

Mary Mescall
7 Soho Square
London
W1D 3QB

Tel: (01903) 737794

Fax:
DX: 57406 Littlehampton
Minicom: 01903 732765



e-mail: charlotte.hardy@arun.gov.uk

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