

## WEST SUSSEX COUNTY COUNCIL CONSULTATION

<b>TO:</b>	West Sussex County Council FAO: Andrew Sierakowski
<b>FROM:</b>	Stephen Gee WSCC - Highways Authority
<b>DATE:</b>	11 August 2020
<b>LOCATION:</b>	Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL
<b>SUBJECT:</b>	WSCC/036/20 Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.
<b>DATE OF SITE VISIT:</b>	n/a
<b>RECOMMENDATION:</b>	Further Information
<b>S106 CONTRIBUTION TOTAL:</b>	-

### Background

The site is located to the west of Ford Road and south of Ford Lane, Ford and currently benefits from two planning permissions the first for a waste transfer facility and a second app ref: WSCC/027/18/F for a link road (Southern Link Road) that allows a total of 240 two-way HGV movements per day (120 in and 120 out).

Pre application correspondence took place with the applicant's highway consultants in March 2020 and comments were also provided on the Environmental Impact Assessment.

### Access

The proposed development would utilise the existing access onto Ford Road, the access provides a 8m carriageway with a footway running alongside the link into the site from the service road.

As per the pre application advice, the development would result in an increase of 50+ vehicles and as such in line with the WSCC Safety Audit policy a stage 1 audit is required to be undertaken, if necessary a designers response in line with Appendix F of GG119 should be provided.

### Sustainable Transport

A Walking, Cycling and Horse-Riding Assessment Report (WCHAR) has been produced and details a number of footpaths to the north of the site that provide connections towards Yapton, Ford Road and Ford Lane. There are no dedicated cycling facilities within the study area however Ford Road and Church Lane have speed limits of 40mph. The section of Church Lane south of Horsemere Green Lane is identified as part of the south coast cycle route and signed as such however there are no dedicated cycling facilities.

The WCHAR concludes there are limited opportunities for the development to improve pedestrian and cycle access but could support wider opportunities to:

- Explore dedicated/ shared cycleway between the site and Ford Rail station and/or A259;
- Consideration of viability of connection between the site and Rollaston Park/Yapton Road. Noting there maybe some land ownership constraints and conflicts with 'The Landings' (F/4/20) application; and
- Improved provision of pedestrian/cyclist facilities from the site to Ford Road.

The applicant should provide information on how they would support the opportunities identified.

### Trip Generation

Trip Generation has been based upon assuming all staff travel by single occupancy vehicles, LGV trips based upon a similar Energy from Waste facility run by the applicant and HGV trips in line with the maximum number imposed by the conditions of the extant planning permissions.

The trip generation of the site for a normal day has been calculated as 442 two-way vehicle daily movements (221 in and 221 out) of which 25 two-way trips take place in the AM network peak and 30 two-way trips in the PM network peak.

The peak day trips have been calculated as 465 two-way vehicle daily movements (232 in and 233 out) of which 25 two-way trips are in the AM network peak and 32 two-way trips in the PM network peak (19 AM peak HGV trips and 5 PM peak HGV trips.) As identified within the pre application advice, the shift patterns avoid the network peaks and a such a condition restricting the changeover to avoid the peak hours would be recommended.

The increase in trips compared to that previously considered in WSCC/027/18/F is shown below.

(HGVS in brackets)	Approved	This Application	Difference
Daily Total	334 (240)	465 (240)	131(0)
AM Peak	17 (17)	25 (19)	8 (2)
PM Peak	25 (17)	32 (5)	7 (-12)

### Trip Distribution / Assignment

Trips for staff and LGV trips have been distributed according to census journey to work data (10% north and 90% south) and HGV trips 100% to the south according to the existing HGV routing.

This equates to 24 daily two trips Northbound and 418 two way trips southbound in the normal operation scenario<sup>1</sup> and 100 daily two trips northbound and 1064 southbound during the peak construction phase (Month 35).

### Junction Modelling

#### Site Access

The application has provided junction modelling submitted within the Ford Airfield Transport Assessment (Arun ref: F/4/20) - Which details that the junction would work well within capacity in the peak periods. The application (F/4/20) includes all consented

<sup>1</sup> Table 5.16 of the TA provides peak operational trips which appears to incorrectly apply the normal day trip assignments instead of peak day trips

developments and local plan allocations and as such the application has provided information that considers the cumulative impact and would not result in a severe impact on the junction once operational.

A sensitivity test is requested to assess the impact of the construction vehicles of phase 3 and the Ford Market proposals currently being assessed under app ref F/5/20 by Arun District Council.

#### A259/Church Lane

The development is anticipated to generate 24 AM and 29 PM peak trips through the junction in the peak period during operation and as such the level of trips generated would not result in a severe impact on the junction. The junction is identified for improvements within the Arun Local Plan Transport and a larger mitigation scheme has been secured via CM/1/17/OUT.

Whilst no formal assessment of the development impacts were requested at pre application stage, the level of construction vehicles had not been presented and as such further information should be provided on the impact of the development during the construction phase peak period and network peak should the improvements not be implemented at the time of construction.

#### HGV flows

The predicted HGV flows would remain under the maximum daily limit set by the existing condition and as such the impact of the flows on the local network has been reviewed and accepted in principle.

Whilst the level of HGV flows may increase of what the site currently produces and decrease the perception of safety of Non-Motorised Users of Ford Road and Church Lane the levels would operate within the approved limit of application ref WSCC/027/18/F and as such would not result in a safety concern for the highway authority.

A monitoring regime of the HGV traffic would be secured via condition or inclusion within S106 agreement of the Delivery and Servicing Plan.

#### Personal Injury Accidents

Personal Injury Accident (PIA) information has been supplied within the application which shows no PIA have occurred at the site access. No PIA involving NMU along the links of Ford Road and Church Lane south of the site access have been recorded.

A total of 11 PIA have occurred at the A259/Church Lane Rbt since 2015 including 7 involving cyclists, however I would note cycle facilities at the junction have been upgraded as part of the A259 Bognor to Littlehampton cycle route improvements. Further improvements to the junction have also been secured via CM/1/17/OUT (if implemented) to include off road cycle routes and a signalised crossing across the A259 west of the junction.

#### Delivery and Servicing Plan

A plan to monitor HGV movements along the SLR and HGV movements external to the site adhere to the operational HGV route has been provided with the application. The plan and measures will be monitored by a Travel Plan Coordinator. A yellow and red card disciplinary system would apply to staff and third parties who do not follow the delivery and service plan.

#### Construction and Environmental Management Plan (CEMP)

It is noted that the Transport Assessment and CEMP construction trips do not align with the CEMP assuming single occupancy vehicle trips for construction staff of 1 person per

vehicle and the TA of 1.5. The use of differing figures does not raise any additional concerns for the Highway Authority.

The construction phase peak is anticipated to result in a total of 1164 two way daily trips (582 in and 582 out) (based on the higher CEMP figures) The number of HGV trips would remain below the consented 240 daily movements.

A total of 119 two way trips are anticipated in the AM network peak and 104 two way trips in the PM network peak. Significant flows are also expected in the shoulder peak periods of 224 two way trips between 7-8AM and 228 two way trips between 4-5pm.

The CEMP provided details the following peak

	Details	Duration	Peak Month Daily flow	Average Daily flow
Phase 1	Demolition of the westernmost existing building, construction of the northern half of the WSTF and any feasible enabling works for the southern half of the WSTF	10 months	56 two-way vehicle movements	31
Phase 2	Demolition of the remaining existing buildings including the existing WTS	3 Months	22 two-way vehicle movements	20
Phase 3	Construction and commission of the ERF	36 Months	722 two-way vehicle movements	Approx. 400 <sup>2</sup>
Phase 4	Construction of the southern half of the WSTF	12 Months	68	44

In addition to the above the CEMP details the existing WTS or proposed new WSTF would be operational throughout the construction period with an average generation of 72 two way trips.

Whilst it is acknowledged that the peak impact of construction would be limited in duration further consideration should be provided of its impact on the shoulder peaks (would these become the new peak periods?) and its impact on the A259/Church Lane junction.

A Construction Traffic Management Plan would be a necessary pre commencement condition. Whilst not a formal consideration within the application, the peak construction period should not align with the implementation of improvements to the A259/Church Lane roundabout associated with planning application ref CM/1/17/OUT further consideration of this would take place during the booking of roadspace with the streetworks team should the applications be approved and implemented.

#### Parking

The development proposes a total of 133 car parking spaces and 2 minibus/1 coach spaces. The level of parking has been calculated to provide sufficient capacity at the shift turn over time. 100% of the staff and visitor parking spaces will be electric charging enabled.

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<sup>2</sup> Estimated from Figure 10 of Outline CEMP

64 covered and secure cycle parking spaces in the form of Sheffield stands would also be provided.

A total of 10 HGV and 28 Refuse collection vehicles (+5 temporary bays next to the workshop) would also be provided.

#### Travel Plan

A workplace travel plan would be required to be secured via condition.

#### Conclusion

Further Information is requested:

- Safety Audit (and if applicable Designers Response)
- Figures relating to phase 3 construction vehicles
- Site access modelling sensitivity test of Ford market proposals and peak network and shoulder peak of Construction Phase 3.
- A259/Church Lane modelling of Construction Phase 3 peak and shoulder peak prior to implementation of junction improvements.
- Consideration of WCHAR conclusions.

**Stephen Gee**  
**West Sussex County Council – Planning Services**

## WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

### Environment & Heritage Team – Response to consultation by County Planning

#### ARCHAEOLOGY comments

To: - [planning.applications@westsussex.gov.uk](mailto:planning.applications@westsussex.gov.uk)

FAO: - Andrew Sierakowski, County Planning

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**DATE:** 21<sup>st</sup> August 2020

**Consultation date:** 20<sup>th</sup> July 2020

**REF.:** WSCC/036/20

**LOCATION:** Ford Circular Technology Park, Ford Road, Arundel BN18 0XL

**PROPOSAL:** Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.

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#### RECOMMENDATIONS:

Objection is raised to the proposals on the grounds of the their major adverse impact upon the settings of the Grade II Listed Buildings to the south of Ford Lane and St Andrew's Church, causing substantial harm to and loss of significance of those heritage assets.

Policies: National Planning Policy Framework, paragraph 195; Adopted Arun Local Plan 2018, Policy HER DM1 (Listed Buildings) (e).

#### COMMENTS:

The following comments address archaeological (including historic landscape) and built heritage considerations. The West Sussex Historic Environment Record (WSHER) database has been consulted (internal search, 3<sup>rd</sup> August 2020).

Archaeological and built heritage considerations relevant to this application are presented in Chapter 10 (Cultural Heritage) of the Environmental Statement (ES).

#### Built Heritage

##### *Former Ford military airfield structures*

The existing former aircraft hangars 1 and 2 (type B1 aircraft sheds) on the site were built in 1948-51 for the post-war military airfield; in 1946 their site was occupied by part of the RAF aircraft dispersal area and a workshop. It is stated in the ES (10.69) that they are "of a standard and common building type, have been extensively altered and are in

the greatly changed setting of the partly redeveloped airfield". For these reasons they have been assessed as of "low-negligible importance".

This is a reasonable assessment of the hangars' present significance in a national context. An additional consideration is that they lack a direct connection with the internationally important and locally memorable events of World War II. No objection on archaeological grounds is raised to their demolition, subject to an adequate historic building archaeological record (photographic, with drawn sections, concise written description and historical context).

*Scheme effects on designated heritage assets: visual impacts on settings*

Numerous heritage assets are included within the Zone of Theoretical Visibility (ZTV) of the proposals. The observations below focus on the effects of the proposals on designated heritage assets within 1 km of the site and on Arundel, because of its elevated location on the edge of the South Downs, and the concentration at the highest point of the town of Arundel Castle, Arundel Park, Arundel Cathedral and St Nicholas' Church, respectively a Scheduled Monument and Grade I Listed Building, a Grade II\* Registered Park/ Garden, and Grade I Listed Buildings.

1. General: the coastal plain

On the crest of Halnaker Hill (Viewpoint and Visualisation 18) is a Scheduled Monument - a Neolithic causewayed enclosure - and the locally well-known Grade II Listed Halnaker Windmill'

The Ford site is too far from these (9.5 km) to have anything but a low visual impact on the settings of these two heritage assets, but the Visualisation provides a good impression of the prominence they would have as unusually tall structures upon the coastal plain. Comparably tall structures within this visual envelope are few: Chichester Cathedral, the Littlehampton Gas Holder, and high-rise buildings in Littlehampton and Bognor Regis. Because of their height and bulk, the new buildings will be in view of heritage assets over a wide area of the coastal plain.

2. Atherington House, Ford Place, Southdown House, The Lodge, Ford Lane

Close to the site (245 metres), Viewpoint VP26 is taken from the roadside on Ford Lane, adjacent to the Grade II Listed Atherington House, Ford Place and Southdown House, a late 17<sup>th</sup>-/ 18<sup>th</sup>-century building, subdivided. They belong to a distinctive building style of the period, the "Artisan Mannerist", and before subdivision were used as the farmhouse of one of the larger farms in Ford Parish, Ford Place Farm.

The buildings' local significance lies in their building style, their historical setting essentially rural/ agricultural, as a farmhouse on a narrow country lane, amidst arable fields. In the 19<sup>th</sup> century a rural canal operated in the background, and in the mid- 20<sup>th</sup>-century a military airfield.

A visualisation has not been provided. The eastern end of Hangar 2 of the former military airfield is visible in Viewpoint VP26, on the far side of an arable field (lying outside The Landings strategic development area), and at the edge of views from the upper storey of the Listed Buildings (from WSCC visit to VP26, 13/8/20). Hangar 1 and the remainder of Hangar 2 are almost wholly screened behind the line of tall trees on the north side of the footpath running along and outside the northern site boundary.

The height of the existing former hangars would be considerably overtopped by the new buildings. Owing to their height and monolithic massing, the new buildings would constitute a considerable new visual intrusion into the existing setting of the Listed

Buildings, which remains largely rural/ agricultural, and a significant new adverse visual impact upon that setting.

Because of their height, mass and proximity to the Listed Buildings, filling the skyline in southerly views from the Listed Buildings, mitigation of this impact does not appear to be feasible. A permanent adverse effect, through loss of significance of the Listed Buildings' largely rural/ agricultural setting, would result.

The submitted Sun Path Study for the Winter Solstice indicates that long winter shadows cast by the new buildings during the late afternoon would place the Grade II Listed Buildings in shadow, another permanent visual change to the Listed Buildings' settings, although temporary each year. However the existing shadowing effect at this throughout the year upon the Listed Buildings of the tall trees in the hedgerow running southwards from the Listed Buildings towards Hangar 2 should be taken into account as well, so as to isolate for the purposes of visual impact assessment any shadowing effect exclusive to the new buildings.

### 3. St Andrew's church, Ford

St Andrew's church, Ford, is a Grade I Listed Building, and therefore a designated heritage asset "of the highest significance" (National Planning Policy Framework (NPPF), February 2019, para. 194 (b)).

In the medieval period, contemporary with the church, it stood at the east end of a very small village, bounded on the south by a lane from Ford Road and on the west by Ford Road itself. The village became deserted in the 1500s, possibly due to regular flooding. Part of the village site was later cut through during construction of the Portsmouth-Arundel Canal, now filled in. The present open surroundings of the church, constituting its setting, reflect the desertion of the settlement which led to the isolation of the church; and so are integral to understanding of the history both of the church and Ford village.

It has been stated fairly in the ES that the existing setting of the church is extensive and open, and that Ford Road, HM Prison, Ford, Rodney Crescent, the houses at the end of Ford Lane and the existing hangars and industrial development on Ford Airfield to the rear constitute a visual and aural (i.e. noise-related) separation or edge to the setting of the church (ES, 10.105).

Viewpoint and Visualisation VP14 are located on the bank of the River Arun, 260 metres behind the western elevation of the church, nearest the proposal site. An additional viewpoint and visualisation from the west end of the church were requested by the County Council in pre-application consultation about viewpoints (April 2020), but have not been taken owing to the then current Covid-19 lockdown movement restrictions (ES, 10.24).

In photographs taken by WSCC in January 2020 from the west end of the churchyard at Ford, the existing hangars in the application area are visible from Ford church, 700 metres distant, but are not prominent, appearing between the houses of Rodney Place and no higher than the tops of the roof- and adjacent tree-lines.

Referring to the more distant Viewpoint and Visualisation VP14, the new buildings would be visible from that viewpoint at twice the height of the existing roof- and tree-lines, the stack higher still. From the western end of the church, the new buildings will appear higher and more prominent, with correspondingly greater effects upon the setting of the church.



The height and monolithic mass of the new buildings would constitute a major new intrusion into the visual envelope of the church. In view of the national “highest significance” of the church, and the historical significance of its open and still very largely rural setting, the new buildings would constitute a permanent adverse impact upon that setting and loss of significance to that heritage asset.

#### 4. St Mary’s church, Climping and closely adjacent medieval village earthworks

St. Mary’s church, Climping (Grade I Listed Building) is located 0.95 km south-east of the site. Earthworks of the shrunken medieval village of Climping, parts of a Scheduled Monument, are located nearby, to the south and east.

Viewpoint VP25 from outside the church shows a few small trees in the foreground of the line of sight from church to site, but without a Visualisation (requested April 2020 during pre-application advice), it is not possible to assess whether the upper parts of the new buildings and stack would be visible from the church, and how prominent they would be within the settings of the church and Scheduled Monument.

In view of the proximity of the church and monument to the site, and their highest significance as heritage assets, provision of a Visualisation from Viewpoint VP25, , requested at the Scoping stage of this application, is essential for reliable assessment of the effects of the proposals upon the assets’ settings. Without that Visualisation, this application cannot be supported.

#### 5. Arundel

Viewpoint and Visualisation 4, taken from the A27 Arundel Bypass 3.95 km from the site, upon the coastal plain, show the new buildings at a point east of the flood plain of the River Arun. The buildings show as an intrusion into the view southwards from Arundel towards the coast, an important historical connection for Arundel as a historic town, because of its former status as a medieval port. At this low level, the buildings are noticeable, despite their distance from the town, but do not impinge upon that view in such a way as to cause major harm to the significance of the town’s setting.

Viewpoint and Visualisation VP 31, from Arundel Castle, are not illustrated. Viewpoint and Visualisation 29, taken from the top of Arundel Roman Catholic Cemetery, near the top of the town, are not useful for assessment of the views from the highest point of Arundel, where Arundel Castle, St Nicholas’ church, and Arundel Cathedral are situated on the ridge line, because of a tree in the immediate foreground.

Because of the urban topography of Arundel (downhill streets orientated north-north-west – south-south-east), it is not clear that southward views from the Cathedral and St Nicholas’ church at ground level would include the site, nor, because of surrounding planting, from within the grounds of Arundel Castle. From within the Castle at higher level, the site is likely to be more visible. Because of the significance of the view from Arundel Castle, as a heritage asset of the highest significance, more information is needed, in the way of views from the Castle, to enable assessment of the impact of the proposals upon the Castle’s setting.

#### 6. Yapton Conservation Area

In Viewpoint and Visualisation VP24, taken from a Public Right of Way to the north of Yapton Conservation Area, the new buildings and stack are prominently seen, almost four times the height of the intervening hedge and tree lines.

St Mary's church, Yapton (Grade I Listed Building), Church Farm House and Church Farm Mews, in that part of the Conservation Area nearest the application site, are well screened to the east by walls (the church) and tree lines.

Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane have views eastwards, with Church Farm and a tree line still further east. The existing hangars are not visible in the current view (site visit) but the upper part of the new buildings and stack may be at 1.25 km distance. Viewpoint 35, located immediately west of the churchyard, does not allow assessment of the effects of the proposals upon this part of the Conservation Area.

#### 7. Tortington Priory

Tortington Priory, comprising the remains of a 12<sup>th</sup>-century Augustinian priory, is a Scheduled Monument, situated 2.5 km north of the site. The Priory is well screened by mature trees on its southern and south-western boundaries.

No Viewpoint or Visualisation is available from the site, but referring to the perceived height of the new buildings and stack in Viewpoint and Visualisation 28, 800 metres to the south-west and so much nearer the site, the new buildings and stack would be unlikely to be visible through the screen of trees around the Priory.

#### 8. New Place, Ford Lane

Trees, walls and low buildings intervene in the view between the Grade II Listed New Place, on the north side of Ford Lane, and the site. At 540 metres' distance, it is possible that the uppermost parts and stack of the new buildings may be visible from upper storey windows.

### Archaeology

#### *Below-ground archaeological features and deposits*

The known below-ground archaeology and historical development of the site are fairly set out in Chapter 10 of the ES.

Known below-ground archaeological remains include a 300-metre long section of the early 19<sup>th</sup>-century Portsmouth to Arundel canal, infilled and buried below the former Ford Airfield, and remaining traces of part of the removed and built-over aircraft dispersal area of the World War II period airfield, comprising concrete slipways, a workshop and other small buildings.

There have been several previous archaeological intrusive and non-intrusive archaeological investigations on the former airfield that attest to the extent of earlier archaeology on the Airfield, from the Bronze Age to Roman periods. Areas of archaeological features of Iron Age and Roman settlement, recorded to the south in 1999 in advance of construction of the Ford Wastewater Treatment Works, extended northwards outside the Works, possibly as far as the current application area.

#### *West Sussex Waste Local Plan – site-specific archaeological policies*

The West Sussex Waste Local Plan (WLP), recently reviewed, includes the site as a Built Waste Management Facility allocation (WLP, 7.3.8). The Development Principles include provision (7.3.9) to the effect that if substantial new ground excavations are proposed, low-level archaeological mitigation (will be) required.

The term “low-level archaeological mitigation” is not defined, but is interpreted here to involve archaeological features and deposits, below- and above-ground. It is considered not to require preservation of such features and deposits intact (reserving for discussion with the applicant, if planning permission is granted, the unexpected discovery of nationally significant archaeological remains).

This mitigation is considered to include the preservation “by record” of archaeological features and deposits, including industrial archaeological features such as the buried canal, and former military historic buildings such as Hangars 1 and 2.

Preservation “by record” would involve on-site investigation and recording and subsequent off-site analysis and reporting, and public access to historical and archaeological information about the findings of the investigation and recording.

#### *The Portsmouth to Arundel Canal*

During its operation in the early 19<sup>th</sup> century, the Portsmouth to Arundel canal was a significant feature of the landscape and transport infrastructure of West Sussex. Parts of the Canal and its infrastructure (bridges) survive almost intact, albeit now normally dry; elsewhere it has been infilled and built over.

The buried section of the canal within the site is not specifically referred to in the WLP. Archaeological investigation and recording of buried remains of the canal, where it would be adversely affected by development, should form part of the mitigation alluded to in the WLP, together with these landscaping proposals relevant to the line of the canal.

It should be noted that as regards the canal, through several iterations of their Local Plan, Arun District Council have favoured a development principle of preserving the line of the canal. Well-preserved visible sections of the canal, not infilled and grassed-over, are allocated as green space (Arun District Local Plan (ADLP) Policies Map), and ADLP Policy HER DM5 requires that development will be permitted where it would not adversely affect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it.

At Ford Airfield, where the canal is buried and not visible, ADLP Strategic Development Site SD8 (Ford) development principles require development to “Reflect the historic alignment of the canal” (Policy H SP2c (Housing Delivery) SD8 (Ford) (h)). On the illustrative masterplan of “The Landings”, Ford development proposal for Site SD8 (Arun District Council planning application F/4/20), a green space corridor is proposed within this very large site, broadly along the line of and commemorating the buried canal, on the western edge of the former Ford Airfield.

In the current waste related planning application, in the context of the limited space available for redevelopment, it has not been proposed to leave the line of the canal undeveloped. Most of the line of the canal within then site would be built over or cut through by underground drainage structures.

In terms of canal related mitigation, two breaks in the planting of the western and eastern boundaries of the site have been proposed, overlying the line of the canal and marking its course at these two points, with information to be provided on site about the history of the canal.

#### *Archaeological survival and scheme impact*

It is noted reasonably in the ES (10.87) that “the site area has suffered from earthwork clearance and construction of airfield and extant buildings on site” and that damage to archaeological horizons is unquantifiable. Much of the buried canal structure is likely to

survive below the existing concrete rafts and buildings, and (if present) Iron Age and Roman archaeological features may survive, possibly truncated (uppermost parts reduced/removed), , in between areas of deeper 19<sup>th</sup>-century and modern disturbance for construction of the canal and airfield-related former slipways, tanks, bunkers, and building foundations.

Within the footprint of the proposed bunker for the energy recovery facility (ERF), deep excavations for new construction are likely to cut through and remove the northern edge of the buried and infilled canal structure entirely, and any shallower, more ancient archaeological features outside the canal. The underground drainage structures are not expected to cut as deeply into the infilled canal, but would cut through its full width.

Beyond the bunker and underground drainage structures, assessment of the below-ground archaeological impact of other new build is difficult, in the absence of details of the construction methods to be used. The submitted documents state that foundations of existing buildings, once demolished, are not to be grubbed out below ground level; that existing concrete standings will be used as foundations in some cases; and that heavy plant expected to be present during construction may or will include piling rigs. These statements imply a preference for retaining where possible the existing concrete hard standing, and an expected need for piling. For the purposes of these comments, both piled foundation and trench foundation construction methods for the new buildings will be considered.

Trench foundations would cut through the canal infill, probably to its full depth. The infill will be mid-20<sup>th</sup> century, and expected to be of negligible archaeological value, but the structure of the sides and floor of the canal is expected to have been lined with puddled clay for water retention, is of archaeological interest, and would also be removed. An accommodation bridge crossed the canal, when the latter was in use, its eastern edge within the footprint of the new Waste Sorting and Transfer Facility building (WSTF). The bridge abutments may survive below ground level, and are also of archaeological interest. Trench foundations would also remove locally earlier buried archaeological features.

In general terms, piled foundations, as a series of point impacts rather than the linear impacts of trench foundations, would remove less of the structure of the canal, canal bridge and archaeological features. However a dense piling pattern may still bring about considerable archaeological disruption.

Driven (hammered/ vibrated) piling can cause much distortion of archaeological layers and damage to fragile artefacts such as prehistoric or Roman pottery. Drilled piles would involve a lesser footprint of disturbance at depth. In all cases , any earthworks for construction of a piling mat, excavations for pile caps and ring-beams may reduce the uppermost parts of archaeological features and structures, and to a greater depth if excavations to create them are begun from a level beneath the concrete raft.

To conclude this section, excavations for construction of the ERF bunker, underground drainage structures, and new building foundations will remove buried archaeology. Buried archaeological features are not expected to be of national importance. ; the impact of both trench foundations for the new buildings and a drilled-pile foundation design is preferred in that it would cause less disruption to surviving ancient archaeological features and to the buried structure of the canal and canal bridge.

The scope of necessary archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations.

John Mills

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## WEST SUSSEX COUNTY COUNCIL CONSULTATION

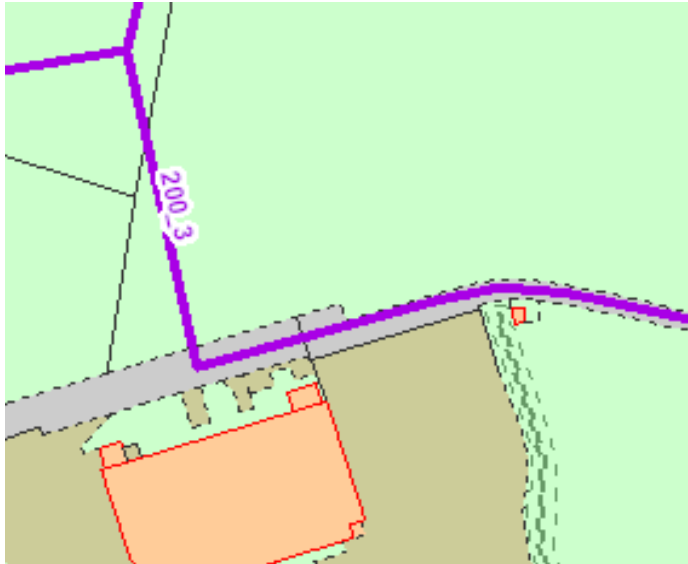
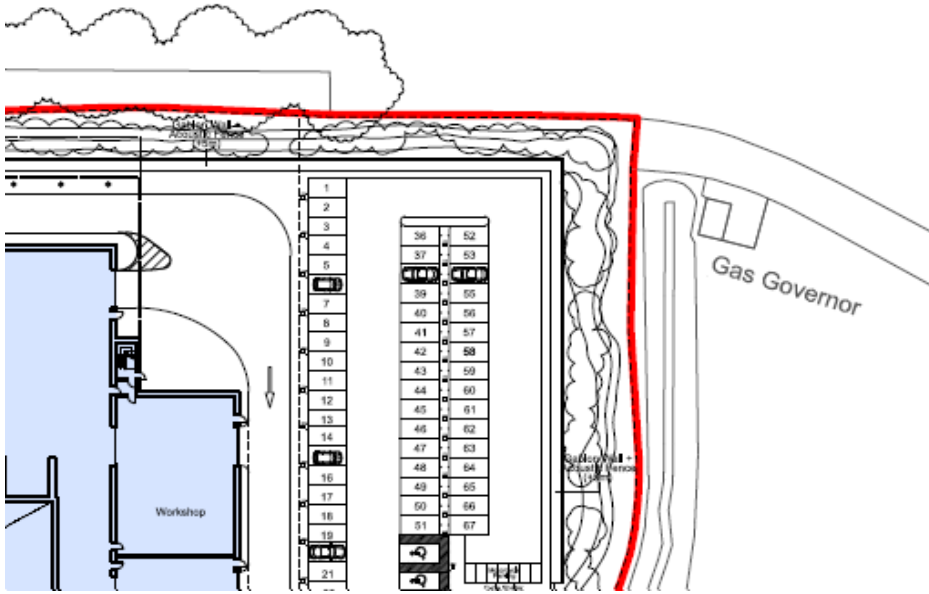
<b>TO:</b>	West Sussex County Council FAO:Chris Bartlett
<b>FROM:</b>	WSSC - Highways Authority (Public Rights of Way)
<b>DATE:</b>	24 July 2020
<b>LOCATION:</b>	Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL
<b>SUBJECT:</b>	WSSC/036/20 Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.
<b>DATE OF SITE VISIT:</b>	24/07/20
<b>RECOMMENDATION:</b>	Objection
<b>S106 CONTRIBUTION TOTAL:</b>	n/a / £ See below for breakdown.

The existence of a Public Right of Way (PROW Footpath 200\_3) is a material consideration. Should planning consent be granted, the impact of development upon the public use, enjoyment and amenity of the PROW must be considered by the planning authority.

Having reviewed the information supplied, it is unclear how the existing PROW is to be accommodated. A holding objection is hereby lodged pending receipt of further information once supplied, the application will be reviewed again and a formal response provided.

The design and access statement states no PROW fall within the site however this conflicts with the plan and definitive line of Footpath 200\_3 which intersects the site in the North East corner. According to the plan an access road, also Public Right of Way Footpath 200\_3 is obstructed by a bund/vegetation just West of the gas governor which can be seen in the site photo. This access road continues, carrying PROW Footpath 200\_3 before turning North out of the site.

It should also be noted that the Public Footpath extends the entire width of the access road as shown below.



Footpath 2003\_3 View West from Gas Governor (NE corner of site)



Line of Footpath 200\_3 heading West before turning North.



**Darryl Hobden**  
Public Rights of Way





## **WSSC TREE OFFICER response to planning consultation**

**Application reference number:** WSSC/036/20

**Location:** Ford Circular Technology Park, Ford Road, Ford, Arundel BN18 0XL

**Proposal:** Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works

**District:** Arun

**Date:** 5<sup>th</sup> August 2020

**Summary response:** no objection subject to appropriately worded conditions to secure tree protection and a full, detailed landscape specification.

**Response:** The site benefits from some limited existing planting on the northern and eastern boundaries. Although this is shown outside the red line boundary, opportunities should be explored to supplement and reinforce this planting, especially where gaps exist.

Looking at the site within the context of the wider landscape, opportunities should be explored to improve the linear habitat connectivity by planting up gaps in hedgerows / shelterbelts where possible, e.g. the gap to the north east of the site along the access track from Rodney Crescent, which is also PROW 200\_3.

The site is extremely constrained, so there are limited opportunities for 'landform screening, landscape planting and biodiversity improvements'; hence the need to look beyond the site boundaries for additional landscape enhancements, if possible, to 'integrate the proposal with the adjacent landscape', as advised at the second pre-application meeting.

The arboricultural impact assessment (AIA) has identified Group 10, the poplars along the access road, to have <10 years remaining contribution and categorised them as 'U', so planned replacement of these should be incorporated into future landscape plans to ensure the screening they provide is continued.

The conservation grassland proposed on the northern boundary could be heavily shaded by Group 1 conifers (and the acoustic fence) unless the access track is to be retained between these and the new planting.

Smaller tree stock should be used – it is likely to establish more successfully, assuming the maintenance and aftercare is thorough – 10-12cmg instead of 20-25cmg. This will also avoid the need for ground anchors, but some low above ground staking will be required.

**Species mixes:** scrub planting – omit alder buckthorn (which does not occur locally) replace with field maple (*Acer campestre*); omit silver birch and replace with goat willow (*Salix caprea*).

**Hedgerow** – hawthorn (*Crataegus monogyna*) should be 60% of the mix and field maple 20% instead of blackthorn. Omit *Clematis vitalba* (which will appear over time naturally) and replace with 5% blackthorn.

Planting along the southern boundary is challenging because of the very narrow area, additionally constrained by two fences; an inner 3m high timber acoustic fence and an outer 2.4m high security fence. Enough light should be available for the grassland to establish, but may be difficult to maintain. Given time, the proposed oaks may clear the fencing and branches can then grow over both, but they could be constrained / distorted by the fencing with branches growing through the outer fence. Security would also potentially be compromised if it was possible (well into the future) to climb the trees and gain access to the site that way. The oaks are also shown planted very close together – each must have sufficient space to develop to their full potential. Smaller stock should be planted which is likely to establish more successfully.

A full, detailed planting specification is required together with details of suppliers; prior approval is required, particularly for biosecurity reasons. Tree guards, shelters and fixings should be biodegradable.

Ash (*Fraxinus excelsior*) cannot be planted due to the prevalence of ash dieback.

There must be full compliance with, and implementation of, the tree protection measures and mitigation detailed within the AIA. As noted, bespoke method statements may be required in future for any additional works that could impact on existing trees / shrubs, e.g. CHP pipeline.

A comprehensive Landscape and Ecological Management Plan (LEMP) should incorporate and add to the submitted landscape management plan.

I cannot comment on the submitted LVIA.

[Julie Bolton](#) | County Arboriculturist, Environment & Heritage Team, Planning Services,  
[West Sussex County Council](#)  
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Landscape Architect Response to Planning Application

**Town and Country Planning Act 1990**  
**The Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017.**  
**County Matter Application**

**Date** 20th August 2020

**Application Number** WSCC/036/20

**Description** Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works

**Address** Ford Circular Technology Park, Ford Road, Ford, Arundel, BN18 0XL

**Summary Response:** Objection

**Comments**

1. The application site is located at the Ford Circular Technology Park to the west of Ford and forms part of the former Ford Airfield and lies at approx. 6m AOD. The application site is partially used as an existing waste transfer station and comprises buildings relating to this business and areas of hardstanding and former hangars. Concrete access roads connect the site to Ford Lane in the east and to Ford Airfield Industrial Estate and Rollaston Park in the west. Agricultural land lies to the north, east and west with a sewage works and market site to the south. Further south lies Rudford Industrial Estate, HMP Ford and the village of Climping. The village of Yapton lies to the west. The River Arun lies approx. 1km to the east and the English Channel approx. 2km to the south. A railway line runs east-west approx. 900m to the north of the site before diverging north, south and east to the west of Littlehampton. The wider landscape is generally flat and low-lying before rising up to the South Downs approximately 2km further north.
2. The application site is surrounded by the Ford strategic allocation (known as 'The Landings') which is due to provide at least 1,500 dwellings, school facilities, a community hub (compromising retail, commercial and community facilities) a library, healthcare facilities and sports pitch. A public exhibition was held in January 2020 at which the latest proposals for 'The Landings' were presented.
3. Context/ baseline assessment
  - i. Landscape Character;  
The site lies within Chichester to Yapton Coastal Plain landscape character area (LCA) as identified in the West Sussex Landscape Character Assessment. Lower Arun Valley LCA lies immediately to the east of Ford Lane. The boundaries of other LCA lie close by to the south, north and east. Marine Character Area (MCA) 7: Selsey Bill to Seaford Head lies offshore to the south.
  - ii. Historic Landscape character;

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The site is identified as lying within the Historic Landscape Characterisation Broad Character Type 'Industry' and the Historic Landscape Characterisation Character Type 'Other Industry'

- iii. Designations;  
The South Downs National Park lies approx. 2.3km to the north. There are no designated ecological sites within the immediate vicinity, the closest is Climping Beach SSSI which lies approx. 2.8km to the south. There are a number of heritage assets and conservation areas in the surrounding area, the closest being the Grade II Atherington House and New House Farmhouse and the Grade I Parish Church of St Andrew.
- iv. PROW;  
Footpath 200-3 runs along the entrance road from Ford Lane and connects with other local PROW, it also forms part of the promoted 'Canal Walks' which follow the course of the former Chichester and Arundel Canal.  
The Monarch's Way long-distance footpath lies approx. 4km to the north on higher ground.
- v. Common land and OAL;  
The closest Registered Common Land/Open Access Land to the site is The Pond at Horsemere Green which is located approx. 1km to the south of the site.
- vi. Settlement:  
Ford is a small, scattered settlement comprising a group of older buildings centred on the junction of Ford Lane and Station Road close to the Grade I listed church, small developments of post-war houses at Rodney Crescent and Nelson Row, The Ship and Anchor riverside public house and an area of park homes to the east of Ford Station
- vii. Tranquillity;  
In my opinion the site is generally tranquil despite occasional traffic and train noise and some noise associated with current site use.
- viii. Visibility and Views;  
Due to the flat landform and the scale of the proposed development including the stack it is likely that this will be a highly visible feature in near and middle-distant views of the site. Even where vegetation provides some screening the built form is likely to be visible above this. In more distant and elevated views including those from the South Downs or from the sea it is likely that the built form will break the horizon..

#### 4. Relevant landscape-related planning policy;

West Sussex Waste Local Plan (April 2014)

Policy W10: Strategic Waste Allocations

Policy W11: Character

Policy W12: High Quality Developments

Policy W13: Protected Landscapes

## Landscape Architect Response to Planning Application

### Arun Local Plan 2011-2031 (July 2018)

Policy LAN DM1: Protection of landscape character

Policy LAN DM2: The Setting of Arundel

Policy D SPI: Design

Policy D DM1: Aspects of form and design quality

Policy HER DM3: Conservation Areas

Policy HER DM5: Remnants of the Portsmouth and Arundel Canal

Policy ENV SPI: Natural Environment

Policy ENV DM5: Development and Biodiversity

Policy W DM3: Sustainable Urban Drainage Systems

Policy QE SPI: Quality of the environment

Policy QE DM1: Noise pollution

Policy QE DM2: Light pollution

### Ford Neighbourhood Plan 2017-2031 (January 2019)

Policy EH1: Protection of trees and hedgerows

Policy EH8: Light Pollution

Policy EE10: Quality of Design of commercial buildings

A Pre-app meeting was held on 11<sup>th</sup> February

A Response to Planning Consultation Request for Scoping was issued on 17<sup>th</sup> February

A Conference call was held on 1<sup>st</sup> May to discuss proposed viewpoints

## **5. The submitted Landscape Design 2829-01-SK002**

- 5.1. Due to the height and scale of the proposals, including the EfW and the stack, effective onsite screening is not feasible as the applicant acknowledges. In order to screen the built form effectively considerable off-site planting would be required in conjunction with 'The Landings'. The space allowed for landscape proposals even limits the opportunity for effective screening in close views.
- 5.2. Opportunities exist for much more effective screening tree-planting to be provided offsite in conjunction with 'The Landings' to mitigate the impact of views from offsite towards the EfW/WS&TF and protect the amenity of future residents. An opportunity also exists to work with the developers of 'The Landings' to ensure the proposed habitat connects via 'The Landings' to the wider landscape thus providing maximum benefits for ecology.
- 5.3. Within the parameters of the very limited space allocated for the onsite landscape proposals they do appear to be generally sound and achievable. The plan would benefit from showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context. The north point is incorrectly orientated.
- 5.4. I would wish to see scrub planting and hedgerow mixes that are better informed by the local ecology. To the bunds I would wish to see some additional native tree planting, rather than reliance solely on scrub mix. These could be concentrated towards the lower slopes to better disguise the alien landform.
- 5.5. I consider there are opportunities for additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological

## Landscape Architect Response to Planning Application

enhancement, amenity and natural shading and provide some separation and enclosure for the car parks both from the wider EfW site.

- 5.6. Consideration should be given for the long-term prospects of the off-site coniferous tree belt and suitable advance tree-planting should be proposed to ensure a continuation of screening of sensitive views from the north.
- 5.7. The inclusion of flint walls is a welcome feature although this would only be noticeable in very close views, and I would wish to see more detail of these provided. The wildlife pond is another welcome feature and marks the location of the former canal, however this will not be visible for visitors outside the site and I would wish some evidence of the former canal to be shown on the eastern boundary, as it is on the western side of the site to give context for visitors. I would wish to see details of the construction of the pond and any planting.
- 5.8. The nature trail path is a welcome feature however as it does not form part of a route leading to anywhere or form part of a circular route and as it is contained by the bund and the security fence, I cannot see it being very appealing. Greater thought should be given to this and how it might make a more appealing route for staff.
- 5.9. There are no proposals shown for the funnel-shaped piece of land to the north-west of the site and I would wish to see details of proposals for this, especially as it lies close to future housing within 'The Landings', and all land on the site, including the access roads and their verges.
- 5.10. I would wish to see the inclusion of climbers to the acoustic fence to both enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing.
- 5.11. The colour and design of the security fence is an important factor and I would wish to see a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should also be ensured that sufficient gaps are left to allow species such as hedgehogs to pass through the fence and access the newly-created habitat.
- 5.12. No details of proposed surfacing are shown beyond the area of paving around the entrance foyer and there are no details of the proposed fill for the gabions. More details of these are required.

### **6. The submitted Landscape Implementation and Management Plan**

The submitted plan is generally sound but I would recommend a soil survey be undertaken to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals

### **7. The submitted Landscape and Visual Impact Assessment (LVIA)**

An LVIA has been prepared by Terence O'Rourke Ltd on behalf of the developer Viridor and Grundon in support of the proposed development. The LVIA is included within the submitted Environmental Statement at Chapter 12 and supported by Technical Appendix H.

## Landscape Architect Response to Planning Application

### 8. Assessment methodology

The methodology setting out the way in which the LVIA has been undertaken is set out within Appendix H, with methodology for producing visualisation material set out in Chapter 12 at 12.15. These indicate the intent for the assessment work to follow the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013), published by the Landscape Institute and Institute for Environmental Management and Assessment, with visualisations prepared in accordance with 'Visual Representation of Development Proposals. Technical Guidance Note 06/19' by the Landscape Institute. Whilst it is noted that due to restrictions in place due to the Covid-19 pandemic the production of high accuracy visualisations has been affected, it is accepted that the visualisations are sufficiently accurate for the purposes of assessment. However, there are some very important and significant omissions from a number of key viewpoints that need to be addressed and these are included as Appendix B. Whilst there are not an insignificant number of visualisations requested I believe that it is proportionate considering the scale of the proposals and the potentially wide area of their landscape and visual impacts. Should more visualisations be provided once Covid-19 restrictions have eased it is expected that these would be of a greater degree of accuracy.

### 9. Landscape baseline

The account of landscape baseline refers to the Arun District Council (ADC) Arun Landscape Study (2006) as the most recent and fine-grained assessment of land outside the South Downs National Park and includes an assessment of landscape value and sensitivity. The submitted LVIA notes that 'the ADC assessment was prepared to assist selection of new major development areas and also omits areas of significant existing development, which skews its assessment of landscape sensitivity'. The LVIA also refers to the West Sussex Landscape Character Assessment (2003) 'to augment and inform this report's assessment of landscape value in addition to the ADC study'. The South Downs Integrated Landscape Character Assessment does not appear to have been referred to in LI3- Landscape effects on the South Downs national Park (SDNP).

9.1. I acknowledge that the strategic allocation will have a significant effect on the landscape character of the immediate area but the proposed Energy Recovery Facility and Waste Transfer Station have the potential to greatly impact the wider landscape character due to their more substantial bulk and height.

9.2. The submitted methodology refers to 5.44 of the GLVIA which states that;

- *'The value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particular landscape features, notable aesthetics, perceptual or experiential qualities and combinations of the contributors.'*

9.3. In addition at H 2.40 it states that

*'Landscape designations should not be over relied upon to signify the value of landscape receptors. Other factors that can help in the identification of valued landscapes include:*

- *Landscape quality (condition)*
- *Scenic quality*



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- *Rarity*
- *Representativeness*
- *Conservation interests*
- *Recreational Value*
- *Perceptual aspects including wildness and or tranquillity*
- *Associations'*

9.4. I do not consider that sufficient consideration has been given in the landscape baseline to recreational value or perceptual qualities (including openness and tranquillity) and the long views to the South Downs which are a highly distinctive and very apparent due to the low-lying and flat landscape with relatively few trees. In particular the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain (within which the site is located) as including:

- *Long views to Arundel, the Downs and to the distinctive spire of Chichester Cathedral*
- *The relatively open character of much of the area allows long views so that village church towers are important landmarks in views*

According to the West Sussex LCA, key issues highlighted with respect to the Chichester to Yapton Coastal Plain include;

- *Introduction of large scale industrial buildings and glasshouses with distribution sheds*

According to the West Sussex LCA, Landscape and Visual sensitivities on the Chichester to Yapton Coastal Plain include:

- *Key views to the South Downs... and Arundel*

The West Sussex LCA also notes in relation to the Chichester to Yapton Coastal Plain that

*'Industrial buildings, for instance in the Ford and Tangmere areas, are strong suburban element. Where these occur, they create visual confusion and poor definition between town and countryside, and erode distinctive landscape character.'*

9.5. Due to the considerable scale of the proposals and the location of the site towards the eastern edge of the character area it is informative to also refer to the adjacent character area Lower Arun Valley.

Key characteristics of the Lower Arun Valley include:

- *Long views of river valley towards the Chalk Downs and Arundel from the south*

Key issues highlighted with respect to the Lower Arun Valley include;

- *Loss of pastoral character of the valley*
- *Any large scale housing/commercial development*
- *Loss of long views to Arundel and the Downs*

## Landscape Architect Response to Planning Application

- 9.6. A more detailed examination of the landscape baseline may have resulted in different weighting to the sensitivity of the landscape receptors and affected the final significance.
- 9.7. The nearest landscape character area to the site within the SDNP is BI: Goodwood to Arundel Wooded Estate Downland. One of its listed key characteristics is
- *The panoramic views across the coastal plain*
- 9.8. According to the West Sussex LCA, Landscape Management/ Development Considerations specific to the Goodwood to Arundel Wooded Estate Downland include:
- *Pay particular attention to panoramic views, for example from the popular viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary.*
- 9.9. There is no consideration of the potential effects on the Seascape Assessment for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head) which includes the following key characteristic;
- *Coastal geology dominated by chalk, also forming the prominent ridgeline of the South Downs visible in views from the sea*

### 10. Assessment of landscape effects

As discussed above I do not consider that enough consideration has been given to some of individual elements that comprise landscape character and to the effects on key characteristics of landscape character as defined in the West Sussex Landscape Character Assessment that a development of this scale and height could have. Even allowing for the age of this assessment and that of the ADC study they are still of relevance. Where they are considered to be out of date additional surveys should be undertaken.

10.1. As GLVIA states:

- *Existing assessments must be reviewed critically as their quality may vary, some may be dated and some may not be suited to the task in hand. Before deciding to rely on information from an existing assessment a judgement should be made as to the degree to which it will be useful in informing the LVIA process. (GLVIA 5.13)*
- *Existing assessments may need to be reviewed and interpreted to adapt them for use in LVIA – for example by drawing out more clearly the key characteristics that are most relevant to the proposal. Fieldwork will also be required to check the applicability of the assessment throughout the study area and to refine it where necessary, for example by identifying variations in character at a more detailed scale. (GLVIA 5.15).*
- *Even where there are useful and relevant existing Landscape character Assessments and historic landscape characterisations, it is still likely that it will be necessary to carry out specific and more detailed surveys of the site itself and perhaps its immediate setting or*

## Landscape Architect Response to Planning Application

*surroundings. This provides the opportunity to record the specific characteristics of this more limited area, but also to analyse to what extent the site and its immediate surroundings conform to or are different from the wider Landscape Character Assessments that exist, and to pick up other characteristics that may be important in considering the effects of the proposal. (GLVIA 5.16).*

- 10.2. With regard to Landscape effects on the site (L 1), I am surprised that the magnitude of effect at completion is considered to be 'medium beneficial' and the significance 'slight beneficial and not significant'. Whilst the proposed building is of a dramatic and modern design using high-quality materials of local provenance such as flint and there is proposed landscaping to the site boundaries, the scale of the proposed built form is nevertheless still very significant and potentially overbearing within the landscape character area due to its size and height. The existing buildings including the retained hangars, whilst large, have an almost agricultural appearance, not at odds with their rural location, and due to their comparatively low height and pale colouring are not obtrusive features and are often screened from view by intervening tree belts. The hangars also relate well to the site's history as an airfield. Regardless of the quality of the built form, the proposals will further erode the areas remaining rural character by introducing a large-scale industrial building with stack and occasional plume.
- 10.3. With regard to Landscape effects on the South Downs National Park (L 13) there is no acknowledgement that panoramic views are one of the key characteristics of this part of the SDNP, or any assessment of the effect that the proposals would have on these highly sensitive views.
- 10.4. It is also noted that there is apparently no consideration given in night-time landscape effects to the potential effects of plume at night, with light sources reflecting on the water droplets in vapour, and its likely contribution to eroding the rural character.
- 10.5. There is no examination at all of the potential effects on the Marine Character Areas as requested in my earlier comments.

### **11. Visual baseline**

- 11.1. The LVIA has tested the visual envelope of the proposed development site by considering the visual baseline conditions at 36 representative viewpoints. These viewpoints have been grouped variously to represent different types of visual receptors which might be expected to have broadly similar sensitivities, for example residents within 1.5km of the site or walkers on Public Rights of Way (PROW). Assessment of the sensitivity of these visual receptors (comprising value and susceptibility to change) is given in the tables which can be found at 12-39 to 12-59. Whilst this approach is considered sound, I feel that for the sake of transparency the grouping of viewpoints would benefit from more consideration. I would wish to see visual receptors in Conservation Areas, who are considered to be highly sensitive, assessed separately rather than in combination with other less sensitive receptors. Whilst I acknowledge that the receptor value and susceptibility to change is based on the highest in the group, this is somewhat confusing.

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- 11.2. There is a lack of consideration given to the very large number of future residents, and therefore visual receptors, of The Landings who will be living in close proximity to the site with its limited onsite screening. Unless there is much more effective offsite screening proposed there is a high risk that achieving an acceptable level of visual impact for these future residents is not achievable. The applicant and the developer of The Landings need to work together to ensure both schemes are acceptable.
- 11.3. A lack of consideration has also been given to some PRoW in the immediate vicinity such as 200-3 and 363. Additional viewpoints which I would wish to see examined are listed in Appendix A.
- 11.4. Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), would benefit from being taken from nearer to the receptor, for example in the churchyard to the front of the church where there are some open views to the site, to give a better impression of the existing view.
- 11.5. For clarity the report would benefit from the inclusion of those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission.
- 11.6. It is important that a LVIA is proportionate to the development proposed and with a development of such a considerable scale as this I would wish to see greater examination of closer viewpoints. Those that I wish to see examined are included in Appendix A.

### **12. Assessment of visual effects**

- 12.1. Some of the visual effects would, in my opinion be greater than stated, and the assessment as whole understates the magnitude of some visual effects. This may be partly due to the use of a 7-point scale which permits magnitudes to be described as low/medium, medium/high etc. However, I note that the highest magnitude given is medium-large. With a development of this considerable scale in such a flat landscape and residents/walkers at a close proximity I would anticipate some magnitudes of visual effects would be classed as high. One of the factors which contribute to the magnitude of visual effect is size/scale. A development of this scale would take up a large proportion of the view composition in viewers close to the site. This is not adequately reflected in the visualisations provided, with some key visualisations of the chosen viewpoints omitted. With this in mind I do not understand what criteria these views have met to warrant the downgrading of the magnitude of change from high to medium/high.
- 12.2. If the grouping of viewpoints to form visual receptors has resulted in this 'averaging out' of effects then I would suggest that it is more appropriate to re-examine those groupings. For example, for residents of Rodney Crescent or walkers on PRoW 200-3 close to the site I would anticipate the magnitude of visual effect would be high.
- 12.3. Whilst it is acknowledged that 'the appreciation of the design is subjective' I do not agree that the proposals may result in a 'feature of interest in a landscape that lacks

## Landscape Architect Response to Planning Application

distinctiveness'. The distinctiveness of this landscape, as discussed above, stems from its low-lying, coastal-plain character with historic villages and ancient churches set against the backdrop of the South Downs, albeit having been subject to modern housing development.

12.4. Greater consideration should be given to the impact of the proposed built form (including the stack and plume) where it breaks the horizon, including that of the South Downs or crosses the offing (the area of the sea seen below the horizon) in views from the north. The addition of angled elevations and vertical elements into these wide panoramic views is likely to be particularly noticeable when seen against the rolling downs or the horizontal offing.

12.5. I would wish to see greater consideration given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact.

### 13. Visualisations submitted

13.1. The visualisations submitted as part of this applications (found at 12.48- 12.62) are considered very helpful in assessing the extent of the proposals. However, it is noticeable that some of the viewpoints closest to the site, where one would expect the effects to be most noticeable are lacking visualisations, specifically viewpoint 26 (Ford Lane) and Viewpoint 36 (Rodney Crescent). It is also noticeable that the visualisations do not show the plume which, although potentially visible on only approximately 25% of days, would still be a noticeable feature, and would draw attention to the built-form. The stack and plume are particular elements which would undermine the agricultural character of the landscape by introducing industrial features into views.

13.2. Of the viewpoint photographs which lack visualisations I have attached a list (at Appendix B) which indicates those which I would wish to see additional visualisations produced for in order to fully understand the visual effects of this development. Due to its considerable height it is likely to be very visible above intervening layers of vegetation and this needs to be examined.

### 14. Compliance with policy

West Sussex Waste Local Plan (April 2014)

14.1. As per my comments above I do not consider that the LVIA adequately assesses the impacts on the amenity of users of close public rights of way, close dwellings or future dwellings or offers sufficient mitigation or enhancement and is therefore contrary to the development principles of Policies W10.

14.2. Even in more distant views where the degree of visual intrusion may be not so great, due to the high sensitivity of these receptors the resultant impact is considered significant and contrary to Policy W10.

## Landscape Architect Response to Planning Application

- 14.3. The very limited onsite landscaping scheme submitted does not provide acceptable mitigation as required by Policy W10. It will require a significant offsite element to be considered acceptable considering the adjacent housing/mixed use allocation. There exists an opportunity for the applicants to work in conjunction with the developers of 'The Landings' to ensure that existing residents and future residents of 'The Landings' are protected from any loss of amenity through careful site planning and mitigation measures. I would wish to see this opportunity explored.
- 14.4. I consider that the proposals will have an unacceptable impact on *'the character, distinctiveness, and sense of place'* and fail to *'reflect and, where possible, reinforce the character of the main natural character areas (including the retention of important features or characteristics)'* and are therefore contrary to Policy W11.
- 14.5. I consider that the proposals do not adequately *'take into account the need to: (a) integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities; (b) have regard to the local context including: (i) the varied traditions and character of the different parts of West Sussex; (ii) the characteristics of the site in terms of topography, and natural and man-made features; (iii) the topography, landscape, townscape, streetscape and skyline of the surrounding area; (iv) views into and out of the site; and (v) the use of materials and building styles;'* and are therefore contrary to Policy W12.
- 14.6. Furthermore I do not consider that the proposals accord with Policy W13: Protected Landscapes (with regard to the SDNP) and will *'undermine the objectives of the designation'* by causing significant adverse effects, as established within the submitted LVIA.

## 15. Conclusion

- 15.1. Due to the considerable height and size of the proposed development and its location within a low-lying and flat coastal plain landscape it is unsurprising that the impacts are found to be far-reaching and significant. The limited screening possible and proposed does little to mitigate these effects. There are a large number of sensitive landscape and visual receptors within the study area which all have the potential to be significantly and adversely impacted by the proposals including the SDNP, listed buildings and conservation areas. Visual receptors also include walkers on the many local PRow and existing and future residents of the area including the large proposed development at The Landings which surrounds the site.
- 15.2. The LVIA omits to assess the impacts on a number of key receptors and greater discussion of the method of assessing sensitivity and effects for each receptor is required. Grouping of visual receptors is also not considered helpful in some instances. The assessment of landscape effects would benefit from greater examination of all the constituent elements which comprise the landscape and its character.

## Landscape Architect Response to Planning Application

15.3. Notwithstanding my comments above, and the report's apparent lack of a conclusion of its own, the LVIA as submitted concludes that out of the 13 landscape receptors assessed 8 would be considered to experience significant adverse effects, including the highly sensitive South Downs National Park. Of the 22 visual receptors assessed 16 would be considered to experience significant adverse effects including visitors to the South Downs National Park. The proposed built form is of such a large scale and mass as to have a significant adverse impact on visual receptors both close to the site and further away and also to impact adversely landscape character over a considerable geographical area.

15.4. Due to the adverse impact on heritage assets and PRow and the lack of a comprehensive landscaping scheme which mitigates these impacts, because of the adverse impacts on the character and sense of place, the scale/form/design of the proposals being such that they will not integrate and enhance adjoining land uses, because it will adversely affect local context including landscape, skyline and views into and out of the area, and because it would undermine the objectives of nearby protected landscapes, and in particular the South Downs National Park, the proposals are contrary to the West Sussex Waste Local Plan Policies W10, W11, W12 and W13.

The terra firma Consultancy / *Keith Baker* for and on behalf of West Sussex County Council  
(Environment & Heritage Team)

### APPENDIX A

#### Supplementary viewpoints and visualisations requested

Description	Reason
Close PRow to north and west of site (366/ 363/ 200-2 Old Canal)/ 200-3/200-4/359) which will be within The Landings	Representative of local footpaths and future residents of The Landings
Close PRow 175 to south of site which will be within The Landings)	Representative of local footpaths and future residents of The Landings
Riverside PRow further south than VP 14	Representative of PRow users
From western side of churchyard of St Andrew's, Ford	Representative of Church visitors and PRow
Views from sea	Representative of Marine Character Area with views to South Downs

# West Sussex County Council

## Landscape Architect Response to Planning Application

### APPENDIX B

#### Supplementary visualisations requested

TOR Viewpoint Number	Description	Reason
5	Poling Street	Represents mid-range views in countryside to east
6	East of Littlehampton	Represents footpath users and residents in the Arun Valley
9	Night view from Nore Folly	Day time view and visualisation requested
11	Ford Lane	Representative of close views from local roads and dwellings
13	Lyminster Conservation Area	Representative of views within Conservation Area and adjacent to Grade I listed church
16	Ford airfield	Representative of residential views on Rollaston Park new dwellings on 'The Landings'
17	North edge of Middleton on Sea	Representative of residential views towards South Downs.
19	SDNP PROW	Representative of views from lower slopes of SDNP to north of A27 where there is intervening woodland.
21	A259 Bognor	Representative of residents, PRoW and motorists crossing the open coastal plain
25	St Mary's Climping	Representative of views within Climping. To demonstrate potential screening effect of trees
26	Ford Lane	Representative of workers, motorists, local PRoW and residents of Atherington Ho etc.
30	North of Arundel Castle	Representative of views from Arundel Park within SDNP.
31 (Landings VP11)	Arundel Castle Keep	Representative of view from Grade I listed Arundel Castle. A key view for Arundel Castle and SDNPA
32 (Landings VP10)	West of Littlehampton	Representative of residents on the west of Littlehampton looking across the Arun valley



## West Sussex County Council

### Landscape Architect Response to Planning Application

33 (Landings VP 8)	PROW 166 south-east of Burndell/Yapton	Representative of PROW and residents
34 (Landings VP3)	Horsemere Green	Representative of effects on local residents and motorists
36	West of Rodney Crescent	Representative of neighbouring residents and PRoW

## Raymond Cole

---

**From:** Fiona Fitzgerald  
**Sent:** 06 August 2020 14:32  
**To:** Planning.Responses  
**Cc:** Raymond Cole  
**Subject:** WSCC/036/20

Dear Ray,

Please find Environmental Health comments for air quality and the emissions mitigation statement.

I should clarify that I have only had time to read the sections on air quality and the emissions mitigation statement at present. Therefore there may have been mention of mitigation measures included in other documents that I have not had chance to look at.

### **Air Quality**

- The applicant has carried out an emissions mitigation calculation in line with the Air Quality & Emissions Mitigation Guidance for Sussex (2020). This has calculated a five year cost of £9,025. However the guidance requires that a mitigation statement should include proposed mitigation measures which should equal the health damage cost. The mitigation options should be designed into the development from the outset. In this case I cannot see that any proposed mitigation measures have been suggested and the applicant should refer to both the Standard Mitigations and Table 2 of the above guidance to propose mitigation measures for consideration by the planning authority.
- I have noted that Section 3.1 of the walking, cycling and Horse Riding Assessment Report dated June 2020 by Ramboll lists a number of opportunities for improving cycling and pedestrian connections but I can not see that these have been incorporated into the design.
- EV Charge points should be included in the scheme for staff parking and vehicles used on site should be electric where possible.

### **Environmental Permitting**

- This activity will be permitted by the Environment Agency and they are best placed to make comments on this issue as they should already have been involved with the development of the plans.

Regards

Fiona

## Raymond Cole

---

**From:** Sue Howell  
**Sent:** 23 July 2020 16:55  
**To:** Planning.Responses  
**Cc:** Raymond Cole; Rachel Alderson; Joe Russell-Wells  
**Subject:** RE: Planning Consultation on: F/15/20/WS

### Response to Planning Application

**From:** Arun District Council Greenspace

**Date:** 23 July 2020

**Application ref:** F/15/20/WS

**Description:** Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works. This application is a County Waste Matter will be determined by West Sussex County Council.

**Location:** Ford Circular Technology Park Ford Road Ford BN18 0XL

**Determining Authority:** WSCC

**Summary recommendation:** I would recommend that landscape detail is provided at an early stage to demonstrate how mitigation and screening requirements will be addressed. These requirements should not be underestimated considering the proximity to existing and adjacent planned residential proposals. The impact on the wider environment of the surrounding District also requiring that mitigation landscaping be provided to soften the immediate impact and important distant views. This would need to provide appropriate planting measures which will establish and mature as the site develops.

---

## Comments

### Relevant landscape designations:

There are no environmental or cultural heritage designations on the site or built heritage assets.

There are heritage assets in the surrounding area including Yapton Church Lane and Main Road/Church Road conservation areas 1km and 1.3km to the west of the site.

The site is located 2.2km to the south of the South Downs National Park.

### Response

The site is presently in use as a waste plant and occupies, predominantly the central section of the red edge site. The site is partially vacant with parking and porta cabins to the west, 2 hangers to the north and hardstanding to the south.

Access to the site is via Ford Road to the south. Existing sports pitches and sewage treatment works lie to the south of the site with further hardstanding for market use south again to the sewage works.

The influence of the site upon the wider character area is restricted through low lying topography and limited intervening vegetation. It sits on the rural fringe of Ford and Yapton in an area of existing commercial development.

The proposed energy recovery, waste sorting and transfer facility is considerable in size and massing and will sit well above the existing skyline. There is some existing vegetation on the boundary of the site and along nearby field boundaries, but the images provided demonstrate this will have little effect in screening views of the building structure, both near and distant. The coastal plain does not provide the natural landform which would assist in delivering a more elevated, enhanced screening solution.

The NPPF para 124/127 relate to good design principles which equally apply to commercial development. LVIA viewpoints with photomontage have been carried out which go some way to assessing the impact on the area from differing locations. It is clear to see from these that the impact on the area will be significant in height and scale and where detailed work would be required to demonstrate the effectiveness of any proposed mitigation measures.

The proposed development site is immediately adjacent the site of the submitted application F/4/20/OUT for 1500 residential dwellings. Consideration of how the proposed waste facility will impact on existing and future residents is required, as well as the existing sports facilities, in terms of visual, noise and odour issues. The presence of the waste facility has the potential to impact greatly on existing adjacent dwellings, the proposed housing development, the enjoyment of the public open space and use of the adjacent sporting facilities.

## **Impact**

The proposed development will impact greatly the immediate area and beyond including from mid and distant views where it will remain obvious. Pollution would be anticipated from increased trafficking to support the facility along the potential for negative environmental, biodiversity, air quality, noise and habitat impact.

## **Mitigation/requirements**

Whilst the inclusion of a substantial landscape scheme should be integral to the development, there is little evidence of this shown to the layout at present. Acoustic fencing is indicated with some inductive landscaping, however the restriction that the site presents with the footprint of the available site would go nowhere towards allowing the space required for a robust and effective landscape scheme to be implemented.

The proposals shown have the potential to result in visual, noise and odour detriment, environmental impact including biodiversity and habitat loss. Any opportunities to enhance the existing landscape setting and biodiversity improvement should be considered.

## **Recommendation/Conclusion**

I would recommend that landscape detail is provided at an early stage to demonstrate how mitigation and screening requirements will be addressed. These requirements should not be underestimated considering the proximity to existing and adjacent planned residential proposals. The impact on the wider environment of the surrounding District also requiring that mitigation landscaping be provided to soften the immediate impact and important distant views. This would need to provide appropriate planting measures which will establish and mature as the site develops



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Mr Chris Bartlett  
West Sussex County Council  
County Planning, 2nd Floor Northleigh  
County Hall  
Chichester  
West Sussex  
PO19 1QT

Direct Dial: 0207 973 3642

Our ref: P01208738

16 September 2020

Dear Mr Bartlett

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**FORD CIRCULAR TECHNOLOGY PARK, FORD ROAD, FORD, ARUNDEL BN18  
0XL  
Application No. WSCC/036/20**

Thank you for your letter of 8 July 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Impact upon Setting**

The proposed height and massing of the development is considerable and would represent an unusually tall structure upon the coastal plain. It therefore has the potential to impact upon the setting of heritage assets, historically important viewpoints, and the general historic landscape character, over a wide area.

Impact upon settings of Listed Buildings

a) St Andrew's Church, Ford

We have serious concerns regarding the impact of the proposed waste facility on the significance of the Grade I St Andrew's church (Ford) through changes to its setting.

St Andrew's is notable as a largely Norman two cell church with a later chancel, 14<sup>th</sup> century belfry and a distinctive brick Dutch gabled south porch which was added in 1637. The wide open rural landscape surrounding the church forms part of its setting and this plays an important contribution to its significance as it highlights the isolated nature of the church.

The visualisation submitted at viewpoint 14, to the east of the church on the bank of



the river, indicates that the proposal would have a significant impact on the rural character of the church's setting. The proposed buildings would rise high above the existing treeline, with the stack rising even further. The design and scale of the buildings are of particular concern. The monolithic character of the buildings and their height would greatly reduce our appreciation of the wide, open rural landscape surrounding the church.

The ES notes that the existing buildings at the site and other buildings such as the prison and the houses of Nelson Row are visible as part of the developed area within this view. We think however, that these are largely subservient to the tree line and remain relatively unobtrusive within the church's setting. We agree with the ES's conclusion that the proposal will have a 'permanent substantial adverse effect' to the qualities and character of the setting of the church (10.105), and we therefore have serious concerns regarding the impact to the church's significance.

We note that only one viewpoint has been provided of St Andrew's church and we think that further visualisations from within the churchyard looking westwards towards the site are necessary to understand the full impact of the proposal on this heritage asset.

#### b) St Mary's Church, Climping

There may be further, lesser impacts on St Mary Climping (Grade I), although a lack of visualisations of this makes it difficult to assess.

The medieval church is of significance for its historical and architectural value as a large rural medieval church set within a walled churchyard. Its wider rural setting is still somewhat appreciable, despite the modern industrial development on the former airfield to the west, which is partially obscured by trees.

Although a viewpoint has been provided, no visualisation has been submitted as part of the application, and we think that this is necessary to understand the level of harm that the proposal would have on this asset. We do not think that it is possible to ascertain as the ES has done, that the 'proposed development will not alter the qualities and character of the setting' of the church at Climping. We therefore encourage the applicant to provide a visualisation from this viewpoint so that the impact can be adequately assessed.

#### c) Grade II listed buildings

It is not within Historic England's remit to comment on proposals' impacts to Grade II listed buildings through changes in their setting, and we defer to the conservation officer on these matters.



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However, we would briefly note that the proposal is in close proximity to Atherington House, a late 17<sup>th</sup> to early 18<sup>th</sup> century farmhouse, whose setting largely comprises of open rural landscape, albeit somewhat marred by the existing industrial buildings on the proposal site. We note that while a viewpoint is provided (number 26) a visualisation has not been submitted from this location. However, we think that the height, design and scale of the building as well as its proximity would have a negative impact on the listed building through changes to its setting, and that this would be towards the higher end of less than substantial.

### Impact upon Conservation Areas

We think that the proposal would also have an adverse impact on the conservation areas of Church Lane at Yapton and Lyminster through changes to their rural settings.

Viewpoints and visualisations 24 and 36 indicate that the proposal would be extremely visible in from the fields bordering the conservation areas and would intrude on the low, rural landscape that form the village's wider rural setting. However, while it is clear that the proposal would have an impact on the setting of the conservation areas, visualisations from within these conservation areas are lacking. It is therefore difficult to assess the full extent of the impact to these conservation areas without these.

### Impact upon setting of Scheduled Monuments

The development also has the potential to impact upon the setting of a number of scheduled monuments in the vicinity.

These monuments are Climping Deserted Medieval Settlement (List Entry Ref: 1005828), and Tortington Augustinian Priory (List Entry Ref: 1021459). The significance of both of these monuments derives at least in part from their retention of predominantly undeveloped and rural surrounds, the character of which may be impacted depending on how visible the new development appears within them.

We acknowledge that existing vegetation and development exist between the development and both Climping's historic core and Tortington Priory. However we also note that no visualisations have been provided to assess or demonstrate exactly how prominent the development might be from these designated assets. Without such, it is not possible to determine the development's precise level of impact.

### Impact upon the setting of Arundel and heritage assets within it

The development also poses potential harm to the setting and appreciation of Arundel and some of the heritage assets within it.

Historic Arundel - itself designated a Conservation Area - contains a number of



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designated heritage assets, including the scheduled and listed Castle and grade I listed cathedral. The broad expanse of coastal floodplain that lies directly below Arundel to the south - and ultimately extends all the way to the coast - is a very important element of the setting of the whole.

This area would always have been a marginal hinterland exploited for its resources and most importantly as a means of access and transport to the sea; first as a sea inlet and later as a marshy estuary through which the river Arun flowed. As such the retention of this plain as an open and undeveloped area (and the preservation of unimpeded views across it) contribute significantly to an understanding of the town's historic past. This landscape is thus not one capable of easily accommodating change.

Although the development would sit on a site already developed and at some distance from Arundel, the introduction of such a large structure in this location thus has the potential to intrude into these highly significant views and detract from our appreciation and understanding of the town, and its relationship with the coast and surrounding landscape.

Visualisation 4 (from low-lying land just south of Arundel) shows that the development site would be a visible intrusion into important southwards views. Whilst the visualisation shows that the development will certainly impinge upon this view, it also shows that - at this low level - it is unlikely to intrude into this view in such a way as to cause a high level of harm.

The development is however likely to be more damaging to heritage significance when viewed from points within the town of Arundel itself, due to its more elevated elevation and thus the increased visibility it affords. Views from Arundel Castle in particular will need to be considered as they are integral to the significance of this most highly graded asset, and because the castle represents the most elevated point within the town.

The importance of these views and the need for their protection is also highlighted explicitly within the local plan for Arun (7.5.9). This states that "views out from [the town] are equally important [as views in]" and that "all views stretching across the river flood plain to the coast from more elevated positions within the town...are worthy of protection...some of them are particularly important as they include a view of the Castle or the Cathedral."

Unfortunately the application does not properly assess or demonstrate the development's impact upon these significant views or the assets to which they pertain. There are no visualisations from the Castle itself or from other significant or high points within the town, e.g. St Nicholas' Church and Arundel Cathedral which also sit at the top of the town along the ridge line. The only visualisation provided from the town (Visualisation 29 from the Roman Catholic Cemetery) is not useful for assessment

because of a tree in the immediate foreground.

### Impact upon Historic Landscape Character

The development will also have an impact upon historic landscape character. Whilst the site is already developed, the massing and height of the proposal will comprise a considerable intrusion into views across the surrounding landscape which - to the north at least - retains as a largely open, undeveloped and rural character; a survival of medieval and post-medieval field systems and use.

### **Impacts to undesignated archaeology**

The development also has the potential to impact upon undesignated archaeological remains, including deposits of geo-archaeological interest.

Your main advisor for this element of the historic environment should be the West Sussex County Council Archaeologist, John Mills. However please note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

### **Relevant Policy**

The NPPF requires that heritage assets should be conserved in a manner appropriate to their significance (para. 184), and that great weight should be given to the conservation of the significance of a designated asset (para. 193). Any conflict between an asset's significance and a development proposal should thus be avoided and minimised. This includes any impact the development may have upon the asset through impact upon its setting (para. 190).

The NPPF also requires that planning applications for proposed developments should describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance (para. 189).

In determining applications, local planning authorities should also take account of the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, para. 192).

The Local Plan for Arun also states that "designated heritage assets and Conservation Areas will be given the highest level of protection [and] development likely to prejudice any of the above, including their settings, will be refused" (Policy HER SP1).



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## Position and Recommendations

We note that the development's impact upon the setting of some heritage assets has not been sufficiently assessed to allow us to determine the development's overall impact.

We therefore recommend that this application is not determined until sufficient further assessment has been submitted (NPPF, para. 189).

In particular, there is a need for further visualisations of the development from:

- St Andrew's Churchyard;
- Climping's historic core (the church and scheduled monument);
- Within Yapton and Lyminster conservation areas;
- Tortington Priory;
- Assets within Arundel (including Arundel Castle and other elevated points within the town of heritage significance).

We nevertheless do already have concerns about the proposal. Where impact to setting has been adequately assessed, it is clear the development will have an impact upon assets' significance; and for some assets this level of harm is likely to be high.

In this respect, we think the proposal may fail to meet the requirements of the NPPF (paras. 184, 190 & 192). Nor does it align with the policies of the Local Plan for Arun (Policy HER SP1).

Finally, we recommend that you take the advice of the WSCC County Archaeologist with regard to the proposal's impact upon undesignated archaeology. Please also note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

Yours sincerely

### **Maria Buczak**

Assistant Inspector of Ancient Monuments  
E-mail: [maria.buczak@HistoricEngland.org.uk](mailto:maria.buczak@HistoricEngland.org.uk)

cc: Isabelle Ryan, Assistant Inspector of Historic Buildings and Areas, Historic England



County Planning  
County Hall  
Chichester  
PO19 1RH

Our Ref: SDNP/20/02905/ADJAUT  
Contact Officer: Kelly Porter  
Tel. No.: 01730 819314

6th August 2020

Dear Sir/Madam,

### **Neighbouring Authority Consultation**

**Proposal:** Adjoining Authority Consultation from West Sussex CC, Case Ref: WSCC/036/20 - Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.

**Address:** Ford Circular Technology Park, Ford Road, Ford, Arundel, West Sussex, BN18 0XL

Thank you for your correspondence received 8 July 2020, consulting us as a neighbouring authority on the above noted development proposals.

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

- **Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- **Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

The National Park's comments on the development are as follows:

At the present time, we are objecting to the proposal given its impact on the Statutory Purposes of the South Downs National Park and its special qualities.

Please note our comments below are focused on the landscape and visual impacts of the proposal, we will leave it to West Sussex County Council to determine the acceptability of other potential impacts, such as air quality and impacts to public rights of way and highways.

We acknowledge that this site is allocated for such a use in the adopted Waste Local Plan and safeguarded in the adopted Arun Local Plan, we did not object to permission WSCC/096/13/F and the surrounding land is allocated as Strategic Housing Site in the adopted Arun Local Plan (and is currently subject to an application F/4/20/OUT to Arun District Council).

We do accept that any new development in this area will have an urbanising impact on the wider

landscape, however this application is proposing a substantially large building(s) and stack (with the building approximately 30m higher and the stack 35m higher than the permitted scheme).

We agree with the conclusions of the submitted Environmental Statement (and in particular the LVIA) that this proposal will have substantial adverse impacts on views and experiential qualities of the National Park and its setting. For example, the proposal will be highly visible in panoramic views of the Arun Valley / coastal plain from a National Trail (the South Downs Way) and other public rights of way across the National Park.

However, we do not agree with the conclusion that by creating a 'visually dynamic architectural landmark', that this impact is acceptable.

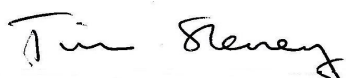
As stated, we accept that the neighbouring Strategic Housing Site will also have an impact on the National Park (particularly in the panoramic views of the Arun Valley / coastal plain), however, it is the combination of the scale, height, bulk (in particular) and colour choices (notably the 'coppery earth') of this proposal which is creating the unacceptable adverse impacts.

We do not believe that sufficient consideration has been given to all the mitigation measures to reduce the adverse impacts to the National Park and in harmonising this proposal with the landscape.

In addition to exploring further a reduction in scale and height of the building(s) and stack and other measures to reduce the visual impact. Further consideration should be given to the use of 'green / living' walls (which would have the added benefit of enhancing the biodiversity / ecology of the site). The use of living walls on such a facility is possible, as shown on facilities owned / managed by Veolia (the Recycling and Energy Recovery Facility in Leeds and the Materials Recovery Facility proposed in Alton, Hampshire).

We would also like to reiterate that under Section 62 of the Environment Act 1995, the need for West Sussex County Council to be confident that they have met the legal requirement to have regard to the National Park in determining this application and are able to clearly show how they have considered the Statutory Purposes of the National Park in their decision making.

Yours faithfully



**TIM SLANEY**  
Director of Planning  
South Downs National Park Authority

**Contact Officer**  
Kelly Porter  
kelly.porter@southdowns.gov.uk