

Alternative Site Assessment		
Elbridge Farm Recycling Centre	Recycle Southern Ltd	R009-04

Revision	Comments	Author	Date
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APPENDIX 1

Table 1: Various Sites

Table 2: Arun HLEAA Sites

Table 3: Chichester HLEAA Sites

1 INTRODUCTION

1.1 Introduction

1.1.1 This Alternative Site Assessment (ASA) supports the planning application for a proposed extension, increase in throughput and regularising of site operations at Elbridge Farm Recycling Centre, Bognor Regis, PO21 5EF.

1.1.2 The proposed extension comprises an area of approximately 0.8ha which will extend the site eastwards as shown by the yellow area below.

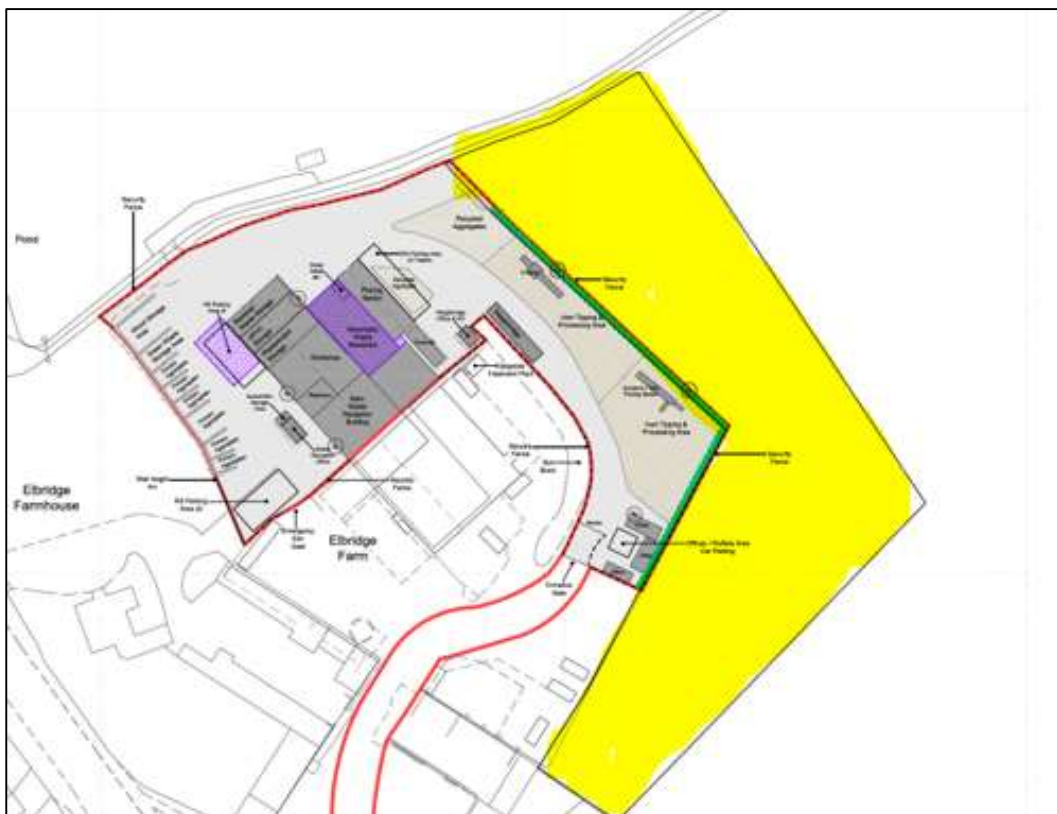


Figure 1: Proposed extension area

1.2 Policy Background

West Sussex Waste Local Plan (WLP), April 2014

1.2.1 Policy W3 of the 2014 WLP sets out the requirements for the location of waste management facilities. The Policy states that proposals that accord with part (a) must:

“only be located on a greenfield site, if it can be demonstrated that no suitable alternative sites are available;”

1.2.2 The supporting text to the policy, at paragraph at 6.4.12, states that:

“Any proposal for an extension beyond the boundary of an existing site will be treated as a new site.”

1.2.3 At paragraph 6.4.16 it states that:

“Greenfield sites should only be used if no other suitable sites are available. Applicants will be required to demonstrate that all alternatives have been fully investigated, appropriate to the scale and nature of the development. This includes consideration of existing, permitted, or allocated sites for built waste management uses; other sites within built-up areas; and previously- developed land outside built-up areas.

1.2.4 Policy W13: Protected Landscapes states:

- a) Proposals for waste development within protected landscapes (the South Downs National Park, the Chichester Harbour Area of Outstanding Natural Beauty (AONB), and the High Weald AONB) will not be permitted unless:*
- (i) the site is allocated for that purpose in an adopted plan; or*
 - (ii) the proposal is for a small-scale facility to meet local needs that can be accommodated without undermining the objectives of the designation; or*
 - (iii) the proposal is for major* waste development that accords with part (c) of this Policy.*
- c) Proposals for major* waste development within protected landscapes will not be permitted unless:*
- (i) there is an overriding need for the development within the designated area; and*
 - (ii) the need cannot be met in some other way or met outside the designated area; and*
 - (iii) any adverse impacts on the environment, landscape, and recreational opportunities can be satisfactorily mitigated.*

Local Planning Policy

The Chichester Local Plan: Key Policies 2014-2029, adopted July 2015

1.2.5 Policy 45 Development in the Countryside states:

“Within the countryside, outside Settlement Boundaries, development will be granted where it requires a countryside location and meets the essential, small scale, and local need which cannot be met within or immediately adjacent to existing settlements.”

Adoption Arun Local Plan 2011-2031 adopted July 2018

1.2.6 Policy C SP1 Countryside states:

“Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty.

Development will be permitted in the countryside where it is:

- a. for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan;”*

2 METHODOLOGY

2.1 Area of Search

2.1.1 In order to maintain the existing client base, and for logistical reasons, the Client has advised that a radius of around 5 miles from the existing site would be an appropriate area of search. This is shown as the red circle on the Google aerial imagery extract below. The existing Site is marked by the yellow pin. The green line represents the boundary of the South Downs National Park, and the pink line is the eastern boundary of Chichester Harbour AONB. The light blue line is the approximate limit of the “Areas of Search” as depicted on the Waste Local Plan Key Diagram.

2.1.2 The Area of Search includes the administrative boundaries of Chichester District Council and Arun District Council.



Figure 2: Area of Search

2.2 Sites Assessed

- 2.2.1 The ASA is desk based and has not been subject to any “on the ground assessment.” In line with the Waste Local Plan requirements the following categories of site have been assessed:
- A. Existing/permitted, waste sites
 - B. Allocated waste sites
 - C. Sites listed in the relevant Brownfield register within built up areas
 - D. Housing and Economic Availability Assessment (HLEAA) sites

2.3 Sites Excluded

- 2.3.1 The current site needs additional room to expand not only for the increased output but also to enable the site to be operated in a more efficient manner. The current site area is about 0.7ha and the extension area is about 0.8 ha. The total extended site would therefore be approximately 1.5ha. Any alternative site would therefore need to be at least 1.5ha in size.
- 2.3.2 Policy WLP 3 states that new sites (which include extensions) *“should only be located on a greenfield site, if it can be demonstrated that no suitable alternative sites are available”*.
- 2.3.3 Therefore greenfield sites, unless employment allocations in the HLEAA, have also been ruled out as they would contravene the same WLP policy requirements.
- 2.3.4 Any potentially suitable sites within the AONB or the National Park have also been excluded as they would be likely to conflict with WLP Policy 13.
- 2.3.5 The Areas of Search shown on the WLP Key Diagram coincides with most of the ASA Area of Search apart from the southwestern part. However, it is not possible to define this area precisely due to the small scale of the Key Diagram. Accordingly, an approximation of the WLP Areas of Search boundary is shown in Figure 2.

3 ASSESSMENT

3.1 Introduction

3.1.1 The Area of Search, shown in Figure 2, is the basis for all of the site assessments, subject the caveats mentioned above. However, in order not to be unduly prescriptive, any potential sites which lie within 0.5 miles (0.8km) of the AOS boundary have also been considered.

3.1.2 The Tables in Appendix A are those sites from the categories A-D (see paragraph 2.2.1) and basically comprise all of the sites which are:

- At least 1.5ha in size
- Within the AOS or within 0.5 miles of the AOS boundary
- Not within the AONB or National Park
- Within the WLP Areas of Search
- Not greenfield or within open countryside – unless an HLEAA “allocation”

3.1.3 Tables 1-3 of the Appendix lists those sites falling within the relevant criteria and summaries the potential suitability. In some cases sites are ruled out because of proximity to residential or other sensitive land uses. Access has not been assessed unless it is clear that it would be an impediment. Other issues such as flood risk and nature conservation considerations have not been assessed unless they have already been raised (such as within the HLEAA).

3.1.4 For ease of comparison the Sites have been graded on a “traffic light” system as follows:

RED – Unsuitable

ORANGE – Limited suitability

BLUE – Suitable but with constraints

GREEN – Suitable with no significant constraints

3.1.5 Any potentially suitable sites have then been reviewed by the client to assess any commercial/logistical issues.

3.2 WLP Allocations

- 3.2.1 There are only five WLP allocations, which are contained within Appendix B of the WLP. These are listed in Table 1 of the Appendix. None of the sites are considered to be suitable.

3.3 Inactive Dormant Waste Sites

- 3.3.1 Table 1 includes relevant inactive/dormant waste sites as listed in the West Sussex 2020/2021 Monitoring Report Appendix D. In this category sites with permission for recycling, merchant waste transfer or MRFs have been considered. For completeness, those sites which had any potential are listed but all are outside the AOS.

3.4 Brownfield Register Sites

Arun Brownfield Register (sites over 1.5ha)

- 3.4.1 The majority of the Sites in the Arun Brownfield Register are below the 1.5ha threshold. Only three sites are above 1.5ha as listed in Table 1. Of these, two are outside the AOS and the other is not suitable for the reasons given.

Chichester Brownfield Register (sites over 1.5ha)

- 3.4.2 Only three sites are above 1.5ha in size and these are listed in Table 1. None of them are suitable for the reasons given.

3.5 HLEAA Sites

- 3.5.1 The HELAA is a technical and theoretical assessment of sites that could potentially contribute towards the future supply of housing and employment land within the Local Planning Authority Area. As a consequence, the HELAA does not set policy, but provides background evidence on the potential availability of sites.
- 3.5.2 The identification of sites in the HELAA should not be seen as an intention to allocate these sites for development, or that planning permission will be granted.
- 3.5.3 However, for the purposes of this assessment, the HLEEA is helpful in identifying potential employment sites which would not necessarily be included in the aforementioned categories of sites.

Arun HLEAA

3.5.4 Table 2 of Appendix 1 lists the HLEEA in Arun District. In this case there are three sites which are classed as having some potential for a waste recycling facility. It should be noted that all four sites are classed as “greenfield” by Arun DC, which would make them contrary to the WLP Policy. However, as they have been earmarked for potential employment use it is deemed that such a use would be acceptable in principle. The sites are briefly discussed below.

Rowan Park Land West of Shripney Road (Bognor Regis Caravan Park)

3.5.5 This is a 3ha site to the north of Bognor Regis. It is currently a caravan park. The Site is allocated as strategic employment site in the Arup Local Plan and so a waste use may not be acceptable. However, as it has yet to be developed (the Local pan was adopted in 2018) there may be a problem in attracting a suitable occupant. The site is within an Archaeological Notification area - mulltiperiod site, North Bersted. Flood Zone 3a abuts the site to the north and west presently, but significantly encroaches the site once climate change is accounted for. The site has been graded as orange – limited suitability.

3.5.6 The site (shaded red) is shown in Figure 3 below.



Figure 3: Site Area

Land West of Ford

3.5.7 This 2.8ha sites lies near Climping between Bognor Regis and Littlehampton. It is 0.3 miles outside of the AOS. There is a concrete mouldings business occupying the northern part of the site. The HLEAA notes that the site may be contaminated. There appears to be a residential property on the eastern boundary adjacent to Ford Road, which may be a problem. The site has been graded as orange – limited suitability.

3.5.8 The boundary of the site is shown in yellow on the Google Earth extract below (Figure 4).

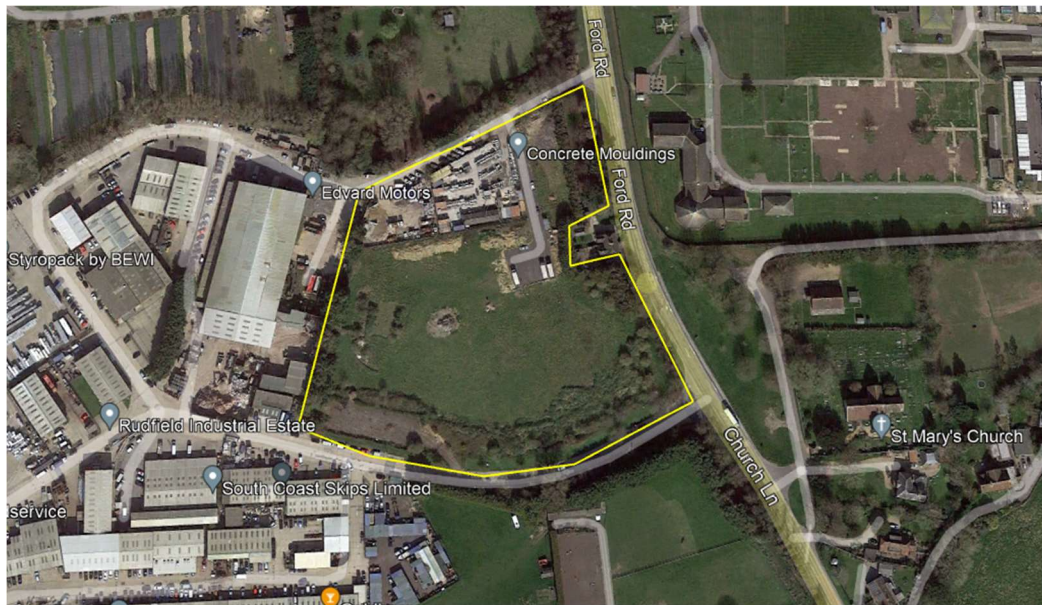


Figure 4: Site Area

Land north of Horsemere Green Lane

3.5.9 This L shaped site is about 6ha in size within a permitted waste sites buffer (500m). There is housing adjacent to the southern and eastern boundaries and access may be a issue. Also, the northern part appears be outside the settlement boundary, which may make development in this area contrary to policy. The site has been graded as orange – limited suitability.

3.5.10 The site is shown on the Google Earth extract below (Figure 5). The southern part of the Land west of Ford site is also shown.

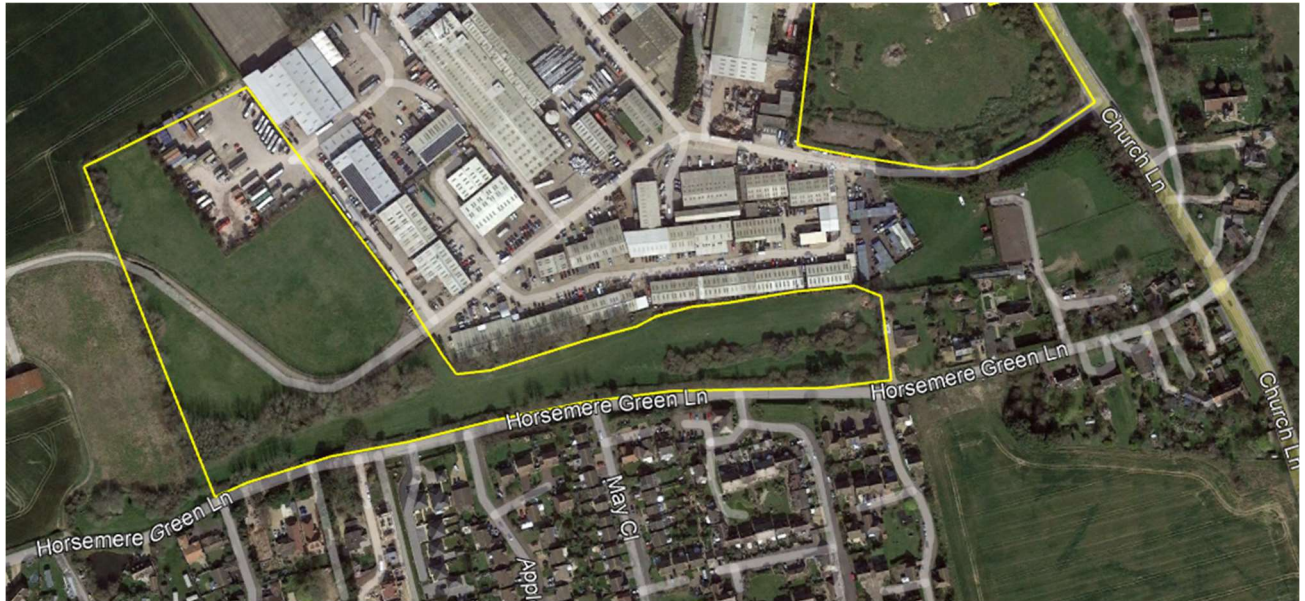


Figure 5: Site Area

Chichester HELAA Sites

3.5.11 Chichester HLEEA Sites are listed in Table 3 of Appendix 1. Despite the relatively large number of sites only two have been assessed as having any potential suitability.

Land south of Bognor Road

3.5.12 The site is opposite existing established and allocated employment areas. The HLEAA says that it is potentially suitable for employment development subject to detailed consideration including access and transport, agricultural land quality assessment and landscape impact. The District Council may not support a recycling use. The site has been graded as orange – limited suitability.

3.5.13 The site is shown in the Google Earth extract below (Figure 6).



Figure 6: Site Area

Drayton Depot

3.5.14 This a brownfield site within open countryside about 1km to the east of Chichester. There is a railway to the south and woodland to the north. The site is earmarked for specialist employment but is currently a West Sussex Council Highways depot. The HLEAA states *“This existing employment site is suitable for additional or alternative specialist employment and service uses, subject to detailed consideration of matters including contamination, mitigation for Flood Zone 3b to the south east corner and access by sustainable means”*. The latter point may be an impediment if the existing access is not suitable. The County Council may own it. Out of the five sites this site has the most potential, albeit with some issues to resolve. The site has been graded blue - potentially suitable but with issues.

3.5.15 The site is shown edged yellow in the Google Earth extract below (Figure 7).



Figure 7: Site Area

4 SUMMARY OF SITE ASSESSMENTS

4.1 Summary

- 4.1.1 This ASA has assessed all relevant available information in the exercise of identifying any alternative site(s). Despite the comprehensive review of the information only 5 sites have been identified as having any potential. Of these, four are considered to have limited suitability, with the other having potential, but with issues.
- 4.1.2 What the ASA has shown is that it is difficult to find a waste site that is suitable for the proposed use. All five of the “potential” sites have issue/problems, which may not be resolvable in the short term.
- 4.1.3 If the current site is allowed to expand, it would clearly be the best site when compared to the 5 potential sites identified through the ASA.

Table 1					
Site/Location	Reference	District	Current Use	Suitability	Comment
WLP Allocations					
Site north of Wastewater treatment works, Ford	Policy Map 1	Arun	Grundons EFW		Planning permission granted (WSSC/096/13/F) for new waste treatment and residual waste treatment facility.
Hobbs Barn near Climping	Policy Map 2	Arun	Skip Hire		Arun Waste occupies half the site; and Fabco Sanctuary the other half
Fuel Depot , Bognor Road, Chichester	Policy Map 3	Chichester	Vacant		Outline pp granted April 2021 for mixed use
Brookhurst Wood, Horsham	Policy Map 4	Horsham	Not Known		Outside AOS
Land west of WW treatment works Burgess Hill	Policy Map 5	Horsham	Vacant		Outside AOS
Monitoring Report					
Inactive/dormant relevant waste sites					
Former Wealden Brickworks, Horsham		Horsham	Inactive inert recycling site		Outside AOS
Eastlands Farm, Scaynes Hill		Mid Sussex	Inactive inert recycling site		Outside AOS
Land at Thistleworth Farm, Dial Post Horsham		Horsham	Not known		Outside AOS
Brookhurst Wood, Horsham		Horsham	Inactive inert recycling site		Outside AOS
Arun Brownfield Register					
St Martins Car Park & Former Waitrose Littlehampton	PS12	Arun	Not known		Outside AOS
Littlehampton West Bank	17LU9	Arun	Not known		Outside AOS
Regis Centre Site	BR19	Arun	Town centre		Inappropriate site - town centre/sea front. Proposed redevelopment granted on appeal July 2018
Chichester Brownfield Register					
Land south of Gaylingwell Drive, Chichester	BLR0002	Chichester	Vacant		Subject to outline pp for residential. Legal agreement signed on 16 August 2022

Former Portfield Depot and UMA House, Oving.	BLR0012	Chichester	Vacant		Application lodged in 2020 for erection of 88 dwellings, access, car parking and landscaping.
South Downs Holiday Village, Bracklesham Bay	BRL0020	Chichester	Not Known		Outside AOS

Table 2: Arun HLEAA Sites					
Site	Reference	District	Status	Suitability	Comment
Rowan Park Land West of Shripney Road (Bognor Regis Caravan Park)	NEWBE11	Arun	Greenfield/caravan park	Yellow	Not classed as o/c. May be flood risk issue. Policy wise earmarked as strategic employment site. Adjacent site to north is part developed
LEC Airfield, Bognor Regis	PS3	Arun	Greenfield	Red	Strategic employment site Located within Flood Zone 2, 3a and partially 3b. Public footpath runs along north Western boundary. Flood mitigation works required. Need for bypass to open up access to site. delivery timescale unknown at this time.
Land R/O Acopia Southern Cross Industrial Estate Oldlands Way Bognor Regis	BR2B	Arun	Brownfield/developed	Red	No map, but would appear to be developed
Oldlands Farm Site South of Rolls Royce Bognor Regis	BR1	Arun	Greenfield	Red	Part of larger strategic employment site. Potential flood risk. Opposite side of A259 to NEWBE11. Recycling operation unlikely to be acceptable here.
Ambulance Station Chichester Road Bognor Regis	18BR4	Arun	Brownfield/developed	Red	Built up area. Near to housing and hospital.
Land west of Ford Road	FO1B	Arun	Greenfield	Yellow	Greenfield, but potentially contaminated land. 0.3 miles east of AOS. 2.8ha
Land West of Bairds Business Park Crookthorn Lane (A259)	RU5a	Arun	Greenfield	Red	Greenfield. Subject to Gaps between settlement policy, which restricts built development
North Paddocks Land to West of Felpham Way	17FP1	Arun	Greenfield	Red	Greenfield. Subject to Gaps between settlement policy, which restricts built development
Opp Unit 22 Land north of Horsemere Green Lane	PS11	Arun	Greenfield	Yellow	Greenfield. Part of the Site is outside settlement boundary. Housing to south and east. If northern part not available, then the Site would not be suitable.

Table 3: Chichester HELAA Sites

Site	Reference	District	Current Use	Potential	Comment
Land SW of Chichester	HAP0003a/3b	Chichester	Agriculture		Large site mostly greenfield. Does not appear to be deliverable at the present time.
Wophams Lane Nursery/The Barnyard	HBI0023	Chichester	Mixed land uses		The HLEAA states that the site is potentially suitable for redevelopment including for employment or mixed uses in the event that the horticultural business ceases and there is no continuing need for the land or infrastructure for horticultural purposes. Would appear that it is not available now.
Land west of Chichester	HCC0002	Chichester	Partly developed for housing as at June 2022		Partly developed for residential & mixed uses.
Part of Barnfield/north of Lidl (phase 2)	HCC0050b	Chichester	Vacant/brownfield?		Site within settlement boundary. It is bordered to the west by residential development and a crematorium on the east with out of town retail units and a fuel garage beyond. River Lavant to the western boundary, Flood Zone 3b.
Land north of Brandy Hole Lane	HCC0057	Chichester	Agricultural/pasture		Res and mixed used proposed, but potential employment area is too small. Residential on two sides.
Land south of Bognor Road	HNM0017a	Chichester	Agriculture		The site is opposite existing established and allocated employment areas. HLEAA says that it is potentially suitable for employment development subject to detailed consideration including access and transport, agricultural land quality assessment and landscape impact. Recycling use may not be supported here.
Vinnetrow Business Park	HNM0020	Chichester	Active and vacant business units including former site of Chichester Free School		Partly occupied site. Only 0.7a appears to be available. Also, still designated as open countryside and horticultural area.
Land at Chichester Food Park (north of the Grain Store)	HNM0021a	Chichester	Agriculture		In open countryside. Earmarked for specialist employment use within existing food park.
Drayton Depot	HOV007	Chichester	Council Depot		Brownfield land within open c/side. Two cottages in corner. Earmarked for specialist employment but occupied by Council depot.
Chichester Garden Centre	HOV0011	Chichester	Retail, car wash, café		Brownfield land within open c/side. But existing uses on south part. Northern area is only 1ha so not suitable.

Land east of Rolls Royce	HWH0003a	Chichester	Paddock/vacant		The site has been promoted by the current operator and the landowner for specialist employment purposes, and additionally by the landowner for residential and general employment use should the expansion not be required. The landowner has identified the land remains safeguarded at the present time for the expansion of Rolls Royce.
Goodwood Aerodrome and Motor Circuit	HWH0016	Chichester	Aerodrome and Motor Circuit		Part of the Goodwood Aerodrome and Motor Circuit site. Proposed use is specialist employment uses to complement and enhance the existing provision are potentially suitable subject to detailed consideration. There is a reasonable prospect that the site would be developable, more likely during the later stages of the Plan period.