

5th November 2021

Richard Goodall
Advoco Planning

By Email Only

Dear Richard,

Barfoots of Botley Ltd, Sefter Farm, Pagham Road, Arun
Proposed Packhouse
(Application Reference: P/117/21/PL)

Highgate Transportation provided a Transport Statement (HTp/2167/TS/01, July 2021) to support the application for the proposed packhouse on land at Barfoots's Sefter Farm site, Pagham Road, Arun.

The most recent highway officer comments from West Sussex County Council (WSCC) were received on 16th September 2021 (see **Appendix 1**) and requested further information with regard to trip generation, car parking within the internal layout, and Travel Plan information. A consultation response was also received from National Highways (see **Appendix 2**).

Trip Generation

It was set out in WSCC comments relating to the previous, and now implemented, planning consent (ref: P/76/16/PL) that the worst case scenario could result in up to 237 additional two-way trips daily i.e. staff travel and HGV movements.

The WSCC response has requested further information and clarification on anticipated changes to vehicle trip generation at the site.

"Of the 237 worst case existing movements how many are currently in the AM and PM peak hours?"

Firstly, it is apparent that the worst case increase of 237 movements forecast by WSCC previously in association with the 2016 application, does not occur.

Secondly, information has been obtained from the GoodsIn Manager at Barfoots Sefter Farm site to set out the current level of daily HGV movements to provide further clarity over traffic movements.

It has been confirmed that there are currently up to a maximum of 13 two-way HGV movements in each of the AM and PM peak hours, with an average of only around nine movements in each peak hour i.e. one HGV movement every seven minutes.

A summary of HGVs arriving and departing the site is summarised in **Table 1**.

Table 1 – Existing HGV movements at Barfoots Seftor Farm site

HGV “pool”	Daily		Peak Hours (0800-0900 & 1700-1800)	
	Average (two-way movement)	Maximum (two-way movement)	Average in AM / PM peak hours (two-way movement)	Maximum in AM / PM peak hours (two-way movement)
Goods In Schedule	30	60	1	2
Crates	20	30	1	2
Packaging	10	20	1	2
Despatch	80	100	5	6
Tractor Transfers	20	30	1	1
Total	160	240	9	13

“What other HGV trips are existing at the site access (aside from transport to third party storage sites) and what is their impact on the peak hours?”

The information in **Table 1** demonstrates the HGV movements at the site access and that around 10% of HGV movements occur in each of the AM and PM peak hours. This is not expected to materially change moving forwards.

It has also been confirmed that the usual site arrival and departure times for staff are 0530-0800 for arrivals and 1730-1815 for departures. Therefore, staff arrivals will not conflict with the AM peak hour. Staff departures do straddle the PM peak hour, and observations suggest that there are no issues with the operation of the site access junction at this time.

“Will the increased floor area and automated processing increase production at site and therefore have potential for non-storage?”

The proposed packhouse floor area increase is due to the automation of the processing requiring more floor area. Therefore, there will not be an increase in production. Furthermore, some of this packhouse floor space is intended for storage, to reduce off-site third party storage requirements. This will see a net reduction in HGV movements on the local highway network.

National Highways have commented on the impact of this proposal on the Strategic Road Network. Barfoot’s statement addressing this is provided at **Appendix 3**.

Internal Layout

The highway officer has requested plans showing the HGV routes throughout the site to understand the site layout rearrangement and the impact this will have on vehicle routes. Plan HTp/2167/03 is provided at **Appendix 4** to demonstrate the HGV routes through the site.

The highway officer has asked for confirmation of where all 219 car parking spaces are located. Plan HTp/2167/04, contained in **Appendix 5**, annotates where the existing 219 car parking spaces are provided and where the safeguarded parking area for 64 car parking spaces is located.

It has also been requested by the highway officer that parking standards of both the existing and proposed building floorspace is demonstrated. As shown on the plan contained at **Appendix 5**, land has been safeguarded for parking associated with the proposed new packhouse, when applying the B8 parking standards provided in WSCC's *Guidance on Parking at New Developments (September 2020)*, i.e. $6,430\text{sqm} / 100\text{sqm} = 64$ parking spaces. This is suitable in terms of geometry and given that the current parking on site is appropriate for the existing needs, as agreed previously as part of application P/76/16/PL. Further car parking is not required to be provided.

Furthermore, it is considered that given the packhouse application is a bespoke/sui generis usage, the provision of parking in accordance with WSCC's B8 parking standards, is at best a guide.

National Highways have also commented on parking provision. Barfoot's statement addressing this is provided at **Appendix 6**.

Travel Plan

The WSCC highway officer set out that it would be useful for the Sefton Farm Travel Plan to be updated as part of the application. It is confirmed that the requirement for the Travel Plan to be updated can be form a planning condition.

Summary

It is clear that there will not be an increase of trip generation associated with the proposed packhouse, and an appropriate level of parking is provided, with an area safeguarded for future car parking should it be required.

It is therefore concluded that the planning application for the proposed packhouse should not be prevented or refused on highway grounds.

We trust that this is the information that you require, should you have any questions then please do not hesitate to contact us.

Yours sincerely



Fiona Bennett
Director



Appendix 1

WSCC Consultation Response

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Arun District Council - FAO: Simon Davis
FROM:	WSCC - Highways Authority
DATE:	16 September 2021
LOCATION:	Sefter Farm, Pagham Road, Pagham, PO21 3PX
SUBJECT:	P/117/21/PL Construction of a new packhouse including relocation of parking area and landscaping. This site may affect the setting of a listed building and is in CIL Zone 5 (Zero Rated) as other development.
RECOMMENDATION:	More Information

West Sussex County Council, in its capacity as Local Highway Authority (LHA), have been consulted on proposals for new packhouse and relocation of existing parking area.

The packhouse will be 6430sqm and used as part of the existing operations at the site. It will enable development of automated production systems and allow onsite storage for vegetables. The relocation of the car park will form a new internal access from the site access road and a new roundabout within the site is proposed to assist vehicle movements.

The LHA previously provided comments under P/76/16 for packing house and associated works, to which no objection was raised subject to conditions and s106 contribution towards accessibility improvements in the locale.

Access Arrangements

Pagham Road is rural single carriageway subject to 60mph. The LHA has reviewed data supplied to WSCC by Sussex Police over a period of the last five years. There have been recorded injury accidents at the junction of Pagham Road with Sefter Road, approximately 245m south of the site access and one incident to the north of the site access. There have been no incidents directly related to the site access.

The existing access is to be utilised. This takes the form of an established wide bellmouth with kerbed radii. Car and HGV tracking of the access has been provided and this is anticipated to work as per existing arrangements.

Under P/76/16 improvements to forward visibility along Pagham Road were proposed by cutting back vegetation within the public highway. Improvements for the existing visibility for right turns in to the site and for pedestrian visibility to the informal crossing points of Pagham Road (vicinity of internal crossing to the south and bus stop) were provided and accepted by the LHA.

Trip Generation

The LHA is mindful that the packhouse is proposed to allow more automated systems to develop and that of the existing 600 staff currently employed, no new staff are proposed. It is also outlined that the new building will omit the need for third party storage currently used at Barnham, Portsmouth and Ford and thus the 12 HGV (24 two-way movements) per day associated with third party storage requirements are removed.

Under P/76/16 the LHA surmised that a best case 70 additional two-way trips and worst case 237 additional two-way trips per day could occur. Whilst it is noted that a Travel Plan, mini-bus and coach service and cycle to work scheme have been introduced to promote reduction in car travel, the LHA nevertheless require further information and clarification on anticipated changes to vehicle trip generation at the site. Of the 237 worst case existing movements how many are currently in the AM and PM peak hours? What other HGV trips are existing at the site access (aside from transport to third party storage sites) and what is their impact on the peak hours? Will the increased floor area and automated processing increase production at site and therefore have potential for non-storage HGV trips to increase? Please ask the applicant to provide this further detail in a clear format so that the LHA can better understand existing against proposed movements for all vehicles at the site.

Internal Layout

To understand the rearrangement of storage on site and impact on vehicle routes it would be useful for plans to show HGV routes throughout the site.

The existing car park will be relocated and visibility splays of 2.4m by 25m (20mph) from the car park access to the internal site road have been demonstrated. Tracking shows that cars can manoeuvre within the car park and pass in the access. It is stated that 219 spaces exist at the site in total although 190 are provided in the relocated car park it is not clear where the additional 29 spaces are located. Whilst it is noted that no new staff are proposed, it would be useful for each existing and proposed building floorspace to be set out against the required parking standard. It would also be beneficial to understand proposed storage only floor area of the new building and justify how the amount of space provided will meet all storage needs on site omitting third party movements.

Finer detail of the proposed bicycle and motorcycle parking and electric vehicle spaces can be secured by condition, if further information requested above is deemed satisfactory.

Accessibility and Travel Plan

It is understood that a bus stop 270m south on Pagham Road serves both north and southbound services to Chichester and Bognor. There is also a mini-bus and stagecoach service (routes to/from site include Bognor, Littlehampton and Portsmouth) subsidised by Barfoots and fit in with shift times. A cycle to work scheme exists and car sharing will be promoted. Nevertheless, with the proposed new building and changes to processes at the site it would be useful for the Travel Plan to be updated and provided with this application.

Conclusion

Please ask the applicant for the trip generation, car park and Travel Plan information and re-consult.

Katie Kurek
West Sussex County Council – Planning Services

Appendix 2

National Highways Consultation Response



**Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEHR 2021)
Holding Recommendation in connection with an
Application for Planning Permission**

From: Nicola Bell (Regional Director, South East)
Operations Directorate
South East Region
Highways England
PlanningSE@highwaysengland.co.uk

To: Arun District Council (FAO Case Officer Simon Davis)
planning.responses@arun.gov.uk

CC: SpatialPlanning@highwaysengland.co.uk

Council's Reference: P/117/21/PL

Location: Sefter Farm, Pagham Road, Pagham, PO21 3PX

Proposal: Construction of a new packhouse including relocation of staff parking area and landscaping. This site may affect the setting of a listed building and is in CIL Zone 5 (Zero Rated) as other development.

Highways England Reference: 92427 / #14185

Referring to the planning application referenced above (received 25/08/2021) in the vicinity of the A27 Chichester Bypass (which forms part of the Strategic Road Network), notice is hereby given that Highways England's formal recommendation is that we:

- a) recommend that planning permission not be granted for a specified period* (see Annex A – further assessment required)

*The specified period is the time required for the applicant to meet the requirements set out in Annex A. Until such time as the requirements are fully met, Highways England will not be able to assess whether the proposals comply with national planning and transport policy set out in DfT C2/13 (especially paras 8 to 11) and MHCLG NPPF2021 (especially paras 110 to 113); and hence will not be able to provide our formal planning response.

If the Local Planning Authority wishes to determine the application ahead of this time, they must contact highways England and we will provide our assessment based on the evidence as it exists at that point.

HIGHWAYS ENGLAND (“we”) have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This HEHR represents Highways England’s formal recommendation (prepared by the Area 4 Spatial Planning Team) and is made available to the Department for Transport as per the terms of our Licence.

Highways Act Section 175B (covering new access to the SRN) is not relevant to this application.¹

Signature:		Date: 15 September 2021
Name: Kevin Bown		Position: Spatial Planning Manager
Highways England: Bridge House, 1 Walnut Tree Close, Guildford, GU1 4LZ		
<u>PlanningSE@highwaysengland.co.uk</u>		

Annex A: Highways England Required Further Assessment

Highways England has carried out an assessment of application P/117/21/PL. The assessment has been sent to the Local Planning Authority to place on the application file; and copied to the applicant or their agent for their response.

We will work with all relevant parties until we have sufficient information to complete our assessment of the impact of the proposals (individually and/or in combination with other developments/ plans as appropriate) on the safety, reliability and/or operational efficiency of the Strategic Road Network (reflecting the C2/13 and NPPF test). Once we are able to complete our assessment, we will provide our formal recommendation to the Council and applicant. It may comprise:

- a) No Objection
- b) No Objection subject to the imposition of conditions or the entering into of a legal agreement
- c) Refusal

Based on the above, our assessment is as follows:

We require further information to be provided by the applicant on this application in order that an informed decision can be made in relation to the potential impacts of the development on the strategic road network. In particular, the following comments should be passed onto the applicant:

Traffic Impact on A27

The applicant needs to consider the potential worse case traffic generation from a B2/B8 unit falling within that land use classification.

The Transport Statement should reflect the net traffic generation for the development irrespective of the proposed use by the current occupier and demonstrate the impact of the proposal on the operation of the SRN.

Therefore, the applicant needs to provide updated, peak period traffic generation information using the latest version of TRICS; this will be required for review, including the corresponding trip distribution and assignment, and an assessment of the likely impacts on the SRN.

ACTION: Updated peak period trip generation information is required for review including the corresponding trip distribution and assignment, and an assessment of the likely impacts on the SRN.

Car Parking

The car park relocation requires the existing 219 spaces to be moved to the east of the new packhouse unit. While the TS states that there will be no increase to staff and no new trips forecasted, this has not been demonstrated given the proposal should be considered as a new B2/B8 unit. However, Arun District Council's parking standards dictate that one parking space is required per 100sqm. The development comprises

6,430sqm and, therefore, this equates to 64 spaces; land for which will be safeguarded to the south of the new parking area location.

If it is intended that the 64 spaces not be provided, a car parking accumulation study should be carried out to confirm that the 219 spaces can adequately accommodate the forecast traffic generation from the proposed land use without the need for the additional 64 spaces.

ACTION: A car parking accumulation exercise is required to be included in the revised Transport Statement

Additional Comments

Further, at the appropriate stage of the process we would anticipate the inclusion of planning conditions relating to the following:

- The submission of a Travel Plan to minimise single occupancy vehicular trips and encourage and promote sustainable travel on the basis that a suitable S106 Agreement to secure financial contribution towards accessibility improvements can be acquired;
- The submission and approval of a Construction Traffic Management Plan

This application has been assessed by the Highways England South East Region Spatial Planning Team. This HEPR form represents Highways England's formal recommendation regarding the application. It is copied to the Department for Transport as per the terms of our Licence.

Appendix 3

Barfoot's Statement Regarding Impact on Strategic Road Network



Barfoots of Botley Ltd

Sefter Farm
Pagham Road
Bognor Regis
West Sussex
PO21 3PX

Fiona Bennett
Highgate Transportation Ltd
First Floor 43-45 Park Street
Bristol
BS1 5NL

[By email]

5th November 2021

Dear Fiona,

Proposed Packhouse – Impact on the Strategic Road Network
Land at Barfoots of Botley Ltd, Sefter Farm Site, Pagham Road, Arun
Application Ref: P/117/21/PL

Comments were received from National Highways (formerly Highways England) on 15th September 2021, which set out that the impact of the proposal on the operation of the Strategic Road Network should be demonstrated.

As you are aware, this sui generis application (ref: P/117/21/PL) is for a proposed packhouse on land at the Barfoots of Botley Ltd site at Sefter Farm. The requirement for the packhouse floor area increase is due to the need to automate the processing, which requires more floor area than traditional methods, as well as provision of space for on-site storage of goods. Therefore, I can confirm that the new packhouse will not result in an increase in production and hence no increase to the level of traffic generation is anticipated.

It can therefore be confirmed, as set out in Highgate's Transport Statement (HTp/2167/TS/01, July 2021), that the proposed new packhouse will not have an impact on the operation of the Strategic Road Network and given this, that additional trip generation and distribution exercises are unnecessary.

Furthermore, HGV movements currently associated with third party storage will be able to travel straight from the port to the Sefter Farm site and will not go to the third party storage site prior to travelling to the Sefter Farm site i.e. a reduction of HGV movements.

It can be noted that WSCC's highway officer comments were received on the 16th September 2021 and it is clear they have accepted that there are no new staff proposed due to the space being required for automated systems and that the new packhouse will omit the need for third party storage, which is currently used at Barnham, Portsmouth and Ford.

We trust that this is the information that you require.

Yours sincerely,



Julian Marks
Group Managing Director

Appendix 4

HGV Routes Through the Proposed Site

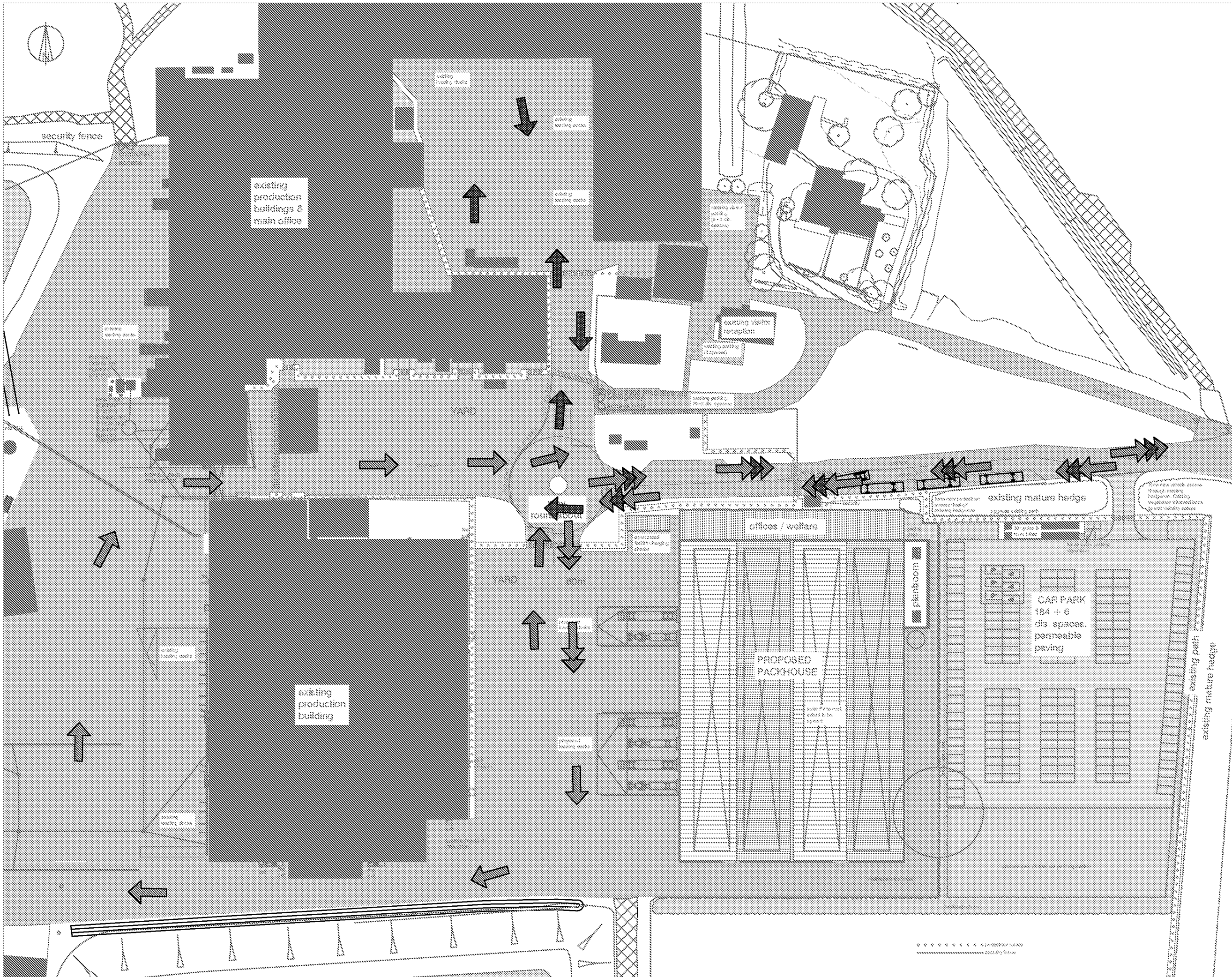


FIGURE
© Crown copyright and database rights 2021 OS Licence
100055454.

Based on Curtis Leves Technical Ltd drawing 'Proposed Site
Layout Plan' ref 21/02/005 rev 03, dated July 2021

KEY
HGV Movement

ISSUE	REVISION	BY	DATE

PROJECT:
**BARFOOTS OF BOTLEY
SEFTER FARM**

CLIENT:
BARFOOTS OF BOTLEY

PROJECT REF	DRAWING NUMBER	SCALE (AT A3)
2167	03	1:1,000

SHEET NUMBER
SHEET NUMBER 1 OF 1

SCALE BAR:
0m 10m 20m 30m 40m 50m

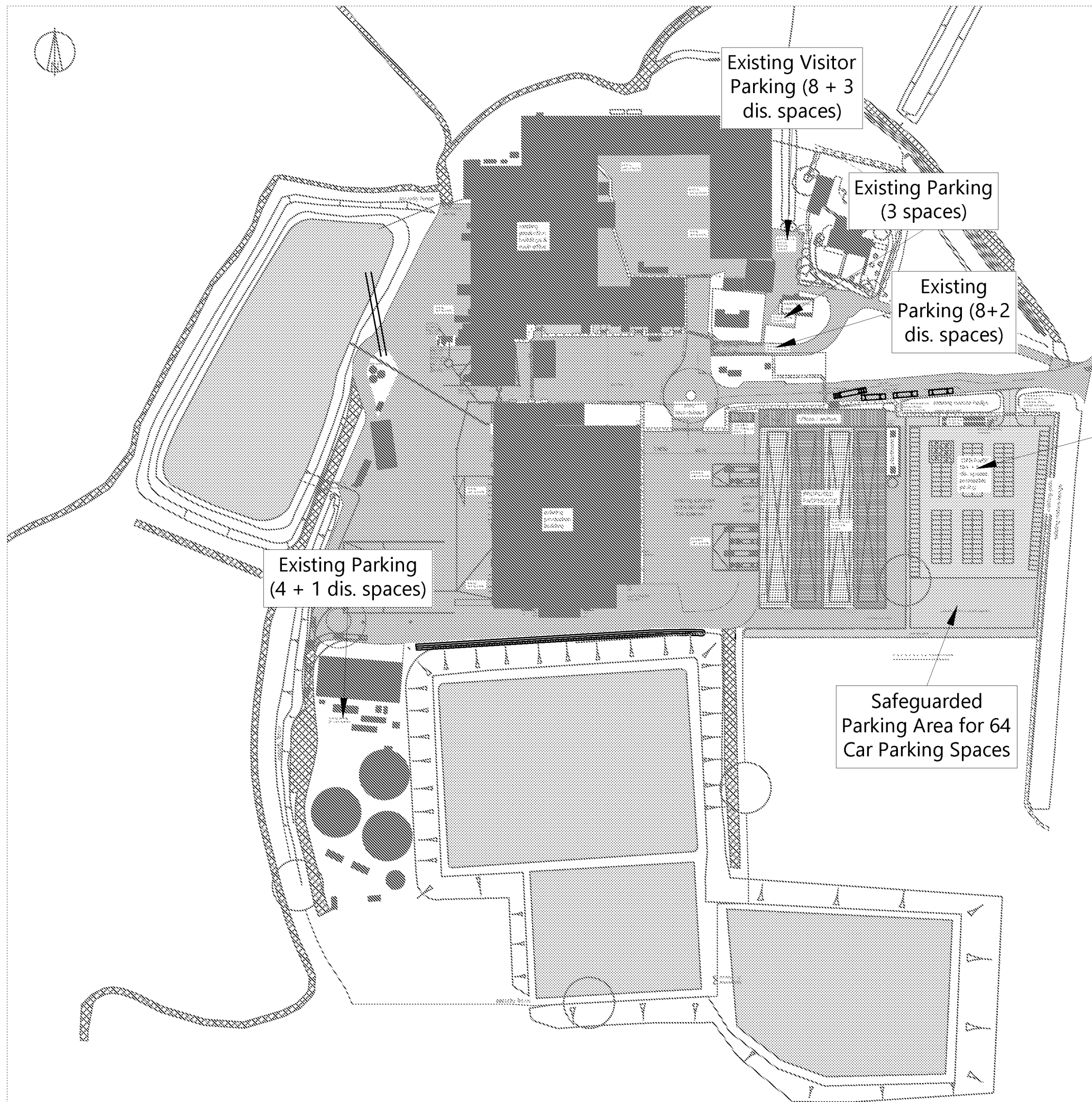
HighgateTransportation
www.highgate-transportation.co.uk
First Floor, 41-45 Park Street
Bristol BS1 5NL
01179 349 121
© Highgate Transportation Limited

TITLE:
**INDICATIVE ROUTES
OF HGVs THROUGHOUT SITE**

DATE	DRAWN BY	CHECKED
19/10/21	AH	FB

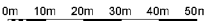
Appendix 5

Car Parking Plan



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Based on Curtis Leves Technical Ltd drawing 'Proposed Site Layout Plan' ref 2102/005 rev 03, dated July 2021

PROJECT: BARFOOTS OF BOTLEY SEFTER FARM		
CLIENT: BARFOOTS OF BOTLEY		
PROJECT REF: 2167	DRAWING NUMBER: 04	SCALE (AT A2): 1:2,000
SHEET NUMBER: SHEET NUMBER 1 OF 1		
SCALE BAR: 		
Highgate <i>Transportation</i> www.highgatertransportation.co.uk First Floor, 43-45 Park Street Bristol BS1 5NL 01179 349 121 © Highgate Transportation Limited		
TITLE: LOCATION OF ON SITE CAR PARKING		
DATE: 19/10/21	DRAWN BY: AH	CHECKED: FB

PROJECT:

BARFOOTS OF BOTLEY
SEFTER FARM

CLIENT:

BARFOOTS OF BOTLEY

PROJECT REP:	DRAWING NUMBER:	SCALE (AT A2):
2167	04	12,000

SHORT MESSAGE

SHEET NUMBER 1 OF 1

COLLINS



HighgateTransportation

www.highcaretransportation.co.uk

First Floor, 43-45 Park Street

Bristol BS1 5NL

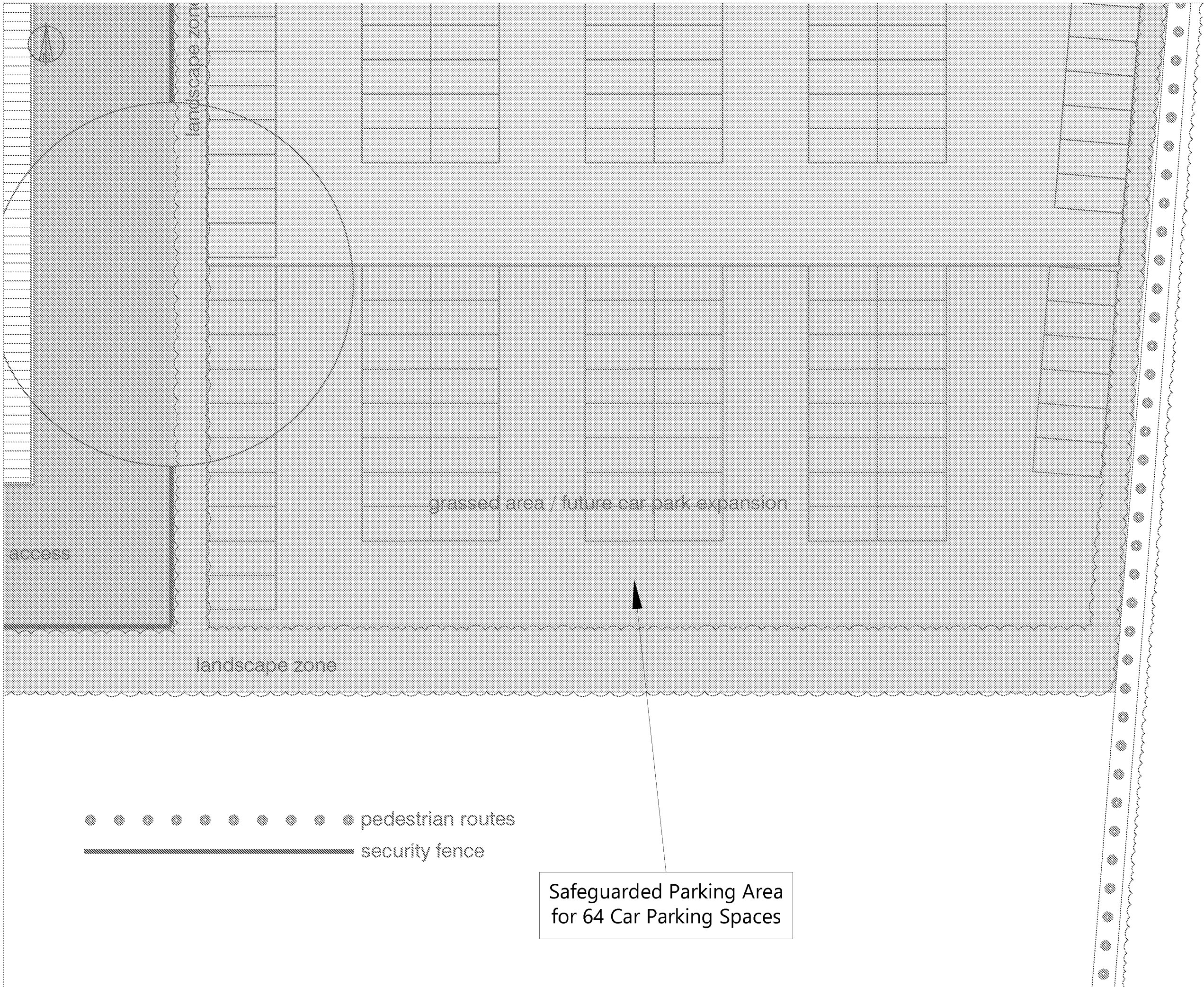
01179 349 121

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TABLE:

LOCATION OF
ON SITE CAR PARKING

DATE: 19/10/21	DRAWN BY: AM	CHECKED: FB
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NOTES

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Based on Curtis Leves Technical Ltd drawing 'Proposed Site Layout Plan' ref 2102/005 rev 03, dated July 2021

DATE	REVISION	BY	DATE

PROJECT: BARFOOTS OF BOTLEY SEFTER FARM		
CLIENT: BARFOOTS OF BOTLEY		
PROJECT REF 2167	DRAWING NUMBER: 05	SCALE (AT A3): 1:250
SHEET NUMBER: SHEET NUMBER 1 OF 1		
SCALE BAR: 0m 5m 10m		
HighgateTransportation www.highgatetransportation.co.uk First Floor, 43-45 Park Street Bristol BS1 5NL 01179 349 121 © Highgate Transportation Limited		
TITLE: SAFEGUARDED PARKING FOR 64 CAR PARKING SPACES		
DATE: 05/11/21	DRAWN BY: AH	CHECKED: FB

Appendix 6

Barfoot's Statement on Parking



Barfoots of Botley Ltd

Sefter Farm
Pagham Road
Bognor Regis
West Sussex
PO21 3PX

Fiona Bennett
Highgate Transportation Ltd
First Floor 43-45 Park Street
Bristol
BS1 5NL

[By email]

5th November 2021

Dear Fiona,

Proposed Packhouse – Car Parking
Land at Barfoots of Botley Ltd, Sefter Farm Site, Pagham Road, Arun
Application Ref: P/117/21/PL

Comments were received from National Highways (formerly Highways England) on 15th September 2021, which set out that a car parking accumulation exercise is required if it is the intention to not provide the additional 64 parking spaces.

Firstly, I can confirm that the proposed new packhouse will not result in any net staff increase. Therefore the status quo of car parking provision on site is considered sufficient.

Secondly, as set out in Highgate's Transport Statement (HTp/2167/TS/01, July 2021), it has been confirmed that we are safeguarding land for the 64 car parking spaces identified in any event, to be located to the immediate south of the new parking area. We are therefore committed with this planning application to provide these parking spaces should they be necessary in the future.

I can reiterate that the requirement for the packhouse floor area increase is due to the automation of the processing, which necessitates the need for more floor area.

I can also confirm that the current car parking facilities on site are not at capacity. Currently, 219 marked car parking spaces are provided throughout the site. As part of this application for the packhouse extension, it is proposed to relocate 190 car parking spaces (i.e. the existing main car park) to the new car park with the remaining 29 car parking spaces being retained in their current locations. A plan HTp/2167/04 has been provided to demonstrate the car parking on site.

Therefore, given that the current car parking is not at capacity, land will be safeguarded for the 64 car parking space identified, and there will be no net staff increase associated with the automation, it is considered that there is no need for a car parking accumulation exercise to be carried out by Highgate Transportation.

We trust that this is the information that you require.

Yours sincerely,

Julian Marks
Group Managing Director