

**FORD ENERGY RECOVERY FACILITY AND
WASTE SORTING AND TRANSFER FACILITY,
FORD CIRCULAR TECHNOLOGY PARK**



ENVIRONMENTAL
STATEMENT
CHAPTER 5
ENVIRONMENTAL
ISSUES AND
METHODOLOGY

5 Environmental issues and methodology

Introduction

- 5.1 This chapter explains the identification of the environmental issues considered and outlines the overall approach taken to the EIA. Specific methodologies for each of the specialist studies are given in the relevant topic chapters.

The scope of the EIA

- 5.2 Scoping is the identification of the range of significant issues likely to arise as a result of the proposed development. Scoping also ensures that significant issues are addressed in detail, while those of lesser relevance are considered accordingly. This is an important exercise, undertaken at an early stage of the EIA process, which allows effort to be concentrated on significant issues and avoids unnecessarily complicated examination of minor ones.
- 5.3 Terence O'Rourke Ltd undertook a scoping exercise and produced an EIA scoping report in January 2020 to inform application WSCC/036/20 (for the demolition of existing buildings and structures, and the construction and operation of an ERF and a WSTF for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works) submitted in June 2020. This document provided a summary of the proposals, identified the potential main environmental effects to be addressed within the EIA and scoped out issues that did not require consideration. Application WSCC/036/20 has now been withdrawn, but as this new application is for the same type of development (i.e. an ERF and WSTF) at the same site, the scope of the assessment work was considered to be the same and therefore it was not considered necessary to re-undertake scoping. In addition, given that the scoping was carried out quite recently (last January) an updated report and opinion was considered unnecessary.
- 5.4 The following factors influenced the breadth of the January 2020 scoping exercise, and so the EIA:
- The scale and nature of the project
 - The physical characteristics of the proposals
 - Application site characteristics
 - Neighbouring land uses
 - Environmental designations
- 5.5 A copy of the EIA scoping report accompanied the EIA scoping opinion request made to WSCC. A number of statutory bodies and non-statutory organisations were also consulted (table 5.1).

WSCC: Planning, Ecology, Flooding and Drainage, Archaeology / Heritage, Landscape, Rights of Way, Tree Officer, Highways

Natural England

Environment Agency

Historic England

South Downs National Park Authority
Arun District Council: Planning and Environmental Health
Public Health England
Southern Water
National Air Traffic Services
Ford Parish Council
Lyminster and Crossbush Parish Council
Yapton Parish council
Climping Parish Council
Goodwood Aerodrome
Redrow Homes Southern Counties and Wates Developments Ltd Barton Willmore
National Planning Casework Unit
Table 5.1: Scoping consultees

5.6 A copy of the EIA scoping report (including details of the scoping methodology), the responses from the consultees and the council’s formal scoping opinion can be found in technical appendix A.

Key issues identified during scoping

5.7 Responses were received from a number of the organisations consulted and as a result some additional potential issues were identified. A summary of the key issues raised is provided in table 5.2 and these are set out in full in technical appendix A. In accordance with the requirements of the EIA Regulations, the ES has been based on the scoping opinion and technical appendix A includes signposting for where issues raised in the opinion are addressed in the ES.

Topic	Key issues identified in the scoping report	Additional issues raised during consultation
Air quality and climate	<ul style="list-style-type: none"> • Generation of emissions from process plant post-construction • Increased nitrogen and acid deposition at designated nature conservation sites as a result of process plant emissions • Increase in dust during construction and effects on air quality and local amenity • Effect on greenhouse gas emissions 	<ul style="list-style-type: none"> • Road traffic emissions • In-combination effects • Impacts resulting from the overlap of construction and operational activities • Odour impacts during operation • Dust impacts during operation • Separate ES chapter for carbon and greenhouse gas emission assessment
Community, social and economic effects	<ul style="list-style-type: none"> • Effects on health post-construction 	<ul style="list-style-type: none"> • Separate chapter for health issues • Potential impacts on housing supply, education, local services, microclimate (over shadowing) and tourism
Cultural heritage	<ul style="list-style-type: none"> • Impact on archaeological remains on site during construction 	<ul style="list-style-type: none"> • Heritage visual impact assessment

Topic	Key issues identified in the scoping report	Additional issues raised during consultation
	<ul style="list-style-type: none"> • Change to settings of scheduled monuments in the vicinity of the site during and post-construction • Change to settings of listed buildings in the vicinity of the site during and post-construction • Change to settings of conservation areas in the vicinity of the site during and post-construction • Impact on Ford Airfield military structures during construction 	<ul style="list-style-type: none"> • Impact on conservation areas and scheduled monuments further afield (e.g. Lyminster Conservation Area, Tortington Priory SM and the elevated heritage ridge line of Arundel to the north) • Archaeological assessment to include above / below ground military structures, below ground remains of the Portsmouth to Arundel Canal, below ground prehistoric or Roman remains and geoarchaeology • Impacts on non-designated features of historic / architectural / archaeological or artistic interest • Indirect effects of construction traffic on heritage assets
Ground conditions	<ul style="list-style-type: none"> • It is proposed that ground conditions is not scoped into the EIA 	<ul style="list-style-type: none"> • Ground conditions to be scoped into the ES. • Phase 1 investigation, including coverage of legacy fuel tank, potential for creation of preferential pathways, groundwater levels, and how unknown contamination will be dealt with
Land use and land take	<ul style="list-style-type: none"> • It is proposed that land use and land take are not scoped into the EIA 	<ul style="list-style-type: none"> • None
Landscape, townscape and visual effects	<ul style="list-style-type: none"> • Change to landscape character of the site and effects on surrounding landscape character areas • Change to sensitive views, including from designated landscapes 	<ul style="list-style-type: none"> • Assessment to include built structures, lighting and plumes and effects on skyline, topography, over shadowing and views • Visual impact of HGVs travelling to / from the site
Major accidents / disasters	<ul style="list-style-type: none"> • It is proposed that major accidents / disasters are not scoped into the EIA 	<ul style="list-style-type: none"> • None (measures to reduce risk of accidents arising from site operations is covered in the proposals chapter of the ES)
Natural heritage	<ul style="list-style-type: none"> • It is proposed that increased nitrogen and acid deposition at designated nature conservation sites as a result of process plant emissions is covered in the air quality chapter of the ES 	<ul style="list-style-type: none"> • Natural heritage to have a defined chapter in the ES. • Indirect impacts on air, water, noise and light to be considered • Impacts on internationally, nationally and locally designated sites to be assessed • Include an ecological appraisal • Biodiversity impacts must be assessed and biodiversity net gain demonstrated
Noise and vibration	<ul style="list-style-type: none"> • Generation of noise during site preparation and construction 	<ul style="list-style-type: none"> • Potential vibration impacts to be assessed

Topic	Key issues identified in the scoping report	Additional issues raised during consultation
	<ul style="list-style-type: none"> • Generation of plant and activity noise post-construction 	<ul style="list-style-type: none"> • Overlap of construction and operation impacts of noise and vibration • Noise and vibration impacts from HGV traffic
Traffic and transport	<ul style="list-style-type: none"> • It is proposed that traffic and transport are not scoped into the EIA 	<ul style="list-style-type: none"> • Traffic and transport to be scoped into the ES • Updated baseline to be included, reflecting local growth and approved and current development • Impact on non-motorised users • Opportunities for increasing sustainable transport modes
Waste and natural resources	<ul style="list-style-type: none"> • It is proposed that waste and natural resources are not scoped into the EIA 	<ul style="list-style-type: none"> • None
Water environment	<ul style="list-style-type: none"> • Pollution of surface water during construction • Pollution of groundwater during construction • Change in groundwater hydrology / recharge during construction 	<ul style="list-style-type: none"> • Hydrological risk assessment • Risk to controlled waters

Table 5.2: Key issues identified during scoping

WSCC EIA Regulation 25 request and information for clarification

5.8 Following the submission of application WSCC/036/20 in June 2020, WSCC undertook consultation and in November 2020 issued an EIA Regulation 25 request for further information, together with a request for information for clarification purposes. This new application has adopted these information requests as part of the required scope of the new application. The Regulation 25 and clarification information requirements are set out in tables 5.3 and 5.4, including signposting to where they are addressed in the ES. WSCC's letter of the 20th November 2020 is included in technical appendix A (Part 2) for reference.

Topic	Regulation 25 request	Location in ES and response
Traffic and transport	<ol style="list-style-type: none"> 1. A Stage 1 Safety Audit including a designer’s response in line with Appendix F of GG119 of the Design Manual for Roads and Bridges 2. Information on how the development will support opportunities (as identified in the Walking, Cycling and Horse-Riding Assessment Report (WCHAR) to improve pedestrian/cyclist provision and an in particular: <ul style="list-style-type: none"> • provision of a dedicated/ shared cycleway between the site and Ford Rail station and/or A259 • consideration of viability of a connection between the site and Rollaston Park/Yapton Road • Improved provision of pedestrian/cyclist facilities from the site to Ford Road 3. A sensitivity test 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 4. Details of the impact of the development on the junction of the A259 and Church Lane during the construction phase peak period and network peak should the currently proposed improvements not be implemented at the time of construction. This should include modelling of the Construction Phase 3 peak and shoulder peak prior to implementation of junction improvements. 	<ol style="list-style-type: none"> 1. Stage 1 Road Safety Audit commissioned and completed in accordance with GG 119 and WSCC requirements. The Stage 1 Road Safety Audit appended to the Transport Assessment (Technical Appendix K). 2. The proposed development will support such opportunities by engaging with a WSCC-led process, however it is noted that none of these opportunities are solely the responsibility of nor at the discretion of the proposed development. Therefore, a collaborative process of engagement within a WSCC-led process is the most effective way for the proposed development to support the opportunities identified. See Walking, Cycling and Horse-Riding Assessment Report (WCHAR). 3. Undertaken modelling of site access junction in AM network peak and PM network peak, without and with Ford ERF & WSTF traffic, for the 2025 Construction Year and 2026 Opening Year. Also undertaken a sensitivity test combining busiest hour construction traffic and busiest hour Ford Market & Car Boot (FMCB, F/5/20) traffic on the site access junction. See Transport Assessment (Technical Appendix K). 4. Using revised construction traffic flow data, undertaken local junction model of the A259/Church Lane roundabout based on current geometry per junction. Assessed AM network peak and PM network peak traffic during the peak Construction Year (2025). Peak construction phase traffic is higher than peak operational phase traffic. Model shows capacity is exceeded without construction phase traffic. Unable to assess shoulder peak due to the unavailability of suitable baseline data. It is assumed the “improvements not implemented at the time of construction” refer to the CM/1/17 mitigation scheme for the Church Lane / A259 roundabout. See Transport Assessment (Technical Appendix K).
Cultural heritage	<ol style="list-style-type: none"> 1. A Visualisation of Viewpoint VP26 from Ford Lane Adjacent to Atherington House 2. An additional Viewpoint and visualisation from the west end of Ford Church 	<ol style="list-style-type: none"> 1. Figure 12.72 Visualisation View 26; chapter 10, paragraphs 10.112-10.113. 2. Figure 12.70 Visualisation View 23; chapter 10, paragraphs 10.115-10.117.

Topic	Regulation 25 request	Location in ES and response
	<ol style="list-style-type: none"> 3. A visualisation of Viewpoint VP25 from outside St Mary's church, Climping and closely adjacent medieval village earthworks 4. A Viewpoint and Visualisation VP 31, from Arundel Castle 5. A Viewpoint and Visualisation from Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane, Yapton 6. Viewpoint and Visualisation from Tortington Priory 7. An archaeological investigation and recording of buried remains of the canal through the application site, where it would be affected by development and a report of the investigation and recording. The scope of the archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations in relation to the line of the canal 8. An additional Viewpoint and Visualisation from the west end of Ford Church (similar to the request from WSCC Environment and Heritage and WSCC Landscape Consultant) 9. A Viewpoint and Visualisation from the Conservation Areas at Yapton and Lyminster 10. Provide a Viewpoint and Visualisation VP 31, from Arundel Castle and/or from other significant high points at the top of the town e.g. from St Nicolas' Church and Arundel Cathedral 	<ol style="list-style-type: none"> 3. Figure 12.82 presents a Wireframe for View 25 proving the proposals will in no way be visible; chapter 10, paragraph 10.118. 4. Figure 12.76 Visualisation View 31; chapter 10, paragraphs 10.125. 5. Figure 12.71 Visualisation View 24 and 12.79 Visualisation View 35; chapter 10, paragraphs 10.119 – 10.120. 6. Figure 12.73 Visualisation View 28; chapter 10, paragraph 10.123. 7. The archaeological potential has been considered within chapter 10 with proportionate mitigation for possible remnant archaeological features proposed within the Mitigation section to be secured by way of a pre-commencement planning condition; chapter 10, paragraphs 10.96-10.97; 10.129-10.132. 8. Figure 12.70 Visualisation View 23; chapter 10, paragraphs 10.115-10.117 . 9. Figure 12.71 Visualisation View 24 and 12.79 Visualisation View 35 (Yapton); chapter 10, paragraphs 10.119 – 10.120 & Figure 12.61 Visualisation View 12 (Lyminster); chapter 10, paragraph 10.122. 10. Figure 12.76 Visualisation View 31; chapter 10, paragraphs 10.125.
Public rights of way	<ol style="list-style-type: none"> 1. Details of how the existing Public Right of Way (PROW Footpath 200 3) is to be accommodated 	<ol style="list-style-type: none"> 1. See Chapter 3 of ES and DAS.
Trees	<ol style="list-style-type: none"> 1. To demonstrate that the scheme is deliverable and likely to be successful, particularly around the boundaries of the site, notably to the south and west, provision of a full, detailed planting specification together with details of suppliers 2. Provision of a comprehensive Landscape and Ecological Management Plan (LEMP) 	<ol style="list-style-type: none"> 1. Landscape planting will take place during phase 5 of the construction programme (i.e. the last 12 months of the 51 month construction programme). The applicants are therefore yet to appoint a landscape contractor. Prior to the commencement of the development, a landscape scheme detailing all planting and seeding proposals will be submitted to and approved in advance by WSCC. As set out in the Arboricultural Impact Assessment (Section 13): 'Any existing trees shown to be retained, or trees and shrubs to be planted as part of the landscaping scheme that are removed, die, become severely damaged beyond recovery or diseased within 2-5 years of the completion of the development (dependent on planning Conditions), shall be replaced within the next planting season with trees or shrubs of appropriate size

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		<p>and species that complement the existing tree stock.’ The applicants will therefore ensure the proposed planting scheme is deliverable and successful.</p> <p>2. Anticipated to be conditioned.</p>
Landscape design	<ol style="list-style-type: none"> 1. Provision of a plan showing existing features, such as the offsite coniferous tree belt and public rights of way to provide context and a corrected north point 2. Provision of revised scrub planting and hedgerow mixes that are better informed by the local ecology 3. Provision of additional native tree planting, rather than reliance solely on scrub mix on the bunds 4. Additional tree and shrub planting within the two car parking areas (to north-east and south-west) to provide greater ecological enhancement, amenity and natural shading and provide some separation and enclosure for the car parks from the wider EfW site 5. 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 6. Provision of additional details of the flint walls 7. Provision of evidence of the former canal on the eastern boundary to give context for visitors 8. Provision of details of the construction of the pond and related planting 9. Provision of revised details of the routing of the nature trail path to proving more meaningful and appealing route for staff 10. Provision of details of proposals for the tear-drop shaped area of land to the north-west of the site including its landscaping, the access roads and their verges, given its close proximity to future housing within the Ford Strategic Housing Allocation site (Allocation SD8 in the Arun Local Plan 20011-2031) 11. Provision of details of planting which should include climbers to the acoustic fence to enhance biodiversity and mitigate their appearance whilst the trees and shrubs are establishing 12. Provision of details of the colour and design of the security fence with a colour and design selected that minimises its visual impact. Gates required for access and maintenance should also be shown. It should 	<ol style="list-style-type: none"> 1. Please refer to 2829-001-01 – Landscape Softworks GA. PRow are not shown on the landscape design but are included on the TOR visual receptor plan. 2. The proposed scrub has been reviewed by the project ecologist and is satisfactory. Note there is no defined West Sussex hedgerow specification to inform the mix. 3. Please refer to 2829-001-01 – Landscape Softworks GA. 4. This is related to a previous design. The new design has maximised the amount of tree planting and ecological enhancement within the site footprint. Please refer to 2829-001-01 – Landscape Softworks GA. 5. The conifers are not being lost with the current design and appear to be in good health. To mitigate any loss of these trees large stock has been planted along the northern boundary, broadly in the same extent to mitigate their loss should it occur. Please refer to 2829-001-01 – Landscape Softworks GA. 6. Flint walls detail to be provided at detailed design. 7. Blue Block paving has been provided within carparking in the site. In addition a pond and flint wall marking the alignment on the western side has also been provided. Please refer to 2829-001-01 – Landscape Softworks GA. 8. Details of pond and planting to be provided at detailed design. 9. This is related to the previous design. There is no nature trail provided, however there is a breakout area provided and staff can walk around the top of the bund to the eastern area but it will not be a formalised route. Please refer to 2829-001-01 – Landscape Softworks GA. 10. This is outside of the Scheme design. 11. This is related to a previous design. No climbers are proposed on the acoustic fencing, however the colour and finish will be to mitigate visual impacts. There will be mature stock planted along the northern boundary which will soften the appearance of the fencing to views to the north. For planting please refer to 2829-001-01 – Landscape

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	<p>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</p> <p>13. Provision of details of the surfacing beyond the area of paving around the entrance foyer and the fill to be used in the gabions</p>	<p>Softworks GA and for fencing details please refer to 1404_PL108_FENCING LAYOUT_1:500NS.</p> <p>12. Please refer to 1404_PL108_FENCING LAYOUT_1:500NS</p> <p>13. This is related to a previous design. The detail of gabion fill will be provided at detailed design.</p>
Landscape implementation and management plan	<p>1. Submission of a soil survey to support the Landscape Implementation and Management Plan to ensure there is no on-site contamination or compaction and to ensure the long-term success of the landscape proposals</p>	<p>1. This will be addressed at detailed design, but the specification will include that soil to be imported to comply with BS3882:2015 and any compost to be incorporated to comply with BSI PAS 100. An update to the landscape management plan will be included.</p>
Landscape and visual impact assessment methodology	<p>1. There are a number of important and significant omissions in terms of the viewpoints and visualisations that need to be addressed. These are included as Appendices A and B in WSCC's Regulation 25 letter dated 20th November 2020 (see technical appendix A for details)</p> <p>2. Supplementary viewpoints requested:</p> <ul style="list-style-type: none"> • 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 • Close PRoW 175 to south of site which will be within The Landings) • Riverside PRoW further south than VP 1 • From western side of churchyard of St Andrew's, Ford • Views from sea <p>3. Supplementary visualisations requested:</p> <ul style="list-style-type: none"> • Poling Street • East of Littlehampton • Night view from Nore Folly • Ford Lane • Lyminster Conservation Area • Ford Airfield • North edge of Middleton on Sea • SDNP PROW • A259 Bognor • St Mary's Climping • Ford Lane • North of Arundel Castle 	<p>1. Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSCC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapter 12.</p> <p>2. As above.</p> <p>3. As above.</p>

Topic	Regulation 25 request	Location in ES and response
	<ul style="list-style-type: none"> • Arundel Castle Keep • West of Littlehampton • PROW 166 south east of Burndell / Yapton • Horsemere Green • West of Rodney Crescent 	
Landscape baseline	<p>1. They advise that insufficient 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. They advise that the West Sussex Landscape Character Assessment highlights key characteristics of the Chichester to Yapton Coastal Plain and the Lower Arun Valley and that a more detailed and revised examination of the landscape baseline is required. Further details are set out in the comments of The County Council's Landscape Consultant, although your attention in particular is drawn to the comments relating to; the Goodwood to Arundel Wooded Estate Downland and need to pay attention to panoramic views, for example from the viewpoint at The Trundle, in planning any change in this or adjacent areas, including areas outside the National Park boundary; and there being no consideration of the potential effects on the seascape for South Marine Plan Areas (Marine Character Area 7: Selsey Bill to Seaford Head)</p>	<p>1. To address these points the baseline has been expanded to include additional character areas and additional analysis. More references are made to the WSCC character assessment. Regarding the SDNP comments, the new SDNP landscape character assessment (not extant at the time of the first submission) has been referred to and five new SDNP character areas have been identified and included in the assessment. In addition, the Marine character area 7 has also been included as a landscape receptor. See Chapter 12.</p>
Assessment of landscape effects	<p>1. Further consideration needs to be given to 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. This should include review of the existing Landscape Character Assessments as details on the comments of the County Council's landscape consultant including further detailed surveys of the application site and its immediate setting or surroundings. This should include an analysis of the extent to which 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)</p> <p>2. Re-assessment of the Landscape effects on the site (L 1) is required</p>	<p>1. As stated above, further reference has been made to the WSCC character assessment and in a series of site visits in late 2020, and early 2021, the site's setting and surroundings have been further looked at and a very good understanding of the current character area gained sufficient for LVIA purposes.</p> <p>2. The site, receptor L1 has been re-assessed and the assessment on the SDNP has been re-assessed and broken down into a much greater level of detail by subdividing into five new SDNP receptors, L13, L14, L15, L16 and L17.</p> <p>3. See 2 above.</p> <p>4. Night-time effects are fully considered in the assessment. It is acknowledged that in certain atmospheric conditions, there may be a degree of light reflecting off condensed water droplets. All light</p>

Topic	Regulation 25 request	Location in ES and response
	<ol style="list-style-type: none"> 3. Re-assessment of the landscape effects on the South Downs National Park (L 13) is required 4. Consideration needs to be given to night-time landscape effects including 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 of the area 	<p>sources in the development will produce zero upward light pollution and so would not contribute to any reflected light. The area around Ford, Climping and Yapton has a large amount of ambient light from various sources and the amount of light glow from the plume would not add significantly to the baseline light glow experienced in the area. See Chapter 12.</p>
Visual baseline	<ol style="list-style-type: none"> 1. The grouping of viewpoints requires reconsideration. Visual receptors in Conservation Areas, that are highly sensitive, should be assessed separately rather than in combination with other less sensitive receptors 2. Further consideration needs to be given to the visual impact on the future residents of Ford Strategic Housing Allocation site, who will be living in close proximity to the site with its limited onsite screening, particularly in terms of the provision of more effective screening 3. Further consideration needs to be given the impacts on the PRoW in the immediate vicinity such as 200-3 and 363, including the provision of additional viewpoints (included in Appendices A and B below) 4. Some viewpoints, for example those representing views from St Andrew's Church (Viewpoint 14), should be 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 5. For clarity the report should include those photographs which were not able to be taken due to Covid-19 and form part of 'The Landings' submission 	<ol style="list-style-type: none"> 1. Visual receptors have been regrouped as requested and the residents of the conservation areas at Yapton have been separately assessed. See Chapter 12. 2. Consideration is given to the future residents of the strategic housing allocation site by making them into a new visual receptor group VR6. See Chapter 12. 3. Footpaths in the immediate vicinity have been reviewed in site visits in late 2020 and early 2021 and new viewpoints as covered in the response above have been provided. See Chapter 12. 4. A new view representing St Andrew's Church from the location suggested by .WSCC has been provided See Chapter 12 5. The matter of Covid restrictions on photography and survey has been resolved and the requested views as agreed have been taken, surveyed and included in the LVIA chapter. See Chapter 12.
Assessment of visual effects	<ol style="list-style-type: none"> 1. The magnitude of visual effects needs to be reassessed (see the comments from the Council's landscape consultant) and the missing visualisations included (see Appendices A and B below). You should also take into account the advice on the evaluation of the landscape as lacking distinctiveness in undertaking the re- assessment 2. The grouping of viewpoints needs to be re-examined and regrouped reassessed (see the comments from the Council's Landscape consultant) 3. Further consideration needs to 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 	<ol style="list-style-type: none"> 1. The magnitude of effects has been re-assessed as part of the full re-assessment of the amended scheme. TOR are satisfied that the evaluation of the landscape value, susceptibility and sensitivity are in accordance with the appropriate guidelines and in accordance with the stated methodology. See Chapter 12. 2. Grouping of visual receptors has been broken down into smaller groups and new receptor groups identified. See Chapter 12. 3. Impacts of the development including skyline, offing and horizon effects have been a key consideration in the design process for the amended development with the chief measure being a substantial reduction in the height of the development coupled with a review of external

Topic	Regulation 25 request	Location in ES and response
	<ol style="list-style-type: none"> Further consideration needs to be given to the choice of colours of the proposed built form and how they reflect the landscape character and might lessen the visual impact 	<p>materials and colour leading to a much lighter and much less obtrusive design. See Chapters 3 and 12.</p> <ol style="list-style-type: none"> See above.
Visualisations	<ol style="list-style-type: none"> The Council's Landscape Consultant has advised 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). These should be provided They also advise 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. Additional visualisations should be provided to show the plume Of the viewpoint photographs which lack visualisations attached in Appendix B below, visualisations should be provided 	<ol style="list-style-type: none"> Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSCC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapter 12. The applicant believes that due to the frequency of appearance of the plume, it would not be representative to show it on visualisations. Refer to Plume Visibility Modelling Results in the Air Quality, Odour and Dust Technical Appendix (TA C). See 1 above.
Air quality and emissions	<ol style="list-style-type: none"> An emissions mitigation statement that includes proposed mitigation measures which should equal the health damage cost, with mitigation options designed into the development in accordance with the Standard Mitigations and Table 2 of Air Quality & Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership (2020) available at https://sussex-air.net/ImprovingAQ/GuidancePlanning.aspx) Details of the proposed improvements for cycling and pedestrian connections in accordance with Section 3.1 of the submitted Walking, Cycling and Horse Riding Assessment Report dated June 2020 by Ramboll Details of the EV charge points for staff parking and vehicles used on site Geographical odour modelling in the vicinity of the site to support the conclusions of the Environmental Statement along with confirmation of the OEU levels caused from the site by the operation in the worst case scenario A cumulative assessment of odour impacts the biogas digester and lagoon to the north of Ford Lane, and Besmoke on Ford Lane Provision of amended lighting details and an assessment designed in accordance with Zones E2/E3 rather than Zones E3/E4 	<ol style="list-style-type: none"> The Emissions Mitigation Statement has been updated to include measures already included in the design of the proposed development, this includes details of the proposed improvements for cycling and pedestrian access, details of the EV charging points. See updated Walking, Cycling and Horse Riding Assessment Report (March 2021). Details on EV charge points anticipated to be conditioned. Odour modelling has not been carried out, the assessment has been carried out on a source-receptor-pathway approach rather than specific modelling. See ES chapter 6. See 4 above. Amended lighting plan has been prepared. See plan and ES Chapter 3.

Topic	Regulation 25 request	Location in ES and response
Noise and vibration	<ol style="list-style-type: none"> 1. They advise that the Acoustic Report (Technical Appendix J: Noise and Vibration Assessment) June 2020 and the ES Chapter 14 need to be amended to take account of the development right across the Ford Strategic Housing Allocation site and not just the defined R5 receptor and that it should take into account the phasing of the development and include Ford Prison as a noise sensitive receptor. They advise that greater clarity needs to be provided of effect of the phasing of development on the adjacent Ford Strategic Housing Allocation site, so that the impact, particularly of the construction phase (which will be lengthy) is fully understood. Noise contours should be provided illustrating impact of the construction phase and the operation phase on the Ford Strategic Housing Allocation site 2. Revision of the Acoustic Report to explain why the entire 24-hour period on the 9th and 10th February 2020 has been excluded from the long-term noise survey, provide definition of the “relatively short duration” 	<ol style="list-style-type: none"> 1. A more detailed assessment of the operational noise on the wider Ford Strategic Housing Allocation (and not just the defined R5 and R6 receptors) cannot be provided as the residential development proposals are only at masterplan stage. Operational noise contour plots (as previously provided) have been provided in Figures 14.13-14.15 and in Technical Appendix J. Additional receptor locations cannot be assessed without additional baseline noise surveys, to determine the background noise levels. Additional surveys and assessment at this stage would not be beneficial as a fixed future layout of the housing allocation is not available. Chapter 14 states that likely effect levels will reduce with increased distance from the proposed ERF and WSTF site. Effects are further likely to reduce once proposed residential dwellings are in place to screen noise emissions to those dwellings at increased distance from the ERF and WSTF site. Chapter 14 and Technical Appendix J consider Ford Prison as a receptor location. 2. Construction noise modelling has been completed and construction noise contour plots are provided in Figures 14.6-14.12 and in Technical Appendix J. The noise contour plots provide a visual means of evaluating likely effects. An assessment of construction noise levels has been made to the Ford Strategic Housing allocation in Chapter 14 and Technical Appendix J (for receptor locations R5 and R6). The nearest proposed residential dwellings (shown on the Illustrative Masterplan for the residential site) have been included in the construction noise modelling for scenarios included construction of the ERF and landscaping works. However, a more detailed assessment against the phasing of the Ford Strategic Housing allocation cannot be made, as detailed construction phasing information has not been made available by the applicant for the development on the housing allocation land.
Landscape	<ol style="list-style-type: none"> 1. Provision a detailed of the landscaping plan and specification demonstrating how mitigation and screening and screening in relation to existing and future residents and existing and proposed sports facilities, will be provided and how the landscape setting and biodiversity improvement and enhancement will be achieved 	<ol style="list-style-type: none"> 1. Please refer to 2829-001-01 – Landscape Softworks GA and the LVIA chapter of the ES. Please refer to the ecological chapter of the ES, Chapter 13.

Topic	Regulation 25 request	Location in ES and response
South Downs National Park	<ol style="list-style-type: none"> 1. The South Downs National Park Authority (SDNPA) have commented that the proposal will have substantial adverse impacts on views and experiential qualities of the National Park and its setting. It 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. This is acknowledged in the landscape and visual impact assessment. Accordingly, a more explicit assessment of the impact on the South Downs National Park is required. As part of this the approach of creating a 'visually dynamic architectural landmark', needs to be justified and explained in this context. Further information is also requested regarding the consideration given to the mitigation measures to reduce the adverse impacts on the National Park and to how the development of the site could best harmonise the proposal with the landscape, including the use of material finishes and colours 2. The detailed comments from the SDNPA suggest exploring further a reduction in the scale and height of the building(s) and stack and other measures to reduce the visual impact and giving further consideration to the use of 'green/living' walls 	<ol style="list-style-type: none"> 1. The Design and Access Statement will cover what is now not a 'visually dynamic architectural landmark' and how the design responds to mitigating its visual impact in scale / height / form / materials, and explain why the use of 'green/living' walls has been rejected in favour of landform bunding and planting. The South Downs Landscape Character Assessment October 2020 (not extant at the time of the first application) has been reviewed and referenced and the LVIA assessment has further subdivided the SDNP receptors into five new SDNP receptors, L13, L14, L15, L16 and L17 providing a much greater level of detail and explanation as to the effects on the SDNP. 2. The applicant has recognised the concerns raised regarding a 'landmark building' approach and the re-design based on a process that allows a significantly smaller development has enabled the adoption of a different design strategy to minimise the landscape and visual effects which works for both near and middle distance receptors, as well as for more distant receptors within the SDNP. Refer to Chapter 3, The proposals, Chapter 12, Landscape and Visual effects and the Design and Access Statement.

Table 5.3: Additional issues raised in WSCC Regulation 25 request

Topic	Clarification request	Location in ES and response
Visual impact	<ol style="list-style-type: none"> 1. You will be aware from our recent discussions following the initial round of consultation that the application has raised significant concerns about the scale, bulk and height of the building(s) and stack and of the need for additional measures to reduce the visual impact (as is reflected in the comments of consultees set out above). We would therefore strongly advise that further consideration is given to this matter, including consideration of the overall design, with a view to minimising the height of the buildings and further mitigation achievable through the choice of colour and materials palette and extended landscaping provision (see our 	<ol style="list-style-type: none"> 1. The applicant has recognised the concerns raised regarding a 'landmark building' approach and the re-design, based on a process that allows a significantly smaller development, has enabled the adoption of a different design strategy to minimise the landscape and visual effects. The measures include lowering of the building to the greatest extent possible without incurring unacceptable effects on ground water levels. Refer to Chapter 3 The proposals, Chapter 4 Alternatives, Chapter 12 Landscape and visual effects, Technical Appendix G – Hydrological Impact Assessment, also Chapter 3 of the

Topic	Clarification request	Location in ES and response
	<p>further comments below). This should include an explanation/demonstration that the buildings cannot be constructed below the existing ground level and alternative technology options which may enable a lower and/or smaller buildings to be designed</p>	<p>Planning Supporting Statement, the Design and Access Statement and Chapter</p>
Landscape and visual impact and cultural heritage	<p>1. You will see from the consultation responses that there have been a number of concerns, and in some cases disagreement, with the conclusions of the Environmental Statement and supporting technical appendices. This is particularly the case in relation to the landscape and visual impact assessment and impacts on heritage. We would therefore advise that you review, amend as necessary and update the assessments in the light of the preparation and submission of the additional information listed above</p>	<p>1. Viewpoints have been reviewed and detailed discussions took place during November and December 2020 with WSCC officers including landscape and cultural heritage advisers, to agree new viewpoints and visualisations. Following this, amendments and additions were made to the viewpoints incorporating all but a few of the suggested additions. These discussions and reviews have informed the strategy for minimising landscape and visual effects been fully re-assessed. These are all described in Chapter 12 and figures 12.16 and 12.17 show the representative viewpoint locations. See Chapters 12 Landscape and Visual effects and Chapter 10 Cultural Heritage.</p>
Design	<p>1. With regard to the exterior design of the proposed buildings we would recommend that you submit an updated Design and Access Statement, particularly with regard to the final form and appearance of the development. This should demonstrate that the design has taken into account issues raised by consultees and that the opportunities that have been considered to deliver a building that contributes positively to the character and quality of the area and promotes community acceptance of waste facilities through high quality design. This should include an explanation of why the plant has to be the size proposed, and whether a smaller capacity facility could not deliver any substantive reduction in the buildings height and scale</p>	<p>1. See updated Design and Access Statement and chapter 3 of the Planning Supporting Statement. The size of the ERF and the WSTF have delivered a substantive reduction in height and scale in this revised proposal, without a reduction in the capacity. A further reduction in scale of the buildings is not possible unless the capacity was reduced to an unviable level of throughput. This is addressed further in chapter 3 of the Planning Supporting Statement.</p>
Landscape design	<p>1. In addition to the details requested by the Council's Tree Officer, as set out above, other planting opportunities for landscaping and tree planting that have been considered, both on and off-site, should be identified. The relationship with the Ford Strategic Housing Allocation site will be particularly critical, as well as the impact on the nearby heritage assets and public rights of way, particularly to the north-west, north and east of the site</p>	<p>1. See Arboricultural Impact Statement, the Landscape Management Plan and Chapter 12 of the ES.</p>
Landscape design	<p>1. Clarity is requested on what, if any, landscaping provision is proposed to the northern boundary of the site and the teardrop shaped area to the northwest. This should identify what is proposed in relation to existing</p>	<p>1. The landscape screening along the northern boundary generally has been increased in the revised proposals, including both earth mounding and new planting, and this has been maximised. The</p>

Topic	Clarification request	Location in ES and response
	<p>conifers, what if any screening at a lower level would be provided along this boundary, and how this would be maximised. Because the proximity of the Public Rights of Way network, this is an important issue in relation to public access to the area immediately around the site to the north</p>	<p>existing conifers are off site, but the proposed bund and planting within the site provides another layer of screening in addition to these. Note that the teardrop shaped area is not now included within the application site boundary (see PSS chapter 3). The lower boundary will be a flint wall with a hedgerow on top, reflecting local character. Please refer to 2829-001-01 – Landscape Softworks GA. PProW's are not shown on the Landscape Design but are shown on the site layout plan and are taken into account in the LVIA, see Chapters 3 and 12.</p>
<p>Planning</p>	<p>1. In the light of any review, amendment and updating of the assessments we would also advise that you provide an updated appraisal of how the development is seen to accord with the individual 'development principles' for the 'Site north of Wastewater Treatment Works, Ford', a requirement (W10) of the West Sussex Waste Local Plan (April 2014), Policy W10, where necessary, drawing evidence from the Environmental Statement</p>	<p>1. A new Planning Supporting Statement is submitted that includes appraisal of compliance with the development principles of Policy W10, see chapter 7. This draws on the evidence from the ES.</p>
<p>Cumulative impact</p>	<p>1. As has been raised by Arun District Council and the neighbouring developer, because of the constraints of the site and the concurrent proposals for the development on the Ford Strategic Housing Allocation site, it is important that the applicants and the developer of the adjacent site seek to cooperate to produce proposals that work together and incorporate adequate mitigation across the two schemes. This is required to ensure compatible development which both safeguards the amenity not only of future residents of the Ford Strategic Housing Allocation site, on the one hand, but also the business, schools and other mixed uses proposed, and the operation of the energy recovery facility and waste sorting and transfer facility, on the other. The provision of noise, odour and lighting contours and mapping of sun light/overshadowing on the Ford Strategic Housing Allocation site needs to be explicitly addressed, showing which, if any areas of the allocation would be affected or the use of which would be sterilised. The County Council appreciates the applicants cannot require the developer for the Ford Strategic Housing Allocation site to co-operate, but nonetheless continued communication is encouraged to ensure that where necessary suitable separation buffers and/or mitigation are investigated and clearly identified.</p>	<p>1. Twenty-three projects have been considered cumulatively in the ES, including The Landings proposals at Land at Ford Airfield. Specifically, operational noise contour plots (as provided in the original submission) have been provided which show the expected noise levels for the wider Ford Strategic Housing Allocation site. The noise contours are provided in Figures 14.13-14.15 and Technical Appendix J.</p>

Topic	Clarification request	Location in ES and response
Proposals	1. Confirm if there is a need for a minimum volume of residual waste to be stored on site to allow continuous generation of electricity and how is this managed?	1. The waste bunker is sized to provide for capacity equivalent to approximately five days of waste storage which provides flexibility around periods when there are no waste deliveries. This therefore allows for the continuous generation of electricity for up to five days with no deliveries.
Planning	1. Provide an updated assessment of need and the sources of waste to be managed, taking into account the latest West Sussex Joint Minerals Local Plan and Waste Local Plan: Monitoring Report 2018/19	1. See chapter 5 of the Planning Supporting Statement.
Traffic and transport / noise / community and social	1. Provide an assessment of the impacts on amenity for properties and highway footpath users along the route of HGVs in the light of the changes as a result of use of larger HGVs now proposed. This point does not appear to have been addressed or is not apparent in the submitted noise and vibration assessment	1. Assessment of construction HGV noise and the operational changes in road traffic noise levels (including HGVs) was provided in the earlier submission, as per the methodologies agreed with Arun District Council. Negligible effects were predicted for both construction and operational HGVs. This has again been provided in the updated assessment. There is no accepted standard assessment methodology for the impact of HGVs for highway footpath users and it is expected that this would be covered by the assessments provided. The predicted changes in operational road traffic noise levels are detailed in Chapter 14 and Technical Appendix J (in terms of Basic Noise Levels at 10m from the edge of the carriageway, as per the methodology of the Calculation of Road Traffic Noise 1988). Any additional assessment would be bespoke and could not be assessed against typical criteria.
Accident risk management	1. Give consideration to the risk of major accidents which has been raised as an issue by a number of consultees and third parties. Can you therefore please provide an assessment of potential accident risks and how these will be managed	1. See Appendix 3 to this report – Table A4 has been extracted from the Ford ERF Environmental Risk Assessment, prepared by Fichtner Consulting Engineers Ltd and submitted to the Environment Agency as part of the Environmental Permit application suite of reports.

Table 5.4: Additional information requested by WSCC for clarification

Assessment methodology

Introduction

- 5.9 An environmental effect is an alteration, positive or negative, to some aspect of the environment that occurs as a result of a proposed development. It is essential that the EIA methodology is comprehensive and focused. It must predict and measure the degree of effect and identify mitigation requirements. The method used should be objective, consistent and adaptable, and as free from analytical bias as possible.
- 5.10 It is important that the assessment methodology distinguishes between the sensitivity of the receptors and the type and size of the change that will affect them, either directly or indirectly. It is also important that the ES is clear and effective in communicating the results of the assessment to the determining planning authority, the general public and professionals involved with appraising the development proposals.

Guidance and best practice

- 5.11 The methodologies used for the assessment of specific issues are discussed in the relevant chapters of this ES. Where appropriate, use has been made of published guidance and information on best practice, and the Ministry of Housing, Communities and Local Government's (MHCLG) web-based National Planning Practice Guidance: *Environmental Impact Assessment* (updated 2019). The guidance has been considered in conjunction with the EIA Regulations.

Difficulties in compiling information

- 5.12 The EIA Regulations require that the ES should include an indication of any difficulties (technical deficiencies or lack of knowledge) encountered by the applicant in compiling the required information, together with the main uncertainties involved. Where such difficulties and uncertainties have been experienced, they are discussed in the relevant ES topic chapters and / or technical appendices. Of particular relevance is the coronavirus (COVID-19) pandemic that has affected some of the baseline study work.

The extant consent

- 5.13 In 2015, Grundon Waste Management Ltd secured planning permission for an energy from waste facility and a materials recovery facility, known as the Circular Technology Park (application reference: WSCC/096/13/F). The application was subject to EIA and was accompanied by an ES that was written in October 2013 and an ES Addendum that was prepared in November 2013. While the approved facilities have not been built, the permission has been implemented and the site currently operates as a WTS that usually handles about 20-25,000 tonnes per annum (tpa).
- 5.14 The main focus of this EIA is on the effects of the proposed development. However, the extant consent for the site represents a theoretical alternative development scenario or fall-back position with its own potential effects. The ES

topic chapters therefore also summarise the potential effects of the consented scheme for comparative purposes.

- 5.15 The 2013 ES and ES addendum provide an assessment of the effects of the permitted proposals. For the purposes of comparatively assessing the fall-back position no adjustment has been made to the baseline of the 2013 assessment, unless it was considered necessary by the technical specialists. The conclusions set out in the 2013 ES have therefore been cross-referenced where possible and if not possible, an explanation provided as to why a different approach has been taken.
- 5.16 Planning permission was also granted in August 2019 for a new access road that has replaced the previous one-way circulation system (application reference: WSCC/027/18/F). The permission also increased the permitted heavy goods vehicle (HGV) movements to / from the site and amended the approved waste delivery hours. Construction of the road was completed in December 2019 and vehicles no longer use Rollaston Park Road to access the site or the private access road to the north of Rodney Crescent to egress onto Ford Road. The access road application was also subject to EIA and accompanied by an ES (May 2018). An additional assessment of this application is not required as the road is currently in use, although not for the full number of movements permitted, and forms part of the baseline for the proposed development.

Connection to the National Grid

- 5.17 The proposed ERF will export the majority of the power generated to the National Grid. The local distribution network operator (Scottish and Southern Electricity (SSE)) will be responsible for connecting the ERF to the National Grid. It will also be responsible for obtaining any permissions or permits required to develop the necessary connection infrastructure. As such the planning application boundary does not include the grid connection route from the proposed development site to the existing substation to the north of Arundel Road / A27 near Crockerhill, which is the closest available point of connection for the ERF. However, consideration of the potential effects resulting from the construction of the connecting cablework have been considered in the ES (no effects are considered to arise during operation as the cables will be underground).
- 5.18 For the purposes of the assessment the 12.1 km connection route indicated by SSE in correspondence with Ford EfW Limited in April 2020 has been assessed (please note that the precise detail of the route will be determined by SSE once planning permission is secured and will be subject to its own future survey and assessment). As shown in figure 5.1 the cable route would route from the proposed development site, along the access road and then north along Ford Road as far as the junction with Ford Lane. The cable would run west all the way along Ford Lane, then north along North End Road / B2132 / Yapton Lane until it joins the A27 / Arundel Road. The cable would then route for approximately 5.5 km westwards along the A27 / Arundel Road, as far as Earham Lane at Crockerhill. From the junction of Arundel Road and Earham Lane, the cable would route approximately 300m north and the Crockerhill sub-station is just on the left. For the purposes of the assessment, it has been assumed that all cable laying activities would take place within existing roads

and pathways that are part of the public highway. Where the cable route crosses the existing railway line at North End it is assumed directional drilling will be undertaken in consultation with Network Rail.

Cumulative effects

- 5.19 The potential for cumulative effects with other proposed and consented developments, plus some sites allocated in the Arun Local Plan that are in the vicinity of the proposed site has been assessed for each environmental topic where relevant (see individual topic chapters). The projects in table 5.5 have been included in the cumulative effects assessment. The locations of these cumulative projects are shown on figure 5.2. Not all projects are relevant to all of the environmental topics; the projects that have been considered are clarified in each assessment.
- 5.20 For the purposes of the cumulative effects assessment, information on the construction and operational timescales has been sought for the projects in table 5.5 where available and compared with the proposed construction and operational timescale for the proposed ERF and WSTF. Publicly available information for each project was also sought and utilised for the assessment where available.
- 5.21 The assessment of cumulative effects has involved the consideration of any residual effects (i.e. those that remain following effective design and mitigation) identified during the main assessment (i.e. the assessment of the construction and post-construction effects of the proposed facilities on the existing baseline). For the main assessment, only those effects graded ‘moderate’ and above are considered to be significant. For the purposes of the cumulative effects assessment, those residual effects graded ‘slight’, ‘moderate’, ‘substantial’ and ‘very substantial’ were included. Residual effects graded as ‘negligible’ were not considered to have the potential to lead to significant cumulative effects and were therefore excluded.
- 5.22 In addition to the consideration of other schemes, the temporary cumulative effects associated with the overlap of the newly operational WSTF with the construction and commissioning of the ERF have been assessed. Details on commissioning activities and their likely duration are set out in the proposals chapter.

Application reference	Date of approval	Description
F/4/20/OUT (part of SD8 allocation) (Site 1 on figure 5.2)	Current application / undecided	Land at Ford Airfield, Ford – Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application may affect the setting of

Application reference	Date of approval	Description
		a Listed Building. This application falls within CIL Zone 1 - Zero Rated. For further information go to: www.arun.gov.uk
SD8 allocation only (Site 2 on figure 5.2)	N/A – local plan allocation only	Remaining part of the Ford strategic housing allocation (site SD8 in policy H SP2c of the adopted Arun Local Plan). For further information go to: www.arun.gov.uk
F/5/20/PL (Site 3 on figure 5.2)	Current application / undecided	Ford Airfield Market, West Sussex, BN18 0FL Reconfiguration of Ford Market, including revised market access, hardstanding for replacement vehicular parking and associated infrastructure, landscape, ancillary and site preparation works. For further information go to: www.arun.gov.uk
CM/1/17/OUT (Site 4 on figure 5.2)	Refused / Appealed Allowed, September 2018	Land West of Church Lane and South of Horsemere Green Lane, Climping – Outline application for the erection of up to 300 dwellings and ancillary development comprising open space, a building within use class D1 (Non- Residential Institutions) of up to 875 square metres net, a building for A1 (Shops) use having a floor area of up to 530 sq. metres net, together with open space & ancillary works, including car parking and drainage arrangements, with appearance, landscaping, layout & scale wholly reserved for subsequent approval. The access detail, showing the points of access to the development, are indicated on Bellamy Roberts drawings numbered 4724/004 & 4724/005. All other access detail within the site to be determined as a reserved matter at a later stage. For further information go to: www.arun.gov.uk
Y/91/17/OUT (Site 5 on figure 5.2)	Approved, April 2019	Land at Bilsham Road, Yapton – Outline application for the development of up to 250 residential dwellings (Class C3), vehicular access, public open space, ancillary works and associated infrastructure. Departure from the Development Plan. For further information go to: www.arun.gov.uk
Y/92/17/OUT (Site 6 on figure 5.2)	Approved, May 2019	Land east of Drove Lane Yapton, BN18 0EB - Outline application with all matters reserved save access, for up to 300 dwellings, link road, surface drainage, open space and landscaping. Departure from the Development Plan and Access route is within the Yapton (Main Road) Conservation Area. For further information go to: www.arun.gov.uk
Option / Site F (Site 7 on figure 5.2)	N/A – preferred site only	Site supported by Arun District Council as the preferred option for a 10 form entry secondary school to support the local plan strategic allocations. For further information go to: www.arun.gov.uk
WSCC/037/19 (Site 8 on figure 5.2)	Application pending a decision*	T J Waste, Burndell Road, Yapton, Arundel, BN18 0HR Proposed Inert Waste Recycling Facility, with new building, hardstanding, car parking, boundary treatment and re-aligned access to the agricultural unit. Includes variation to approved site landscaping and use of internal spaces within the existing MRF. * Committee date 09/07/2019. This is an existing site, where planning committee recently resolved to grant planning permission for an extension (subject to a S106 routing agreement which is pending hence decision yet to be issued). For further information go to: www.westsussex.gov.uk

Application reference	Date of approval	Description
WSCC/049/18/LY (Site 9 on figure 5.2)	Approved May 2019	East of Lyminster village and between Toddington Nurseries and A284 Lyminster Road, Lyminster, Littlehampton Creation of a 1.1km highway, with shared cycleway and footway, Pegasus crossing, viaduct, culvert, wetland areas, balancing pond and swales, street lighting and associated works. For further information go to: www.westsussex.gov.uk
A/122/19/OUT (Site 10 on figure 5.2)	Approved March 2020	Land off Arundel Road Angmering BN16 4ET Outline application with some matters reserved for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage systems (SuDs), vehicular access point from Arundel Road; together with up to 1,393 square metres (15,000 square feet) of B1/B2 units with associated parking provision and vehicular access point from Arundel Road and land made available for expansion of current sports pitch provision (following the demolition of existing commercial units and one bungalow) (re-submission following A/36/18/OUT). For further information go to: www.arun.gov.uk
F/30/18/PL (Site 11 on figure 5.2)	Approved September 2019	Wicks Farm Ford Lane Ford BN18 0DF The proposal is on existing open arable land in a single field (9 ha) and includes: a balancing pond 4m deep, 2 large multispan polytunnels / greenhouses of approximately 2.5 ha in size and 7.5m high, 2 ancillary buildings 54m x 30m in size, 21 car parking spaces within the site to the south east corner, 3 HGV turning circles serving the ancillary buildings and a further 22 spaces, including 10 cycle parking spaces. The proposed use of the multispan tunnels are for the growing of strawberries and raspberries and the site would have 20 employees. For further information go to: www.arun.gov.uk
WA/44/17/OUT (Site 12 on figure 5.2)	Approved February 2018	Land east of Tye Lane Walberton Outline application for the erection of 175 No. dwellings, car parking including garages, internal access roads, footpaths, parking & circulation areas, hard & soft landscaping, allotments, play areas/equipment & community orchard & other associated infrastructure & engineering works. This application may affect the character & appearance of the Walberton Village Conservation Area. For further information go to: www.arun.gov.uk
LU/47/11/ LU/121/17/RES (Site 13 on figure 5.2)	Outline approved January 2013 Reserved matters approved December 2017	Land north of Toddington Lane Littlehampton BN17 7PP Outline application with some matters reserved for mixed use development comprising: demolition of existing buildings and structures, up to 1,260 residential dwellings (out of a potential 1,460 dwelling masterplan), up to 13,000 sqm of B1 employment floorspace (including 3,000 sqm Enterprise Centre), up to 3,500 sqm of Class A local facilities, a 100 bed hotel, 60 bed care home, a new 2 Form Entry primary school, community centre, youth and leisure facilities, combined heat & power plant, extension to existing household recycling centre, landscaping, replacement and additional allotments, multi-functional green infrastructure including sports pitches (& associated changing facilities), informal open space, children's play areas, primary vehicular access from a new access from the A259 bridging over the railway line with additional access from Mill Lane & Toddington Lane. This application is the subject of an Environmental Impact Assessment and a departure from the development plan. This application affects a public right of way.

Application reference	Date of approval	Description
		Land North of Ioddington Lane Parcel C1 & part Parcels B2, B4 & C2 - Approval of reserved matters following outline consent LU/47/11/ for construction of 126 No. dwellings together with internal road network, car parking & landscaping. For further information go to: www.arun.gov.uk
BN/122/19/EIS (Site 14 on figure 5.2)	Scoping opinion requested December 2019*	Land North of Barnham Road Eastergate Request for a formal scoping opinion for a residential development of up to 500 homes and a dedicated care home, public open space, associated infrastructure and works. Opinion to be provided by 17/01/20 but no scoping opinion on the Arun District Council planning register. For further information go to: www.arun.gov.uk
Additional cumulative developments included in assessment – as identified by The Landings Regulation 25 Submission, dated 24 th November 2020		
Y/82/20/RES (Site 15 on figure 5.2)	Approved November 2020	Land to the south of Ford Lane and East of North End Road Yapton BN18 0DS Approval of reserved matters following outline consent Y/80/16/OUT for 4.5ha of residential development comprising of 3.4ha of land for the erection of 100 No. dwellings (up to 30 (30%) affordable housing) together with 1.1ha of land set aside for public open space, strategic landscaping, 2.2ha of public open space, green corridors with vehicular access from Ford Lane & pedestrian/cycle access only from North End Road (resubmission following Y/19/20/RES). This application may affect the setting of listed buildings, affects the character and appearance of the Church Lane, Yapton Conservation Area and affects a Public Right of Way. This site falls within Strategic Site SP2 (Zero Rated). For further information go to: www.arun.gov.uk
Y/19/16/OUT (Site 16 on figure 5.2)	Refused / Appealed Allowed, October 2017	Land off Burndell Road Yapton Outline application for the development of a maximum of 108 No. residential dwellings, vehicular access from Burndell Road, public open space, ancillary works and associated infrastructure. This application is a Departure from the Development plan For further information go to: www.arun.gov.uk
Y/44/17/OUT (Site 17 on figure 5.2)	Approved December 2018	Land at Stakers Farm North End Road, Yapton Outline Planning Application for 70 No. residential dwellings including 30% affordable, public open space and associated landscaping. All matters to be reserved apart from Access . This application is a Departure from the Development plan. This application affects the character & appearance of Main Road/Church Road Yapton Conservation Area and the setting of Listed Buildings For further information go to: www.arun.gov.uk
Y/83/19/OUT (Site 18 on figure 5.2)	Approved March 2020	Clays Farm North End Road Yapton BN18 0DT Outline application with some matters reserved for the erection of 33 No. dwellings, access roads, landscaping and associated works (resubmission following Y/62/18/OUT). This application is a departure from the Development Plan. For further information go to: www.arun.gov.uk
Y/93/14/OUT (Site 19 on figure 5.2)	Approved August 2015	Land North of Yapton C of E Primary School North End Road Yapton BN18 0DU

Application reference	Date of approval	Description
		Outline application for the erection of 38 dwellings to comprise 6 No. 4-bed houses, 20 No. 3-bed houses, 10 no. 2-bed houses and 2 no. 1-bed houses each with a garage and parking space, together with the means of access off North End Road For further information go to: www.arun.gov.uk
Y/49/17/OUT (Site 20 on figure 5.2)	Approved February 2018	Land at Street Buildings North End Road Yapton BN18 0DT Outline application with some matters reserved for the demolition of all existing structures and redevelopment of the site with up to 45 dwellings (30% affordable (up to 14)) & 0.3 hectares of landscaped open space with vehicular access from Maypole Lane & pedestrian/cycle access only from North End Road. This application is a departure from the Development Plan and may affect the setting of a listed building For further information go to: www.arun.gov.uk
F/4/18/PL (Site 21 on figure 5.2)	Approved June 2018	Land to the South of Ford Lane Ford BN18 0DF Salt storage building, office building, parking and turning area and open storage areas for highways maintenance depot - this is a departure from the Development Plan For further information go to: www.arun.gov.uk
F/7/15/OUT (Site 22 on figure 5.2)	Approved March 2016	Land south of Burndell Road Yapton BN18 0HR Outline application for residential development comprising 45 dwellings. Formation of access onto Burndell Road (Resubmission following F/9/14/PL) - This application also lies within the parish of Yapton. This application is a departure from the Development Plan. For further information go to: www.arun.gov.uk
CM/6/18/PL (Site 23 on figure 5.2)	Approved July 2018	Land at Northwood Farm Yapton Road Climping Change of use to develop a concrete batching plant, with associated infrastructure, site offices and parking For further information go to: www.arun.gov.uk

Table 5.5: Projects considered in the cumulative effects assessment

NB Application Y/98/20/Plat Bonhams Field Main Road Yapton BN18 0DX for the erection of 75 No. dwellings with associated parking, public open space and the creation of a new vehicular access was included in The Landings cumulative effects assessment, however, this was refused in December 2020 and has been excluded from the assessment

Determining the significance of effects

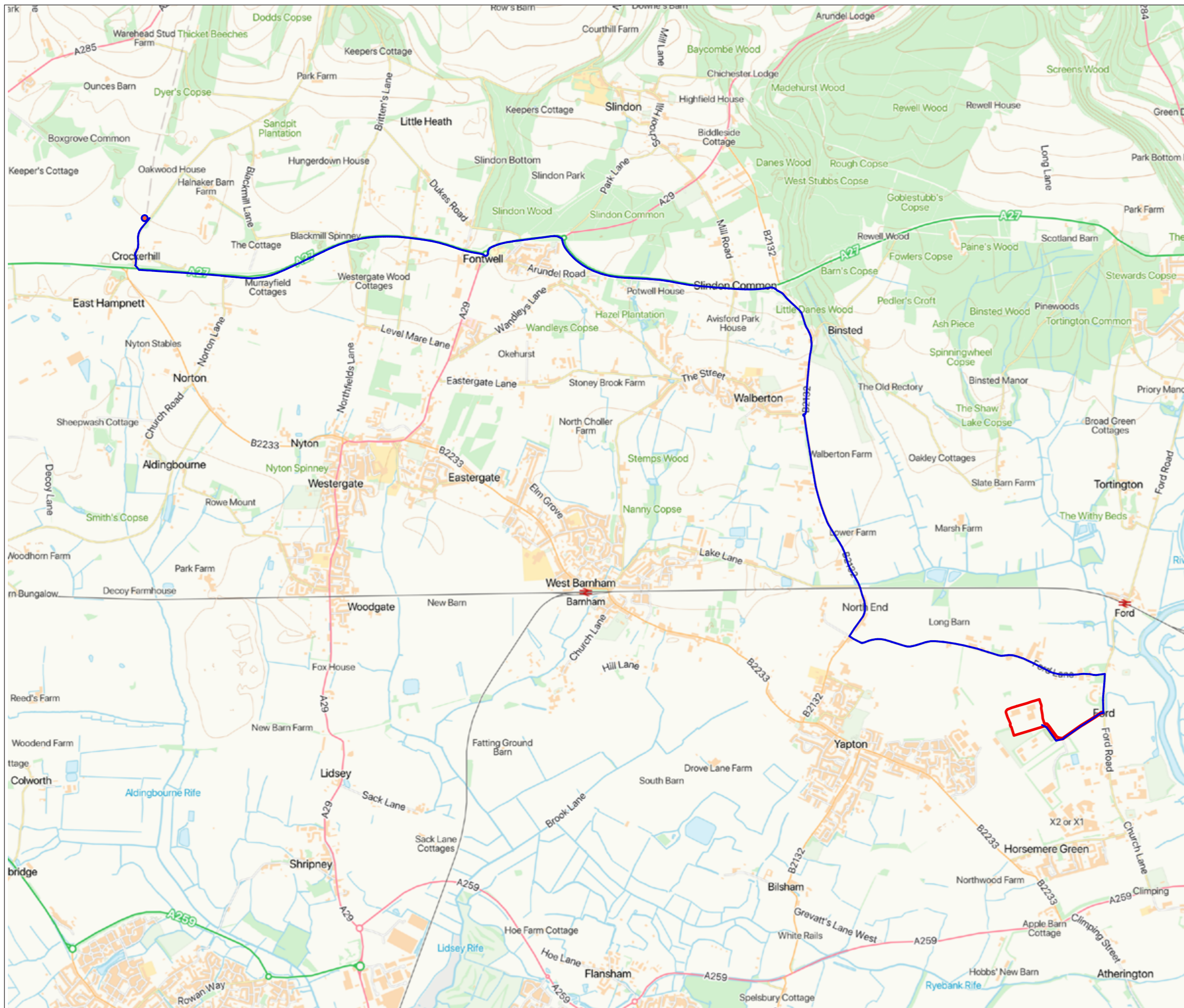
- 5.23 The evaluation of effect significance is fundamental to the EIA process. The degree of an effect determines the resources that should be deployed in avoiding or mitigating an adverse effect and identifies the actual value of a beneficial effect. As far as possible, standard words have been used to define degrees of effect (i.e. ‘very substantial’, ‘substantial’, ‘moderate’, ‘slight’ and ‘negligible’), but not so rigorously as to stifle flexibility or particular individual requirements.
- 5.24 The degree of an effect is determined by the interaction of two factors: the magnitude, scale or severity of the impact or change, and the value, importance or sensitivity of the environmental resource being affected. This is then used to determine whether an effect is significant. If the degree of effect is moderate or above (including slight to moderate effects, as these contain elements of both

slight and moderate and are therefore considered to be significant on a precautionary basis), then the effect is considered to be significant in EIA terms. Slight or negligible effects are not considered to be significant for the purposes of the EIA.

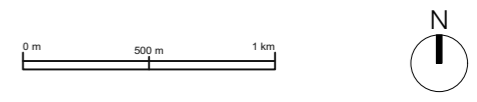
- 5.25 Sensitivity and magnitude categories have been developed for the environmental topics, based on a combination of best practice guidance and expert judgement. These are provided in the specialist topic chapters. Assumptions made during the assessment process have been reported in the text. Figure 5.3 shows the general matrix used to determine the degree of each identified effect, and thus whether it is significant. This matrix has been developed by Terence O'Rourke Ltd and is used in the assessment of the various environmental impacts to enable meaningful comparisons to be made. Where assessments depart from this methodology to accord with other best practice requirements, the revised methodologies are fully explained in the relevant chapters.
- 5.26 The assessment of the potential effects also takes account of timescale, permanence and whether the effects are adverse or beneficial, as appropriate (for example, 'a long term but reversible, substantial, significant adverse effect').

Identification of mitigation measures, monitoring and residual effects

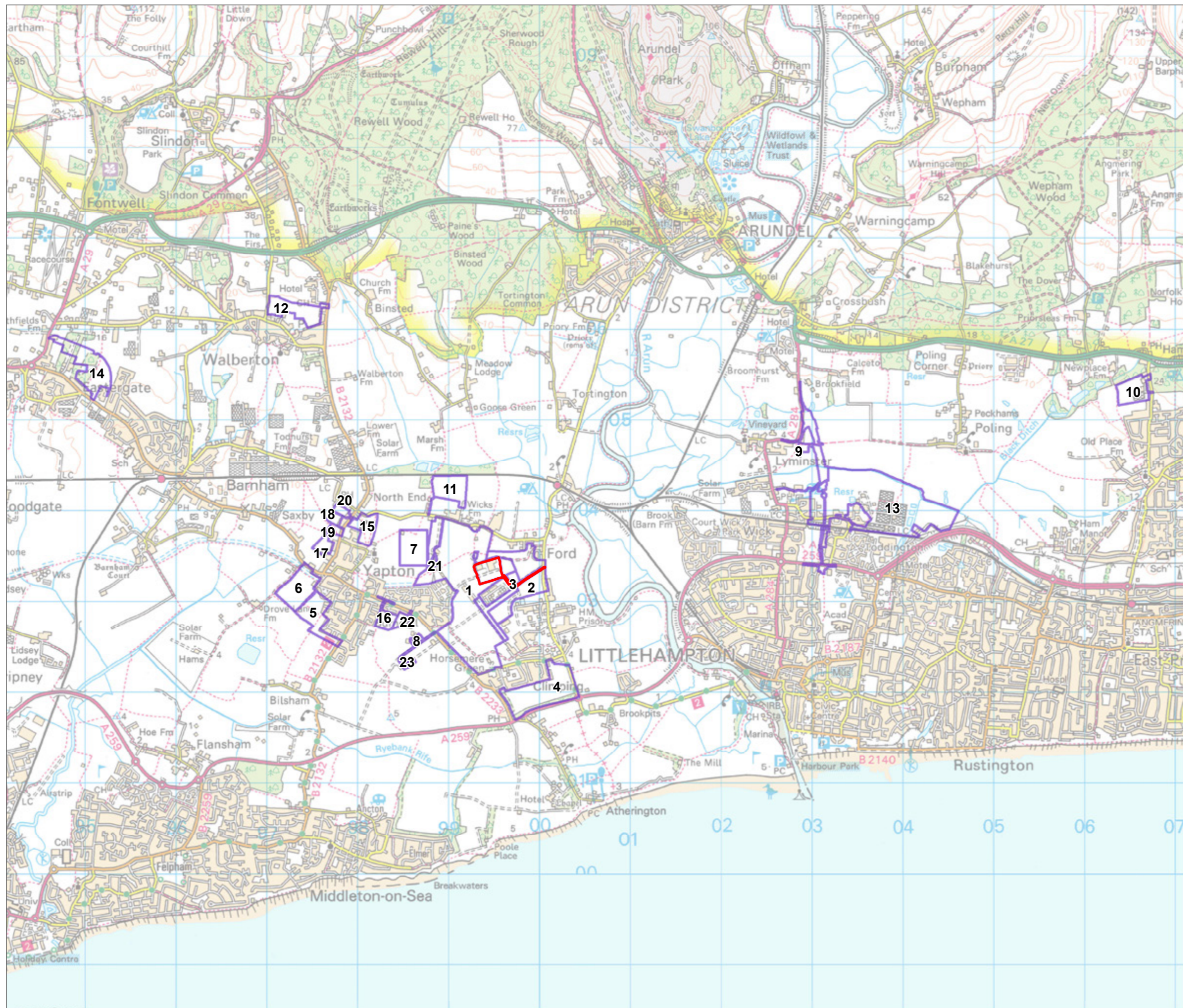
- 5.27 The results of the assessment of significance have helped to guide the mitigation measures proposed. At the end of each of the environmental assessments, where relevant, there is a 'residual effects' table, which summarises the significant environmental effects remaining after mitigation. This includes a measure of the confidence placed in the prediction of each potential residual effect, such as 'absolute', 'reasonable' or 'limited'. Where appropriate, measures to monitor significant adverse residual effects have been identified.



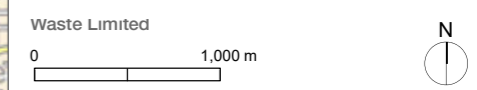
- Key
- Site boundary
 - Chichester 33 kV connection point
 - Likely grid connection route (12.1 km)



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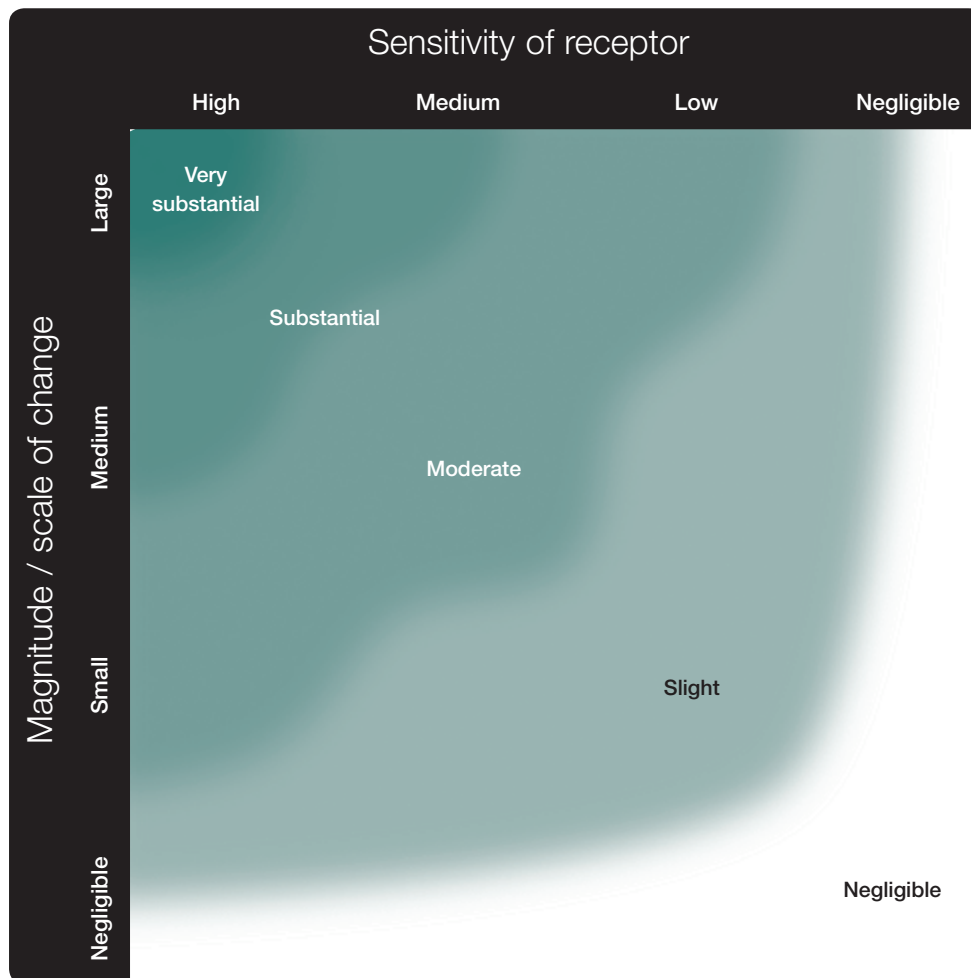


- Cumulative sites
- 1. F/4/20/OUT (part of SD8 allocation)
- 2. Remaining part of SD8 allocation
- 3. F/5/20/PL
- 4. CM/1/17/OUT
- 5. Y/9/1/17/OUT
- 6. Y/9/2/17/OUT
- 7. Option/Site F
- 8. WSCC/037/19
- 9. WSCC/049/18/LY
- 10. A/122/19/OUT
- 11. F/30/18/PL
- 12. WA/44/17/OUT
- 13. LU/47/11 and LU/121/17/RES
- 14. BN/122/19/EIS
- 15. Y/82/20/RES
- 16. Y/19/16/OUT
- 17. Y/44/17/OUT
- 18. Y/83/19/OUT
- 19. Y/93/14/OUT
- 20. Y/49/17/OUT
- 21. F/4/18/PL
- 22. F/7/15/OUT
- 23. CM/6/18/PL



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Determination of significance matrix



Significance

If the degree of effect is moderate or above, then the effect is considered to be significant.