

DCLG Consultation Paper

“Eco-Towns: Living a Greener Future”

A Summary of Responses to the Proposal to Create an Eco-Town at Ford

Executive Summary

1. This paper summarises local Ford-related responses to the DCLG’s consultation paper “Eco-Towns: Living a Greener Future”. The responses are those that have been made available to CAFÉ, and may not represent a comprehensive review. Nevertheless they comprise a significant sample.
2. On the evidence available, there is overwhelming objection to the methodology of the Eco-Towns process, as well as to the specific proposal relating to Ford Airfield. The level of objection is consistent across regional, county, district and local consultees.
3. The key issues are consistent at all levels:
 - a. There is a genuine fear that the principle of Eco-Towns is being taken forward outside of the planning system. There is particular concern that the forthcoming Eco-Towns Planning Policy Statement could effectively override regional and local plan-making.
 - b. Development of an Eco-Town at Ford is inconsistent with regional, structure plan and local plan policies. Also, the current proposal is simply a reworked old and previously rejected development submission.
 - c. The Ford site is not significantly brownfield as is claimed. It is overwhelmingly greenfield, comprising between 83% and 97% productive high grade agricultural land.
 - d. The Ford Eco-Town is undeliverable and unsustainable without the construction of the A27 Arundel by-pass.
 - e. There is concern about the ‘exemplar’ energy-from-waste proposals that form a major part of the proposed Ford development’s environmental credentials. The promoter’s plans lack coherent detail and appear to be

based on unfounded assumptions about the County waste management strategy and its implementation.

f. The housing provisions of the Eco-Town proposal are not appropriate to meet the current housing needs of Arun District, which are focused on Littlehampton and Bognor Regis.

g. Employment and retail investment in the Eco-Town would be in direct competition with the regeneration plans for Littlehampton and Bognor Regis.

h. There is great concern over the potential loss of the individual character of the villages of Ford, Clymping and Yapton, as well as the loss of the much prized Clymping Gap between Littlehampton and Bognor Regis, and the impact on the proposed South Downs National Park.

Introduction

4. This paper is based on comments submitted to DCLG by regional, county, district and local authorities, economic development organisations, and local interest groups in response to the consultation document “Eco-Towns: Living a Greener Future” (April 2008).

5. In general, while many respondents applauded the broad principals behind the concept of Eco-Towns, there was strong condemnation of the methodology being promoted to deliver Eco-Towns, and universal local objection to the proposal for an Eco-Town at Ford.

The Proposals at Ford

6. The site at Ford comprises 369 hectares of predominantly high quality agricultural land. The promoters contend that the site includes 108 ha of brownfield land, comprising the runway, associated buildings and hinterland of a former Naval Air Station decommissioned in 1958.

7. There are two separate schemes. One from 3 ex-local councillors, called the Ford Enterprise Hub proposal, and the other from 3 local landowners and 2 national developers, calling themselves the Ford Airfield Vision Group. Each proposal envisages delivering 5,000 homes, 40% of which will be ‘affordable’; some 30 to 40 ha of employment land; a major contribution towards the provision of local infrastructure; site specific energy solutions; and a relocated railway station and improved services to assist the regeneration of the Sussex coastal area.

South East Regional Assembly (SEERA)

8. SEERA was primarily concerned about the Eco-Town process, but also raised specific concerns over proposals at Ford in the belief that there was a danger that resources would be diverted from existing priorities (including Growth Areas).

9. In particular, SEERA noted that the proposal for Ford is not supported by the local authority (Arun District Council), and that the priority for the Sub-Regional strategy for the Sussex Coast (in common with the priorities for the coastal area of SEEDA's Regional Economic Strategy) is the regeneration of the existing settlements. Thus, SEERA's initial view of the Ford proposal was that it is inconsistent with the spatial strategy, and that there is a strong likelihood that the proposal would undermine the agreed regional spatial and economic priorities.

West Sussex County Council (WSCC)

10. WSCC is the local strategic planning and highway authority and, most importantly in the context of proposals at Ford, the strategic waste disposal authority. The County Council opposed the general principle of the Eco-Towns approach, and also opposed the proposal for an Eco-town at Ford, with specific concerns relating to infrastructure, energy and waste, flood risk, employment opportunities, and the effect on the regeneration of the nearby coastal towns.

11. WSCC expressed concerns about the following local issues:

a. Infrastructure. This concern related not only to the critical factor of transport infrastructure, but also to health care, social and educational facilities, waste management, energy provision, and water supply and treatment. The existing infrastructure serving the coastal towns is already under severe strain, and could prove inadequate to meet the additional demand imposed by new 5,000 households. The lack of investment, particularly that needed to relieve the severe traffic congestion on the A27, especially around Arundel, suggests that new funding would be unlikely in advance of completion of the Eco-town.

b. Energy Supply and Waste Handling. There was particular concern about the 'exemplar' energy-from-waste proposals. The promoters claim to be seeking to apply best practice and to be seeking techniques to maximise the potential that derives from a combination of the existing waste infrastructure and the on-site water treatment works. WSCC contended that the proposals are based on unfounded assumptions relating to the location of waste facilities at Ford, the amount of waste produced on-site, and the acceptability of importing refuse-derived fuel or biomass to the site.

- c. Flood Risk. A further area of concern was that part of the Ford site is located in a low-lying area of land within the flood plain of the River Arun, and so may be vulnerable to future climate change and/or sea level rise. The proposals include flood mitigation measures to remove the need for flood defences on the west bank of the River Arun, but it was not clear whether these would protect Ford from flood risk in the long term.
- d. Local Services and Employment. Despite assertions to the contrary, 5,000 dwellings were unlikely to generate a self-sustaining community where social and employment opportunities would flourish. There was therefore a very strong likelihood that the settlement would be reliant on facilities and opportunities in other towns, to the detriment of those local communities, and requiring travel by car to access them.
- e. Coastal Town Regeneration. The promoters had been unable to allay concerns that the proposed development would be detrimental to efforts in support of the social and economic regeneration of the coastal towns of Bognor Regis and Littlehampton. Development at Ford might serve to draw investment and businesses away from the coastal towns, which already include areas of significant deprivation.

Arun District Council (ADC)

- 12. ADC is the local planning authority for the Ford site. In order to fully understand the Eco-Town proposals at Ford, ADC established a special Select Committee to consider evidence on all aspects of the proposals. The Select Committee concluded in June 2008 that the Eco-Town process was fundamentally flawed, and that Ford was not the proper place to deliver a new settlement. The findings of the Select Committee were agreed by ADC, and the Council urged the Government not to take the proposal forward.
- 13. The Council's objections can be summarized as:
 - a. Without an A27 bypass at Arundel, major development in this location would cause significant additional congestion on the strategic and local highway networks, and the Council did not accept that car reduction measures would be sufficient to mitigate this impact acceptably.
 - b. Employment and retail investment in the Eco-Town would be in direct competition with regeneration plans for Littlehampton and Bognor Regis and, particularly in the absence of strategic road improvements, they were unlikely to attract sufficient investment to overcome this effect.
 - c. While an Eco-Town might provide solutions to the District's housing problems in the medium/long term, alternative solutions should be evaluated before committing to an Eco-Town as a housing solution.

d. The energy generating proposals were considered to be unacceptable as they depended on the Eco-Town becoming a net importer of waste from a wide area, the waste-to-energy proposals would subvert the County Council's waste strategy, and the net benefits of any County-wide waste-to-energy arrangements should not be restricted to an Eco-Town at Ford. Rather, they should be available to the community as a whole.

e. The Eco-Town would have a significant and damaging impact on the existing local community, and would result in a substantial adverse change in the character of the District and this part of the coastal plain.

14. Significantly, the Select Committee noted that the Ford location had already been assessed as being unacceptable as a major housing location by the Arun District Local Plan Inspector and the West Sussex Structure Plan EiP Inspector. Also, the Council stressed that the housing provisions of the Eco-Town proposals were not appropriate to meet the current housing needs of the District; which are focused on Littlehampton and Bognor Regis. Evidence was given to the effect that local people, even those from deprived areas, strongly resisted relocating to different communities, even with the promise of improved housing.

South East England Development Agency (SEEDA)

15. In SEEDA's view, a key issue for the Agency was the potential impact of an Eco-Town at Ford on the regeneration of Littlehampton and Bognor Regis, and possibly further airfield, (e.g. Shoreham). There was a risk that an Eco-Town at Ford could have an adverse impact on these regeneration initiatives. There was also concern about whether the economic development proposals were realistic, given the difficulty to date in delivering high quality business space in this area. Infrastructure, and particularly the need for major improvements to the A27 at Arundel, were also a key area of concern.

West Sussex Economic Partnership (WSEP)

16. The WSEP considered the proposal in the light of wider economic regeneration of coastal West Sussex in view of the great importance given to the relatively weak economic performance of the coastal towns in recent years. WSEP fully supported more sustainable house building and achieving reduced energy consumption. However, all new buildings should be subject to such standards, and not just those labelled as being Eco-Towns.

17. Both Bognor Regis and Littlehampton have been striving to revitalise their town centres to attract new investment and to create more job opportunities. WSEP fully supports these plans, but remained concerned that an Eco-Town at Ford will have a disruptive impact and cause further social difficulties.

18. WSEP had two principal concerns:

a. Transport. A new town with a population of 12,000 residents and with 4,000 jobs would generate significant additional traffic despite its eco-credentials. Proposals for an A27 Arundel Bypass to reduce traffic congestion have been under consideration for years. The access routes between the A27 and the proposed Eco-Town at Ford are already heavily congested. WSEP considered that approval for the proposed Eco-Town could not be given unless an A27 bypass at Arundel was provided at the same time.

b. Employment. The coastal West Sussex sub-regional economy does not perform well. Jobs have reduced in recent years and average pay is low. Local employment tends to be focused on low skill activities of tourism/hospitality, care sector and low value manufacturing. Against this background, the proposal to create some 4,000 jobs should be welcome, but experience suggested that creating new jobs in this area would be very challenging. Indeed, the promoters of the Ford Eco-Town suggest that many of these jobs will be attracted from the adjacent towns of Littlehampton and Bognor Regis. Thus, these would not be new jobs.

Sussex Enterprise (SE)

19. Sussex Enterprise, the Chamber of Commerce for Sussex, supported the development of housing as a driver for economic development, but noted that any proposals at Ford should form part of the South East Plan's housing allocation. Additionally, they stated that the Eco-Town should not impact negatively on the local area. Also, Sussex Enterprise recognised the views and concerns of business on traffic congestion on the A27, especially at the bottleneck at Arundel. SE's recently completed "Voice of Business Survey 2008" showed that the development of an A27 bypass around Arundel is needed today and it was therefore imperative to support a development of this size. SE challenged the Government to come forward with some very strong transport solutions, given the congestion in the area.

Local Parish and Town Councils

20. Responses to consultation were submitted by Clymping, Ford, Yapton, Barnham, Middleton, Felpham, Lyminster and Walberton Parish Councils, and by Littlehampton, Bognor Regis and Arundel Town Councils. All the councils expressed overwhelming concern and objection to the proposals at Ford. The objections reflected the concerns raised by the regional, county and district authorities, but they contained two strong themes. First, was the overwhelming concern about traffic congestion and, second, was the loss of the individual character of the villages of Ford, Clymping and Yapton as well as the loss of the, Clymping Gap between Littlehampton and Bognor Regis and potential impact on the adjoining proposed South Downs National Park. There could be no doubt that

an Eco-Town (and its associated traffic) would engulf these three villages, and destroy everything that is highly prized about living in a rural, as opposed to an urban, environment.

Council for the Protection of Rural England (CPRE)

21. CPRE Sussex submitted an impressive response to the consultation document. They identified six serious material deficiencies in the Ford Eco-Town proposals. Significantly, they provided strong evidence that, contrary to the developers' claims of 30% of the site being brownfield, the site amounts to 97% greenfield land; the vast majority of which is productive Grade 1 and Grade 2 agricultural land. In addition, CPRE stated that, contrary to the claims of the developers, the site has an important strategic function in the landscape, the transport proposals lack sustainability, the developers have failed to provide either an economic strategy or to consider the economic impact on the neighbouring towns of Bognor Regis and Littlehampton.

Local Civic Societies

22. Responses to the consultation were submitted by the Arundel Society, the Bognor Regis Civic Society, the Littlehampton Civic Society and the Walberton Action Group (WAG). Objections to the proposals mirrored those of the statutory authorities and the town and parish councils, and can be summarized as;

- a. The wrong homes built in the wrong location.
- b. Loss of greenfield land to development.
- c. Adverse economic impact on adjoining towns.
- d. Lack of transport infrastructure.
- e. Potential environmental problems.

23. As an illustration of these concerns, the response from the WAG is typical. WAG is an organisation whose purpose - inter alia - is to seek protection of the natural environment of the Parish of Walberton (which includes the villages of Walberton, Binsted and Fontwell), and to improve the quality of life of residents by promoting the conservation of the local countryside. In summary, WAG concluded that the area is already plagued with acute transport issues, the local demand for affordable housing is limited, as is the demand for further employment in this area. Speculative job opportunities suggested in the current plans were too few to satisfy the occupants of 5,000 homes, many of whom will be compelled to seek work elsewhere. Thus, the Eco-Town proposals, expedient for housing development, did not meet the intended spirit of the Government's Eco-Town concepts. The development could only be achieved at the price of destroying a substantial area of greenfield land, and the size of the development would completely change the attractive character of the area and its villages.

Communities Against Ford Eco-Town (CAFÉ)

24. After the publication of the DCLG's Eco-Town consultation paper a number of local residents formed CAFÉ, which now represents and speaks for several thousand local people who believe that Ford is quite the wrong place to build an Eco-Town. To emphasise the local concerns, CAFÉ have raised a petition of some 10,000 signatures, some 2,000 people have marched in protest, and hundreds have attended public and local council meetings in numbers unique in this part of rural West Sussex. CAFÉ has almost unanimous local support; not because people are opposed to development per se, but because of the wider and long-term implications of the Ford proposal, and particularly because the process is outside the Local Development Framework.

25. In their comprehensive submission, CAFÉ provided useful insight into the planning and political history of the Ford site. In their view, the two Ford Eco-Town submissions which have been taken forward into consultation were misleading; being essentially long-dated development proposals which had been given a hurried coat of green paint.

26. CAFÉ emphasised this by highlighting that ADC had faced pressure for development at Ford since the 1990s and, in relation to an earlier proposal to build some 5,700 houses on the site, the Inspector who conducted the Inquiry into the draft Arun District Local Plan said, in 2002, that: "The proposal would cause severe harm to the rural character of the locality and that, together with the serious sustainability drawbacks, this outweighed any potential advantages of development". Similarly, the Inspector who conducted the EiP into the draft West Sussex Structure Plan said, in 2003, in relation to a Barton Willmore/Redrow Homes proposal for 5,000 or more houses at Ford that: "As a whole the Ford Airfield area did not fall within the definition of PDL, it was isolated and lacking in many existing facilities, and it was not particularly well located for travel, other than by car, bearing in mind the lack of major facilities nearby".

27. Also, since 2004, ADC had been involved in the production of its LDF documents, and the Council's draft "Core Strategy - Preferred Options" document (that had to be suspended in mid-2007 because of uncertainty about housing numbers arising from the EiP into the draft SE Plan) showed, based on extensive evidence-based research, that the Ford area was unsuitable for large-scale development. Thus, the selection of the Ford site as a prospective Eco-Town would not only subvert the local planning process, but would result in a major development in the least sustainable location in the whole of Arun District.

28. In relation to key issue of transport infrastructure, CAFÉ noted that an essential element of any Eco-Town was that it must be well linked to existing towns, but that the roads around Ford were already heavily congested and forecast to get worse. Both the FAVG and the FEH proposals had confirmed that their schemes have a fundamental dependency on the provision of an off-line

A27 bypass at Arundel, and this was also seen as a significant constraint in the DCLG's consultation paper. However, the Highways Agency scheme for an Arundel bypass was not yet approved and, even if it could be started in the early part of the post-2016 timeframe, it was unlikely to be operational before 2020.

29. In conclusion CAFÉ stated that it was difficult to see on which key DCLG criteria the Ford site qualified as an Eco-Town. The proposals would cause the coalescence of at least three small rural settlements, use 350 hectares of land (at least 87% of which is greenfield), and the area earmarked for businesses was only proposed for development as and when markets dictate. Additionally, the area has severe infrastructure issues, especially in relation to highways and transport, there was limited demand for affordable housing in this particular part of Arun District, and there was limited demand for employment in the area. Thus, the emphasis of this development proposal was simply to build houses on greenfield land, rather than to tackle the key issues and spirit inherent in the Government's concept of an Eco-Town. In addition, there were doubts about the sustainability of the project in terms of energy, water, flood-risk, and attraction for new business, and it would threaten the viability of nearby towns.

Conclusion

30. This paper has summarised a number of the Ford-related responses to consultation on the Government's paper "Eco Towns: Living a Greener Future". The consultation responses analysed are those held by CAFÉ, and may not represent a comprehensive review. However, on the evidence available, there is significant objection to the methodology of the Eco-Town process, and many specific objections to the proposals relating to the Ford Site. The level of objection is consistent across regional, county, district, town and parish councils and individual consultees, and it is clear that the Ford Eco-Town proposal does not have the support of the local community.

Peter Wright

Peter Wright BA (Hons) MRTPI

11th September 2008

[Authors Details: Peter Wright is a resident of Ford in West Sussex. He is a Chartered Town Planner and a Member of the Royal Town Planning Institute. He has recently retired from Local Government service, having spent 27 years as a practicing Town Planner, including 9 years as a Chief Planning Officer]