

“Eco-Towns Sustainability Appraisal”

“Scoping Report for the Planning Policy Statement on Eco-Towns”

DCLG – 24 and 31 July 2008

Ford - a CAFE Response

1. This submission is a response to the DCLG's Eco-Towns Sustainability Appraisal Scoping Report published on 24 July 2008 and to the Appendices which were published separately on 31 July 2008, and concerns the information relating specifically to Ford in West Sussex.
2. The Scoping Report, which is Stage A of the Sustainability Assessment process, was drafted by DCLG’s consultants Faber Maunsell but, as set out in Section 5 - “Baseline Information”, it was written on the basis of a desk-level review, and “no fieldwork or any surveys or other primary data gathering were undertaken”.

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3. The Scoping Report records specific information about Ford in Figure 2 (associated with paras 6.3 and 6.4) which “is intended as a sketch, showing the pattern of regional and local key issues/problems”. However, the information seems to be incomplete, especially when compared with Appendix E, pages 193 to 196 (Arun District Council).
4. In particular, Figure 2 implies that there are no issues/problems associated with SA Objectives such as climate change, water resources, environmental quality, leisure and economic growth in relation to Ford; all of which were not only alluded to in the CAFÉ response dated 26 June 2008 to the DCLG Eco-Town Consultation Paper, but also in Arun District Council’s comprehensive response which followed its own special Ford Eco-Town Select Committee Inquiry.
5. As far as “Climate Change Mitigation”, “Climate Change Adaptation” and “Water Resources” are concerned, there are two aspects deserving of

specific attention. First, that the DCLG Consultation Paper “Eco-Towns: Living a Greener Future” makes clear the need to ensure that Eco-Towns are “resilient to predicted future climate change for their area”. Second, that there is published national and regional evidence of issues/problems which seems to have been missed.

6. Examples of such evidence are:

- a. UKCIP document “Rising to the Challenge: Impacts of Climate Change in the South East in the 21st Century” (Nov 99).
- b. Environment Agency Southern Region Press Release No 252 dated 24 November 1999: “New study prompts call for action to halt worst effects of climate change”.
- c. DETR publication in 2000 (Product Code 00EP0282) “Climate Change: Assessing the Impacts - Identifying Responses”. This includes the highlights of the first three years of the UKCIP, and information concerning South East England is set out on pages 12 and 13.
- d. Environment Agency Southern Region paper dated 24 August 2000 “Strategic Implications of Climate Change for Coastal Flood Risk in the South East”.
- e. Environment Agency Report (2008): “Areas of Water Stress: Final Classification”. See Table 1 and Map 1.

7. It is clear from this evidence that the Sustainability Appraisal of a possible Eco-Town at Ford needs to take proper account of flood risk and water supply problems, and that it must be resilient to predicted future climate change. Thus, whilst development could possibly take place on Flood Zone 1 ground today, there is a need to consider the possible position 25 to 50 years hence. The South East of England is most likely to be impacted by the long-term negative aspects of climate change, and Ford is a low-lying area in the Lower Arun Valley, susceptible to fluvial, tidal and surface water flooding; all of which could occur simultaneously.

8. The region has already been designated an “area of serious water stress” by DEFRA/EA, and the UK Climate Impacts Programme scientists predict

that saline intrusion into the River Arun aquifer is highly likely as time passes. Also, as revealed at the ADC Ford Eco-Town Select Committee Inquiry, neither the Environment Agency nor the local water companies have taken future sea-level rise predictions into account.

9. As far as “Environmental Quality and Pollution”, Leisure” and “Economic Growth” are concerned, all these aspects are alluded to in the SEERA South East Plan; the most recent iteration of which is the “Companion Document to the Secretary of State’s Proposed Changes to the Draft Regional Spatial Strategy for the South East of England” (July 2008), particularly Chapter 17 - Sussex Coast - on pages 217 to 224. Additionally, the problems/issues relating to these SA Objectives are highlighted in the SEEDA “Regional Economic Strategy 2006-2016”, particularly the section dealing with “The Coastal South East” - on pages 34 to 37. Aspects of all of these Objectives are seen to need improvement because of current shortcomings, and therefore deserve to be part of the “baseline” to be taken into full account during the preparation of the Sustainability Appraisal in respect of the possible Eco-Town at Ford.

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Appendix C, Table 2 - Biodiversity - Natural England

10. Ford is highlighted on page 83, which alludes to the possible impact of visitor pressure on Climping Beach SSSI is highlighted. This is also an aspect of local concern, as was highlighted in the CAFÉ response dated 26 June 2008 to the DCLG Eco-Town Consultation Paper.

11. Ford is also highlighted on pages 102 and 103. In contrast to the assertions of the developers, it is good to see the information about the many “protected species” that have been identified within the site. On the other hand, the information concerning the possible route of the Arundel bypass is incorrect. Tortington Common is not ancient woodland, rather it is replanted ancient woodland, the road would not pass through the Binstead Wood SNCI complex, and the eastern section will not cross the River Adur(!). Additionally, the information concerning the Bognor Northern Relief Road seems to be irrelevant, as is that concerning the Littlehampton Marina and Golf Course.

Appendix C, Table 3 - Heritage - English Heritage

12. Ford is highlighted on page 120, which appears to exaggerate the impact of an Arundel bypass on the setting of the town of Arundel and the undefined “high archaeological potential of the area”. The real purpose of these adverse comments is unclear, especially as no “sources” have either been identified or quoted. The comments give an impression of anti-bypass rather than anti-Eco-Town pressure rather than being - as one would expect - evidence-based.

Appendix C, Table 4 - Climate Change and Flood Risk - Environment Agency

13. Ford is highlighted on page 132 where, in a surprisingly truncated commentary, it is said that the EA Assessment "doesn't account for flood risk" (amazing!). However, in view of the "trends" highlighted on page 131 in respect of the River Arun, there is (or should be) genuine concern about their impact in and around the Ford area.

Appendix E - Key Issues from SAs of LDF Core Strategies

14. Despite the earlier comments (see para 3 above) about the inadequate content of Figure 2 in the Scoping Report (24 July 2008), Arun District Council’s “Key Issues” are well set out on pages 193, 194, 195 and 196; especially 195 and 196 which contain a summary which should have been used as the basis for Figure 2. Indeed, this comprehensive statement of the issues and constraints which affect the District as a whole is also a fair assessment of the issues and constraints which affect the Ford area, and should therefore be treated as the “baseline” from which to draft the Ford Eco-Town Sustainability Appraisal.