

ADVOCO -PLANNING

SEFTER FARM,
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DESIGN ACCESS
AND PLANNING STATEMENT
(INCORPORATING A
HERITAGE STATEMENT)

JULY 2016



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1.0 Introduction

- 1.1 This Design, Access and Planning Statement has been prepared by Advoco Planning on behalf of Barfoots Farms Limited and is to explain and support a detailed planning application for the construction of a building for the packaging, preparation and distribution of fresh foods, along with ancillary accommodation associated with the existing horticultural business, along with revisions to internal access road, car parking and hardstanding areas and landscaping.
- 1.2 In the interests of submitting clear and concise information, the national and local requirements for both a Design and Access Statement and Planning Supporting Statement have been combined on this occasion, although care has been taken to ensure that the formal requirements for both documents are met in this single submission. The site also contains a Listed Building (Sefter Farmhouse) and therefore a Heritage Statement is included within the report to address any impact on that heritage asset. An Economic Statement is also included within this document.
- 1.3 This statement will comprise the following:
- Section 2 – Site and Surroundings
 - Section 3 – Planning History
 - Section 4 – Proposed Development
 - Section 5 – Planning Policy Context
 - Section 6 – Community Involvement
 - Section 7 – Examination of the Principal Issues
 - Section 8 – Conclusion and Summary
- 1.4 Alongside a full set of planning drawings of the proposed development, the planning application submission includes a number of freestanding technical reports which address a range of specific issues. These include:-
- Archaeology Report;
 - Transport Statement;
 - Ecological Appraisal;
 - Landscape and Visual Impact Assessment (LVIA)
 - Noise Assessment;
 - Flood Risk Assessment (FRA)
 - Lighting Assessment
- 1.5 This Statement is designed to provide a comprehensive, but essentially non-technical document in support of the proposed development. It will therefore seek to summarise and identify the key points identified within each of the technical reports and therefore should more detailed information be required the reader should, in the first instance, refer to the relevant technical report.
- 1.6 The design of the proposed development is largely a product of its function. For this reason the Design and Access (DAS) Issues, as identified in DCLG Guidance published in March 2010 entitled 'Guidance on information requirements and

validation', will be limited and will appear in Section 7. However, many of the DAS headings will be addressed in more depth as specific issues also within Section 7, and will be cross referred to where necessary. This approach is also consistent with more recent advice contained within the The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the National Planning Practice Guidance.

- 1.7 In advance of submitting this planning application detailed pre-application guidance was sought from the LPA. This is included as **Appendix 1** and the issues, scope and structure of both the overall planning submission and this document are largely informed by the advice issued. In the interests of brevity issues such as the detailed planning history of the site and planning policy context will be shortened to those areas of most relevance although long lists of both planning history and policy are included as **Appendix 1** within the LPA pre-app response.

2.0 Site and Surroundings

- 2.1 Sefter Farm is a large and long established horticultural enterprise, and is the operational base for Barfoots who are involved in the cultivation, harvesting, preparation and packaging of vegetables and salad products. The site is located within the fertile coastal plain, which is an area of open countryside used extensively for large scale agriculture and horticulture located to the south of Chichester. The application site is located about 10 km to the south of Chichester and is between the smaller settlements of Runcton to the north and Pagham to the south.
- 2.2 The application site itself measures 2.33 ha. and comprises an existing building group which includes the original Sefter farmhouse (Listed) alongside a large industrial type building used for the cleaning, preparation, packaging and distribution of vegetable and salad products, along with ancillary office and other accommodation. The site also contains an anaerobic digester (AD) waste to energy plant, and significant areas of hardstanding for the parking and circulation of cars and commercial vehicles, along with areas for the storage of pallets and crates. The site also has a series of bunds, reservoirs and balancing ponds and is surrounded by open arable land used for horticultural production.
- 2.3 A more detailed contextual analysis of the site is contained within the accompanying Landscape and Visual Impact Assessment (LVIA).

3.0 Relevant Planning History

- 3.1 The planning history derives from the LPA's pre-application response and is included in full as part of their pre-application response which is attached as **Appendix 1**. This shows a large number of applications over the years, most of which have been approved and implemented. Of most significance and recognised as such by the LPA, is application P/144/06/ which was approved 24/01/2007 and was for a substantial detached building similar to that now proposed. This application was never implemented due to the economic downturn but serves to establish the principle of significant additional floorspace on the site and an increase in output and traffic commensurate with such an increase. The site plan for this previous approval is included as **Appendix 2**.

4.0 Proposed Development

- 4.1 This is a detailed planning application for a steel framed industrial type building totally 7,944 sq.m. This comprises a proposed production area of 5,320 sq.m., offices and changing rooms of 1,857 sq.m., WCs and washrooms of 173 sq.m.

and planting and engineering areas of 594 sq.m. An existing canteen housed within a relocatable building totalling 200 sq.m. is also proposed to be removed. Seven lorry loading bays are to be provided on the western elevation of the building.

- 4.2 Changes to the existing areas of hardstanding are also proposed along with some new areas to accommodate loading and circulation areas within the site. A constructed wetland is also proposed to the north of the main site just west of the Pagham Road, which forms part of the waste and drainage management strategy for the site.
- 4.3 The total level of existing accommodation on site is in the region of 13,500 sq.m. the bulk of which is 9,500 sq.m. of production area, with the remainder comprising the AD plant, offices, welfare and amenity areas and engineering and plant areas.
- 4.4 It is also useful to provide some explanation for the operational need for the additional accommodation, which is in short required to address existing and secure contracts with UK supermarkets, which in turn is a response to consumer needs and expectations.
- 4.5 Specifically, since the financial crisis from 2008 consumer behaviour has changed. Consumers now increasingly demand products from which they generate little or no waste, take the minimum time to prepare or are fully prepared for them, and offer a range of cooking options that chime with their busy lifestyles, but enable them to feel they are still 'cooking from scratch'.
- 4.6 Demand for High Quality UK grown vegetables continues to grow, and as part of its evolution Barfoots has developed from a vegetable grower to a supplier to UK retailers that is fully vertically integrated from seed to plate. The company is at the forefront of 'Health' innovations in the vegetable market as consumers increase the quantity of fresh produce they consume as part of healthier more balanced diets.
- 4.7 Most recent successes for the company have included the innovative launch of Courgette Spaghetti and Butternut Noodles which offer a delicious low calorie alternative to pasta and other carbohydrates whilst being convenient to use and a very flexible ingredient. This innovation has enabled the company to utilise product that would otherwise be wasted and to improve crop yield and utility.
- 4.8 With these significant increases in demand Barfoots now needs to invest in additional purpose built capacity. This development will enable Barfoots to produce a range of added value vegetable products that fulfil the ever increasing demands of discerning consumers, in an environment that offers the highest levels of food safety and integrity. The new facility will be powered from 100% renewable energy.
- 4.9 Barfoots is a UK success story, but more importantly is an Arun District success story. Serving the majority of UK food retailers the company has developed an enviable reputation as an innovator, pushing forward the development of UK horticulture. As consumer tastes continue to change and evolve Barfoots is prepared to invest to enable the ongoing success of the company and to ensure that all the stakeholders involved with the business are part of a sustainable organisation that continues to deliver excellence.

EIA Screening

- 4.10 In the LPA's pre-app response (**Appendix 1**) reference is made to the requirement for a screening request to clarify whether the project triggers the need for an Environmental Impact Assessment (EIA). This can be done at any stage of the planning process and will be submitted during the determination of this planning submission. The issue has been fully explored and our findings are that no EIA is required. The rationale for this conclusion and a full explanation

of anticipated impacts will be included within the formal EIA screening request, the timing of which has been explained above.

5.0 Planning Policy Context

- 5.1 It is anticipated that the proposals will be assessed against the saved policies of the adopted Arun District Local Plan 2003 and other related local supplementary planning policy documents. Also of relevance is the National Planning Policy Framework (NPPF) which provides a broad national planning policy framework for both planning decision making and policy formulation. It is noted that the LPA is in the process of producing a new Local Plan although the pre-app response does not refer to any of these emerging policies and therefore it is assumed that limited weight should be afforded to them, and the applicant has treated them accordingly.

The Development Plan

- 5.2 Based on the long list provided by the LPA and included within **Appendix 1**, the policies deemed to be of most significance to this proposal are policies GEN3, GEN7, DEV3, DEV6 and AREA10 and these are included in full below:-

POLICY GEN3 Protection of the Countryside

Outside the Built-Up Area, as defined on the Proposals Map, the countryside will be safeguarded for its own sake. Development will not be permitted unless:

- (i) it meets the operational needs of agriculture, forestry, the extraction of minerals or the deposit of waste; or
- (ii) for quiet, informal recreation; or
- (iii) for the diversification of the rural economy; or
- (iv) for essential road schemes; or
- (v) it is in accordance with a policy in Sections 2 and 3 of the plan referring to a specific use or type of development.

Permission will not be given for the extension of isolated groups of buildings or the consolidation of linear or sporadic development unless the proposal accords with criteria (i) to (iii) or (v).

POLICY GEN7 The Form of New Development

Planning permission will only be granted for schemes displaying high quality design and layout. Development proposals involving new buildings or significant extensions or alterations must be accompanied by an illustrated written analysis of the site and its immediate setting, together with its relationship with the relevant townscape, landscape, wildlife and movement characteristics of the wider area.

Development will be permitted provided it:

- (i) makes efficient use of land or buildings and, in the case of new residential development, achieves net densities of at least 30 dwellings per hectare;
- (ii) demonstrates that it responds positively to the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness;
- (iii) promotes sustainable development, including the effective use and

conservation of energy and reducing the need to travel, particularly by private car;

- (iv) does not have an unacceptable adverse impact on adjoining occupiers, land, uses or property and, where relevant, facilitates the development of adjoining sites;
- (v) takes account of any unacceptable adverse impacts that may arise from adjoining land uses or property;
- (vi) retains significant open or wooded areas which, in their own right, make a material contribution to the local environment;
- (vii) allows for the safe movement of pedestrians and vehicles, giving priority to pedestrians;
- (viii) provides for vehicle parking in accordance with Policy GEN12 and Appendix 2 and open space in accordance with Policy GEN20.

In all cases, the District Council will expect a high standard of design and layout and all applicants will be encouraged to improve the visual amenities of the particular locality in scale, external appearance, hard and soft landscaping and materials.

POLICY DEV3 Horticulture

New glasshouse and polytunnel development will usually be permitted provided that:-

- (i) there is no adverse impact on the surrounding environment and landscape;
- (ii) long views across substantially open land are retained;
- (iii) adequate water resources are available; and
- (iv) adequate surface water drainage capacity exists or can be provided as part of the development.

POLICY DEV6 Agricultural Buildings

Agricultural buildings will be permitted provided that:

- (i) their scale, siting, design and materials minimise the visual impact on the landscape; and
- (ii) new buildings are grouped with any existing buildings in order to minimise impact on the landscape. Isolated buildings will be permitted where their location is essential to the agricultural activity being undertaken and that they are not situated in a prominent location.

POLICY AREA10 Strategic Gaps

Strategic Gaps, as identified on the Proposals Map will be maintained and protected between the following settlements:

- (i) Worthing and Ferring
- (ii) East Preston and Ferring
- (iii) Littlehampton and Middleton-on-Sea
- (iv) Pagham and Selsey

(v) Bognor Regis and Chichester

(vi) Arundel and Littlehampton

Proposals for development within a Strategic Gap will be subject to the most rigorous examination.

National Planning Policy Framework (NPPF)

5.3 The NPPF confirms and clarifies the Government's presumption in favour of sustainable development (para 14 specifically). The NPPF states the following:

7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- ***an economic role*** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- ***a social role*** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- ***an environmental role*** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

5.4 Paragraph 56 of NPPF states (inter alia) that:-

“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”

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

“3. Supporting a prosperous rural economy

28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;”*

6.0 Community Involvement

- 6.1 It is also anticipated that the applicant will fully engage with the Parish Council through the determination of the planning application. This will include attendance at the relevant Parish Council meeting and presenting the proposals or making available any additional information which might assist the Parish in their consideration of the proposals as required. Initial contact was made with the Parish Council prior to submission, although the timing of their meetings has not corresponded with the project programme and therefore the first available meeting to the applicants will be post submission, That said, through the initial contact the PC are aware that plans are afoot and the applicants have developed a long standing and constructive dialogue with the Parish which they hope will continue through the application process and beyond.
- 6.2 In addition, the submission of this planning application does not signal the end of any potential dialogue between the applicant and the other stakeholders including the Arun District Council and neighbours, and therefore the applicant will be happy to consider any reasonable request for amendments should these arise through the determination process.

7.0 Examination of the Principal Issues

- 7.1 The following section will comprise two parts namely the analysis which would otherwise be contained within a freestanding Design and Access Statement and a section which addresses other planning issues and compliance with the policies cited in Section 5, notably the specific policies cited in para. 5.2 above.

Design and Access Issues

Principles

- 7.2 Local and Government planning policy is broadly supportive of new buildings for agriculture and horticulture as they are central to the rural economy. In this case, the principle of significant additional floor area has already been established through the approval of planning application P/144/06/ which was approved under essentially the same local planning policies as apply now.
- 7.3 The design principles have been to provide a building which meets the applicant's needs in terms of servicing existing and developing markets and contracts. In addition, the building needs to function around the existing site constraints and to meet operational requirements including maintaining separate areas for large commercial vehicles to service existing and proposed buildings whilst avoiding conflict with light traffic and pedestrians. Furthermore the design and siting of the building is guided by policy and the objective of minimising its visual impact. Specifically LP Policy DEV6 seeks to ensure that buildings are grouped together as far as possible and that objection has been a key design principle for this proposal, and indeed has been achieved to a greater extent than the earlier 2007 approval which was more freestanding and visually less integrated with the existing building group.

Use

- 7.4 The use of the site for the preparation and packaging of the vegetables and salad products has long been established. In addition, the agricultural/horticultural emphasis has endured despite widespread changes to consumer demand and lifestyle changes which impact on the way food is purchased and the diversity of products the consumer now demands.

Amount

- 7.5 The total floor area proposed is circa 7,957 sq.m., the breakdown of which is set out in Section 4 of this Statement. This is the level of accommodation required to meet operational and commercial objectives having due regard to existing and secured contracts and emerging patterns within the industry for future demand.

Layout

- 7.6 As highlighted in para. 7.3 above, the layout of the development is a product of its function and the need to accommodate a process flow for an ever expanding range of products and presentation of those products.
- 7.7 Safe working is also a key driver and the need to minimise potential conflict between personnel movements and yard and loading areas which are used by heavy goods vehicles. Equally the need to position the building as close to the existing as possible has also informed the layout, which is now deemed to be optimal having due regard to these key site constraints.

Scale

- 7.8 The issue of scale is largely addressed under the earlier 'Amount' heading. The building height is largely standardised for industrial type buildings where fork lifts operate within and stacking systems are used. The building height is also the same as existing buildings for this same reason. The footprint of the building has also been minimised and where there are opportunities for accommodation to be provided over two floors rather than one within the proposed building shell, these have been fully exploited.

Landscaping

- 7.9 The site currently benefits from good levels of screening when viewed from most vantage points. A well-established hedge runs along the Pagham Road frontage and close to the building there are bunds and reservoir enclosures which also add to the overall screening. That said, this is flat open landscape and distance views will be available and these cannot be fully mitigated against. The LVIA does however include a series of mitigation measures which will further minimise these impacts and these can be secured via the imposition of planning conditions. The general approach to mitigation places the emphasis on softening the appearance of the proposed development rather than seeking to physically screen it from view, having due regard to the established open and flat landscape character of the site and surrounding land.

Appearance

- 7.10 The buildings are modern steel framed building clad in profiled steel to match those adjoining it. The existing dark bluey grey colour scheme appears to be relatively inconspicuous within its setting and therefore a similar approach it is assumed for the proposed new build. That said, should other colours be preferred that could be secured via planning conditions.
- 7.11 Care has also been taken to ensure that the loading bays and lorry areas are to the rear of the building which minimises the visual impact of these elements. Similarly, the eastern elevation facing Pagham Road is lower and therefore presents a lower vertical building mass to this key vantage point. In addition, this side of the building provides the offices and other non-production areas and therefore contains more articulation and detail in the form of doors and windows. This further assists in reducing the perception of mass and softens the appearance of the building.

Accessibility

- 7.12 All proposed buildings are located on a flat site and benefit from level thresholds. It is therefore highly accessible. All new works will be fully building regulations compliant and will provide suitable access for all user groups. The parking, access and circulation arrangements is explained within the Transport Report and is summarised below under the highways heading.

Other Planning Issues

- 7.13 The following sections address the other planning issues which fall outside the scope of the Design and Access related issues detailed above. They principally relate to compliance with Local Plan policies cited in para. 5.2 above but also address the full suite of policies cited in the LPA's pre-app response attached as **Appendix 1**.

Principle of Development

- 7.14 As previously stated a similar scale of development has previously been consented on this site in 2007. This was for a similar scale building in a similar location and that planning permission has since lapsed. The earlier planning approval goes some way to establishing the principle of the proposed development, particularly as it was assessed against essentially the same local planning policies. That said, in the interests of completeness it is useful to assess whether there have been any material change in circumstances which might now resist the principle of previously consented development.
- 7.15 In this regard the three main changes are firstly the introduction of the NPPF. The effect of this is to provide clear national policy guidance and where old policies might not be consistent with its objectives, reduce or remove the weight which might be afforded to such policies. In this regard the effect of the NPPF is not deemed to be significant as the local policies are not in any obvious conflict with its purposes. That said, the importance of economic development and the rural economy is reinforced and therefore if anything the NPPF adds only further support to the proposed development and in no way provides policies which might now seek to resist it.
- 7.16 Secondly, since the 2007 approval, consent has been granted under permission ref. P/68/15/PL on 21/10/2015 for a significant area of glasshouses on land between the main Seftor Farm building and the Pagham Road. This consent has not been implemented but is not considered to materially change the situation inasmuch as the output of the site is primarily a product of the land available.
- 7.17 Therefore whilst glasshouses extend growing seasons and allow crops which would otherwise be unsuited to the local climate to be grown, they do not materially add to output. In any event the permission has not been implemented and any impacts of this earlier approval have been factored into the assessment of this proposal.
- 7.18 In light of the above the principle of the proposed development is considered to be broadly established and the acceptability of the scheme therefore hinges on its details and specific impacts. In establishing the broad principle of development this inevitably includes an assessment on the loss of agricultural land. In this regard, open land is being developed and therefore is notionally lost. However the land in question is between two key operational hubs (the main buildings and the AD plant) and is dominated by existing yard, storage and loading areas. Accordingly, the vast majority of the land to be developed is not in productive use and therefore its loss is acceptable and does not conflict with the overriding objective of protecting best and more versatile agricultural land.

Highways, Transport and Parking

- 7.19 Whilst the proposed development will increase overall output its principal purpose is to allow new processes to be employed and to provide a wider range of products in response to consumer demands. Accordingly, despite a significant increase in overall floor area, the total increase in the number of HGVs will be 15%. In absolute terms the number of HGVs fluctuates between days of the week (Monday to Saturday with no working Sunday) and within each working day with the greatest number of movements typically within the hours of 0800 and 1700 hrs daily.
- 7.20 Averages for a typical week is a daily number of HGV movements of circa 110 which, based on 24hr operation, is 4.6 movements per hour and based on a more realistic 9 hour day is circa 12 movements per hour or one every 5 minutes. In the event, the actual number of movements is somewhere between the two figures as there is a concentration within the identified working day but equally some movements outside these times.
- 7.21 Notwithstanding these measurement issues, the proposed increase of 15% would take the average hourly HGV traffic from 12 to less than 14 which is not considered significant.
- 7.22 In addition any limited increase in HGV traffic needs to be considered alongside the car (staff) movements to provide a comprehensive traffic picture. In this regard the site employs some 400 staff, and parking provision with the new scheme will allow up to 215 parking spaces. However it is anticipated that 50% of current workforce will shift to the soon to be introduced bus service and therefore even allowing for additional employment from the proposed development, the overall car movements will reduce. The site and surrounding land is also flat which adds to the viability of cycling as a realistic alternative to the private car.
- 7.23 In light of the above it is contended that the overall traffic and transport implications if the development are acceptable and can readily and safely be accommodated within the existing road network.

Light Pollution

- 7.24 As a rural site within an area of open countryside lighting is clearly a sensitive issue. Equally the site is already a large scale operational site and is required to provide safe working areas, many of which are used in low light conditions, particularly during the winter months. Accordingly, the site has large areas of illuminated outside spaces and further areas will be required as part of the proposed development.
- 7.25 To this end a specialist has been appointed to design a lighting scheme which provides a safe working environment within the areas it is required yet minimises light spillage into the areas where it is not. Whilst a detailed lighting scheme has yet to be fully designed the lighting report provides a framework and specification of future lighting. It is anticipated that a planning condition would be imposed to require the submission and approval of a detailed lighting scheme, which thereafter will be retained in accordance with the agreed specification.
- 7.26 Notwithstanding the above and in terms of general principles, all lighting will be highly energy efficient. In addition, all external lighting will be designed to minimise light spillage and be used only when required. To this end all lights will have sensors which ensure that they come on only when light conditions require and in all circumstances will not be on overnight.

Landscape and Visual Impact (LVIA)

- 7.27 This planning application is accompanied by a LVIA. This identifies the existing baseline which is effectively the impact of the existing buildings on the local landscape and the viewpoints where this impact occurs.
- 7.28 Using industry accepted methodology it then seeks to identify and measure the impact of the proposed development on the landscape. As has been previously explained the flat open nature of the landscape is such that any new buildings of any size will be apparent within the landscape. However this impact must be viewed in its correct context. Specifically the proposed new building will add to an existing building cluster and therefore its impact is far less than would be the case for an isolated freestanding building of the same scale. Such an approach also minimises any impact on the strategic gap (Policy AREA10).
- 7.29 In addition, the points where the proposed development would be seen are also important. In this regard these viewpoints are typically distant and therefore the impact of the buildings is inevitably less. Furthermore planting and screening is already in place and this planning application provides the opportunity for further planting to be secured.
- 7.30 Given the above and consistent with the detailed findings of the LVIA the landscape impacts are considered both modest and acceptable, and due to improved siting closer to existing buildings, an enhancement over the previous 2007 approval.

Noise

- 7.31 A specialist noise report has been submitted as part of the overall planning submission. The scope and methodology for this was agreed in advance with the Council's Environmental Health team. Its principal purpose is to determine whether or not any predicted increase in operational sound levels at the proposed facility will have an unacceptable effect on the nearest receptor. The structure of the report is essentially in three parts, the first of which established the baseline noise level, which is a measurement of the noise currently generated by the site in terms of traffic and processes.
- 7.32 The report then goes on to identify the main noise sources in relation to the proposed development, which are largely HGV movements and any plant and machinery required. These anticipated impacts are then assessed and where necessary mitigation proposed. It should also be noted that the layout of the proposed development has potential to provide mitigation and by locating the lorry loading bays to the rear of the proposed building, the building itself acts as an acoustic barrier which reduces noise transmission towards Pagham Road and residential uses on this road.
- 7.33 The findings of the Noise Report show only minor increase in both the day time and night time noise levels at the nearest receptor (some 220 metres away). These increases are well within accepted noise levels which are set to ensure that amenity levels are maintained and undue disturbance avoided. The noise implications of the proposed development are therefore considered acceptable.

Amenity

- 7.34 The key amenity impacts in relation to the proposed development are likely to be related to traffic, possible light pollution, noise and visual impact. These have been addressed via a series of technical reports and no significant adverse impacts have been identified. Those reports serve to illustrate that none of the 4 main impacts are significant in their own right although the issues are assessed individually and in isolation.
- 7.35 In looking at these impacts in a comprehensive way it is noted that none of the

anticipated effects are significant and even when viewed together it is contended that the same conclusion can reasonably be reached. The proposed development will therefore not adversely impact on the amenities of either the area or individual users of surrounding land including the few dwellings which are distant neighbours to the site.

Flooding/Drainage

- 7.36 As a low lying site set within a level coastal plain issues of flooding and managing surface water run-off are long recognised as being of significance importance in the development and planning process. Accordingly and in line with best practice a detailed Flood Risk Assessment (FRA) has been prepared. This identifies the scope of the proposed development and the elements which may have a bearing on flood risk including new buildings are areas of hardstanding.
- 7.37 The broad objective is to ensure that development does not add to flood risk and ideally provides an enhancement which improves the current situation. Central to this approach is measuring existing run-off rates and the capacity of water holding features (reservoirs and the like) and the existing drainage capacity in order to establish a known baseline.
- 7.38 With that work fully understand the implications of the proposed development can be established and mitigation measures proposed to address any changes to either run off or flood risk. On this point a reservoir already exists of site and has been identified as having space capacity. Specifically, the calculated run off from the proposed development is 1,220 cubic metres. Given the capacity of the reservoir this would result in a maximum increase in the water level of 125mm which can readily be accommodated.
- 7.39 The proposed development therefore meets the objective of not adding to flood risk either on the site or elsewhere and can readily provide suitable mitigation for any increase in run-off.

Archaeology

- 7.40 In developing sites with a large site area, particularly those previously undeveloped, there is normally a requirement for a level of archaeological assessment to establish the likelihood of important artefacts being present. This is normally undertaken as a desktop assessment and is followed by more detailed site investigation work involving trial trenches in agreed areas to an agreed specification.
- 7.41 In this case a level of excavation was required to inform the necessary ground investigation works required for construction feasibility studies and therefore the specification for excavations was agreed with the County Archaeologist to accommodate his requirements. Accordingly, the report submitted exceeds normal pre-development investigations and provides a comprehensive assessment of archaeological potential based on actual intrusive investigations. The finding of this work is that the site has no records of importance and therefore the issue has been comprehensively and satisfactorily addressed.

Sustainable Construction

- 7.42 The applicants own and operate an Anaerobic Digester (AD) on the site which produces waste from energy and is fuelled by vegetable waste, most notably sweetcorn husks. As a result of this, the proposed development will be powered entirely from this renewable source.
- 7.43 The processes involved at Sefter Farm are potentially energy and water intensive which in turn introduces a significant cost and incentive to operate as efficiently as possible. Furthermore the surplus energy produced by the AD plant is sold back to the grid and therefore although the energy is notionally free, its

profligate use has revenue implications is turns of the surplus available to sell, which further incentivises energy efficiency.

- 7.44 Accordingly, and consistent with the company ethos, the proposed buildings and processes will be highly energy and water efficient. The production areas are chilled and therefore will be highly insulated to allow a lower temperature to be maintained with minimal cost. In addition, high efficiency compressors and low energy led lighting (T5) will be used through the new development. A sub-metering system is also in place for both power and water use to micro-manage consumption and increase efficiency. Solar panels have also been installed on existing roof areas, which further adds to the renewable energy output of the site.

Sustainability

- 7.45 Sustainable agricultural practices underpin the entire Barfoots farming operation, and are pursued for both environmental and commercial reasons. Specifically, in the long term unsustainable practices over time will always become economically unsustainable as waste and inefficiency will ultimately lead to higher costs and undermine competitiveness. Barfoots have therefore produced the following statement which is also available on their website:-

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

We measure our impact on the local wildlife population. Members of the local ornithological society regularly carry out bird surveys, and the results are recorded on a database. Last summer, Barn Owls continued to patrol the immediate site, and Buzzards have paired and set up a territory within our farm boundaries. We recognise that we are only part of the environmental answer but we will continue to strive to be an environmental "sink", encouraging biodiversity wherever possible and appropriate.

Precision farming techniques ensure that inputs of chemicals, fertilizers and water are kept to the absolute minimum to meet a crop's needs. Wherever possible, beneficial insects rather than chemicals are used to control pests. If control is required by chemical means, then careful selection of pesticides are made by BASIS qualified staff and advisors, and by careful use we aim to minimize their environmental impact; maximize their effectiveness and lastly minimize risk of residues on any of our products. Qualified personnel carry out the process with modern machinery. This process ensures our produce is of the right quality, remains wholesome and has the provenance of being grown with minimum impact on the environment.

Through regularly reviewing our Farm Conservation Plans, we aim to continue to sustain and enhance the beauty of our landscape. To continue to improve and extend wildlife habitats whilst creating new habitats, landscapes and improved opportunities for people to enjoy the countryside'

- 7.46 In addition to these practices and the sustainable construction proposed and highlighted above, the proposals include a constructed wetland which is a highly sustainable means of recycling used water and avoids it re-entering the main sewers for the energy intensive process of purification and reuse.
- 7.47 Waste is also managed in a highly sustainable way. Waste vegetable matter is used to fuel the AD plant which in turn provides power for the whole site, with any surplus returned to the grid. The process also produces organic biofeed as a

by products which is used to improve yields from the site and reduces the need for nitrogen based fertilisers. No waste goes to land fill. Crates are re-used and then when no longer serviceable recycled and any cardboard is recycled. Equally fork lifts and company vehicles are plug hybrids or electric and recharge using AD derived power.

Biodiversity

- 7.48 The site has been the subject of Ecological Evaluation to assess for protected species and their habitats, and in particular the presence of water voles. The findings of this report show no overriding ecological constraint which might prevent the development being implemented, such to a series of mitigation measures, all of which are readily secured through the imposition of a planning condition.
- 7.49 The absence of trees, hedges, ponds and traditional buildings, and the use of the application site for operational purposes including large areas of hardstanding, limits its ecological potential. The site potential is further limited by the surrounding land use for commercial horticulture which results in a highly managed land use which by its very nature limits biodiversity potential.

Heritage Statement

- 7.50 The wider Barfoots site contains a Grade II listed building in the form of Seftor Farmhouse and Granary, although this sits outside the formal red line area. Notwithstanding this point, it is a Heritage Asset and therefore the impact of the proposed development on it needs to be properly considered. Specifically, para. 128 of the NPPF suggests that applicants should properly assess the heritage implications of development in a way which is commensurate with the value of the asset and the nature of works proposed. In this regard the heritage assets have been identified and categorised above.
- 7.51 The listing description is short and as follows:-
- One building. C18. Two storeys. Four windows. Stuccoed. Tiled roof. Vertical glazing bars only intact. C19 castellated porch. Modern addition behind.*
- 7.52 The listed building was originally a traditional farmhouse and continues to be used for residential purposes. Its setting is however compromised to a degree by existing buildings, most notably the main production building which is about 15 metres from the listed building and is of modern appearance and is significantly larger in scale.
- 7.53 The proposed new building is some 100m from the farmhouse and there is a pair of more modern farm cottages, car park and internal access road in the intervening space. As a result of this there are no obvious viewpoints where the listed building and the new build would be viewed together in a way which might impact upon its setting. Accordingly, the proposed development is not considered to materially impact on the setting of the listed building and therefore no harm arises. In light of this conclusion, the requirements of section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 have also been met.

Economic Statement

- 7.54 The following statement is short summary which shows the importance of horticulture within the wider economy and the implications of the proposed development in the local context. The evidence base is largely drawn from DEFRA statistics, the applicants own data and some LPA derived information.
- 7.55 Contextually a total of 24.4m hectares of UK land is in agricultural use which is notionally used to feed a current population of 64.6m people. Of this total land area 4.9m ha. are used for crops and horticulture, generating £1,277m of

income from fresh vegetables alone. The situation is of course complicated by imports and exports, the former dominating, with only 55% of vegetables home produced (2013 figures). Accordingly, feeding the nation whilst minimising exports and food miles is a significant challenge and requires innovation, investment and efficient production which inevitably can only be achieved where economies of scale are provided. Intensive agriculture and horticultural is therefore a crucial component of UK food production and without it production would be lower and imports higher.

- 7.56 Agriculture (including horticulture) is however in decline. Between 2014 and 2015 UK agricultural income dropped by 19.3% (DEFRA). Whilst that is only a snapshot and may be influenced by other factors including poor weather the overall trend is of decline. Horticulture is particularly vulnerable as it is labour intensive and therefore is subject to high cost and therefore most at risk from exports from countries with both better climates and cheaper labour.
- 7.57 Barfoots and their competitors have responded to these market pressures by increasing efficiency in both growing and processes at all levels including packaging, washing and transportation of produce. Significant Barfoots have also diversified in terms of the food preparation and producing consumer led products which involve less effort for the end user and add value for the producer (see paras 4.5 to 4.9 above).
- 7.58 Against this national context the role of Barfoots needs to be explained at a local level. In this regard up to date and industry specific data at the local level is scarce. However there is anecdotal evidence including commentary made within the emerging Arun DC Horticulture Local Development Order (LDO). This recognises the importance of horticulture within the local economy and states:-

2.1 Horticulture is identified in the Arun Local Plan (publication version)(2011-2031) as a key employment sector in the Arun District and the associated built environment is particularly concentrated in a number of localities. Horticultural activities included protected cropping associated with glasshouses and polytunnels, open field production, and ancillary produce packing and distribution and water management facilities.

2.2 The Council's Economic Strategy to 2016 identifies the Horticulture Sector as one of four key sectors which are particularly strong in the local economy with good opportunities for economic development and job creation. While the sector has significant potential for growth, it faces issues in relation to economies of scale, the quality of existing infrastructure, and production costs. In responding to these issues, the sector has experienced some locational rationalisation, and external development, mainly residential, pressures on some traditional horticultural locations.

2.3 The Council is committed to assisting the Horticulture Sector to respond effectively to these issues through the policies in its development plan and the proposed LDO.

- 7.59 Notwithstanding Barfoots is a UK success story, but more importantly is an Arun District success story.
- 7.60 The value of the UK Fresh Produce Category is now just over £10 Billion per annum. This figure is growing and demonstrates the growing importance consumers are placing on healthy eating and on the consumption of vegetables and fruit as part of a balanced diet. The traditional Fresh Produce areas have been Kent, Lincolnshire and Cambridgeshire, however the Chichester Plain has a rich fresh produce heritage with a number of the UK's most successful produce growers and processors based in the Arun District.
- 7.61 Barfoots of Botley is no. 24 in the Top 100 UK Fresh Produce companies by turnover. The company will have sales amounting to £160m in 2016. The

Company has grown in size very year for the last 10 years.

- 7.61 Barfoots success has been driven by innovation, customer focus, and a focus on sustainability
- 7.62 Barfoots is a major local employer with 300 full time employees and more than 1,000 Full time equivalents (FTE) depending on the time of year.
- 7.63 Barfoots is a major user of local support services, with engineering, refrigeration, security, cleaning, catering, recruiting, and a plethora of other services contracted with local businesses.
- 7.64 Barfoots has invested heavily in renewable energy facilities. It is self-sufficient in electricity generated from vegetable waste and also supports the National Grid in the local area by exporting surplus energy for use in local homes and businesses. It is a carbon neutral business.
- 7.65 The new facility will generate an additional 30 jobs at all levels over the next 5 years.
- 7.66 As keen supporters of British Farming Barfoots currently grow Field Scale vegetables on 7,000 acres of land in and around Sussex and Hampshire. This offers farmers and landowners a range of land use options enabling them to broaden their rotations, improve soil health and manage fertility more effectively.
- 7.67 The UK market for prepared vegetables is growing dramatically. This is driven by consumer demand for more convenient vegetable products that save time and effort in their preparation, healthy products that reflect demand for diets lower in carbohydrates, and products that reduce or eliminate food waste in the home. Barfoots prepared vegetable business has grown from a turnover in 2014 of £1.5m to a turnover in 2016 of £17m. Barfoots grow and process 120,000 tons of produce per year for the UK Supermarkets, Restaurant Chains, Caterers and Wholesale Markets.
- 7.68 The new building and machinery will allow this produce to be processed in more efficient and different ways. The profit from this innovation will be reinvested in staff, infrastructure and in reducing the environmental impact of the process.
- 7.69 Barfoots turnover is approximately £160million and with the addition of this new development, turnover should increase by 25%
- 7.70 The value to the local economy would be measured by additional local employment of staff and suppliers, the reinvestment in Barfoots Farms with the tree planting schemes etc and promoting the Arun District as a Hub of growing excellence.
- 7.71 Barfoots are ideally placed to develop their long standing relationships with the main Supermarkets to support this growing need, with innovative and environmentally sympathetic solutions that will benefit the local area and wider afield.
- 7.72 All of the electrical power required is produced by the onsite BioDigester which also uses all the waste from the food processing plant, this saves an approximate £500k per year, as well as reducing road usage and noise.
- 7.73 This development will create a need for highly trained operatives to support the general level of staff required.
- 7.74 The importance of the rural economy is further recognised in a report by Coast to Capital Local Enterprise Partnership (July 2016) which highlights why the rural economy is vital to the growth and prosperity of the region.
- 7.75 The report highlights the importance of the rural area to the future success of

the Coast to Capital region, pointing out that the size of the rural economy with over 22% of businesses located there is vital to future prosperity and growth.

- 7.76 Julie Kapsalis, Coast to Capital Board Member and Chair of its Rural Economy Committee, said: “The rural economy contributes £13 billion or 27% of our area’s output annually. It’s the people who are the key asset to any economy and which attract so many businesses to locate here. Our rural residents tend to be highly skilled and qualified. They also tend to be more entrepreneurial with large numbers of home-based businesses and significantly higher rates of self-employment than in urban areas, although if female self-employment rates in rural areas were the same as male rates, there would be another 17,000 jobs.

“However, there are some issues which are holding back the sector; our rural businesses and resident populations are growing, driving the need for more housing and employment space. Poor transport connectivity, access to childcare and higher housing, inadequate broadband speeds and lack of suitable business premises are all major issues facing the rural economy and can make it difficult for some residents to access employment.”

Key points of the report are:-

- One in five businesses is based in our rural areas
 - The rural economy accounts for 27% of Coast to Capital's economic output
 - It's not just agriculture, important though that is - over 1,000 rural manufacturing companies are based in the rural area
 - The biggest rural industry is professional and business services which makes up nearly a fifth of rural companies –
 - There is also a large and technology-intensive food production and horticulture sector of 500 companies contributing an estimated £1bn per annum and viticulture and brewing are also very important with a growing number of world class vineyards and 60 breweries in West Sussex alone
- 7.77 Julie Kapsalis added: “The future brings great opportunities for the rural economy such as possible airport expansion at Gatwick and improved infrastructure. We know that growth has to be sustainable, that is whilst protecting and enhancing our beautiful rural environment. We will make the most of these opportunities through our action plan for sustainable rural growth which will follow in autumn 2016.”
- 7.78 In light of the above it is clear that Barfoots make a significant contribution to the local economy and the proposed development is entirely consistent with the continuation and increase in this contribution through significant investment and innovation.

8.0 Conclusions and Summary

- 8.1 The above analysis shows that the proposed development fully accords with Local Plan policy. Specifically, Policy DEV3 supports growth of horticulture and related development in the countryside, which in turn provides a justification for development in countryside terms by virtue of Policy GEN3.
- 8.2 The strategic gap is not compromised (Policy AREA10) and the individual and cumulative impacts of the development are, fully assessed, limited and acceptable. Whilst a significant amount of floor area is proposed it is to widen the product range in response to consumer demand and overall output does not increase commensurately. Indeed HGV traffic will increase by only 15% which is considered minimal and acceptable.

- 8.3 The development will help support jobs and opportunities for both the applicants and other local industries and suppliers. Horticulture is recognised as one of 4 key sectors locally and its growth is supported in acknowledgement of its importance within the local economy.
- 8.4 The proposed development is also substantially similar to a previously approved and now lapsed planning permission granted in early 2007. This was assessed against essentially the same local planning policies and the only significant material change in circumstances at a policy level is the introduction of the NPPF, which serves to add support to developments of this nature.
- 8.5 The proposals are therefore considered to be fully policy compliant at all levels and as such should be supported.