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20th January 2016

Please ask for: Charlotte Hardy

Your Ref: 23885 – Ford Airfield
Our Ref: F/SEA/Scoping

Dear Mary

Response to Ford Neighbourhood Plan SEA Scoping Report

This letter provides a response to the Ford Neighbourhood Plan Scoping Report that was submitted to the Council on 25th November 2015. It is informed by responses resulting from a formal consultation with statutory consultees and a slightly wider group of stakeholders, which are attached.

The comments provided below are split according to the section of the document that they relate to.

Introduction

The last paragraph talks of the intentions and purpose of the document. Though it is acknowledged that there will be a focused consideration of the existing evidence, the purpose of this is to provide a baseline of the current situation and evidence gaps, to inform future stages of the process. Through the consultation with the statutory consultees, it is evident that there are a number of areas where information is incorrect or missing entirely. Some of these are included within the later comments on Baseline Conditions but copies of all are within the attached documents.

The last sentence of paragraph 1.6 of the Study Area when looking at Figure 3 would appear to be inaccurate. The red line of the site seems to deliberately go around these areas and so they are not within the site. For clarity this should be corrected. As these facilities provide critical infrastructure, it is important that both issues connected with these and any future intentions for them are shown to have been taken into account through the process (possibly through analysis of alternatives and/or cumulative impacts).

The discussion of all information to do with the Burndell Road application should be removed from this section as it has been granted subject to s106.

It is not understood why the vision has been put at the end of this section, especially considering there has been no introduction beforehand explaining anything about it.

It is felt that the final sentence of para 1.11 should be amended as the development proposals cannot be considered modest, especially considering the size of the parish and the intended position in relation to neighbouring parishes.

Methodology

There is a repetition of Air Quality in the list at paragraph 2.6. One of these needs to be removed. In addition, it is felt that there are two further sustainability themes not in the current list that must be included. These are **Waste** and **Soil**. Particularly for the latter I would direct towards the comments from NE.

Under Scope of the SEA there is nothing discussing the approach to individual effects, giving the impression that only cumulative effects and alternatives are to be included.

Though the content of the Habitats Regulation Assessment section is correct, I would point you towards the comments provided by Natural England in their third paragraph relating to the land being functional land for the Arun Valley SPA. As Arun Valley is a European site, this should be carefully followed.

It is recommended that in addition to the alternatives to the main uses (e.g. residential) included there should also be discussion of alternatives for the approach to transport issues, such as provision of new bus routes or alternatives for the routing of roads or junctions. These should show that the options arrived at are the least harmful and most sustainable.

Under limitations it is said that data is not of a resolution to allow detailed environmental issues to be teased out. However considering this is a neighbourhood plan this should be possible. Further, this ends by saying that it will only be reporting on those which need to be taken into account, it should report on all against the content of the plan and as necessary recommend changes or alterations.

Baseline Conditions

Socio Economic - though it is appreciated that the closest surgery in terms of distance is that discussed, considering the comments regarding where patients for this are primarily taken from, it is recommended that a wider area of search to the east should also be included, or shown why they are excluded. A consequent result of the baseline situation means that this service in particular should be identified as a key issue for socio-economic factors.

Transport – especially considering that the application has been approved subject to s106 and therefore not part of any parish number, the transport assessment for the Burndell Road should not be relied upon for the purpose of creating the baseline for this exercise. The Council have commissioned further evidence connected to the Local Plan and this includes further Transport work, therefore it is advised that you should await initial findings from that work. My colleague Nicki Faulkner is leading on this if you wish to discuss the timetable for that in more detail. Alternatively, if you feel that information will be required earlier then the Arun Transport Study 2013 should be used.

Biodiversity – due to the overall intention contained in the Vision “*Agricultural land production will continue to be the major land use...*”, along with the comments from Natural

England, plus the evidence of the contribution of the land to local economy shown in the Soil and Agricultural Land Assessment 2013 it is critically important that all the fields of the site are included in surveys. The need for species as well as habitat surveys is also reinforced by the content of paragraph 3.28 and the comments from Natural England about the land being functional land for Arun Valley.

A number of points both broad and specific have been identified by Historic England related to the Historic Environment. Due to their nature and especially the points connected to the importance of the airfield plus other features, it is advised that full account should be made of their comments going forward. The minimum this should involve would be the additional objective they have recommended be included. Additionally, at present it is difficult to ascertain the key issue for the Historic Environment considering the various conclusions throughout the rest of the section. With the further information Historic England have provided it is advised this should be widened.

Landscape – there is at least one inaccuracy in this section. According to mapping provided by the South Downs National Park, the NE corner of the Parish lies only 1.14km from the closest part of the boundary. Furthermore, it is also felt that there is potential for additional pressures to the National Park. It is felt this should be brought out more in the document.

Though only part of the wider landscape, an important feature especially in terms of the setting of the site are a set of trees almost immediately to the south, just beyond the old route of the Portsmouth to Chichester Canal. Both sets of trees here are protected by TPO/Y/1/08 and TPO/Y/2/08, although these have not been identified on Figure 6. Additionally another slight inconsistency is that the area identified as being a strategic gap as identified by the Arun Draft Local Plan July 2014 is currently a strategic gap under the 2003 Arun Local Plan.

Water and Flooding – considering the site that is identified it is inconsistent to transpose information related to a different site, although further west (Burndell Road) but still within the Parish, particularly as that was of a much more limited size and scale. In this instance, it is necessary to show that a sequential approach has been taken towards the selection of sites. This could be incorporated in an alternatives section but due to the size of the site and the suggested scale of development, this is required to be in line with legislation.

Consideration of alternatives

As connectivity and accessibility are already issues for the community at Ford. As well as the last of the comments under methodology above, it is recommended that transport issues should also be included in the alternatives to be considered.

The SEA Framework

It is assumed that all of the matrix pages contained here are intended to relate to the different themes proposed, although it is unclear.

Appendix 3 – Review of Plans, Programmes and Policies

There are significant documents that are not contained in this section that are of relevance. These are as follows:

National Planning Policy Framework

West Sussex Waste Local Plan 2014

West Sussex Local Flood Risk Management Strategy 2014

South Downs National Park Green Infrastructure Framework – links provided below

Accessible Natural Greenspace Study; Part 2 contains District summaries.

<https://www.southdowns.gov.uk/planning/planning-policy/national-park-local-plan/evidence-and-supporting-documents/access-network-and-accessible-natural-greenspace-study/>

Page 19 of the draft Framework document accessible via the following link, suggests site specific opportunities for the Arun District.

<https://www.southdowns.gov.uk/planning/planning-advice/south-downs-green-infrastructure-framework-informal-consultation/>

South East River Basin Management Plan

In addition to the comments provided above, I have also attached the comments from the statutory consultees.

If you have any further queries, please do come back to me.

Yours Sincerely



Charlotte Hardy
Senior Environmental Officer



Historic England

C. Hardy
Senior Environmental Assessment Officer
Planning
Arun District Council

Email: Charlotte.Hardy@arun.gov.uk
By email only

Our ref: 2016.01.14
Your ref: Ford NP SEA
Scoping HE
RLS
comments
Telephone 01483 252028
Fax

14th January 2016

Dear Charlotte

Re: Ford Neighbourhood Plan Strategic Environmental Assessment Scoping Report

Thank you for consulting Historic England on the Scoping report for the Ford Neighbourhood Plan. As the government's advisor on planning for the historic environment I have focused on these areas of the Scoping report and on the baseline of historic environment data in particular.

It is clear from the SEA Scoping report and the Parish Council's material online that the community have already gone through a considerable process of plan evolution that has been constrained to an extent by the size of the allocation the parish is expected to deliver through the emerging local plan and the nature of the former Ford Airfield as the site that could realistically deliver this. Nevertheless, within the site there will be potential to consider alternatives and options for phasing, masterplanning and the provision of policy requirements (such as requirements for design, layout and landscaping) that should usefully be informed by the Strategic Environmental Assessment and we hope to see that there has been an iterative process between the further development of the plan and its specific policies and the evidence and assessment presented in the SEA.

As a general point, whilst we understand why the plan's early development has focused on the redevelopment of the former airfield we would still expect the SEA to cover the whole of the parish and appropriate surrounding areas. This is for two reasons. Firstly, to provide the evidence that, where the proposed development would or could result in negative impacts, that these could not be provided with less harm elsewhere in the parish. Secondly, to identify current or predictable environmental effects within the neighbourhood that could be influenced, either



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positively or negatively, by the plan options. Where the plan could provide beneficial effects it might be necessary to secure these through the plan policies to offset, or outweigh, potential negative impacts or 'harm'. As such, we would request that the historic environment baseline is expanded to include consideration of neighbouring areas, in particular Yapton Conservation area, as the large scale of development proposed is likely to result in indirect impacts to the historic environment (principally increased traffic) and impacts on views which will need to be considered in developing the outline masterplan and development management policies.

With regard to the assessment of the environmental baseline presented we would like to make a number of specific comments that we feel need to be addressed:

At 3.41 we disagree with the statement at 3.41 that the 'site' is located outside the setting of the Grade II Listed Atherington House. It is not clear whether this assessment has been based purely on a visual analysis, but our advice does point out that the setting of a heritage asset is also determined by other sensory experience of the asset and, therefore, assessment of setting should also include consideration of noise (or its absence), odour, dust and activity where these have an influence on the significance of the heritage asset. The assessment of the setting may also vary between seasons, for example when winter leaf fall increases the openness of landscapes and depends on the nature of the development that could affect it. Nevertheless, it appears from the mapping that the 'site's' boundary is in fact contiguous with the garden of the farmhouse. The argument in the scoping report is, in any case flawed, stating that the industrial buildings at the northern end of the site are seen from the curtilage of the listed property and negatively contribute to the property's significance. As such, at least part of the site must form part of the listed building's setting. Whether part of the site represents the farmland that, as a farmhouse, gave the building it's *raison d'être* and therefore contributes to its significance beyond providing a rural character would be a matter for further research, which is a need that should be identified in the Scoping Report.

We note that the emerging masterplan proposes providing a rural character setting to this building and others along Ford Lane by retaining open land as a paddock. The reasoning for this as a positive element of plan making to sustain the significance of a designated heritage asset should be explained in the Environmental Report, in order to justify the exclusion of this land from housing development.

The Scoping Report helpfully reviews the evidence of prehistoric and early Roman period archaeological remains that have been found within the 'site'. The presence of a multi-period landscape of archaeological remains spanning the Mesolithic to the early Roman period, and in particular the more extensive late Iron Age and Early Roman remains recorded, suggests the site does have potential to contain remains of more than local interest, contrary to the statement at 3.54. The proposals are, in fact likely to have effects on features of regional significance, with some, albeit



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limited potential for areas of nationally important remains to be affected. Whilst this does not preclude development that delivers substantial benefit that could potentially outweigh the harm resulting from the loss of non-designated heritage assets, this will need to be clearly expressed and opportunities to avoid harm clearly considered and, where practicable, pursued. Furthermore, a cautionary approach needs to be taken in the development of policy in the plan to ensure it meets the NPPFs requirement to secure the retention of remains of national importance if identified. We would recommend the community work closely with the District Council's archaeological advisor to develop a robust approach to the understanding and conservation of archaeological remains where these may be affected by development proposals and site allocations. The presence of important archaeological remains may require some flexibility in policy and masterplanning to allow nationally important remains (if identified) to be preserved in-situ and, ideally, interpreted to contribute to the development's sense of place. If their locations, condition, nature and extent can be more confidently identified during the plan making process this should influence the masterplan proposed.

James Kearney
(DC)

Unfortunately, the scoping report has failed to identify or give suitable consideration to the significance of the airfield itself as a heritage asset or assemblage of heritage assets potentially of considerable importance. The history of use by the Royal Flying Corps and USAAF during WWI, and structures relating in particular to the event of 1918 could be of particular historic, archaeological interest, whilst the site has interesting associations with the history of civil aviation between the two wars. There may be potential for previously unidentified buildings or areas of national interest within the site, which therefore should be assessed through a robust built heritage survey, which should be identified as an evidence gap if it isn't currently available. Even relatively inauspicious historic airfield buildings may have a history that makes them of special local or national interest. Ideally, if buildings and areas are identified as having a particularly high importance for their significance, the plan should include proposals that ensure their retention and sensitive reuse. We note that the masterplans presented have sought to retain elements of the historic airfield layout (the runways and some areas of adjacent green open space). Demonstrating that this has been necessary to retain some of the site's historic interest would help to justify this layout. Again, we recommend working with the Council's historic buildings conservation advisor to develop evidence at a suitable level of detail to inform the plan.

The scoping report identifies the presence of part of the course of the Arundel and Portsmouth Canal but does not identify whether maintaining the integrity of the canal's route has been identified elsewhere as a priority. Maintaining the line of the canal is a policy in the emerging Local Plan, which is informed by the local plan evidence base, which should also be relevant to the neighbourhood plan.



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The existing and emerging local plans include a requirement to protect views of and from the South Downs National Park and Arundel Castle. It isn't clear from the assessment whether there is any potential for the proposal site to affect such views. Where further evidence gathering may be required to test any potential for impacts this should be identified as an evidence gap in the Scoping Report.

We note that the area is identified as having Low/Medium Capacity for landscape change in the Arundel Landscape Character Assessment, whilst the options present would result in considerable urbanising of the rural landscape and loss of separation between at least three settlements, requiring robust justification, where this is considered to be a harmful impact.

At 3.62 the scoping report appears to be making an assessment of the impact of development proposals, which it should not do at this stage. Indeed this suggests that alternatives will not be considered,

The SEA Framework does not provide sufficient clarity for assessment of the likely significant effects of the neighbourhood plan on the historic environment and heritage assets in particular. We would recommend including an additional SEA objective – “to conserve and enhance heritage assets in a manner appropriate to their significance” - to reflect the requirements of National Planning Policy. This may be different from sustaining the area's environmental integrity and may even result in either some loss of environmental integrity or ideally change that better reveals the significance of heritage assets. Given the scale of development and the presence of both designated and non-designated heritage assets in the proposed development area, we feel that this should be a clear SEA objective rather than a subset of another objective.

We hope these comments are of assistance to you but would be pleased to answer any queries you may have or to provide additional information if it can be of assistance.

Yours faithfully

Robert Lloyd-Sweet
Historic Places Adviser (South East England)
E-mail: Robert.lloydsweet@HistoricEngland.org.uk



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Charlotte Hardy

From: Tonge, Catherine (NE) <Catherine.Tonge@naturalengland.org.uk>
Sent: 14 January 2016 11:15
To: Charlotte Hardy
Subject: Ford Neighbourhood Plan, SEA Scoping Report
Attachments: NE Feedback Form 2015.pdf

Hello Charlie

Happy New Year!

Thank you for giving Natural England the opportunity to comment on the SEA Scoping Report for Ford's Neighbourhood Plan. My brief comments are as follows:

Generally the report provides a robust framework for assessing possible impacts on the natural environment. We support paragraphs 3.26 – 3.33 on Biodiversity and particularly welcome the comments in 2.16 (p10) regarding potential water quality impacts on Pagham Harbour.

We note that part of the site is identified as possible functional land for the Arun Valley SPA, therefore a survey will need to be undertaken to assess if any areas are being used by relevant bird species and this should be mentioned in the report.

We note that, although there is a field in the SEA Framework (Table 9) to "Maximise Natural Resource Efficiency" (SEA 6), there is no mention of soils or ecosystem services generally in the main body of the report. When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production. Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to "Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future". The NPPF also states that "Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality" (para 112).

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document. Nevertheless, I hope you have found our comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

If you wish to comment on the service provided by Natural England please use the appended form.

Catherine

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<https://www.gov.uk/government/organisations/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

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Arun District Neighbourhood Plan Checklist

This checklist is for Neighbourhood Plans covering Arun District. Due to the high volume of neighbourhood plans across the county we have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/lit_6524_7da381.pdf

The below checklist takes you through the issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

We recommend completing this to check whether we are likely to have any concerns with your Neighbourhood Plan at later stages.

Flood Risk

Your Neighbourhood Plan should conform to national and local policies on flood risk:

- National Planning Policy Framework – para.100
'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.'
- Arun District Local Plan Publication Version 2014 - Draft Policy W DM2
'Development in areas at risk of from flooding... will only be permitted where all of the following criteria have been satisfied: the sequential test in accordance with the National Planning Policy Framework...'

If your Neighbourhood Plan is proposing sites for development check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.

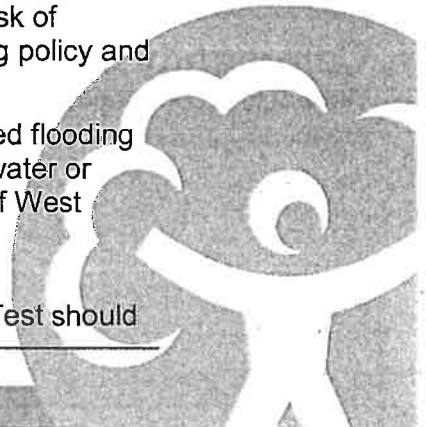
How? Input postcodes or place names at:
<http://maps.environment-agency.gov.uk/wiyby/wiybyController?x=357683.0&y=355134.0&scale=1&layerGroups=default&ep=map&textonly=off&lang=e&topic=floodmap>

If there are no areas of Flood Zones 2 or 3:

We are pleased to see that all development proposed through your Neighbourhood Plan has been directed to areas of lowest risk of flooding. This is consistent with the aims of national planning policy and the emerging policies in the Arun District Local Plan.

If you are aware that any of the sites have previously suffered flooding or are at risk of other sources of flood risk such as surface water or groundwater flooding we recommend you seek the advice of West Sussex County Council and Arun District Council.

If sites proposed In accordance with national planning policy the Sequential Test should



include areas at risk of flooding:

be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's flood map for planning and Arun District Council's Strategic Flood Risk Assessment (SFRA). We recommend you contact Arun District Council to discuss this requirement further.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

Next steps

Please contact us (see details below) for further advice if any sites include areas of Flood Zone 3, which is defined as having a high probability of flooding, as we may have concerns with your Plan.

Wastewater Treatment

Walberton, Yapton, Aldingbourne, Barnham and Eastergate and Middleton on Sea fall within the Lidsey Wastewater Treatment drainage catchment. There are constraints within the sewer network which has led to localised flooding and water quality concerns. We recommend that you speak with Southern Water regarding any allocations. You may also wish to consider how your Neighbourhood Plan could contribute to the delivery of improvements within the catchment.

Water Management

In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment.

Arun District Council lies within the South East River Basin Management Plan area. This area is subdivided into catchments. The relevant catchment for your District is the Arun and Western Streams catchment. A Catchment Partnership has been established for each of these to direct and coordinate relevant activities and projects within the catchment through the production of a Catchment Management Plan. The Catchment Partnerships are supported by a broad range of organisations and individuals representing a whole host of interests.

The following websites provides information that should be of use in developing your Neighbourhood Plan:

<https://www.gov.uk/government/publications/south-east-river-basin-management-plan>

<http://www.arunwesternstreams.org.uk>

Community Infrastructure Levy

We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account when looking to fund local infrastructure.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
0345 988 1188
0845 988 1188

www.gov.uk/environment-agency