

ADVOCO —PLANNING

NEW PACKHOUSE
SEFTER FARM,
PAGHAM,
PO21 3PX

DESIGN ACCESS
AND PLANNING STATEMENT

AUGUST 2021

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1.0 Introduction

1.1 This Design, Access and Planning Statement has been prepared by Advoco Planning on behalf of Barfoots of Botley Limited and is to explain and support a detailed planning application for the construction of a new packhouse to be used for the packaging, preparation and distribution of produce grown by Barfoots. The Proposed building will be positioned alongside existing buildings to effectively extend the main building cluster. The site is currently car parking which will be relocated towards the front of the site behind an established high hedge.

1.2 In the interests of submitting clear and concise information, the national and local requirements for both a Design and Access Statement and Planning Supporting Statement have been combined on this occasion, although care has been taken to ensure that the formal requirements for both documents are met in this single submission. The site also contains a Listed Building (Sefter Farmhouse) and therefore a Heritage Statement is included within the report to address any impact on that heritage asset.

1.3 This statement will comprise the following:

Section 2 – Site and Surroundings

Section 3 – Planning History

Section 4 – Proposed Development

Section 5 – Planning Policy Context

Section 6 – Community Engagement

Section 7 – Examination of the Principal Issues

Section 8 - Heritage Statement

Section 9 – Conclusion and Summary

1.4 The proposed floorspace exceeds the normal threshold of 1,000 sq.m. and therefore constitutes major development. In these terms there is a requirement for a Design and Access Statement. Given that the design of the proposed development is largely a product of its function, its scope will be limited but will address the requirements of the General Development Procedure Order and will appear in Section 7.

2.0 Site and Surroundings

2.1 Sefter Farm is a large and long established horticultural enterprise, and is the operational base for Barfoots who are involved in the cultivation, harvesting, preparation, packaging and distribution of vegetables and salad products. The site is located within the fertile coastal plain, which is an area of open countryside used extensively for large scale agriculture and horticulture located to the south of Chichester. The application site is located about 10 km to the south of Chichester and is between the smaller settlements of Runcton to the north and Pagham to the south.

2.2 The application site itself measures 2.5 ha. and relates to the existing main car parking area located at the front of the main building group and part of an agricultural field located in the gap between the aforementioned car park and Pagham Road and to the south of the main access drive into the site. To the north of the application site is Sefter Farmhouse (Listed) alongside a large industrial type building used for the cleaning, preparation, packaging and distribution of vegetable and salad products, along with ancillary office and other accommodation. The site also contains an anaerobic digester (AD) waste to energy

plant, and significant areas of hardstanding for the parking and circulation of cars and commercial vehicles, along with areas for the storage of pallets and crates. The site also has a series of bunds, reservoirs and balancing ponds and is surrounded by open arable land used for horticultural production.

3.0 Relevant Planning History

- 3.1 The application site has a long planning history of permissions for new buildings and extensions to existing buildings. The planning history provided is therefore restricted to the most recent permissions around the main building group.

P/134/08 Extension to Agricultural Building. Approved 14/09/2009 and now lapsed

P/5/12 Renewal of P/134/08. Approved 12/03/2012 and now lapsed.

P/68/15/PL Glasshouse, balancing pond/irrigation storage, staff facilities, water tanks, security fence & access road. Approved 21/10/2015 and partially implemented and therefore considered extant.

P/76/16/PL Construction of a building for the packaging, preparation and distribution of fresh foods with ancillary accommodation associated with the existing horticultural business, revisions to internal access road, car parking and hardstanding areas and landscaping and provision of a wetland. Approved 09/06/2017. Now implemented.

P/107/17/PL Extension of existing building. Approved 01/12/2017. Now implemented.

4.0 Proposed Development

- 4.1 This is a detailed planning application for the construction of a new packhouse building which would measure 90m in length and 63m in depth giving a total floor area of 5,670 sq.m. (GEA). This is a full height building similar in scale and design to existing operational buildings on the site. Also proposed is a single storey lean to element on the northern side of the building along with a plant room occupying a short section of the eastern side of the building.

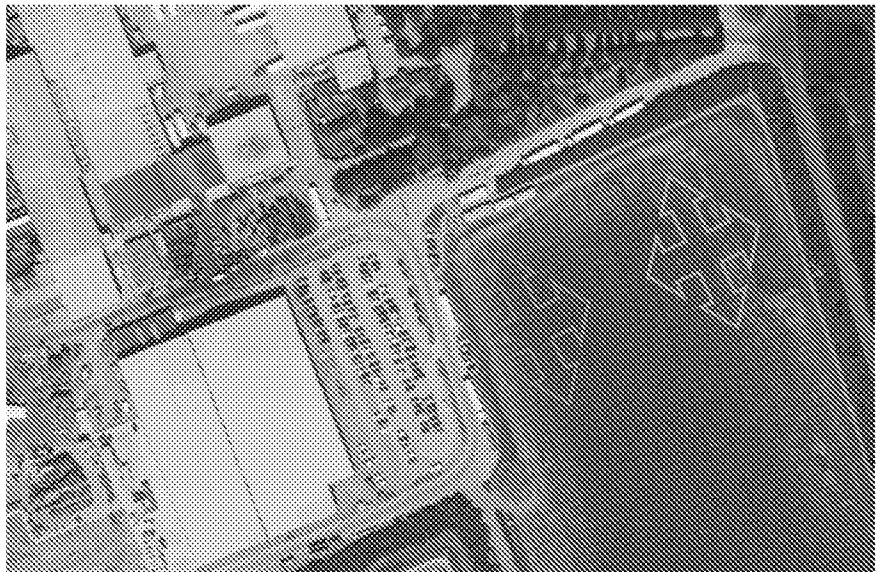


Fig 1. The above photograph shows the approximate location of the proposed new building

in red and the relocated car park in green

- 4.2 The proposed building will be located on the existing staff parking area and clearly this will need to be relocated. A new parking area is therefore proposed on land between the proposed new building and Pagham Road immediately to the south of the existing site access. Staff related light traffic will therefore no longer mix with heavy goods vehicles which has significant safety advantages.
- 4.3 The additional accommodation is required to improve the efficiency and resilience of the existing agricultural enterprise and is in response to a rapidly changing agricultural sector. Specifically, significant changes have and continue to take place within the whole food production supply chain due to a number of factors including, but not limited to, Brexit and Covid.
- 4.4 The following is a short summary prepared by the applicants to explain and put into context this current planning proposal.

Sefter East Warehouse Building

Introduction

Barfoots of Botley is an award-winning sustainable farming business based in Arun District at Pagham. The business has been a pioneer in sustainable agriculture and has continuously invested in facilities that enable it to become self-sufficient in green energy, utilise waste heat, recycle green waste whilst farming in the most sustainable way. The Company's range of vegetables are distributed to all the main retail chains throughout the UK and also exported to Eire and mainland Europe.

The world of agriculture is changing and the focus on Net Zero and sustainability is stronger than ever. In addition, since the departure from the EU the business is adapting to a change in labour markets and availability.

The requirement for a new warehouse facility on the Sefter Farm site is driven by a number of factors detailed below.

The business objective is to get to Carbon Net Zero by 2025 within its UK farming operations.

Vehicle Movements

Currently the business uses third party storage for vegetable products all year round in three locations. The hauliers used are currently struggling to recruit adequate numbers of HGV drivers.

The business currently use 3 offsite stores :-

- *Lyons Haulage Toddington Nursery, Lake Lane, Barnham, West Sussex PO22 0AQ*
- *Portico Shipping Ltd 2 Prospect Road Portsmouth Hampshire PO1 4QY*
- *Roberts Transport Ltd Unit F5, Ford Airfield Industrial Estate BN18 0HY*

This storage is of varying quality and maintaining visibility of quality and ensuring rotation of stock is a challenge.

The current vehicle movements to and from our site amount to 24 per day. Removing the double handling of product will remove 24 heavy goods vehicle movements per day average, (8,760 HGV Movements per annum) across the year from the local roads, as the haulage leg from Farms/Ports etc to 3rd party stores will be removed.

Product Quality and Wastage

Reducing food waste is a key driver in the food industry and a Government focus. The provision of new warehouse facilities will reduce wastage due to improved refrigeration, less handling damage and the ability to run reduced stock levels, due to shorter lead times.

Energy Efficiency/Safety and the Environment

The new development at Sefter East would be designed to incorporate the latest technology in cooling, heat recovery and heat transfer in order to mitigate the overall carbon footprint of the operation. Currently most operations which require cooling facilities, including older facilities operated by Barfoots, provide this function using systems containing gases that directly contribute to global warming, as well as indirectly impacting on the environment through use of electricity and other fuels that generate Co2. The new systems proposed for Sefter East will look to provide a carbon neutral impact through the use of natural refrigerants and benign fluids, combined with heat recovery and generation, high efficiency motors and compressors, all designed to deliver the required cooling and related processes with minimal consumption of fossil fuels and zero direct impact through refrigerant leakage.

The Sefter Farm site is entirely run on renewable electricity from green waste generated on site through the Company's onsite Anaerobic Digestion Plant.

Automation

The Farming industry is operating in a new era in terms of the availability of labour and this new facility will give the opportunity to automate warehouse processes and reduce the manual input into stock handling and management.

In addition, the new packhouse will enable existing space adjacent to current production lines to be allocated to the development of automated systems for production. This will enable a reduced reliance on seasonal and immigrant labour.

5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. It is anticipated that the proposals will be assessed against the policies of The Arun Local Plan 2011-2031 which was adopted July 2018.

The Development Plan

- 5.2 The policies deemed to be of most significance to this proposal are as follows:-
- Policy SD SP1 Sustainable development
 - Policy C SP1 Countryside
 - Policy LAN DM1 Protection of landscape character
 - Policy EMP SP1 Strategic Economic Growth
 - Policy EMP DM1 Employment Land: Development Management
 - **Policy HOR DM1 Horticulture**
 - Policy D SP1 Design
 - Policy T SP1 Transport and Development

- 5.3 The above list is not intended to be exhaustive and therefore other policies will form part of the overall planning assessment. Of the individual policies cited, the policy deemed to be of most relevance to the current proposal is Policy HOR DM1 Horticulture. For this reason, this policy is quoted in full below.

Policy HOR DM1 Horticulture

1. New glasshouse, polytunnel and associated packhouse development will be permitted provided that:

a. It is of a height and bulk which would not significantly damage the character or appearance of the surrounding landscape, unless it can be demonstrated that the need for a larger scale development is outweighed by the economic benefit of the scheme to the rural economy;

b. It relates sympathetically to the natural, built and historic environment;

c. Pollution to soil, water or air generated from the development into the surrounding environment, including the cumulative effects, is within regulated acceptable limits;

d. Long public views across substantially open land are retained where the landscape value is defined as major or substantial for the corresponding Landscape Character Area in the Arun Landscape Study

e. Adequate water resources are available or can be provided (ie. above ground reservoirs);

f. Adequate surface water drainage capacity exists or can be provided as part of the development;

g. Vehicular access from the site to the road network is adequate and uses roads capable of accommodating the vehicle movements likely to be generated by the development without detriment to highway safety and the residual cumulative impact to residential amenity is not severe;

h. There is minimal impact on health or general amenity resulting from internal artificial lighting after 6.00 pm on the occupants of nearby residential properties and minimal impact on the appearance of the site in the landscape by the minimisation of light spillage and glare to keep the natural environment intrinsically dark at night;

i. Noise levels resulting from machinery usage, vehicle movement, or other activity on the site, which when measured against the existing ambient noise levels in the locality would not be likely to unacceptably disturb occupants of nearby residential properties or would not be likely to adversely affect enjoyment of the countryside;

j. Any glasshouse structure(s) and/or polytunnel(s) and or/packhouse(s) deemed redundant to the horticultural or agricultural industry on the development site, are removed and the land is remediated from any contaminated material(s) and the land is used only for the direct diversification of horticulture or other productive green environment or a countryside-based enterprise activity which supports the rural economy. Council will impose this through planning conditions and/or use planning obligation agreements;

k. Proposals include full details of new landscaping, screening and of any trees or vegetation to be retained on the site; and

l. The applicant has submitted sustainability and options appraisals, mitigation measures, and a soil resources plan for the development site.

2. Replacement or renewal of an existing glasshouse structure will be permitted where:

- a. It is in the same position on the site as the existing structure; and*
- b. It is broadly of the same height and bulk as the existing structure; where the criteria for new glasshouse structure shall apply.*

3. Redevelopment of under-used, redundant or derelict glasshouses, polytunnels or packhouses will be supported provided that:

- a. The redundancy of the structure or building to the owner and the horticultural or agricultural industry is proven by the applicant to the satisfaction of the Council; and*
- b. The land is remediated from any contaminated material(s) and the land is used for the direct diversification of horticulture or other productive green environment or is a countryside-based enterprise activity which supports the rural economy; and*
- c. All proposed works include full details of new landscaping, screening and of any trees or vegetation or structures to be retained on the site*

Proposals for redevelopment of horticultural sites for non-horticultural purposes will be considered on a case by case basis against Policy C SP1. To reduce the impact on the sector, applicants/landowners shall be required to work with the Council and any existing horticultural businesses on the site to enable and facilitate relocation within the Arun district of the existing horticultural business in order to protect employment and to allow the existing horticultural business to continue to contribute to the local economy.

- 5.4 Whilst the Development Plan is recent and seemingly accords with current Government planning guidance contained within the National Planning Policy Framework (NPPF), this guidance is also relevant in its own right and the key sections are set out below.

National Planning Policy Framework (NPPF)

- 5.5 The NPPF (July 2021) confirms and clarifies the Government's presumption in favour of sustainable development. The NPPF states the following:

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low*

carbon economy.

- 5.6 Building a strong and competitive economy is also a key theme of the NPPF. Specifically the framework goes on to say:-

Supporting a prosperous rural economy

84. Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

6.0 Community Engagement

- 6.1 It is anticipated that the applicant will fully engage with the Parish Council through the determination of the planning application. If Covid restrictions allow this may include attendance at the relevant Parish Council meeting and presenting the proposals or making available any additional information which might assist the Parish in their consideration of the proposals as required.
- 6.2 In addition, the submission of this planning application does not signal the end of any potential dialogue between the applicant and the other stakeholders including the Arun District Council and neighbours, and therefore the applicant will be happy to consider any reasonable request for amendments or further clarification should these arise through the determination process.

7.0 Examination of the Principal Issues

- 7.1 The following section will comprise two parts, namely the analysis which would otherwise be contained within a freestanding Design and Access Statement and a section which addresses other planning issues and compliance with the policies cited in Section 5 above. Many of the planning topic areas are supported by specialist detailed technical reports including the following:-
- Transport Statement- Highgate Transportation
 - Noise Assessment – Apple Environmental
 - Landscape and Visual Impact Assessment (LVIA) – Ubu Design
 - Flood Risk Assessment and Drainage Strategy - Aqua Callidus
 - Ecology Report – Mathes Ecology
- 7.2 Where this Statement addresses the above topics it will provide only a short summary and therefore if more information is required the reader is directed to the detailed topic report.

Design and Access Issues

Principles

- 7.3 Local and Government planning policy is broadly supportive of new buildings for agriculture and horticulture as they are key sectors in supporting the local economy. The application site forms part of a large agricultural enterprise which plays a key role in the supply of vegetable and salad products to the majority of UK supermarkets. In this addition, the principle of significant additional floor area has already been established through a number of previous approvals as cited in section 3 above. Whilst policies have changed, the broad policy support for development of the nature proposed remains unchanged and therefore the principle of the proposed development is broadly established.
- 7.4 The design principles have been to provide a building which meets the applicant's brief in terms of their operational needs, which are explained in para 4.4 above. Furthermore, the design and siting of the building is guided by policy and the objective of minimising its visual impact and providing a safe and logical operational layout which includes separating staff traffic from all other commercial related vehicle movements; which entails relocating the parking to the front of the site.

Use

- 7.5 The use of the site for the preparation and packaging of the vegetables and salad products has long been established. In addition, the agricultural/horticultural emphasis has endured despite widespread changes to consumer demand and lifestyle changes which impact on the way food is purchased and the diversity of products the consumer now demands. The food supply change has also seen rapid change over recent years and that change is likely to continue, which in turn introduces a high degree of uncertainty and a need for greater resilience and flexibility for businesses involved in the food supply chain.

Amount

- 7.6 The total floor area proposed is circa 6,430 sq.m., which amounts to a circa 25% increase in total commercial floorspace across the Sefter Farm site.

Layout

- 7.7 As highlighted in para. 7.4 above, the layout of the development is a product of its function and the need to provide better and safer accommodation without hindering the operation of existing buildings. The new building is as close to the existing building group as possible having due regard for the need to maintain HGV loading access to the eastern side of the existing building and the western side of the new building, which inevitably results in a shared yard between the two. Staff cars entering the main car park closer to the entrance also minimises any safety concerns and reduces any potential conflict between staff transport and HGVs.

Scale

- 7.8 The issue of scale is largely addressed under the earlier 'Amount' heading. The building height is largely standardised for industrial type buildings where forklifts operate and modern stacking systems are used. The building height is also the same as the existing buildings for this same reason. The footprint of the building has also been minimised.

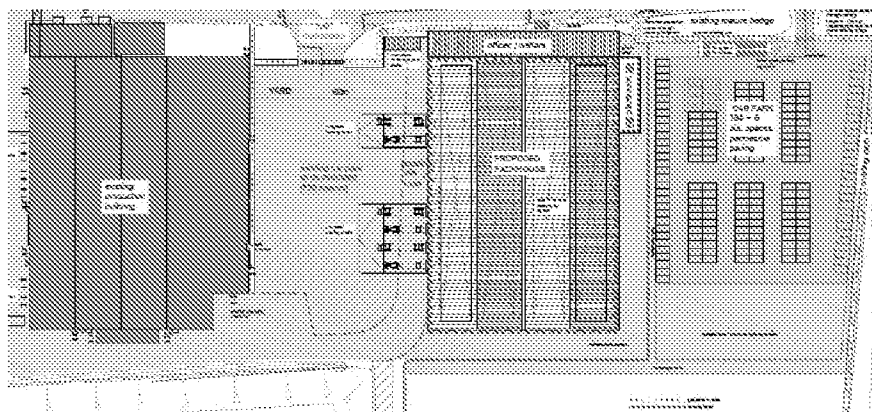


Figure 2. The above plan extract shows the area of the proposed packhouse (edged in red) alongside existing buildings to the west (Left) and the proposed new park to the east (right).

Landscape

- 7.9 The site currently benefits from good levels of screening when viewed from most vantage points. A well-established hedge runs along the Pagham Road frontage and close to the building there are bunds and reservoir enclosures, which also add to the overall screening. Significant landscaping has also been secured via more recent planning approvals.
- 7.10 The current proposals include further landscaping in the form of a native species hedge (hawthorn is most likely) with a wildflower margin, which would extend from Pagham Road and enclose the entire application site including the building and parking area. This will serve to screen parked cars, soften the appearance of the building and will contribute towards achieving Biodiversity Net Gain. Further planting could also be secured if required to achieve either and landscape or biodiversity enhancement (or indeed both) and this could be secured via planning condition.

Appearance

- 7.11 The buildings are modern steel framed building clad in profiled steel to match those adjoining it. The existing dark bluey grey colour scheme appears to be relatively inconspicuous within its setting and therefore a similar approach is assumed for the proposed new build. That said, should other colours be preferred that could be secured via planning conditions.

Accessibility

- 7.12 All proposed buildings are located on a flat site and benefit from level thresholds. It is therefore highly accessible. All new works will be fully building regulations compliant and will provide suitable access for all user groups.

Other Planning Issues

- 7.13 The following sections address the other planning issues which fall outside the scope of the Design and Access related issues detailed above. They principally relate to compliance with Local Plan policies cited in para. 5.2 above.

Principle of Development

- 7.14 it is clear from both the planning history of the site and the Development Plan policies that there is widespread planning support for the type of development proposed here. Specifically, Policy HOR DM1 supports new packhouse and other horticulturally related development such as glasshouses subject to the proposals

meeting all the criteria contained within the policy and all other development plan policies.

- 7.15 The acceptability of the proposals therefore largely hinges on compliance with Policy HOR DM1 which broadly seeks compliance with a range of environmental issues, many of which are supported by technical reports as set out in para. 7.1 above. The following sections will therefore assess all of the potential areas of planning impact, each of which broadly aligns with individual criteria within Policy HOR DM1. For ease of reference, the assessment criteria within policy HOR DM1 will be addressed in the order they appear in the policy.

Landscape and Visual Impact

- 7.16 The proposed packhouse is of a scale and design similar to those within the existing building group. Views of the proposed building would be limited to views from Pagham Road to the east. For those passing in vehicles, the proposed building would not be visible due to the existing high hedge, however limited gaps may provide fleeting views. Views from the east will typically be against a backdrop of the existing buildings and therefore there are very few vantage points where the proposed new building would be publicly visible in a way that would break the skyline.
- 7.17 A feature of the landscape character of the area are large packhouse type buildings alongside substantial areas of glasshouses, set within an essentially flat and open landscape and broken up with hedges and tree belts, but few areas of woodland or copses. In this instance, most views of the building will be against the backdrop of existing buildings of a similar nature. The preferred approach of clustering of buildings has been achieved having due regard to the operational requirements of the site and the need to provide HGV access to both the eastern side of the existing building and the western side of the proposed building, thereby creating an enclosed yard serving both buildings.
- 7.18 The arrangement means that the proposed new building screens and shields HGV movements within the site. The proposed new building effectively turns its back onto Pagham Road where the main views of the building emanate from. This is considered to be a significant landscape and visual impact enhancement as well as an acoustic benefit. New planting is also proposed which will readily mitigate any impact arising from the loss of a short stretch of hedge which is required to provide the car park entrance. This opening seeks to widen an existing break in the hedge.
- 7.19 The size of the building is directly related to the operational needs of the applicant. This is explained in para 4.4 above, and within the Design and Access section of this Statement. The Economic Benefits of the proposed scheme are further explained in the separate Economic Statement which has been provided.
- 7.20 In these terms the proposals are considered to comply with criterion a. of Policy HOR DM1. Compliance with criterion b. relating to Natural and Historic Environment will be addressed in the Ecology and Heritage Statement sections below, whilst any impact on the built environment is considered to have been addressed in the preceding analysis. Compliance with criteria b. and k. of HOR DM1 has therefore been partially addressed and will be fully addressed via this Statement.

Pollution Control

- 7.21 The proposed building forms part of a food production area which is both highly regulated in its operation and the environment within the proposed building will be highly controlled. No polluting processes or products are proposed and therefore the scheme will not adversely impact upon local soil, air or water quality. As a highly regulated use, any impacts will be subject to independent third-party scrutiny and therefore ensuring compliance with regulated acceptable limits will be essential and will have to be achieved.

- 7.22 In these terms criterion c. of HOR DM1 is met. Criterion d. relating to long views is addressed in both the Landscape and Visual Impact Assessment and above, and has been satisfied.

Water Resources

- 7.23 The applicant has significant water storage capacity on site which is required for both irrigation and some of the production processes. The supply of water represents a significant cost to the business and therefore there is a compelling commercial driver to use water efficiently. In this regard, water is widely harvested, stored and recycled at Sefter Farm. The proposed packhouse will place very little demand for additional water and what little demand it makes can readily be met by existing provision.

Drainage and Flood Risk

- 7.24 The application site falls within Flood Zone 1 which has the lowest risk of flooding. That said, and common with the surrounding land, the site is low lying and flat and therefore drainage is a particular sensitivity. The application site area is over 1ha. and therefore this triggers the requirement for a formal Flood Risk Assessment (FRA) which has been provided. Integral to the FRA is a Drainage Strategy which explains how surface water will be managed across the site.
- 7.25 In this regard, the site geology is of low permeability. The relocated staff car park will be of porous construction providing storage for surface water run-off within the pavement matrix. The gradual discharge from the pavement matrix and run-off from the new packhouse and adjacent hardstand will be harvested to the farm's reservoir network for agricultural water supply. This will avoid any increase in run-off from the development and reduce demand on the potable water supply into the site.
- 7.26 The site is on a gentle east to west gradient towards Pagham Rife west of the site. The development will retain the overall east to west exceedance pathways between the site and the Rife. This is explained in some depth in the composite FRA and Drainage Strategy prepared by Aqua Callidus. This work undertaken confirms that criterion f. of HOR DM1 has been satisfied.

Highways, Transport and Parking

- 7.27 The proposed development seeks to rationalise Barfoot's operation, so although new floorspace is proposed, the overall traffic generation is less due to the avoidance of double handling, which currently arises through the use of three remote storage sites as set out in para 4.4 above. Further consolidating the use of Sefter Farm reduces HGV movements between this and other sites.
- 7.28 The processes within the new building will also be highly automated and therefore will be less reliant on individual operatives. This is in direct response to a need to maintain competitiveness and the difficulties in finding and retaining staff; and reflects an industry wide trend.
- 7.29 For these reasons the proposed staff parking area is essentially the same size as the one it seeks to replace. Specifically, the existing car park provides circa 190 spaces whilst the new proposed car park will also provide 190 spaces with enhanced cycle and motorcycle parking. Space is also provided for future expansion which would allow a further 15 or 20% increase should this be required.
- 7.30 Part of the reduced parking need stems from the success of the three bus services which are partly funded by Barfoots and designed to provide a cost effective and practical alternative to other individual transport modes and particular to reduce car use. Barfoots also monitor the use of the car park and over the last two years over capacity has been identified. The level of parking now proposed is therefore

considered appropriate and reflects actual demand and the wider objective of promoting non car modes for an increasing proportion of staff journeys to and from work.

- 7.31 All aspects of the Transport and parking implications of the proposed development have been assessed in some depth and this is captured in the Transport Assessment prepared by Highgate Transportation, which forms part of this planning submission. In light of the conclusions contained within this Assessment, it is contended that the local highway network can accommodate the traffic associated with the proposed development and no adverse impacts on residential amenity would arise, through what is essentially a reduction in overall traffic. In these terms, criterion g. of HOR DM1 is met.

External Lighting

- 7.32 As a rural site within an area of open countryside, lighting is clearly a sensitive issue. Equally the site is already a large scale operational site and is required to provide safe working areas, many of which are used in low light conditions, particularly during the winter months. Accordingly, the site has large areas of illuminated outside spaces and further areas will be required as part of the proposed development.
- 7.33 The proposed development area is an existing illuminated yard area and the level of illumination required is no greater than existing, and applies to areas already illuminated. In these circumstances no material increase in illumination would arise and if necessary, details of any external lighting can be secured via an appropriately worded planning condition. In addition, and as outlined above, the proposed new building will serve to enclose the currently open yard and therefore its illumination when viewed from outside the site will be less apparent.
- 7.34 The existing car park benefits from low level lighting which is the minimum necessary to ensure its safe use. A similar level of lighting will be required in relation to the relocated car parking. Again, precise details can be secured via planning condition which in practice would seek to secure a comprehensive external lighting scheme. For energy efficiency reasons all lighting will be LED and where possible will use sensors, so they only come on when localised lighting is required. This will further limit any impact and ensure that criterion h. of HOR DM1 is satisfied.

Noise

- 7.35 The proposed packhouse will require some plant and machinery in order for it to function properly and as intended. This will primarily comprise refrigeration plant which will be custom designed rather than a standard 'off the peg' piece of plant. Any plant and mechanical equipment proposed would be similar in terms of noise output to the plant used for the existing operations. In addition, all external plant will be fully acoustically enclosed, and the building design includes a significant plant enclosure area for this use.
- 7.36 A Noise Assessment has been undertaken by Apple Environmental which provides a robust assessment of the current noise situation and an accurate measure of existing ambient noise levels. The report overcomes the potential issue of the precise specification of any new plant being as yet unknown, as it will provide an accurate baseline to form the basis of a future planning condition, which can limit the noise emitted by any new plant. This limit can be directly referenced to the measured baseline. This will ensure that noise levels will not exceed accepted tolerances when measured from the nearest residential properties and, in these terms, the requirements of criterion i. of HOR DM1 are met.

Sustainability Statement

- 7.37 Sustainable agricultural practices underpin the entire Barfoots farming operation and are pursued for both environmental and commercial reasons. Specifically, in

the long term, unsustainable practices over time will always become economically unsustainable as waste and inefficiency will ultimately lead to higher costs and undermine competitiveness. Barfoots have therefore produced the following statement:-

'As well as meeting our customer quality and due diligence requirements, we recognise that our results must be achieved in an environmentally sensitive and sustainable way. For this, we set ourselves targets. Our waste levels are monitored monthly. As part of our Producer Responsibility Obligations (Packaging Waste Regulations 1997), we are obliged to recover and recycle our packaging materials to agreed set targets. This is fulfilled through membership of the Valpak scheme.

Precision farming techniques ensure that inputs of chemicals, fertilizers and water are kept to the absolute minimum to meet a crop's needs. Wherever possible, beneficial insects rather than chemicals are used to control pests. Changes in agricultural practice and the introduction of formalised 'Regenerative Farming' techniques are part of Barfoots' ongoing strategy to reach carbon Net Zero by 2025.

Managing soils to increase organic matter, improve water holding capacity, and increase biodiversity is at the forefront of all our operations. Creating a closed loop utilising our green waste to create green energy and then using the subsequent biofertilizer that comes from that process to grow the next crop is a fundamental part of our drive to Carbon Net Zero. Our UK manufacturing operations have been carbon neutral since 2011 and we are now a long way down the path to reach the goal of Net Zero for all operations by 2025

Barfoots is part of the Sustainable Farming Initiative and is developing plans to pilot the scheme over the next three years in conjunction with Natural England and DEFRA. We measure our impact on the local wildlife population regularly carry out Farmland bird surveys, and endeavour to provide planted mixes that help bird species to survive overwinter. We recognise that we are only part of the environmental answer but we will continue to strive to be an environmental "sink", encouraging biodiversity wherever possible and appropriate. Through regularly reviewing our Farm Conservation Plans, we aim to continue to sustain and enhance the beauty of our landscape. To continue to improve and extend wildlife habitats whilst creating new habitats, landscapes and improved opportunities for people to enjoy the countryside.'

Options Appraisal

- 7.38 The current scheme has been subject to a detailed optioneering exercise to ensure that it is optimal in environmental terms and has achieved the maximum practically achievable sustainability gains.
- 7.39 Minimising energy and transport costs is central to that objective. Barfoots have long recognised that consolidating and rationalising their operation is a key factor in securing a sustainable enterprise. The submitted estate plan shows that Sefter is well located in relation to the land it farms and therefore any new development would reasonably be located at this site.
- 7.40 At a more site specific level there is a broad landscape and visual benefit in locating new buildings alongside existing to ensure a level of clustering. It would also be inappropriate to introduce a new building of this scale into an otherwise undeveloped part of the land holding and therefore all options for the proposals inevitably centre around the best fit within the main building group at Sefter. A summary of the option constraints imposed on the site is included as **APPENDIX 1**.

Soil Resources Plan

- 7.41 Barfoots understanding and sensitivity to issues of soil management is set out in

their Statement included in para. 7.37 and for ease of reference is repeated below:-

'Managing soils to increase organic matter, improve water holding capacity, and increase biodiversity is at the forefront of all our operations. Creating a closed loop utilising our green waste to create green energy and then using the subsequent biofertilizer that comes from that process to grow the next crop is a fundamental part of our drive to Carbon Net Zero.'

- 7.42 This project optimises previously developed land, as much of the application site comprises the existing car park. The proposed relocated car park will be on a farmed field and will result in the relocation of topsoil. The car parking area will be as un-engineered as possible and will comprise a shallow scrape overlain by compacted type 1 limestone scalpings. The soil take will be limited and as a precious farming resource will be stored and re-used across the farm holding.

Sustainable Construction

- 7.43 The applicants own and operate an Anaerobic Digester (AD) on the site which produces waste from energy and is fuelled by vegetable waste, most notably sweetcorn husks. As a result of this, the proposed development will be powered entirely from this renewable source. The proposal also includes photovoltaic panels on much of the proposed roof area. This adds to the sustainable credentials of the proposed development.
- 7.44 The processes involved at Sefter Farm are potentially energy and water intensive which in turn introduces a significant cost and incentive to operate as efficiently as possible. Furthermore, the surplus energy produced by the AD plant is sold back to the grid and therefore although the energy is notionally free, its profligate use has revenue implications as it reduces the surplus available to sell, which further incentivises energy efficiency.
- 7.45 Accordingly, and consistent with the company ethos, the proposed extension and processes will be highly energy and water efficient. Chilled areas of the packhouse will be highly insulated to allow lower temperatures to be maintained with minimum energy usage. In addition, high efficiency compressors and low energy led lighting (T5) will be used throughout the new building. A sub-metering system is also in place for both power and water use to micro-manage consumption and increase efficiency.
- 7.46 In light of the assessment contained within paras. 7.37 to 7.45 above, and the safeguards referred to in terms of scope of suggested planning conditions throughout Section 7, the requirements of criterion I. of Policy HOR DM1 are met.

Ecology

- 7.47 The application site benefits from detailed ecological assessment. This provides a robust assessment of any biodiversity potential of the site and its ability to support or provide habitat areas for protected species. Specifically, the report prepared by Mathes Ecology assesses the site's potential in relation to the following species:-
- bats;
 - dormice;
 - great crested newts;
 - badger;
 - amphibians;

- water vole;
- nesting birds; and
- reptiles.

7.48 The report finds that there is little potential for the above species and therefore that no material harm to any ecological interests on the site will arise. There is however an emerging objective to secure Biodiversity Net Gain (NBG). In this respect the report includes a series of measures which would allow NBG to be achieved. These could readily be secured via the imposition of an appropriately worded planning condition which would secure a scheme of measures to include some or all of the suggested mitigation areas outlined in the Ecology Report. With such a condition imposed, the proposals are considered acceptable in biodiversity terms.

7.49 It should also be noted that the site has previously received planning permission for glasshouse development and has therefore been subject to previous ecological assessment. The principle of development on the site has therefore been established and the absence of overriding ecological constraint has also been previously demonstrated.

Archaeology

7.50 This planning submission includes the results of an Historic Records Search which is submitted as a freestanding document. This confirms that the site has no appreciable archaeological potential. In addition, the packhouse is proposed on land which has already been disturbed through various construction phases within the main building group, whilst the parking area will involve very little excavation on land that has already been assessed and approved for other development. In the interests of completeness, the previous archaeology report relating to the glasshouse approval and covering the bulk of the application site has been resubmitted. In these terms there is not considered to be any archaeological constraint which might limit the proposed development.

Economic Statement

7.51 The following statement is short summary which shows the importance of horticulture within the wider economy and the implications of the proposed development in the local context. The evidence base is largely drawn from DEFRA statistics, the applicants own data and some LPA derived information.

7.52 Contextually a total of 17.27m hectares of the UK is in agricultural use which is notionally used to feed a current UK population of 68.2m people. Of this total land area, only 166,000 ha are in horticultural use, generating £1.67billion (2020 figure) of income from fresh vegetables alone. The situation is of course complicated by imports and exports, the former dominating, with only 56% of vegetables home produced (2020 figures). Accordingly, feeding the nation whilst minimising exports and food miles is a significant challenge and requires innovation, investment and efficient production which inevitably can only be achieved where economies of scale are provided. Intensive agriculture and horticultural is therefore a crucial component of UK food production and without it, production would be lower and imports higher.

7.53 Agriculture (including horticulture) is however in decline. Between 2014 and 2015 UK agricultural income dropped by 19.3% (DEFRA). Whilst that is only a snapshot and may be influenced by other factors including poor weather, the overall trend is of decline. Horticulture is particularly vulnerable as it is labour intensive resulting in high costs and therefore most at risk from exports from countries with both better climates and cheaper labour. If the UK is to become more self sufficient in terms of food production, investment in the industry is crucial in order for it to remain competitive.

7.54 Barfoots and their competitors have responded to these market pressures by increasing efficiency in both growing and processes at all levels including packaging, washing and transportation of produce. Significantly, Barfoots have also diversified in terms of the food preparation and producing consumer led products which involve less effort for the end user and add value for the producer.

7.55 Against this national context the role of Barfoots needs to be explained at a local level. In this regard up to date and industry specific data at the local level is scarce. However, there is anecdotal evidence including commentary made within the emerging Arun DC Horticulture Local Development Order (LDO). This recognises the importance of horticulture within the local economy and states:-

11.2.1 Horticulture is a key employment sector in the Arun District. The commercial horticulture industry has a significant presence in the areas surrounding Angmering; Barnham and Pagham. Horticultural activities include protected cropping (glasshouses and polytunnels), open field production and horticultural-produce packing facilities.

11.2.2 In addition to growing horticultural products, the industry is evolving to meet customer demand and is importing, processing, packing and distributing produce all year round.

11.2.3 The Council's Economic Strategy identifies the Horticulture sector as one of four key sectors which are particularly strong in the local economy and offers good opportunities for economic development and job creation. Recognising this, the Council adopted a Horticultural Local Development Order, to assist the horticulture sector, on 14th September 2016 to be applied to identified area(s) of the LDO for a period of 10 years. The evidence base notes that the horticultural sector has significant growth potential and that provision should be made for larger scale horticultural operation expansion within an overall rationalisation of the sector (in response to the economics of production linked especially to the costs of energy and water resources).

7.56 Notwithstanding, Barfoots is a UK success story, but more importantly is an Arun District success story. Barfoots success has been driven by innovation, customer focus, and a focus on sustainability and a major local employer with 450 full time employees and more than 1,000 Full time equivalents (FTE) depending on the time of year.

7.57 In light of the above, it is clear that Barfoots make a significant contribution to the local economy and the proposed development is entirely consistent with the continuation and increase in this contribution through significant investment and innovation.

8.0 Heritage Statement

Relevant Planning Policy

8.1 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990: In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

8.2 Paragraph 200 of the NPPF: In determining applications, local planning

authorities should 'require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'.

- 8.3 Paragraph 197 of the NPPF: In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.

Further:-

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- 8.4 At the local level, the tests which ADC currently apply in its assessment for applications for works to listed buildings and in conservation areas are contained within Local Plan Policy HER SP1 which is set out below:

Policy HER SP1 The historic environment

The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District, based on the following approach:

Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance.

Non-designated heritage assets including locally listed heritage assets (Buildings or Structures of Character and Areas of Character) and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment;

Development likely to prejudice any of the above, including their settings, will be refused.

Any proposals for development will be required to comply with all other relevant policies and reflect any relevant appraisals or management proposals adopted by the Local Planning Authority.

The Local Planning Authority will encourage the re-use of vacant or underused Listed Buildings or unlisted buildings by approving proposals that contribute positively to their conservation either individually or as part of wider strategies for regeneration. Where changes of use are proposed, the Local Planning Authority will consider these in a flexible way but will favour proposals which improve public access where these are not prejudicial to existing character or appearance.

The Local Planning Authority will take a pro-active stance to any heritage assets that may be at risk. This will include working with property owners to find a use that will enable them to be put back in to use. Development proposals involving

the demolition of Listed Buildings or substantial harm to a Conservation Area will not be permitted unless it can be demonstrated that the loss or harm achieves substantial public benefits.'

- 8.5 The Arun Local Plan also includes Policy HER DM1 relating to Listed Buildings. This policy is multi-faceted whilst only the first section has particular relevance to this application and therefore is only quoted in part.

Policy HER DM1 Listed Buildings

Proposals affecting statutory Listed Buildings will be required to:

- a. Preserve or enhance the historic character, qualities and special interest of the buildings;*
- b. Be necessary and not detrimental to the architectural and historical integrity and detailing of a Listed Building's exterior;*
- c. Protect the architectural and historical integrity and detailing of a Listed Building's interior;*
- d. Protect the special interest of buildings of architectural or historic interest; and*
- e. Protect, and where possible enhance the setting of the building.*

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- c. Protect the architectural and historical integrity and detailing of a Listed Building's interior;*
- d. Protect the special interest of buildings of architectural or historic interest; and*
- e. Protect, and where possible enhance the setting of the building.*

Assessment of the Heritage Asset and its Significance

- 8.6 The heritage asset is Sefter Farmhouse and its associated Granary which are both Grade II listed buildings.
- 8.7 The statutory listing description for The Sefter Farmhouse is as follows:
- One building. C18. Two storeys. Four windows. Stuccoed. Tiled roof. Vertical glazing bars only intact. C19 castellated porch. Modern addition behind.*
- 8.8 A plan extract showing the location of the listed buildings relative to the application site is shown below

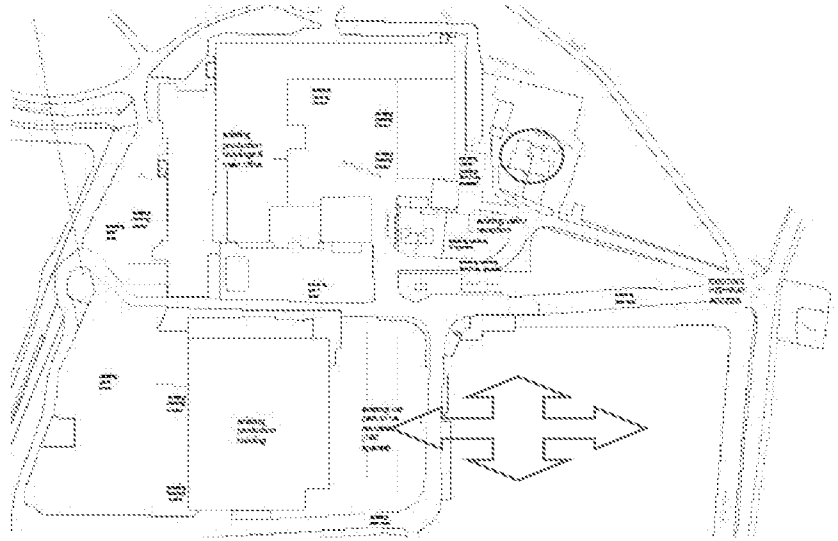


Figure 3 Shows location of listed farmhouse in a red circle and location of proposed development as an red arrow symbol.

- 8.9 In terms of formal assessment, in the revised NPPF, heritage significance is defined as: 'The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.'
- 8.10 The NPPF also defines the setting of a heritage asset as 'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'



Figure 4 Photograph of Sefter Farmhouse

- 8.11 In these terms Sefter Farmhouse is of high significance, although clearly not the highest. In addition, the application site undoubtedly falls outside the curtilage of

the listed building.

- 8.12 In light of the above and following broadly recognised conventions in terms of assessing heritage proposals, it is now necessary to assess any harm to the identified heritage asset, and where harm is identified for this to be explained and justified.

Assessment of Harm

- 8.13 Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (henceforth referred to as 'GPA 2: Managing Significance') gives advice on the assessment of significance as part of the application process. It advises on understanding the nature, extent, and level of significance of a heritage asset.

- 8.14 The crux of the NPPF advocated approach is contained within para 202 which states:-

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

- 8.15 Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against (as part of this, setting may be a consideration).

- Less than substantial harm. Harm of a lesser level than that defined above; and
- No harm (preservation). A High Court Judgement of 2014 is relevant to this, in which it was held that with regard to preserving the setting of a listed building or preserving the character and appearance of a Conservation Area, preserving means doing no harm.

- 8.16 Preservation does not mean no change; it specifically means no harm. GPA 2: Managing Significance it states that "Change to heritage assets is inevitable but it is only harmful when significance is damaged". Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment, it is whether such change is natural, harmful or beneficial to the significance of an asset that matters. With regards to changes in setting, GPA 3: The Setting of Heritage Assets states that "protection of the setting of heritage assets need not prevent change", with the above statement regarding the natural, harmful or beneficial impact on the significance being key.

- 8.17 Importantly no works are proposed to the listed building itself or within its curtilage or indeed land immediately adjoining its curtilage. Any impact is therefore in relation to its wider setting only. The listed building was originally a traditional farmhouse and granary and continues to be used for residential purposes. Its setting is however compromised to a degree by existing buildings, most notably the main production building which is about 15 metres from the listed building and is of modern appearance and is significantly larger in scale.

- 8.18 The proposed new building is some 80m from the farmhouse and there is a pair of more modern farm cottages, car park, other buildings and two internal access roads in the intervening space, along with a well established hedge and mature tree belt. As a result of this there are no obvious viewpoints where the listed building and the new build would be viewed together in a way which might impact upon its setting, taking due account of the NPPF guidance set out in para 8.10 above. Accordingly, the proposed development is not considered to materially impact on the setting of the listed building and therefore no harm arises, which in formal terms amounts to enhancement. In light of this conclusion, the requirements of both local planning policy and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 have been met. This conclusion is

also consistent with others reached by the LPA in relation to other proposals which have a similar impact as the current scheme.

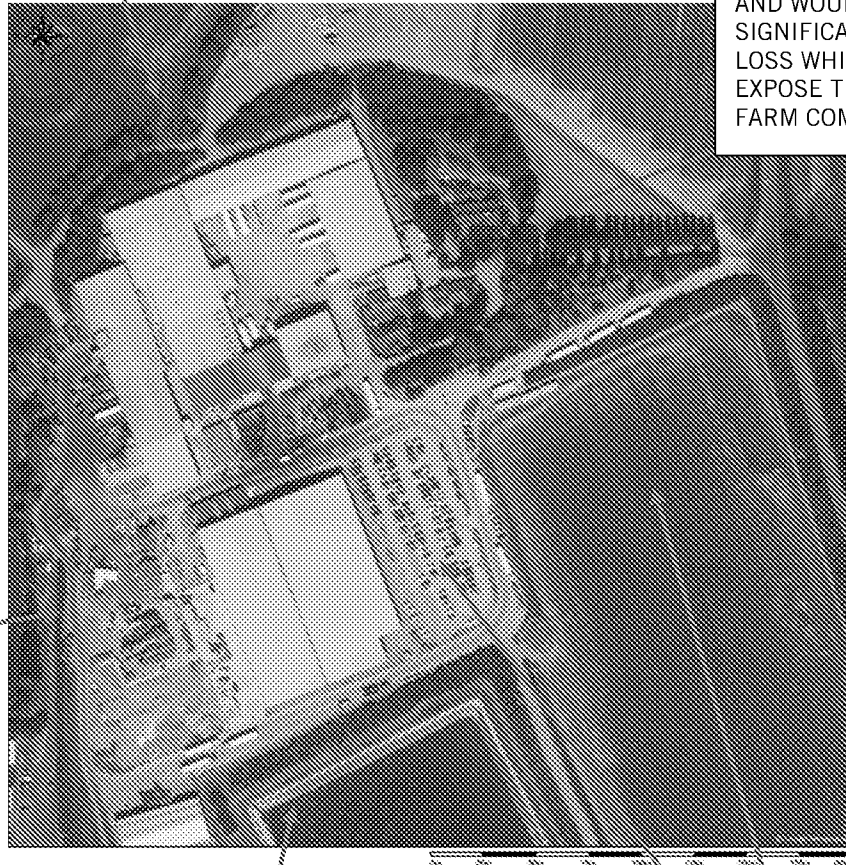
9.0 Conclusions and Summary

- 9.1 The above analysis shows that the proposed development fully accords with Local Plan policy. Specifically, Policy HOR DM1 supports growth of horticulture and related development in the countryside and its requirements are met in full.
- 9.2 The development will help support jobs and opportunities for both the applicants and other local industries and suppliers. Horticulture is recognised as one of 4 key sectors locally and its growth is supported in acknowledgement of its importance within the local economy.
- 9.3 The proposed development will allow elements of Barfoots current operation to be rationalised and consolidated on their Seftor site. This will reduce traffic movements between this site and other current remote storage facilities, and will add to the efficiency and financial resilience of the farm enterprise. The proposed packhouse will be well integrated into the established building group and in these terms will have a limited impact on the local landscape. No material increase in traffic will occur and no adverse impact on the environment in terms of biodiversity, landscape or amenity will arise.
- 9.4 The proposals are therefore considered to be fully policy compliant at all levels and as such should be supported.

APPENDIX 1

THIS AREA IS OPERATIONALLY INACCESSIBLE AND WOULD SEE THE LOSS OF FARM LAND AND TREES

THIS AREA CONTAINS A LISTED BUILDING AND WOULD INVOLVE SIGNIFICANT TREE LOSS WHICH WOULD EXPOSE THE ENTIRE FARM COMPLEX



DEVELOPMENT HERE WOULD SEE THE LOSS OF IMPORTANT FARM LAND TO THE WEST, WOULD EXTEND THE FRAM PARCEL INTO MORE OPEN LAND AND WOULD BE OPERATIONALLY CHALLENGING

DEVELOPMENT IN THIS AREA IS RESTRICTED BY EXISTING RESERVOIRS AND THE AD PLANT

THESE AREAS ARE PARTIALLY SCREENED FROM THE NORTH AND EAST, ARE PARTIALLY DEVELOPED AND/OR HAVE BEEN CONSENTED FOR DEVELOPMENT AND OPERATIONALLY RELATE WELL TO EXISTING BUILDINGS

OPTION CONSTRAINTS PLAN