the setting within which its significance is appreciated. The listed building features mature planting to the eastern, southern, and western boundaries of the site which obscure views of the listed building. The north eastern corner of the site lies within an element of the western side of the setting of Atherington House. This is currently part of a larger arable field (through which the Site boundary cuts in half in a north south direction c. 200m+ to the west of Atherington House). The area of this field that is within the site boundary will be retained as open space. The western boundary of this field comprises a line of tall trees that blocks views into the proposed residential area of the Development to the west. Therefore, it is considered that the screening (of the houses), along with the creation of the open space will not result in any harm to the setting or significance of Atherington House.

In this case there will be significant separation between the proposed residential development and Atherington House and as such the residential development is not deemed to give rise to any harm to the significance or setting of the Grade II listed building. The element of the proposed development which will sit in closest proximity would be the employment uses located in the eastern portion of the application site. This element of the scheme will be sited approximately 134m to the south of the Grade II listed building. It is considered in this case given the presence of significant screening along the southern boundary of the listed building, presence of mature tree screening extending further to the south of the building in addition to ensuring sympathetic design and appropriate screening that the proposed employment element of the development would not result in any harm to the setting or significance of Atherington House.

The significance of Manorial Dovecote at Church Farm, Yapton, lies in its architectural and historic interest. It is located within the garden of Church Farm and it is within this area and the Church Farm complex that the setting has a positive contribution to the significance of the building. The application site is considered to be beyond the setting of the listed dovecote and as such would not give rise to any harm to its setting or significance.

The Parish Church of St Mary, Yapton is located on the north-eastern edge of the built-up area of Yapton, within the Church Lane part of Yapton Conservation Area. Its significance is derived from its architectural, historic and archaeological interest. Its setting comprises the churchyard and other nearby buildings within the Conservation Area.

This part of the Conservation Area is characterised by the church and its churchyard, Church Farmhouse, and three substantial houses. The Conservation Area is described as a loose grouping of buildings with high substantial flint boundary walls, mature landscaping including many substantial trees that enhance the rural character of the area, which forms its setting.

The church is largely screened from the wider countryside to the east (i.e. the direction of the application site). The countryside to the east of the Conservation Area forms the agricultural context of both the church and the Conservation Area. As such, the fields immediately to the east of the Conservation Area have a mild beneficial contribution to the significance of the church and Conservation Area. This contribution diminishes with increased distance. The site is separated from the church and Conservation Area by two arable fields and is considered to be outside of the setting of both the church and Conservation Area. In this location, the western boundary of the site is characterised by a thick line of tall trees which blocks views into and out of the site. Therefore, the proposal will not give rise to any harm to the setting or significance of the Parish Church of St Mary or the Yapton Conservation Area.

Concerns have been raised by Historic England as well as the Council's Conservation Officer regarding the impact of the development upon the historic line of the Portsmouth to Arundel Canal. The proposal to incorporate the former route as part of the open space within the masterplan is encouraged by Historic England and the Conservation Officer as an opportunity to provide interpretation to commemorate its place in the landscape and increase public knowledge of its role in the evolution of the site. The parameter plans show that the route of the canal will be protected from encroachment and as such the proposed development is not deemed to result in any harm to the setting or significance of this non-designated heritage asset, which will be sustained and enhanced in accordance with paragraph 197 of the NPPF.

The runway is considered to constitute a non-designated heritage asset which makes a significant contribution to the historic character and context of the site and its former use. The airfield was in use by the Royal Flying Corps and American forces between 1918 and 1920 before being used for commercial purposes during the 1930s before being occupied as a training site in 1938 prior to suffering extensive damage in August 1940. The airfield was occupied as a base for intruder squadrons and later in the Second World War for fighter-bomber sorties. It remained in Navy use until 1956 where it entered civilian use up until 1980. By virtue of its early decommissioning most buildings associated with its historical military use have been removed and as such the two runways are the greatest reference to its past.

Historic England have identified that they do not concur with the conclusions of the Environmental Statement regarding the removal of the western arm of the runway. The consultation response has expressed the opinion that the removal of the western arm of the runway would result in the loss of its cruciform shape, which is integral to the unusual character and significance of the airfield. It is acknowledged that the indicative masterplan demonstrates how the line of the western arm of the runway would be retained as open space to retain the cruciform shape of the runway as part of the development.

However, it is concluded by Historic England that this would not mitigate its loss, physically or as a key element of the character and appearance of the airfield.

Comments were provided by the applicant's heritage consultant in response to the concerns of Historic England regarding the removal of the western arm of the runway. It was advised in this response that the geophysical survey and crop marks visible on aerial photography show that below ground archaeological remains of the former airfield are present. However, whilst they form part of the airfield, they have no presence on the ground and as such their contribution to the significance of the airfield is in their evidential value rather than as a perceptible element of the existing landscape.

The desk-based assessment and Environmental Statement in support of the application has assessed the significance of the airfield as being of local significance, but it was agreed that these features could be considered as being of regional significance. But it was refuted by the applicant that the remains could be considered of national significance. Therefore, it was concluded by the applicant that there would be a partial loss of alteration of the significance of the heritage asset, with the impact on the runway identified as being moderate adverse and even if the asset was of regional significance utilising the matrix of determining significance of effect the assessment of the impact on the airfield would remain moderate adverse.

In this case it should be noted that whilst the application proposes the removal of a significant portion of the western arm of the runway. The application does not propose the complete removal of the western arm with a portion of the of it to be retained therefore preserving the cruciform with the full extent of the existing arm reflected in the landscaping proposals and kept free from built form. The applicant's response to Historic England identifies that interpretive boards and a themed heritage walk could be provided to inform the new community and visitors to the site of the history of the airfield. Therefore, in this case it is considered that the proposed development, through the delivery of much needed housing and 450 affordable dwellings, when balanced against the moderate adverse harm upon the significance of the non-designated heritage asset would be acceptable. It is considered that the use of a suitably worded condition to secure details of interpretive material and a heritage walk along the line of the former western arm of the runway would be appropriate.

In light of the above, it is considered that the proposed development accords with Policies HER DM6, H SP2(m) and H SP2c(h) of the Arun Local Plan as well as the requirements of Section 66 and 72 of the Planning (Listed Building and Conservation Area) Act 1990 (as amended).

ARCHAEOLOGY

Policy HER DM6 of the Local Plan states "...where a site on which development is proposed has the potential to include heritage assets with archaeological interest (having consulted the Historic Environment Record) permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological interest of these sites."

Chapter 8 of the Environmental Statement deals with archaeology and the built heritage and it includes the results of an archaeological desk-based assessment and an archaeological geophysical survey. This work is stated to have been undertaken in accordance with the NPPF Chapter 16, NPPG Historic Environment and Good Practice Advice in Planning Note 3: The Setting of Heritage Assets. While Historic England is not satisfied with the assessment, ADC's Archaeology Officer has raised no concern with the quality or conclusions of the desk-based assessment.

The desk-based assessment concluded that the site contains non-designated archaeological remains of local significance which are likely to be impacted by the proposed development. A mitigation strategy is appropriate and can be secured using a condition. It also concluded that part of the non-designated

former airfield structures will be adversely affected. Consequently, the mitigation strategy includes the recording of the section of runway prior to its removal and also the recording of other airfield related features revealed by the proposed evaluation trenching of the site.

It is considered that subject to a condition securing an investigation of the site by trial trenching to establish what deposits might be threatened and how to mitigate this, ensures that the development would accord with Policy HER DM6 of the Local Plan as the development will not harm features of archaeological interest.

CLIMATE CHANGE

Policy ECC SP1 of the Local Plan states: "The Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness in biodiversity". Policy ECC SP2 of the Local Plan states: "All major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable".

The Design and Access Statement outlines some of the measures that will be developed at the detailed design stage. These include the use of passive heating/cooling devices, appropriate insulation, natural ventilation and exposure to sunlight to minimise energy consumption.

The proposed development would comply with policy ECC SP2 of the ALP through the imposition of a suitably worded condition, dealing with renewable or low carbon energy generation.

INFRASTRUCTURE PROVISION

Development is only acceptable with the provision of, or contributions towards, the necessary infrastructure and facilities to mitigate the impacts of the development.

Policy H SP2c of the Local Plan sets out the infrastructure requirements for the Ford strategic allocation, which include:

- sustainable links for all modes of transport between the development, Ford railway station and the Littlehampton/Arundel cycleway
- a new two-form entry primary school and nursery places
- new retail, commercial and community facilities
- a new Tier 7 library facility
- healthcare facilities to serve Ford, Yapton and Climping
- two new sports pitches and changing facilities
- a new 3G pitch facility to serve the east of the District, and
- improvements to the A259 between Climping and Littlehampton.

The Infrastructure Delivery Plan and Policy INF SP2 identify the need for a new 10 FE secondary school based on the amount of dwellings within the strategic allocations in the Local Plan.

EDUCATION

WSCC has confirmed that the present primary and secondary schools within the local catchment area would not have sufficient capacity and would be unable to accommodate children from the proposed development. Accordingly, developer contributions are required. The contributions comprise to be secured through the S106 would consist of:

- £10,600,000 plus 2.004ha of land towards a new 2FE primary school in Ford;
- £2,100,000 plus 0.1374ha of land towards a new nursery facility;
- £900,000 plus 0.0239ha of land to provide a facility for special educational needs at the primary school or £775,000 towards the expansion of provision at Cornfield School;
- a formula based financial contribution plus 10ha of land towards phase 2 of a new secondary school in Arun or expansion at Ormiston Six Villages Academy; and
- formula based financial contribution to be spent on facilities at St Phillip Howard Catholic High School Sixth Form. These contributions are considered to be CIL compliant.

LIBRARY

A community space is required on site to accommodate a Tier 7 library facility plus a financial contribution of £100,000 towards the new facility, or a contribution towards the expansion of facilities at Littlehampton Library should the new Tier 7 facility not proceed.

FIRE AND RESCUE

A formula based financial contribution is required towards the redevelopment of Littlehampton Fire Station to be secured through the S106 agreement.

HEALTHCARE

Consideration was given to the provision of on-site healthcare provision, but in this case the CCG has advised that they would look to expand existing facilities and services rather than delivering new on-site provision.

Therefore, it is predicted that new residents will register at The Croft surgery or the GP premises in Yapton, which are the primary care sites to support the proposed development. The CCG has a new build scheme at The Croft site in progress (part funded by future s.106 receipts) and the option to extend or utilise a new build in Yapton.

A financial contribution of £1,812,954 is required towards off-site healthcare infrastructure at The Croft Surgery and/or GP premises supporting Ford at Yapton.

OPEN SPACE AND PLAY PROVISION

Policy OSR DM1 (2) of the Arun Local Plan states: "Housing... will be required to contribute towards:

a. Open space provision in accordance with guidance set out in the current Open Space Study. In some parts of the District open space provision is identified as being sufficient in terms of quantity. Therefore, provision of new open space is not deemed necessary but what is needed is to seek contributions for quality improvements and/or new off-site provision in order to address any future demand. For larger scale developments, the quantity standards should be used to help determine the requirements for open space provision as part of that development."

Developments of the scale proposed in this application are expected to provide open space on site. Using the online calculator associated with the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD, a development of 1,500 dwellings would be expected to provide at least 10.56 hectares of public open space, 1.82 hectares of play space and 0.83 hectares of allotments.

The proposed provision of 12.65ha of on-site public open space, consisting of 10.56ha of public open

space, 1.815ha minimum of play space and 0.825ha of allotments is acceptable and complies with Policy OSR DM1(2) of the Local Plan and the Open Space SPD.

A clear indication of the proposed future management of the open space including the responsibility for play areas and public realm areas would be secured through a Section 106 Agreement. Similarly, the provision of any surface water features within the public open spaces would require detailing including future management and maintenance requirements.

SPORTS FACILITIES

In line with the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD, the following contributions are required.

Off-site provision would consist of:

Sports Halls - £565,049

Swimming Pools - £607,794

3G Pitch (including ancillary facilities and maintenance) - £254,558

Health and Fitness - £184,800

A contribution towards improving the grass playing surface of rugby pitches, maintenance and ancillary facilities at Littlehampton Rugby Club

A contribution towards improving the grass playing surface of the cricket pitch, maintenance and ancillary facilities at Middleton Sports Club

A contribution towards improving the grass playing surface of the cricket pitch, maintenance and ancillary facilities at Clymping.

On-site provision of:

The provision of two natural grass football pitches on site and changing facilities

TRANSPORT

Policy H SP2 of the Local Plan requires strategic allocations to "address the off-site highway capacity requirements, that relate to that particular allocation, identified in the Arun Transport Assessment (2016 and update 2017 and taking into account subsequent relevant assessments) and the local highway network". The requirements for the Ford strategic allocation are as follows:

-A27 Ford Road Roundabout - £301,000

-Ford Road Level Crossing Bridge or environmental mitigation - £3,000,000

-A259 Oystercatcher junction - £600,000

-A259 Comet Corner junction - £97,000

-A259 Corridor Improvement Bognor Regis-Littlehampton - £515,000

-A259 Lyminster Bypass to A280 junction - £15,000.

In addition to these strategically identified junction enhancements the following improvements have also been identified as necessary through the applicants Transport Assessment and will form part of the S106 agreement:

-Construction of Yapton Road Access (drawing no. GA-001 Rev E)

-Construction of Ford Lane Access (GA-004 Rev B)

-Ford Lane/North End Road Improvement (GA-028 Rev C)

-B2233/North End Road Improvement (GA-026 Rev B)

-Bilsham Road/B2233 Improvement (GA-027 Rev C)

The following pedestrian and cycle improvements will also be secured through the S106 agreement:

- Ford Lane Pedestrian Connection (GA-054 Rev A)
- Horsemere Green Lane Pedestrian Access Improvements (GA-058 Rev A)
- Church Lane Pedestrian/Cycle Connection (GA-600 Rev A)
- Rollaston Park & Burndell Road Pedestrian Improvements (GA-041 Rev A, GA-200, GA-201 Rev A, GA-202 Rev A, GA-203 Rev A & GA-204)
- Yapton Cycle Route Improvements (GA-059, GA-060 & GA-061)
- Ford Road-Station Road Pedestrian/Cycle Connection to Station (GA-006 Rev B, GA-007 Rev B, GA-008 Rev A, GA-009 Rev A & GA-010 Rev B)
- Footpath 206 Connection (Ford Road to River Arun public right of way) (GA-400 Rev A) (includes works outside the highway)
- Upgrading existing public rights of way on the site to bridleway status

Paragraph 3.5 of the 2020 report states that "the Ford Road Bridge was tested through the ATS 2016 which showed that the introduction of a railway bridge at Ford level crossing would mitigate the significant environmental impact risk at Ford Road level crossing as a result of queuing traffic, particularly in the AM peak".

As such a financial contribution of £350,000 will be secured towards the consideration of possible routing options and to facilitate the preparation of the requisite technical documentation to support the submission of a planning application.

Therefore, would be sufficient to meet the needs of the occupiers of the proposed development in accordance with Policies H SP2, H SP2c, INF SP1, INF SP2 and T SP1 of the Local Plan.

SUMMARY

The proposed development will secure the delivery of 1,500 residential dwellings (450 of which will be affordable dwellings), a 60-bed care home (Use Class C2) and up to 9,000 sqm of employment floorspace (Use Classes B1) and a new local centre along with land for the provision of a new primary school and sports pitches. The indicative layout has demonstrated that this development can be delivered in accordance with the requirements of policy H SP2c (SD8) of the Arun Local Plan and policy SA1 of the Ford Neighbourhood Development Plan. The application is accompanied by appropriate detail to allow for the full consideration of the proposals with appropriately worded conditions used to ensure that the that the proposals accord with all relevant development plan policies.

The application, through the S106 agreement, will secure appropriate infrastructure to offset any impacts of development. A robust transport assessment has been carried out which has informed the proposed mitigation measures which has been considered by and agreed with WSCC.

Therefore, subject to receipt of the independent review confirming the conclusions of the odour assessment, the below conditions and completion of the S106 agreement the proposed development would accord with all relevant development plan policies.

RECOMMENDATION

That delegated authority is granted to the Group Head of Planning in consultation with the Chairman and Vice-Chairman of the Planning Committee to approve the application subject to receiving confirmation from the independent odour specialist as to the acceptability of the submitted Odour Assessment.

Subject to the below conditions and completion of the Section 106 agreement.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

SECTION 106 DETAILS

See attached heads of terms.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 Details of the layout, scale, appearance and landscaping (hereinafter called 'the reserved matters') for each phase or sub phase as defined within the Phasing Strategy under Condition 5 shall be submitted to and approved in writing by the Local Planning Authority before any development in that phase or sub phase begins and the development shall be carried out as approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

- 2 Application for approval of the reserved matters for the first phase or sub phase shall be made to the Local Planning Authority not later than three years from the date of this permission. Applications for reserved matters for the remaining phases shall be made within seven years from the date of this permission.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3 The development hereby permitted shall begin not later than two years from the date of approval of the first of the reserved matters to be approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

4 The development hereby permitted shall be carried out in accordance with the following approved plans:

- Site Boundary Plan - RG-M-01 Rev. T
- Potential Site Access Arrangement - 3 ARM 40m ICD Roundabout- ITB13091- GA-004 Rev. B
- Potential Southern Vehicular Access from Yapton Road - ITB13091-GA-001 Rev. E
- Ford Airfield Geometry - Eastern Access onto Ford Road - ITB13091-GA- 021
- Access and Movement Parameter Plan - RG-M-122 Rev. M
- Green and Blue Infrastructure Parameter Plan - RG-M-121 Rev. N
- Land Use and Density Parameter Plan - RG-M-123 Rev. L
- Demolition plan - RG-M-107E

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy D DM1 of the Arun Local Plan (2011-2031).

5 A phasing strategy shall be submitted either prior to or concurrently with the submission of the first Reserved Matters application. The phasing strategy shall be approved prior to the approval of the first Reserved Matters and shall include details of:

- The phases of development, including residential, non-residential and on site infrastructure
- The phasing and delivery of:
 - Vehicular access from Ford Lane and Yapton Road
 - Pedestrian, cycle and equestrian connections (on and off site)
 - Temporary or interim access arrangements necessary
 - Custom build units
 - Affordable Housing units
 - Drainage infrastructure
 - Spine Road
 - Public Open Space and Green Infrastructure, including the number and positioning of LAPs, LEAPs, NEAPs and MUGAs, allotments, sports pitches and changing rooms.
 - Local Centre, to include the library, community building (inc. small drop-in office space for police to take statements and undertake administrative work), and retail/commercial space
 - Employment zone
 - Primary School and Early Years
 - Public Art
 - Bus route and infrastructure, including any interim measures
 - Accessible and adaptable dwellings, up to a total site-wide percentage of 50% M4(2) dwellings and 4% M4(3) dwellings

The development will be brought forward in accordance with the agreed details within the Phasing Strategy.

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy D OM1 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition because the phasing of the development needs to be satisfactory before work commences.

- 6 No development shall take place until details for the implementation of a programme of archaeological work in accordance with a written scheme of investigation has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out on a phase by phase basis in accordance with the approved scheme.

Reason: The site has the potential to contain unknown remains of archaeological importance and in accordance with Policy HER DM6 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition because archaeology can only be investigated before construction commences.

- 7 Prior to the submission of any reserved matters application a Design Code for the whole allocation shall be submitted to, and approved in writing, by the Local Planning Authority. This document shall be prepared in consultation with the community and demonstrate how the detailed proposals will reflect the contents of the:

- Approved plans under Condition 4
- Masterplan Document July 2021
- Arun District Design Guide SPD 2021

The Design Code shall provide further details on:

- How the development responds to local character
- The character areas, street hierarchy, building typologies, key buildings, the approach to car parking and electric vehicle charging points, character of green infrastructure and structural planting, street trees, street furniture, external lighting and treatment of the public realm, public rights of way and pedestrian/cycle/equestrian connections.
- The local centre
- The approach to public art
- The integration of drainage infrastructure into the public realm and green infrastructure
- How the above-ground utilities infrastructure will be integrated into the street
- Provision of interpretive material and a heritage themed walk along the route of the former western arm of the runway.

A template for a Code Compliance Matrix will be included within the Design Code and will set out the key criteria that each Reserved Matters will need to comply with. The development shall thereafter be carried out in accordance with the approved Design Code.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity by endeavouring to achieve buildings of visual quality in accordance with Policy D DM1 of the Arun Local Plan 2011-2031.

- 8 Prior to the occupation of the 300th dwelling, the employment zone as identified on RG-M-123L shall be made available for such purposes, and a scheme setting out the marketing and terms of any purchase shall be submitted to and approved by the Local Planning Authority, which shall include marketing for a minimum period of 18 months.

Reason: To ensure that the commercial uses are delivered in a timely manner in accordance with policy HSP2c (SD8) of the Arun Local Plan.

- 9 Prior to the occupation of the 750th dwelling:
- A scheme and specification for a community building (up to a maximum of 500sqm floorspace) shall be submitted and approved by the Local Planning Authority, and the community building shall be delivered and made available for public use. The scheme shall include details of management and maintenance arrangements for the community building in perpetuity.

- A scheme for the marketing of the retail and commercial units (Use Classes A1-A5) within the local centre, as identified on RG-M-123L of up to 900sqm floorspace, to include subsidised rent for a period of 2 years and a minimum marketing period of 2 years, shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure that the community building and retail and commercial units are made available to meet the needs of the local communities and future occupiers in accordance with policy HSP2c (SD8) of the Arun Local Plan.

10 No development shall take place within any phase or sub phase, as defined within the Phasing Strategy under Condition 5, including any works of demolition, until a Construction Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The approved Plan shall be implemented and adhered to throughout the construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access (including adequate visibility splays and sight lines) and routing of vehicles during construction
- full details of the construction compound,
- soil resources plan,
- dust mitigation measures,
- noise and vibration reduction measures,
- the parking of vehicles by site operatives and visitors
- the loading and unloading of plant, materials and waste, including permitted times for deliveries
- the storage of plant and materials used in construction of the development, including covering of stockpiles
- the erection and maintenance of security hoarding,
- the provision of effective wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders), and
- details of public engagement both prior to and during construction works.
- A scheme for recycling/disposing of waste, resulting from demolition and construction works. No burning is permitted.
- Maintenance of equipment, plant and machinery
- Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination.
- Temporary surface water management system, for example oil interceptors, holding tanks to remove suspended sediment before discharge;
- A named representative, including contact details

Reason: In the interests of highway safety and the amenities of the area in accordance with Policies T SP1 and OE SP1 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition because of the safety and amenity issues that need to be addressed.

11 No construction/demolition activities shall take place except between the hours of:

08:00 and 18:00 hours on Mondays to Fridays inclusive,
08:00 and 13:00 hours on Saturdays, and
with no noisy work on Sunday or Bank Holidays.

Reason: To protect the amenity of local residents in accordance with Policy QE SP1 of the Arun Local Plan 2011-2031.

- 12 Prior to the commencement of each phase of development, as identified within the Phasing Strategy under Condition 5, 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 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) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The scheme shall be implemented as approved.

In each phase where demolition is required, where part 2 identifies no overriding risk from the demolition works, parts 3. and 4. can take place post demolition for that phase.

Reason: To ensure that the development complies with approved details in the interests of protection of the environment and prevention of harm to human health in accordance with Policies QE SP1 and QE DM4 of the Arun Local Plan 2011-2031. This is required to be a pre-commencement condition because these details have to be agreed and in place before any work commences.

- 13 Prior to commencement of each phase of development, as identified within the Phasing Strategy under Condition 5, a verification report demonstrating completion of the works set out in the approved remediation strategy for that phase and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

Reason: To protect the environment and prevent harm to human health by ensuring that the remediated site has been reclaimed in an appropriate standard in accordance with Policies QE SP1 and QE DM4 of the Arun Local Plan 2011-2031. This is required to be a pre-commencement condition because these details have to be agreed and in place before any work commences.

- 14 Prior to the demolition of any commercial property, a copy of the asbestos register and remedial strategy (where appropriate) must be submitted to and agreed in writing by the Local Planning Authority. Prior to the demolition of any other buildings that were built before 2000, an asbestos assessment and remedial strategy (where appropriate), must be submitted and approved in writing by the Local Planning Authority.

The demolition works and disposal of any asbestos must be undertaken in accordance with the agreed remedial strategy.

Reason: In the interests of amenity and public safety in accordance with Policies QE SP1 and D DM1 of the Arun Local Plan 2011-2031.

- 15 Prior to commencement of development (excluding demolition) in each phase, as defined within the Phasing Strategy under Condition 5, a scheme for external lighting for that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall ensure that the lighting is sensitive to bats and shall comply with the Institution of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light.

Reason: To control the residential amenities of the local environment in accordance with Policies QE SP1, QE DM2 and D DM1 of the Arun Local Plan 2011-2031.

- 16 Prior to commencement of each phase of development, as identified within the Phasing Strategy under Condition 5, a badger survey shall be undertaken for that phase, if a badger sett is found a mitigation strategy shall be submitted to and approved by the Local Planning Authority. Where relevant, each phase shall be carried out in accordance with the agreed mitigation strategy.

Reason: In accordance with Policies ENV SP1 and ENV DM5 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition to prevent harm to a potentially vulnerable species on site.

- 17 Prior to the commencement of development an Ecological Protection and Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan shall include details of:

- Mitigation measures to restrict human and dog access to areas of habitat suitable for Bewick's swan and the screening of movement on adjacent public footpaths with clear timelines for each mitigation measure to be carried out.
- Reptile and amphibian habitat management
- High quality green infrastructure routes across the site
- Wildflower meadow planting
- Filling of gaps in tree lines and hedgerows with appropriate nature species
- Wildlife ponds and / or wetland areas
- Bat bricks / tiles integrated into the buildings onsite facing south/south-west
- Inclusion of gaps at the bottom of fences to allow movement of small mammals across the site
- Provision of log piles and hedgehog nesting boxes

The approved plan shall be implemented in full in accordance with the agreed timings and details on a phase by phase basis as defined by the Phasing Strategy under Condition 5, where relevant.

Reason: To ensure the retention, protection and enhancement of biodiversity in accordance with Policies ENV SP1, ENV DM1 and ENV DM5 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition to prevent harm to potentially vulnerable species.

- 18 Details for the delivery of the approved measures through the Ecological Protection and Enhancement Plan (Condition 17) shall accompany each reserved matters application for each phase or sub phase as identified within the Phasing Strategy under Condition 5. This shall include details of how and where the measures approved through Condition 17 are to be

delivered as part of each phase or sub phase.

Reason: To ensure the retention, protection and enhancement of biodiversity in accordance with Policies ENV SP1, ENV DM1 and ENV DM5 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition to prevent harm to potentially vulnerable species.

- 19 Prior to commencement of development an Employment and Skills Plan for the construction phase of the development shall be submitted to and approved by the Local Planning Authority. Thereafter, the agreed Employment and Skills Plan shall be adhered to for each phase of development.

Reason: In accordance with Policy SKILLS SP1 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition as it relates to the construction phase of the development.

- 20 The layout, scale, appearance and landscaping particulars to be submitted in accordance with Condition 1 for any phase or sub phase as identified within the Phasing Strategy under Condition 5 shall include (insofar as they are relevant to that phase or sub phase):

- i. The detailed layout of the site including delineation of the precise boundaries of the sites reserved for the care home, local centre, primary school and allotments in the relevant phases;
- ii. The siting, design and external appearance of the buildings, including a schedule of materials and finishes to be used for external roofs and walls of the proposed materials and a statement of detail setting out details of proposed windows and doors, details of the depth of recess/reveal from the brickwork, sills and lintels, brick bonding, brick detailing, eaves detailing and rainwater goods;
- iii. Details and design of bus and public transport infrastructure
- iv. Details of above-ground utility infrastructure
- v. A full arboricultural survey to accompany each phase or sub phase of proposed development;
- vi. The detailed design of above-ground surface water drainage features, including levels and profiles and a programme for construction, in accordance with the Design Code agreed under Condition 7; and
- vii. The detailed design of the care home, local centre, primary school and allotments.

Reason: In the interests of amenity and of the environment of the development in accordance with Policy D DM1 of the Arun Local Plan 2011-2031.

- 21 The landscaping and layout particulars to be submitted in accordance with Condition 1 for any phase or sub phase shall include:

- i. Details of all existing trees and hedgerows on the land, showing which are to be retained and which removed;
- ii. Details of the positions, height, design, materials and type of boundary treatment to be provided;
- iii. Details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, within the crown spread of any retained tree;
- iv. The detailed landscape design for the development including the layout and design of the public realm within the development;
- v. Details of the play areas, public open spaces and new sports pitches, including construction specification, the detailed design of the changing facility and associated car park;
- vi. Details of the surfacing, lighting, and signage of all footpaths, cycle routes and equestrian

routes;

vi. Details of the measures that will be undertaken to protect the public sewers crossing the site.

No tree or hedge shall be felled, uprooted or otherwise removed before, during or after the construction period except where removal is indicated on a plan approved by the Local Planning Authority.

Reason: In the interests of amenity and of the environment of the development in accordance with Policies D DM1, HWB SP1, OSR DM1 and ENV DM4 of the Arun Local Plan 2011-2031.

22 a. Prior to the commencement of development or other operations likely to affect trees being undertaken within each phase, as identified within the Phasing Strategy under Condition 5, a scheme for the protection of the retained trees in that phase produced in accordance with BS5837:2012 (Trees in relation to design, demolition and construction. Recommendations), shall be submitted to and approved in writing by the Local Planning Authority. No development or other operations shall take place except in complete accordance with the approved protection scheme for each phase.

b. No operations shall be undertaken within each phase on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and/or widening or any operations involving the use of motorised vehicles or construction machinery) until the protection works required by the approved protection scheme for each phase are in place.

c. No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved scheme for each phase.

d. Protective fencing shall be retained intact until completion of the phase or sub phase approved

Reason: In the interests of amenity and of the environment of the development in accordance with Policies D DM1 and ENV DM4 of the Arun Local Plan 2011-2031.

23 Prior to the first occupation of each phase of development, as identified on the Phasing Strategy under Condition 5, details of the management and maintenance of the public open space and green infrastructure within that phase shall be submitted to and approved in writing by the Local Planning Authority. The public open space and green infrastructure shall be managed and maintained in accordance with the agreed details.

Reason: In the interests of amenity and the continued management and maintenance of the public open space in accordance with policy OSR DM1 of the Arun Local Plan 2011-2031.

24 Any works to the trees or vegetation clearance on the site shall be undertaken outside of the bird breeding season which takes place between 1st March - 1st October. If works are required within this time a suitably qualified ecologist shall survey the site for the presence of birds prior to any works taking place (within 24 hours of any work).

Reason: In the interests of amenity and of the environment of the development in accordance with Policy D DM1 of the Arun Local Plan 2011-2031.

25 Notwithstanding the Land Use and Density Parameter Plan (RG-M-123 Rev. L), any reserved matters application shall include a scheme setting out details of noise sources and proposed

mitigation relevant to that application, to be secured as part of that reserved matters consent and where relevant to be in broad accordance with section 4 of the Waste Infrastructure Statement and to include details of:

- The buffer zone between acoustic source and residential dwellings (including care home);
- The acoustic barriers around the edge of Ford Industrial Estate;
- Location of gardens so as to not face the noise sources; and
- Orientation of dwellings so that no habitable rooms are directly facing noise source.

Reason: In the interests of residential amenity and to safeguard the continued use of existing and allocated waste management facilities and infrastructure in accordance with Policies QE SP1, QE DM1 and WM DM1 of the Arun Local Plan 2011-2031 and W2 and W10 of the Waste Local Plan.

- 26 At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources. Details of how the above energy reductions will be achieved shall be submitted and secured as part of any reserved matters applications for each phase or sub phase as defined by the Phasing Strategy under Condition 5.

Reason: In order to secure on site renewable energy in accordance with national planning policy, in accordance with Policy ECC SP2 of the Arun Local Plan 2011-2031. It is considered necessary for this to be a pre-commencement condition to ensure that the requisite infrastructure is designed into the housing development.

- 27 Prior to commencement of development (excluding demolition), a plan showing the exact location of the rising main and foul sewer pipes across the site and a 5m easement from the centre line of the pipe shall be submitted to and approved by the Local Planning Authority. Any additional pipework or Southern Water infrastructure found during construction should be investigated to ascertain its condition, the properties served, and potential means of access before further works commence on site.

Reason: To protect the main and foul sewer system during development in accordance with policy W DM1.

- 28 Prior to the commencement of construction works (excluding demolition) for each phase, as identified within the Phasing Strategy under Condition 5, details of a proposed foul drainage system for that phase shall be submitted to and approved in writing by the Local Planning Authority (including details of its siting, design and subsequent management I maintenance) and no dwelling shall be occupied until works for the disposal of sewage have been fully implemented in accordance with the approved details.

Reason: To ensure that the proposed development has a satisfactory means of disposing of foul water in accordance with Policies W DM1 and W DM3 of the Arun Local Plan 2011-2031.

- 29 Prior to the commencement of each phase of development (excluding demolition, site survey and site investigation works) as identified within the Phasing Strategy under Condition 5 full details of the proposed surface water drainage scheme for that phase, in accordance with the principles set out in the Drainage Technical Note (ref: C85228-JNP-92-XX-RP-C-1004) dated 9 July 2021 and the requirements of the Design Code secured under Condition 7, shall be 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 disposal 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 to

BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan 2011-2031. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

- 30 Development shall not proceed on any phase of development as identified within the Phasing Strategy under Condition 5, until details have been submitted to and approved in writing by the Local Planning Authority for any proposals: to discharge flows to watercourses; or for the culverting, diversion, infilling or obstruction of any watercourse on or adjacent to the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run-off values and in accordance with current policies. No construction is permitted, which will restrict current and future landowners from undertaking their riparian maintenance responsibilities in respect to any watercourse or culvert on or adjacent to the site.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W DM1, W DM2 and W DM3 of the Arun Local Plan. And to ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion. It is considered necessary for this to be a pre-commencement condition to protect existing watercourses prior to the construction commencing.

- 31 Development shall not proceed on any phase of development as identified within the Phasing Strategy under Condition 5, until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with Policies W DM1, W DM2 and W DM3 of the Arun Local Plan. It is considered necessary for this to be a pre-commencement condition to ensure that the future maintenance and funding arrangements for the surface water disposal scheme are agreed before construction commences.

- 32 Immediately following implementation of the approved surface water drainage system for each phase, as identified within the Phasing Strategy under Condition 5, and prior to occupation of any part of that phase, as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer shall be provided to the local planning authority that confirms that the scheme was built in accordance with the approved drawing/s under condition 28 and is fit for purpose. The scheme shall thereafter be maintained in perpetuity.

Reason : To ensure that the proposed development is satisfactorily drained in accordance with Policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan.

- 33 Prior to the commencement of any phase of development identified within the Phasing Strategy under Condition 5 to include custom-build units, a scheme for the marketing of those units shall be submitted to and approved in writing by the Local Planning Authority. The

approved scheme shall be complied with for the duration of the marketing period.

Reason: To secure the delivery and marketing of custom-build units in accordance with policy H DM1 of the Arun Local Plan 2011-2031.

34 Prior to the commencement of development (including demolition), a scheme for managing risk of explosives shall be submitted and approved by the Local Planning Authority. Such a scheme shall include:

- Methodology to identify risk of explosives which include details of, but not limited to, the screening of deeper excavations and pile positions using a magnetometer
- A watching brief for unexploded ordnance during construction
- A strategy for managing risk and public safety in the event of explosives being identified.

The scheme shall be adhered to on a phase by phase basis as defined in the Phasing Strategy under Condition 5 throughout the construction period.

Reason: In the interests of public safety and amenity given the former use of the site in accordance with policy D DM1 of the Arun Local Plan 2011-2031.

35 Any reserved matters application that includes proposals for high sensitivity receptors (as defined by Table 2 of the IAQM 'Guidance on the assessment of odour for planning) within 300m of the Activated Activated Sludge Plant, as shown on drawing no. RG-M-152 Rev A, shall be supported by adequate information observational evidence to demonstrate that there would be no unacceptable odour impacts upon those high sensitivity receptors.

Reason: In the interests of amenity in accordance with policies D DM1 and QE SP1 of the Arun Local Plan 2011-2031.

36 **INFORMATIVE:** Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm event plus 40% on stored volumes/rainfall intensity (allowance for climate change) between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year storm event plus 40% on stored volumes/rainfall intensity. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application.

37 **INFORMATIVE:** Under Section 23 of the Land Drainage Act 1991 Land Drainage Consent must be sought from the Lead Local Flood Authority (West Sussex County Council), or its agent (Arun District Council land.drainage@arun.gov.uk), prior to starting any works (temporary or permanent) that affect the flow of water in an ordinary watercourse. Such works may include culverting, channel diversion, discharge of flows, connections, headwalls and the installation of trash screens.

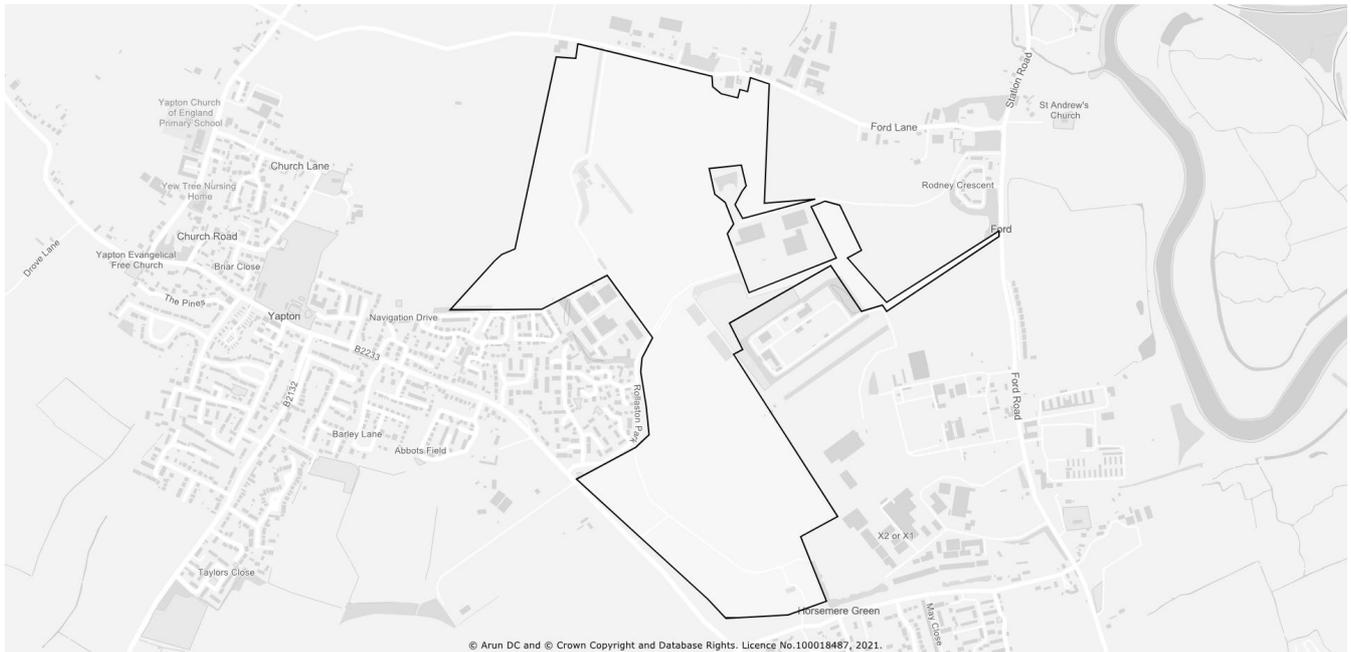
The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. No development is permitted within 3m of the bank of an ordinary watercourse, or 3m of a culverted ordinary watercourse.

- 38 INFORMATIVE: If during construction works, it becomes apparent that implementation cannot be carried in accordance with previously agreed details any resubmission of the drainage design must be accompanied by an updated copy of the management manual.

BACKGROUND PAPERS

[The documents relating to this application can be viewed on the Arun District Council website by going to https://www.arun.gov.uk/weekly-lists and entering the application reference or directly by clicking on this link.](https://www.arun.gov.uk/weekly-lists)

F/4/20/OUT - Indicative Location Plan (Do not Scale or Copy)
(All plans face north unless otherwise indicated with a north point)



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