

Recommendation Report for Planning Permission

REF NO: 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.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION

The packhouse will be single storey but with a two-storey height of 7.75m to the eaves & 10m to the ridge. The roof is formed of two 8 degree pitched roofs with a central valley. Together with the single storey flat roofed office/welfare floorspace on the northern end and a single storey flat roofed plant room on the eastern side, the built area has a maximum width of 70.05m and a maximum length of 99.22m with an overall floor area of 6,302m² (the pack house being 5,670m²). Solar panels are indicated to the roof.

A service yard will be constructed to the west of the new building between it and the existing production building (on the existing car park). This will have 6 loading docks from the new building and a forklift charging shelter is shown.

The construction of the packhouse requires the relocation of existing staff parking to an adjoining field to the immediate east. This relocated car park will provide for 190 cars (including 6 disabled spaces) and there will be a separate cycle (30) and motorcycle (16) store on the northern side. There will be a new access to this car park from the existing main site road. The application includes new landscaping, new pedestrian paths and a new internal roundabout on the site road. An additional future parking expansion area is shown but does not form part of the application.

The application states the additional accommodation is required to improve the efficiency and resilience of existing agricultural enterprise and is in response to a rapidly changing agricultural sector specifically in the whole food production supply chain due to a number of factors including, but not limited to, Brexit and Covid. It will enable the development of automated production systems and allow additional on-site storage for vegetables.

SITE AREA	2.5 hectares.
TOPOGRAPHY	Predominantly flat, the land rises slightly from north to south.
TREES	None affected by the proposed development.
BOUNDARY TREATMENT	The proposals are in a complex of agricultural buildings which have no direct boundary treatments. The boundary to the Pagham Road is formed by a low post and rail fence with a 2.5-3m high hedge in front.
SITE CHARACTERISTICS	The site forms part of an agricultural production facility where produce is grown, dried, stored and packed for market. The site of the new packhouse and relocated car park is part of a larger agricultural field. The new service yard will be on the existing 190 space staff car park and an existing site road.
CHARACTER OF LOCALITY	The site is in a rural location in the countryside and a defined settlement gap. The site is surrounded by open arable land used for horticultural production. The nearest residential properties are 1 & 2 Sefton School House approx. 158m southeast.

RELEVANT SITE HISTORY

P/107/17/PL	Extension of existing building	ApproveConditionally 01-12-17
P/76/16/PL	Construction of a building for the packaging, preparation & distribution of fresh foods with ancillary accommodation associated with the existing horticultural business, revisions to internal access road, car parking & hardstanding areas & landscaping & provision of a wetland. This application affects the setting of Listed Buildings.	App Cond with S106 09-06-17
P/68/15/PL	Glasshouse, balancing pond/irrigation storage, staff facilities, water tanks, security fence & access road. This application affects the setting of a Listed Building.	ApproveConditionally 21-10-15
P/105/14/PL	Demolition of agricultural store & extension to agricultural building	ApproveConditionally 25-02-15

Various relatively recent approvals including a distribution building to the south of the main building, glasshouse and balancing ponds and other building extensions. P/68/15/PL approved permission for a large glasshouse (135m wide by 240m long by 6.8m high) on the existing agricultural field on which the packhouse and car park will be located. This permission has been part implemented by the reservoir to the south of this field. The glasshouses therefore could be implemented at any time in the future.

P/76/16/PL approved permission for a packhouse building to the immediate west of the proposed one and has been implemented. This building is 10.3m to the ridge (6.4m to the eaves) and has a floor area of 5400m² with additional 600m² (plant room) and 2160m² (offices).

REPRESENTATIONS

Pagham Parish Council state no objection but raise concern that the future automation of the site will expand production and result in greater vehicle movements in future. Also have concerns with highway safety due to the number of vehicle accesses onto Pagham Road.

One objection from a nearby resident (Rookery Farm) on the grounds of harm to existing views of the South Downs to the north and increased noise disturbance. The objector raises concerns about compliance with certain Arun Local Plan policies (HOR DM1, GI SP1, LAN DM1, SO DM1, QE SP1 & QE DM3) and why the permission ref P/68/15/PL has only been part implemented (i.e., the reservoir not the glasshouses). Concern is raised as to the lack of advertisement of the application and lack of pre-application community consultation.

COMMENTS ON REPRESENTATIONS RECEIVED:

Highway safety & vehicle movements plus noise disturbance are discussed in the report's conclusions. There is no right in planning law to a view and therefore this is not considered (although landscape impact is). The policies referred to by the objector are considered in the conclusions except in respect of policy GI SP1 as although this site is within a strategic gap (which will be considered) it does not lie within a designated biodiversity area or a biodiversity opportunity area. It is not a planning requirement that applicants carry out community consultation prior to submission although it is to be encouraged. It is acceptable for planning applications to only be partially implemented.

The application was advertised by site notices and an advert in the West Sussex Gazette. Site notices are to be displayed to advertise the application to land adjoining the application site and so notices were placed on Pagham Road near the site entrance and adjacent to no. 1 Sefton School House.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

NATIONAL HIGHWAYS - Initially requested further information concerning traffic impacts on the A27 and on-site car parking.

WSCC MINERALS & WASTE SAFEGUARDING - states that a full assessment against waste safeguarding policies will not be necessary here given the site already shares infrastructure that is of a similar use to the proposal, and the access to the Anaerobic Digester plant appears to be maintained/improved. Therefore, considers that the proposal broadly complies with Policy W2 of the WLP in that the proposal would not likely prevent or prejudice the established waste infrastructure.

WSCC HIGHWAYS - Initially requested further information concerning trip generation, HGV flow through the site, car parking and travel plan information. Commented that:

- Pagham Road is rural single carriageway subject to 60mph.
- No traffic accidents directly related to the site access.
- Car and HGV tracking of the access has been provided and this is anticipated to work as per existing

arrangements.

- Under P/76/16/PL improvements to forward visibility along Pagham Road were proposed by cutting back vegetation within the public highway.
- The packhouse is proposed to allow more automated systems to develop and that no new staff are proposed.
- 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/PL the LHA surmised that a best case 70 additional two-way trips and worst case 237 additional two-way trips per day could occur.
- 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.
- There are 219 total parking spaces on the site.
- A condition will be required to secure the details of cycle & motorcycle storage and electric vehicle charge points; and
- There is a bus stop 270m south on Pagham Road and the site is also served by a minibus and stagecoach service subsidised by the applicant. A cycle to work scheme exists and car sharing is promoted.

WSCC FIRE & RESCUE - states that the nearest fire hydrant is 160m further away than is required. State that should an alternative supply of water for firefighting be considered it will need to conform with the details identified in Approved Document - B (AD-B) Volume 1 2019 edition: B5 section 14. Do not request a condition.

CHICHESTER DISTRICT COUNCIL - make no comments.

ADC LANDSCAPE OFFICER - no objection subject to a landscaping condition:

- The site is surrounded by existing packhouses and associated reservoirs to the north and west with improved grassland / arable farmland to the south and east.
- Pagham Harbour lies over 2km to the southwest and is a designated SSSI, SPA and LNR.
- South Downs National Park and ANOB to the north.
- The proposed site layout plan makes reference to an indicative landscape zone to the south of the proposals; this is not shown in detail and will be required to be submitted plan form detailing the proposals and biodiversity net gain calculations.
- A LVIA has been submitted with this application and the viewpoints would appear suitable for location; and
- The potential impact of the proposals would blend into the surrounding environment and existing commercial presence in this location with confirmation of the proposed landscape offer and greening to counteract this.

ADC ENVIRONMENTAL HEALTH - no objection subject to conditions requiring an acoustic verification test and to control construction hours.

ADC DRAINAGE ENGINEERS - no objection subject to the standard drainage condition:

- It is proposed that surface water from the new development will be utilised within the existing reservoirs on the site which provide water for irrigation purposes on the farm; and
- This would be acceptable but needs further scrutiny and testing of groundwater levels.

ADC CONSERVATION OFFICER - no objection and comment that:

- To the north of the application site is Seftor Farmhouse which is a Grade II Listed Building.
- The farmhouse sits alongside a large group of industrial/agricultural type buildings used for the cleaning, preparation, packaging & distribution of vegetable & salad products, along with ancillary office & other accommodation.
- Further to the south (some 500m or so) is Rookery Farmhouse, also Grade II Listed.
- The proposed new building will be some 80m from the listed farmhouse and there is a pair of more modern farm cottages, car park, other buildings & two internal access roads as well as a well-established hedge and tree belt in the intervening space.
- It would appear that there are no obvious viewpoints where the listed Seftor Farmhouse and the new building would be viewed together in such a way which might impact upon its setting.
- Rookery Farmhouse is some 500m away from the application site, which would remain separate from it by surrounding agricultural land (which helps to inform how it is understood). As a consequence, it would not be adversely impacted.
- The application will not cause harm to the significance of the heritage asset or its setting and so should be determined in accordance with the relevant policies within the Development Plan, along with these comments.

COUNCILS ARCHAEOLOGIST - states that it is unlikely that this site contains archaeological interest of such importance that development of it should be prevented but that investigation is required and should be secured by a condition.

No responses from the Councils Ecologist or Economic Development Officer.

COMMENTS ON CONSULTATION RESPONSES:

Noted unless discussed below.

NATIONAL HIGHWAYS - Following the submission of further information, National Highways were re-consulted on 08/11/21 and they have now stated that they are satisfied that the proposals will not have a material or detrimental impact on the operation of the strategic road network. Conditions required to secure a Construction Traffic Management Plan and Travel Plan. Also state that any future planning application for the extra spaces should be subject to consultation with NH.

WSCC HIGHWAYS - Following the submission of further information, WSCC Highways were re-consulted on 08/11/21 and they have confirmed that subject to Arun DC imposing a condition to restrict the new building to a packhouse used in connection with a horticultural or agricultural use (and for no other purpose within class B8) then they are content with the trip assessment data that has already been provided. They raise no highway safety or capacity concerns but advise that further to their previous comments, car parking should also be secured by condition and a travel plan with a fee of £3500 (for monitoring and auditing of the Travel Plan) by a s106 Agreement. These final comments were made on the basis of the following points put to them by the planning officer (which were informed by an email from the applicant):

- No part of the use is general industrial (B2).
- The application form does list some industrial processes (refrigeration & humidity control), but these would be typical on any form of food storage place.
- B8 is the more likely use due to the site storing, packing, and distributing vegetables/salad.
- However, if the site were simply considered as a B8 use then it could in future become some sort of distribution centre for other goods in a location less suited to such a use.
- It is currently in this location because it is connected with an existing horticultural/agricultural use and the products are grown on adjoining land.

- It is proposed to restrict by condition the use of the new building to a packhouse used in connection with a horticultural or agricultural use (and for no other purpose within class B8).
- This could allow a horticultural operator other than Barfoots to operate from the site but the traffic profile from one horticultural operator to another would not be materially different.
- There is no record of the travel plan condition imposed on P/76/16/PL having ever been discharged.

WSSC FIRE & RESCUE - This will be added as an informative.

POLICY CONTEXT

Designations applicable to site:

Outside the Built Up Area Boundary (BUAB);
Strategic Gap (Bognor Regis to Chichester);
CIL Zone 5;
Waste Consultation Area;
Current & Future Flood Risk Zone 1;
Grade 2 Agricultural Land;
Pagham Harbour Zone B;
Subject to the Councils Horticultural Local Development Order; and
Grade II Listed Buildings on site;

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

CSP1	C SP1 Countryside
DDM1	D DM1 Aspects of form and design quality
DSP1	D SP1 Design
ECCSP1	ECC SP1 Adapting to Climate Change
ECCSP2	ECC SP2 Energy and climate change mitigation
ENVDM2	ENV DM2 Pagham Harbour
ENVDM5	ENV DM5 Development and biodiversity
HERDM1	HER DM1 Listed Buildings
HERSP1	HER SP1 The Historic Environment
HORDM1	HOR DM1 Horticulture
LANDM1	LAN DM1 Protection of landscape character
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QESP1	QE SP1 Quality of the Environment
SDSP3	SD SP3 Gaps Between Settlements
SODM1	SO DM1 Soils
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TSP1	T SP1 Transport and Development
WDM3	W DM3 Sustainable Urban Drainage Systems

[West Sussex Waste Local Plan 2014:](#)

West Sussex Waste W2 Safeguarding Waste

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PLANNING POLICY GUIDANCE:

NPPDG	National Design Guide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021
PDS	Pagham Parish Council's Village Design Statement by PaghamPC

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Where applicable, Neighbourhood Development Plan's, once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area. There is no current Pagham Neighbourhood Plan to consider as the emerging Plan was withdrawn in September 2020.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to comply with the relevant policies as it is appropriate development in the countryside (and within a strategic gap), will not result in any harm to the safety & convenience of the highway, will have only a limited impact on agricultural land, will not adversely affect the landscape or nearby heritage assets or the amenities of nearby residential dwellings, will not adversely affect safeguarded waste sites and will not harm biodiversity.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

(2) in dealing with an application for planning permission the authority shall have regard to -

- (a) the provisions of the development plan, so far as material to the application,
- (aza) a post examination draft neighbourhood development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

"In considering whether to grant Listed Building Consent for any works, 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."

The proposal is considered to comply with these criteria in that it is not considered to materially affect the character or the setting of the nearby Grade II Listed Buildings.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are other material considerations to be weighed in the balance with the Development Plan and these are discussed in the reports conclusions.

CONCLUSIONS

PRINCIPLE:

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

Arun Local Plan (ALP) policy C SP1 states development in the countryside outside the BUAB will be permitted if it accords with other policies in the Plan which refer to a specific use or type of development. ALP policy HOR DM1(1) permits new packhouse development associated with horticultural uses subject to 12 different criteria.

The policy preamble also makes it clear that horticultural development includes horticultural-produce packing facilities. It is also noted that the Barfoots site (including the application site area) is included within the Councils Horticultural Local Development Order which seeks to support the horticultural sector by allowing certain works without the need for planning permission.

Parts (a) to (b), (d) & (f) to (i) of HOR DM1 are analysed in more detail elsewhere in this report but it is concluded that the proposal complies with these criteria as there will be no harm to the landscape/to local character, no harm to biodiversity, no harm to heritage assets, surface water drainage will be accommodated, no harmful impact on the free-flow & safety of local highways, no harm to residential amenity and no harmful noise or light pollution. The following is an assessment of the other criteria.

Part (c) requires that water/soil/air pollution is within regulated acceptable limits. The existing food production operation is highly regulated, and no polluting processes or products are proposed. The application states that any impacts will be subject to independent third-party scrutiny. It is also noted that the Councils Environmental Health Officer raises no concerns regarding air pollution.

Part (e) requires that there be adequate water resources available. The applicant already has significant water storage capacity on site which is required for both irrigation and some of the production processes. It is also understood that water is widely harvested, stored, and recycled at Sefter Farm as it is a valuable resource for the business. The demands of the new packhouse will be met by the existing water provision.

Part (j) concerns proposals relating to the removal of glasshouses or packhouses and is not relevant to this proposal. Part (k) requires that landscaping details be provided. The application makes reference to an indicative landscape zone to the south of the proposals and whilst this is not shown in detail, a condition can be imposed to require the submission of a detailed plan. Part (l) concerns impacts on soils, and this is assessed elsewhere in this report. There is conflict with this part of the policy because the required supporting documentation has not been provided but it is concluded that there are material considerations to outweigh this conflict and that a condition can be imposed to ensure the protection of

soils.

Overall, it is considered that the proposal is in broad accordance with the requirements of ALP policy HOR DM1 and as such is in accordance with the countryside policy.

STRATEGIC GAP POLICY:

The site also lies within a designated Strategic Gap and ALP policy SD SP3 states development in strategic gaps will only be permitted where it meets certain criteria.

The proposal complies with the policy as the site is already developed and part of an existing long established food production facility so there will be no effect on the integrity of the gap or the physical/visual separation of settlements. Also, for the same reasons the packhouse and relocated car park have to be sited in this location. The proposed building will be very large and thus have an impact on the surrounding landscape however, given it is sited near to other existing large buildings and within a 'complex' of existing buildings, it would not compromise the integrity of the gap to such an extent as to justify withholding planning permission.

The Pagham Village Design Statement (2007) states that only in exceptional circumstances will consent be given for change of use development within strategic gaps outside the built-up area, where such development will demonstrably serve the needs of the community. The proposal is not in accordance with this as there is no justification against the needs of the local community. However, the Design Statement predates the ALP and is not part of the development plan itself.

AGRICULTURAL LAND:

The new packhouse and the relocated car park are to be sited on part of a large existing agricultural field used for the growing of crops. The land is designated as grade 2 agricultural land as per Natural England's "Provisional Agricultural Land Classification Grading system" (ALC).

The ALC is not based on site specific surveys but instead is assessed using various criteria including temperature, rainfall, aspect, exposure, frost risk, gradient, micro-relief, flood risk, soil depth, soil structure, soil texture, ground-based chemicals, and stoniness. The ALC uses a grading system to assess and compare the quality of agricultural land at national, regional, and local levels. It assesses the potential for land to support different agricultural uses, such as growing crops for food however, it does not consider the land's current use or intensity of this use.

ALP policy SO DM1 considers soils and states: "Unless designated by this Plan or a Neighbourhood Development Plan, the use of Grades 1, 2 and 3a of the Agricultural Land Classification for any form of development not associated with agriculture, horticulture or forestry will not be permitted unless need for the development outweighs the need to protect such land in the long term." As the proposal is for a form of horticultural development, there is no conflict with the policy.

As discussed above, part (I) of ALP policy HOR DM1(1) also states that the applicant must submit sustainability & options appraisals, mitigation measures, and a soil resources plan for the development site. None have been provided but the application does state that the car parking area will be as un-engineered as possible and will comprise a shallow scrape overlain by compacted type 1 limestone scalplings. Further, that the soil take will be limited and as a precious farming resource, it will be stored and re-used across the farm holding. A condition could be imposed to require the submission of a soil resource plan for the specific site, and this would ensure that the valuable soils are safeguarded, protected, and reused.

It is material that the site is within the Horticultural Local Development Order, and this allows for the extension of existing packhouses, new reservoirs and associated plant or engineering operations without planning permission. This would not allow for the new packhouse as proposed by this application, but it would allow for other development within the existing agricultural field. In particular, it would allow for a parking area of up to 1 hectare in area. In addition, it is material that the field is subject to a part implemented planning permission (P/68/15/PL) which would allow for a large glasshouse development on it.

HERITAGE:

There are two Grade II Listed Buildings (Sefter Farmhouse & its associated Granary) within the wider Barfoots site and the nearest is approx. 80m from the edge of the new building. It is noted that the objector's property is a Listed Building (Rookery Farmhouse), but it is 500m from the site and as per the comments of the Conservation Officer, the proposal is not considered to affect its setting.

ALP policy HER SP1 states development likely to prejudice heritage assets and their settings will be refused. Policy HER DM1 requires that proposals protect and, where possible, enhance the setting of Listed Buildings. Policy HOR DM1 states that proposals should relate sympathetically to the historic environment. The NPPF provides guidance on how to determine impacts on heritage assets.

Para 194 requires applicants to describe the significance of heritage assets affected, including any contribution made by their setting. Para 195 then requires Local Planning Authorities to identify and assess the particular significance of the heritage asset that is affected by a proposal. The Local Planning Authority must then consider the level of harm associated with the proposal and decide whether there is no harm, 'less than substantial harm' or 'substantial harm'. It is then necessary to counterbalance any harm with the level of public benefits associated with the proposal (as set out in para 202).

The submitted Planning Statement includes a Heritage Statement, and this states that:

- Sefter Farmhouse is of high significance, although clearly not the highest.
- The application site falls outside the curtilage of the listed building.
- The listed building was originally a traditional farmhouse & granary and continues to be used for residential purposes.
- Its setting is compromised to a degree by existing buildings, most notably the main production building, which is about 15 metres from the listed building, is of modern appearance and is significantly larger in scale.
- The proposed new packhouse is some 80m from the farmhouse and there is a pair of more modern farm cottages, car park, other buildings & two internal access roads in the intervening space: and
- 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.

The Council's Conservation Officer has assessed the proposal and states that the proposal will not result in any harm to the nearby heritage assets. As such, it is not necessary to assess the application benefits per para 202. The proposed development will not adversely affect the heritage assets or their settings.

The proposal is in accordance with ALP policies HER SP1, HER DM1 and the relevant criteria of HOR DM1(1). The proposal also complies with section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as it is not considered to materially affect the character or the setting of the nearby Grade II Listed Buildings.

ARCHAEOLOGY:

The site lies in a designated archaeological notification area. ALP Policy HER DM6 states where a site on which development is proposed has potential to include heritage assets with archaeological interest, permission will only be granted where it can be demonstrated development will not be harmful to archaeological interest. The policy requires a desk based archaeological assessment be submitted.

The applicant has provided the results of an Historic Records Search 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 partly disturbed through various construction phases within the main building group. The parking area will involve very little excavation on land that has already been assessed and approved for other development (new glasshouses). A copy of the archaeological assessment undertaken in respect to the previous part implemented application has also been provided.

The Council's Archaeologist has assessed the application and agrees that it is unlikely that this site contains archaeological interest of such importance that development of it should be prevented. However, it is stated that an investigation is still required and should be secured by a condition. Provided such a condition is imposed, there would be no conflict with the policy.

WASTE SAFEGUARDING:

The site is within a 500m buffer area of a safeguarded waste site defined by the West Sussex Waste Local Plan (2014). Policy W2 of this Plan states that development should not prevent or prejudice the use of an existing waste management site. The waste site is the existing Barfoots anaerobic digester (AD) plant which is southwest of the proposed site on the western side of a large reservoir. WSCC have assessed the application and consider that there is no conflict with the policy as the proposal is the same use as what is already on the site and the access to the AD Plant will be maintained and improved.

HIGHWAY SAFETY & PARKING:

ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport. Schemes should accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, be accessed by high quality public transport facilities, create safe and secure layouts for traffic, cyclists and pedestrians and provide appropriate levels of parking.

Policy T DM1 requires new development be located in easy access of established non-car transport modes/routes. Part (g) of HOR DM1(1) is also relevant as it requires that new horticultural development provide adequate vehicle access, uses roads suitable for HGV's and does not result in any safety impacts. The Council also has a Parking Standards SPD although this does not have any specific standards for packhouse type storage uses.

Para 110 of the NPPF states: "In assessing .. specific applications for development, it should be ensured that: (b) safe and suitable access to the site can be achieved for all users". Para 111 states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

There is no conflict with policy T DM1 as the proposal is to an existing food production site which is accessible by bus, on foot and by cycle. The application states that:

- The proposed development seeks to rationalise Barfoot's operation, so although new floorspace is proposed, this will avoid the existing need to utilise three existing off-site storage sites with transport

movements in between.

- As such, there will not be an increase of trip generation associated with the proposed packhouse.
- The processes within the new building will also be highly automated and therefore will be less reliant on individual operatives (indeed, the application form states no new employment).
- Barfoots partly fund three existing bus services and these along with other sustainable ways to access the site mean that there is a current over capacity of spaces: and
- The parking area is therefore the same size as the one it replaces but an area has been safeguarded for future parking (64 spaces) should the need arise.

Following the submission of further information, both WSCC Highways and National Highways are satisfied that there will be no adverse impacts on the safety and convenience of the highway network. In respect of the WSCC comments, key to this is that the applicant is willing to accept a condition to restrict the new building to a packhouse used in connection with a horticultural or agricultural use (and for no other purpose within class B8). This condition will prevent the building from being used for other storage & distribution uses which may have a different operating profile and a greater impact on the highway network. The proposed use is for storage and packing of items grown on the property thus reducing the amount of large vehicle traffic to the site (although vehicles will still need to access the site to collect & distribute food goods).

The application will be subject to a s106 Agreement to require the submission and monitoring of a Travel Plan. This will ensure that the site and the specific development continue to promote sustainable transport in accordance with ALP policy T SP1 (recognising that Barfoots already partly fund three existing bus services). WSCC Highway have no objections to the proposed parking provision. The proposal is therefore in accordance with ALP policies T SP1, T DM1 & HOR DM1(1) and with the guidance in the NPPF.

LANDSCAPE, CHARACTER & DESIGN:

ALP policies D SP1 and D DM1 require development make the best possible use of land by reflecting or improving on the character of the site/surrounding area. Policy LAN DM1 states development should respect the particular characteristics & natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas. The Arun Design Guide is a material consideration and section Q discusses rural development which sets out the need for development to integrate into the landscape setting, respect rural character and use simple, unobtrusive design.

Parts (a), (b) & (d) of HOR DM1(1) are relevant and require that development would not significantly damage the character or appearance of the surrounding landscape, it relates sympathetically to the natural and built environment and does not affect long public views across substantially open land.

It is material to note that there is an existing packhouse building on the site to the immediate west and that this has similar dimensions to the proposed one. The existing is 10.3m to the ridge whereas the new building will be 10m but the eaves on the existing is 6.4m and the proposed is 7.75m. This difference is due to there being a different roof pitch angle. The existing does have a smaller total floor area and is not as wide but it is very similar in length. There are further existing large buildings to the immediate northwest of the new building. Furthermore, as noted elsewhere there is an extant permission for glasshouses on the site and these would be 6.8m high.

The application is accompanied by a Landscape & Visual Impact Assessment (LVIA) which states that:

- The design, height, and materials of the proposed packhouse, will match the buildings already on site, and integrate with the existing farm complex.

- The blue profile cladding walls and grey profile roof sheeting will recede in views against pale skies.
- The design reflects the characteristics of the existing farm buildings in terms of scale, massing, character, materials, and finish.
- New hedgerow planting will enclose the new packhouse and car park from views to the south, north & east.
- Post construction, there will be a minor adverse impact on the Chichester to Yapton coastal plain character area and a minor to slight adverse effect to Pagham Road.
- Following 15 years growth of the landscaping, the residual landscape effects will comprise a slight neutral effect to the coastal plain character area, a minor beneficial effect to the application site landscape features, a slight adverse to neutral effect to Pagham Road, a slight neutral effect to Hook Lane, and no effect to footpaths to the northeast, north-west and south-west of the site.
- The proposal will only be partially visible or glimpsed in limited local viewpoints, and will generally be screened or partially screened by existing vegetation or the existing buildings; and
- There will be no significant post construction or residual effect on the landscape or on views from a public or private location.

The Councils Landscape Officer has assessed the proposal and raises no objections subject to a landscape scheme being secured by conditions. The Officer states that the potential impact of the proposals would blend into the surrounding environment and existing commercial presence in this location.

It is considered that the proposed new buildings are appropriate in design, size, and materials to this rural but developed location. The proposed car park will be at ground level and will be screened from view from Pagham Road by the existing hedge and will have very limited visibility in the wider landscape. The car parking will also have a much lesser impact than the approved glasshouses. Overall, there will be some impact on the landscape, but this will not be significant and will fade over time as the landscaping and other existing vegetation matures. The proposal is in accordance with policies D SP1, D DM1, LAN DM1 & HOR DM1(1) and the Design Guide.

RESIDENTIAL AMENITY & POLLUTION:

ALP policy D DM1 requires there be minimal impact to users/occupiers of nearby property and land. Policy QE SP1 requires all development contribute positively to the quality of the environment and ensure development does not have a significantly negative impact on residential amenity.

ALP policy QE DM1 states new noise generating development should demonstrate there are no suitable alternative locations for the development and provide a noise report. Policy QE DM2 requires that new lighting should not have adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation. Parts (h) & (i) of HOR DM1(1) state that new horticultural development should minimise harm to residential amenity and the landscape from lighting and noise.

The application is accompanied by a Sound Level Impact Assessment which concludes that the proposed moving of the yard area further to the east could potentially impact the nearest dwelling (Old Sefter School House to the south-east) but that this needs to be tested once works have been completed and then it may be necessary to implement mitigation measures. There may also be a greater impact to other residential properties in the wider landscape but if the impact is found to be acceptable to the closest residential property, then there will be no harm to others.

The Councils Environmental Health Officer has assessed the proposal and raises no objections on grounds of noise or light. A condition is recommended to ensure that the predicted noise levels at nearby noise sensitive receptors are tested post completion. All new required plant will be fully acoustically

enclosed within the single storey part of the building on the east side.

In respect to lighting, the planning statement recognises the need to minimise the effects of lighting on the surrounding open countryside but also states that lighting is necessary to enable safe working particularly during the winter months. It is proposed that new lighting be no greater in scope than the existing and that the car park only have low level lighting. A condition would be imposed to control the new details of lighting, and this would also ensure that lighting does not adversely affect biodiversity.

The proposal is in accordance with ALP policies D DM1, QE SP1, QE DM1, QE DM2 and HOR DM1(1).

SURFACE WATER DRAINAGE:

The site is not affected by flooding from rivers/sea and is not predicted to be so in the future. ALP policy W DM3 states all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS) as appropriate to the size of development. In addition, part (f) of policy HOR DM1(1) requires that adequate surface water drainage capacity exists or can be provided as part of the development.

The application states that the site geology is of low permeability and so rainwater will be harvested from the car park (using porous paving) and the packhouse to the farm's reservoir network for agricultural water supply. This will avoid any increase in runoff from the development and reduce demand on the potable water supply into the site. ADC Drainage Engineers raise no objections in principle but request standard conditions as the applicant will still need to undertake groundwater testing. On this basis, there is no conflict with ALP policies W DM3 and HOR DM1(1).

BIODIVERSITY:

The site is approximately 1.9km from the Pagham Harbour SPA/Ramsar Site. There is no conflict with ALP policy ENV DM2 as although the site lies in the Pagham Harbour Zone B, mitigation is only required for residential developments as these may result in increased footfall in the SPA.

ALP policy ENV DM5 requires development schemes achieve a net gain in biodiversity and protect habitats on site. They shall incorporate elements of biodiversity such as green walls, roofs, bat, and bird boxes as well as landscape features minimising adverse impacts on existing habitat. In addition, part (b) of HOR DM1(1) requires that new development relate sympathetically to the natural environment.

The proposed building and relocated car park will be sited predominantly on an existing agricultural field. The application includes a detailed ecological assessment which assesses potential for impact to bats, dormice, great crested newts, badgers, other amphibians, water voles, nesting birds and reptiles. This notes that the application results in the loss of approximately 1.5ha of arable land, about 7m of hedgerow and 2m x 250m of grass-verge along the northern and western sides of the arable field. To compensate for this, the application proposes a 130m long new native hedge, a 5m wildflower margin along the length of this hedge and the restoration of a 2m x 100m wildflower margin running parallel to Pagham Road between the existing cycle track/footpath and the proposed new car park. These measures would also help to demonstrate biodiversity net gain, but conditions should also be imposed to secure new bird/bat/hedgehog nesting boxes in the wider site area.

The report finds that there is little potential for the presence of any protected species and so no harm to these. The reports recommends that lighting is controlled in the interests of bats, natural vegetation is removed outside of the bird breeding season and that a badger survey is conducted immediately prior to works commencing.

Subject to conditions being imposed, there would be no conflict with ALP policies ENV DM5 and HOR DM1(1).

CLIMATE CHANGE:

ALP policy ECC SP2 requires all new residential & commercial development be energy efficient and incorporate decentralised, renewable, and low carbon energy supply systems. Policy ECC SP1 requires new development be designed to adapt to impacts arising from climate change. The application states that:

- The applicant has an Anaerobic Digester (AD) Plant on the site which produces energy from vegetable waste and this energy will power the new facilities as with other parts of the Barfoots site.
- The proposal also includes photovoltaic panels on much of the proposed roof area.
- Water is collected from the site and recycled for use with site operation.
- Chilled areas of the packhouse will be highly insulated to allow lower temperatures to be maintained with minimum energy usage.
- High efficiency compressors and low energy led lighting will be used throughout the new building; and
- A submetering system is also in place for both power and water use to micro-manage consumption & increase efficiency.

Subject to the proposed new solar panels and measures internal to the building being secured by a condition, there would be no conflict with ALP policies ECC SP1 and ECC SP2.

SUMMARY:

Overall, the proposal is in accordance with the relevant policies, and it is concluded that the proposal will result in a development which is appropriate to this rural location and does not result in any adverse harm to any of the receptors identified in this report. It is recommended that permission is granted in accordance with the following conditions and the signed s106 Agreement.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership,

pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

SECTION 106 DETAILS

This decision will be passed subject to a s106 legal agreement to secure a Travel Plan and its associated monitoring fee (£3,500 at the time of writing) for monitoring and auditing of the Travel Plan.

CIL DETAILS

This application is not CIL Liable as it is for development not subject to the CIL Charging Schedule.

RECOMMENDATION

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

"Location Plan" dwg 001 Rev 02;
 "Proposed Site Layout Plan" dwg 005 Rev 10;
 "Proposed Floor Plan" dwg 011 Rev 06;
 "Proposed Elevations & Section" dwg 012 Rev 05;
 "Indicative Routes of HGV's Through the Site" dwg 03 (appendix 4 to the letter from Highgate Transportation - 05/11/21);
 "Car Park Access Visibility Splays" dwg 01 (appendix 4 to the Transport Statement - July 2021);
 "Car Park Access Swept Path Analysis" dwg 02 Sheets 1 & 2 (appendix 5 to the Transport Statement - July 2021); and
 "Swept Path Analysis HGV" dwg 03 Sheets 1 & 2 (appendix 6 to the Transport Statement - July 2021).

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policies D DM1, HER DM1, HOR DM1, QE SP1, C SP1, LAN DM1, ENV DM5 and T SP1 of the Arun Local Plan.

- 3 No construction activities shall take place other than from 08:00 hours until 18:00 hours (Monday to Friday) and from 08:00 hours until 13:00 hours (Saturday) with no work involving power tools or machinery on Sunday or Bank/Public Holidays. In addition to these hours of working, the Local Planning Authority may approve in writing a schedule of activities where it is necessary to conduct works outside the hours specified in this condition.

Reason: To protect the amenity of local residents in accordance with policy QE DM1 of the Arun Local Plan.

- 4 The new building shall be used as a packhouse for purposes in connection with the storing, packing and distribution of perishable food goods obtained through horticulture or agriculture and for no other purpose (including any other purpose in Class B8 of the Schedule to the Town & Country Planning (Use Classes) Order 1987 or in any provision equivalent to that

Class in any other Statutory Instrument revoking and re-enacting that Order).

Reason: To enable the Local Planning Authority to maintain control in the interests of the safety & convenience of the highway network in accordance with Arun Local Plan policies T SP1 and HOR DM1.

- 5 No development including site access, demolition or associated construction activities, shall take place on the application site unless and until a badger survey has been undertaken in order to ensure that badgers are not using the site. If a badger sett is found on the site, then the applicants shall provide a mitigation strategy to the Local Planning Authority for approval in writing to be determined in consultation with Natural England.

Reason: To safeguard resident badgers in accordance with Policy ENV DM5 of the Arun Local Plan and the National Planning Policy Framework. It is considered necessary for this to be a pre-commencement condition because the commencement of development could result in harm to any badgers living within the site area.

- 6 No works (including site clearance and/or preparation) shall commence on the development hereby permitted until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority (who shall consult with National Highways). The construction of the development shall be carried out in accordance with the approved Construction Management Plan unless otherwise agreed in writing by the Local Planning Authority (who shall consult with National Highways). In particular, but not limited to, we would wish to see the following information contained within the plan:

- the anticipated number, frequency, types and timing of vehicles used during construction (construction vehicles should avoid the network peak hours of 0800-0900 and 1700-1800 where practicable);
- the parking of vehicles by site operatives and visitors (which must not be within the highway boundary);
- the loading, unloading and storage of plant, materials and waste (which must not be within the highway boundary);
- the erection and maintenance of security hoarding or other appropriate security barriers;
- measures to reduce dust, dirt and any other airborne contaminants and to reduce as far as reasonably possible these passing beyond the site boundaries, which shall include sheeted loads and dampening stockpiles; and
- measures to reduce dust and dirt being deposited on the highway, including wheel washing and sheeted loads.

Details of how measures will be put in place to address any environmental problems arising from any of the above shall be provided. A named person shall be appointed by the applicant to deal with complaints, shall be available on site and their availability made known to all relevant parties.

Reason: To ensure that construction of the development does not result in avoidable congestion and disruption on the A27 Trunk Road, to ensure that the A27 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety in accordance with policies QE SP1, W DM1 and T SP1 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to have the construction site set-up agreed prior to access by construction staff.

- 7 Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved

in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

- 8 No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Local Planning Authority.

Reason: The site is of archaeological significance in accordance with Arun Local Plan Policy HER DM6. This is required to be a pre-commencement condition because the commencement of construction work could harm any archaeology within the site area.

- 9 At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources (as described in the glossary at Annex 2 of the National Planning Policy Framework) unless it can be demonstrated that a fabric-first approach would achieve an equivalent energy saving. Details and a timetable of how this is to be achieved for each phase or sub phase of development, including details of physical works on the site, shall be submitted to and approved in writing by the Local Planning Authority before any development in that phase or sub phase begins. The development shall be implemented in accordance with the approved details and timetable and retained as operational thereafter.

Reason: In order to secure a reduction in the use of energy at the site in accordance with national planning policy and policy ECC SP2 of the Arun Local Plan. This is required to be a pre-commencement condition because the approved measures may need to be built into the fabric of the buildings.

- 10 Prior to the commencement of development or any preparatory works, a Soil Resources Plan shall be submitted to the Local Planning Authority for approval in writing. The Soil Resources Plan shall demonstrate measures to be taken to ensure that the on-site soil resource will be preserved and reused either within the development area or elsewhere on the property. Thereafter, the approved soil resources plan shall be implemented and adhered to throughout the construction of the development hereby permitted.

Reason: To protect and retain the valuable on-site soils in accordance with Arun Local Plan policy SO DM1. This is required to be a pre-commencement condition because otherwise the soils may be lost in the construction of the site.

- 11 No development above damp proof course (DPC) level shall take place until there has been submitted to, and approved by, the Local Planning Authority, a landscaping scheme including details of hard and soft landscaping and details of existing trees and hedgerows to be retained, together with measures for their protection during the course of the development. The approved details of the landscaping shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development,

whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of amenity and of the environment of the development in accordance with policy D DM1 of the Arun Local Plan.

- 12 No part of the development, hereby approved, shall be occupied until provision for parking and turning of cars associated with the development has been provided in accordance with the approved plans. Provision should thereafter be maintained solely for the purpose of the parking and turning of vehicles clear of the highway.

Reason: To ensure that adequate provision for the parking and turning of vehicles is provided for the development in accordance with policy T SP1 of the Arun Local Plan and the National Planning Policy Framework.

- 13 No part of the development shall be first occupied until covered and secure cycle parking spaces for the individual houses have been provided in accordance with plans and details submitted to and approved by the Local Planning Authority. No details are required for the proposed flats as the communal store has been approved through the application decision.

Reason: To provide alternative travel options to the use of the car in accordance with Local Plan policies T SP1 & T DM1 and the National Planning Policy Framework.

- 14 Prior to the occupation of any part of the development, a scheme for the provision of facilities to enable the charging of electric vehicles to serve the new parking area shall be submitted to the local planning authority for approval and thereafter implemented in accordance with the approved details and the charge points shall thereafter be permanently retained and maintained in good working condition.

Reason: New petrol, diesel and hybrid cars/vans will not be sold beyond 2030, and to mitigate against any potential adverse impact of the development on local air quality, in accordance with policy QE DM3 (c) of the Arun Local Plan, the Arun Parking Standards SPD and the National Planning Policy Framework.

- 15 Prior to first use of the new packhouse, the applicant shall submit an acoustic verification test in writing to the LPA for approval in writing. The test must verify that the noise levels detailed in BS8233:2014 for external recreational areas and internal noise levels are met at the nearest sensitive receptor. If the BS8233:2014 noise levels are not met, then a noise assessment in accordance with BS4142+A1:2019 shall be submitted in writing to the Local Planning Authority for approval in writing to include recommendations for noise mitigation if required. The agreed mitigation measures shall be implemented and maintained thereafter.

Reason: To protect the amenity of nearby local residents in accordance with policy QE DM1 of the Arun Local Plan.

- 16 Prior to the occupation of any part of the development, full details of all new external lighting (including type of light appliance, the height and position of fitting, predicted illumination levels and light spillage) shall be submitted to and approved in writing by the Local Planning Authority. The scheme should seek to conform with the recommendations of the Institution of Lighting Professionals (ILP) "Guidance Notes for the Reduction of Obtrusive Light" (GN01:2011) but also minimise potential impacts to any bats using trees and hedgerows by avoiding unnecessary artificial light spill through the use of directional light sources and shielding. The lighting approved shall be installed and maintained in accordance with the

approved details.

Reason: In the interests of the amenities of the area, the site biodiversity (particularly in respect of bats), the interests of minimising crime and to minimise unnecessary light spillage outside the development site in accordance with policies QE SP1, QE DM2 & ENV DM5 of the Arun Local Plan.

- 17 If during development, any visible contaminated or odorous material, (for example, asbestos containing material, stained soil, petrol/diesel/solvent odour, underground tanks or associated pipework) not previously identified, is found to be present at the site, no further development (unless otherwise expressly agreed in writing with the Local Planning Authority) shall be carried out until it has been fully investigated using suitably qualified independent consultant(s). The Local Planning Authority must be informed immediately of the nature and degree of the contamination present and a method statement detailing how the unsuspected contamination shall be dealt with must be prepared and submitted to the Local Planning Authority for approval in writing before being implemented. If no such contaminated material is identified during the development, a statement to this effect must be submitted in writing to the Local Planning Authority.

Reason: To ensure that the development complies with approved details in the interests of protection of the environment and prevention of harm to human health in accordance with Arun Local Plan policies QE SP1 and QE DM4.

- 18 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.
- 19 INFORMATIVE: This decision has been granted in conjunction with a Section 106 legal agreement relating to the provision of a Travel Plan and its associated monitoring fee (£3,500 at the time of writing) for monitoring and auditing of the Travel Plan.
- 20 INFORMATIVE: The Travel Plan/Framework Travel Plan must include sufficient detail regarding how they will be implemented, and their effectiveness monitored. They should contain details of the mechanisms to be used to review the Plans and introduce amended and/or new actions to achieve the stated intentions, if monitoring suggests their intentions are not being achieved.
- 21 INFORMATIVE: Any future provision of the safeguarded parking area will require a further planning application in its own right, which should be supported by a full assessment of the impacts of additional vehicle journeys on the local and strategic road networks. This should be submitted to the local planning authority as part of an application for consideration also by WSCC Highways and National Highways.
- 22 INFORMATIVE: Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm event plus 40% on stored volumes/rainfall intensity (allowance for climate change) between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year storm event plus 40% on stored volumes/rainfall intensity. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that

location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers.

Supplementary guidance notes regarding surface water drainage are located at <https://www.arun.gov.uk/drainage-planning-consultations> on Arun District Council's website. A surface water drainage checklist is available on Arun District Council's website, this should be submitted with a Discharge of Conditions Application.

- 23 INFORMATIVE: The nearest fire hydrant is 160m further away than is required. Should an alternative supply of water for firefighting be considered it will need to conform with the details identified in Approved Document - B (AD-B) Volume 1 2019 edition: B5 section 14.