Dear Sirs,

Please find the below our comments regarding Arun DC Horticulture LDO and the attached Response Form.

**Land off Lake Lane, Barnham**

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area (Lidsey Catchment).

Southern Water apparatus within the sites:

100mm public foul rising main - please note that any water reservoirs or water conveying or retaining features should be located
No closer then 5m from the apparatus.

North End Yapton Wastewater Pumping Station – please note that no habitable buildings should be located with 15m of PS.

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
Land off Pagham Road (South)

The site is not located within Southern Water water supply zone. The site is located within Southern Water wastewater services supply area.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
Land of Pagham Road (North)

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
**Land at Woodgate**

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area (Lidsey Catchment).

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.
Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.

**Land off Yapton Road**

The site is not located within Southern Water water supply zone. The site is located within Southern Water wastewater services supply area (Lidsey Catchment).
Southern Water apparatus within the sites:

- 150mm, 225mm foul sewer, 300mm BAC, 75mm CI foul rising main - no new development or tree planting should be located within 3 m of public apparatus
- Please note that any water reservoirs or water conveying or retaining features should be located no closer than 5 m from the apparatus.

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
Land off Barnham Lane

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area (Lidsey Catchment).

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
**Land off Eastergate Lane**

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area (Lidsey Catchment).

Southern Water apparatus within the sites:

225mm, 175mm foul sewer - no new development or tree planting should be located within 3 m of public apparatus
please note that any water reservoirs or water conveying or retaining features should be located no closer then 5m from the apparatus.

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
**Land at Binsted**

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area.

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
**Land off Sack Lane, Shripney**

The site is not located within Southern Water water supply zone. The site is located within Southern Water wastewater services supply area.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.
Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.

**Land at Hangleton**

The site is located within Southern Water water and wastewater services supply area.
Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.

The Vinery
The site is located within Southern Water water and wastewater services supply area.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
Land at Norton

The site is not located within Southern Water water supply zone.
The site is located within Southern Water wastewater services supply area (Lidsey Catchment).

Southern Water apparatus within the sites:

150mm foul sewer - no new development or tree planting should be located within 3 m of public apparatus
please note that any water reservoirs or water conveying or retaining features should be located no closer then 5m
from the apparatus.

Any new direct or indirect connections to the public foul sewer will require assessment of available pipe capacity due
to capacity restrictions in Lidsey Catchment.

Sustainable drainage proposals are supported by Southern Water and should be agreed and approved by the
council.

Any requirement for trade effluent consent will require approval from the Southern Water Trade Effluent Inspector.
Kind Regards

Marta Karpezo
Technical Co-ordinator
Developer Services
Southern House, Sparrowgrove, Otterbourne, Hants SO21 2SW

Web: www.southernwater.co.uk
FAA:

From: Sue Bowley [mailto:Sue.Bowley@arun.gov.uk]
Sent: 06 April 2016 14:32
To: Architectural Plants Limited - Angus White; Barfoots Farms - Julian Marks; Barfoots Farms - Nathan Delicott; Barfoots Farms - Neil Cairns; Barnsford Nurseries - John Turner; Binsted Nursery - Martin Emmett; Binsted Nursery - Mike Tristram; Blue Ribbon Plants - Walter Back; British Gas; 'C2C - Jonathan Sharrock'; Chalcroft Nurseries - Jacki; Chichester District Council; Chichester District Council - Mike Allgrove; Clerk to Aldingbourne Parish Council - Gaye Hodgson; Clerk to Angmering Parish Council - Mr Rob Martin; Clerk to Barnham Parish Council - Mrs Alison Crabbb; Clerk to Eastergate Parish Council - Mr G Sleet; Clerk to Ferring Parish Council - Nadine Phibbs; Clerk to Pagham Parish Council - Mr Ray Radmal; Clerk to Walberton Parish Council - Mr R Huskisson; 'Coastal West Sussex Partnership - Caroline Wood'; Cobbins Nursery Limited - Clive Lisher; Cobbins Nursery Limited - George Lisher; Colin Frampton; Downs View Nurseries Limited - Chris Brassfield; Downs View Nurseries Limited - Martin Brassfield; EDF Energy - John Park; English Heritage - Samantha Johnson; Eric Wall Limited - Chris Wall; Eric Wall Limited - Paul Faulkner; Fargro Limited - Paul Sopp; Farplants Sales Limited; Fleurie Nursery Limited - Steve James; Fleurie Nursery Limited - Andrew Henry; Fleurie Nursery Limited - Chris Tellwright; Fleurie Nursery Limited - Steve Carter; Fresh Acres Nurseries Limited - Richard Lovejoy; Hall Hunter Partnership - David Kay; Hall Hunter Partnership - Harry Hall; Hannah Packwood; Haygrove Siddesham - Kathy Evans; Highdown Vineyard - Paul Englefield; 'Highways England'; 'Highways England - Elizabeth Cleaver'; 'Highways England - Peter Philips'; Hill Bros Chichester Limited - Kevin Hill; Hill Bros Chichester Limited - Peter Hill; Historic England - Alan Byrne; Hollycroft Park Limited - David Fox; Homes & Community Agency - Helen Burton; Horsham District Council; Horsham District Council - Julia Dawe; Jakes Nursery - Ken Parkinson; John Hall Consulting; Landsdowne Plants - Daniel Gibbs; Langmead Farms - David Langmead; Langmead Farms - David Moore; Lowertrees Nursery - Mr Burton; Madesteen UK Limited - Jonathan Zwinkels; Madesteen UK Limited - Nick Vrijland; Madesteen UK Limited - Peter Zwinkels; Natural England; Natural England - John Lister; New Place Nurseries Limited; New Place Nurseries Limited - Mike Norris; NHS Coastal West Sussex Clinical Commissioning Group; NHS Coastal West Sussex Clinical Commissioning Group - Richard Hornby; Nathart Nurseries - Gary Griffiths; Openreach BT - Simon Cullen; P G Liverman - Peter Liverman; Parigo Horticultural Limited - Frank Geomans; Portsmouth Water - P Sansby; Portsmouth Water - S Morley; Roundstone Nurseries Limited - Gavin Miskelly; Roundstone Nurseries Limited - Peter Cook; Scotia Gas Networks; Scotia Gas Networks - Allan Morrison; Scotia Gas Networks - Jane Crowley; Scottish & South Electric - Terry Davies; Scottish & Southern Electric - Simon Bushell; South Downs National Park Authority; South Downs National Park Authority - Richard Ferguson; Developer Services; Policy, Planning; Southern Water - David Nuttall; Star Nurseries Limited - James Turner; Sussex Biodiversity Partnership - Tony Whitbread; Sussex Police & Crime Commissioner; Sussex Police & Crime Commissioner - Samantha Prior; Sussex Wildlife Trust - Melanie Sims; Swallowfield - David Godsmark; Swallowfield - Greg Allen; Tangmere Airfield Nursery - Dick Houweling; Tangmere Airfield Nursery - Dirk Houweling; Tangmere Airfield Nursery - Gerard Vonk; Tangmere Airfield Nursery - Marcel Houweling; Tangmere Airfield Nursery - Robert Searle; The Woodhorn Group - Cameron Lewis; Toddington Nurseries Limited - Andrew Desmond; V H B Herbs - Chris Moncrieff; V H B Herbs - Nick Gibbons

Vitatress - Chris Moncrieff; Voluntary Action Arun & Chichester; Voluntary Action Arun & Chichester - Sharon Westcott; Walberton Nursery - David Tristram; West Sussex County Council - Lucy Seymour-Bowdrey; West Sussex Fire & Rescue - Rob Mapley; West Sussex Highways / West Sussex Lead Local Flood Authority; Worthing Borough Council - Collette Blackett; Acorn Cottage - Phil Walker; Aldingbourne Trust - Marion Crook; Almodington Nurseries - Chris Wade; Alpha Nurseries - Alan Cox; Annie's Baskets - Anne Smith; Applegate Nurseries Limited - Gary Corbett; Basil Baird (Fareham) Limited - Nick Baird; Bellfield Nursery - Trevor Buttress; Bridge Greenhouses Limited - Mark Chivers; Chartsworth Nursery - Phil Allen; Culberry Nursery Limited - Martin Jarvis; Dave Abbott; David Hand Consulting - David Hand; Grow Train Limited - Graham Bryant; Jack Daws Field - Nick Reece; Kevin Robinson Limited; LwZ Automation Limited - Leon van Zijl; M & Y Fruit Limited - Yuliya Janeiro Mike Plummer; Mr Ian Riggs; South House Farm Nursery - Mr P Wright; Stockbridge Technology Centre - Graham Ward; Tullens Fruit Farm - Ivor Kiverstein; West Sussex Growers Association - John Hall; Woodleigh Nursery - Norman Lee; Woodpecker Nursery - Colin Chewer

Cc: Karl Roberts; Carolyn Nysinge; Sue Bowley

Subject: FW: Arun District Council - Introduction of Horticulture Local Development Order
Dear Consultee

Arun District Council

Introduction of Horticulture Local Development Order

I am pleased to enclose for your information and statutory consultation, details of Arun District Council’s proposed introduction of a Local Development Order (the LDO) that will focus on areas already used extensively by the horticultural industry within the Arun Local Plan Area (Arun District Council administrative area excluding land within the boundary of the South Downs National Park).

The value of the horticulture sector to the local economy is recognised and supported in the Arun Local Plan and the Council’s Economic Strategy.

The Council agreed to the preparation of a Local Development Order for the Horticulture Sector in 2015. Funding for this project was secured with support from the Department for Environment, Food and Rural Affairs (DEFRA).

Please find enclosed:

(a) Draft LDO and Statement of Reasons
(b) List of consultees to be consulted
(d) Consultation response form

Consultees are invited to comment on the statement of reasons for preparing the Order and the content of the draft LDO. I should be most grateful to receive any comments you may wish to make by 5:00 pm Friday, 13 May 2016 by completing the attached consultation response form. These documents have been published on the Council’s website at www.arun.gov.uk/ldo

I hope the following background information will assist you in appreciating the planning and environmental context of the LDO.

Background

Horticulture is a key employment sector in the Arun District and is particularly concentrated in a number of localities. The Council’s Economic Strategy 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. 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.

Proposed Local Development Order

The Arun Horticulture Local Development Order (the LDO) permits development only within the boundaries identified on the LDO area plans. The extent of the LDO area is shown on the “red line” plans within Appendix A and Appendix B “Description of LDO Areas” of the draft LDO document.

LDO Permitted Development

The developments permitted by the Order shall comprise works to:

(i) renew, replace or extend existing areas of glasshouses or polytunnels;
(ii) upgrade areas of polytunnels to glasshouses;
(iii) renew, replace or extend existing packhouse and distribution buildings;
(iv) construct water storage reservoirs; and/or
(v) provide engineered operational surfaces or access routes (including parking areas) and plant/structures external to any proposed glasshouse, polytunnel or packhouse where these are essential to the proper functioning of the glasshouse, polytunnel or packhouse and/or to comply with development parameters or condition set out in the Order.

These documents have been published on the Council’s website at www.arun.gov.uk/ldo

Should you wish to comment, please reply by 5 pm on Friday, 13 May 2016

Representations should be either submitted to:

Horticulture LDO, Management Support, Planning Services, Arun District Council, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Or by email to: horticultureldo@arun.gov.uk

If you have any queries relating to this consultation please contact Management Support (Tel: 01903 737753 or email: horticultureldo@arun.gov.uk)

Your comments and observations would be very welcome.

Kind Regards

for

Karl Roberts
Director of Planning & Economic Regeneration

Visit Arun's web site at www.arun.gov.uk

Save the environment - think before you print.

http://www.arun.gov.uk
NLPG UPRN 100062237016
DX 57495 Littlehampton

Important Notice: This e-mail is intended exclusively for the addressee and may contain information that is confidential and/or privileged. If you are not the intended recipient (or authorized to receive it for the addressee), please notify the sender and delete the e-mail immediately; using, copying, or disclosing it to anyone else, is strictly prohibited and may be unlawful. Any views, opinions or options presented are solely those of the author and do not necessarily represent those of Arun District Council. The information in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000, therefore we cannot guarantee that we will not provide the whole or part of this e-mail to a third party. The Council reserves the right to monitor e-mails in accordance with relevant legislation. Whilst outgoing e-mails are checked for viruses, we cannot guarantee this e-mail is virus-free or has not been intercepted or changed and we do not accept liability for any damage caused. Any reference to "e-mail" in this disclaimer includes any attachments.

This e-mail is intended solely for the person or organisation to which it is addressed. It may contain privileged and confidential information. If you are not the intended recipient, you are prohibited from copying, disclosing or distributing this e-mail or its contents (as it may be unlawful for you to do so) or taking any action in reliance on it.

If you receive this e-mail by mistake, please delete it then advise the sender immediately by reply e-mail to "Karpezo, Marta"
Without prejudice to the above prohibition on unauthorised copying and disclosure of this e-mail or its contents, it is your responsibility to ensure that any onward transmission, opening or use of this message and any attachments will not adversely affect your or the onward recipients' systems or data. Please carry out such virus and other such checks as you consider appropriate.

An e-mail reply to this address may be subject to monitoring for operational reasons or lawful business practices.

This e-mail is issued by Southern Water Services Limited, company number 2366670, registered in England and having its registered office at Southern House, Yeoman Road, Worthing, BN13 3NX, England.

In sending this e-mail the sender cannot be deemed to have specified authority and the contents of the e-mail will have no contractual effect unless (in either case) it is otherwise agreed between Southern Water Services Limited and the recipient.
HORTICULTURE
DRAFT LOCAL DEVELOPMENT ORDER
(HORTICULTURE LDO)
7 April – 13 May 2016
CONSULTATION: RESPONSE FORM

Please return your completed representation form to Arun District Council
By 5pm on Friday, 13 May 2016

This form has two parts:

PART A - Personal Details

All responses will be publicly available alongside your name, company name (if applicable), and your client's name/company (if applicable).

If you submit a response, your contact details will be used to notify you of the subsequent stages in the preparation of the HORTICULTURE LDO.

PART B – Your Response

Please respond with reference to each section of the draft HORTICULTURE LDO as appropriate. It would also be useful if you could identify any changes considered necessary to resolve the issues that you have identified. Please add continuation sheets as necessary.

Please access the response form at www.arun.gov.uk/ldo. Your responses should be returned to horticultureldo@arun.gov.uk or to Horticulture Local Development Order, Management Support, Planning Services, Arun Civic Centre, Maltravers Road, Littlehampton, West Sussex, BN17 5LF

A guidance note to explain what this consultation is about is attached to this form.
1.
If you wish to make general comments on any aspects of the HORTICULTURE LDO, please set out your comments below specifying which paragraph, section or page your comments relate to.

Please refer to content of my email dated 13/05/2016.
Please set out the changes you consider necessary to resolve the issues you have identified above. Please explain why these changes will make the HORTICULTURE LDO more useful.

It will be helpful if you are able to put forward your suggested revised wording of any part of the HORTICULTURE LDO. Please refer each specific section, paragraph, table, plan or appendix as appropriate.

Please be as clear as possible.
Guidance Note:

Procedure for Making and Consulting upon Local Development Orders ("LDOs")

Legislation.

The legislation governing the making of Local Development Orders is set out in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990. Paragraph 1(1) of Schedule 4A states that an LDO must be prepared in accordance with such procedure as is prescribed. The procedure for LDOs is set out in Part 8, Section 38 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO 2015).

The Localism Act 2011 made it easier for Local Planning Authorities ("LPAs") to make LDOs as it removed the requirement for LDOs to achieve policies in adopted local development documents.

Consultation Procedures

The steps that need to be taken are, in summary, as follows.

The Council, as Local Planning Authority (LPA), to prepare a draft order and a statement of reasons for making the order. The statement must contain a description of the development which the order would permit and a plan or statement identifying the land to which the order would relate.

The LPA must then consult any of the persons set out in Part 8, Section 38 (3) and (4) of the DMPO (2015). To include those whose interests the LPA consider would be affected by the order. The LPA must also consult any person whom they would have been required to consult on an application for planning permission for the development proposed to be permitted by the order.

In carrying out the consultation the LPA shall:-
(a) send a copy of the draft order and statement of reasons to the consultees; 
(b) specify a consultation period of not less than 28 days; and 
(c) take account of all representations received by them during the consultation period specified.

Consultation on the draft LDO includes the following requirements:
- To make a copy of the draft order and statement of reasons available for inspection at their principal office and such other places the LPA consider appropriate.
- publish details on the Council website.
- give notice by local advertisement of, site notices, and serving notice on both landowners and tenants of the land within the draft LDO boundary.

4. Any representations received within the timescales referred to above as a result of the aforementioned consultation, publicity and service shall be taken into account by the LPA in deciding what modifications should be made to the draft order or whether such order should be adopted.

5. The Growth and Infrastructure Act 2013 simplified the Local Development Order process by removing the requirement for the local planning authority to submit the order to the Secretary of State before adoption for consideration of whether to intervene. This was replaced by a requirement to notify the Secretary of State, via the National Planning Casework Unit at npcu@communities.gsi.gov.uk, as soon as practicable after adoption. The Act also removed the requirement for Local Development Orders to be reported on as part of Authorities' Monitoring Report.
From: Paul Sansby
Sent: 29 April 2016 09:22
To: Sue Bowley
Cc: Steve Morley
Subject: RE: ADC - Horticulture LDO Consultation

Sue
I don’t think that we have seen this consultation but we have been in discussion with the West Sussex Growers about water supply.
Developers of new horticultural sites need to ensure that they have access to sufficient sustainable water supplies.
Water Companies have no statutory obligation to supply non households and competition will further complicate matters after 2017.
Portsmouth Water may be able to supply sites, or to develop water supplies to support horticulture, but we are not part of the formal planning process.
If sites are allocated without planning permission then it is even more important that the developers and the West Sussex Growers talk to us as soon as possible.
The current Water Resources Management Plan does not allow for significant horticultural dement.
If this develops then future plans will need to include this in the overall demand.
Regards
Paul

From: Karl Roberts
Sent: 27 April 2016 18:25
To: Sue Bowley; Carolyn Nysingh
Subject: Fwd: ADC - Horticulture LDO Consultation

Sent from my iPad
Karl Roberts-Director of Planning and Economic Regeneration, Arun District Council.

Begin forwarded message:
From: "John Hall (WSGA)"  
Date: 27 April 2016 at 18:21:43 BST  
To: 'Karl Roberts' <Karl.Roberts@arun.gov.uk>  
Cc: Martin Emmett, Paul Bennett, Growtrain Graham Bryant  
Subject: RE: ADC - Horticulture LDO Consultation

Hello Karl,

During a conversation with Martin Emmett this afternoon; I realised that I had misinterpreted my response under my point number 4: 4. Siting – 30m distance from existing buildings is too restrictive. 10m to 15m is more realistic.

Please delete point number 4. from my response on behalf of WSGA.

Thanks, John.

John Hall MBA MI Hort  
West Sussex Growers’ Association  
113 Limmer Lane  
Felpham  
West Sussex  
PO22 7LR

w: www.wsga.co.uk

From: Karl Roberts [mailto:Karl.Roberts@arun.gov.uk]  
Sent: 15 April 2016 09:41  
To: 'John Hall (WSGA)'
Cc: 'Bob Horn'; 'Chris Moncrieff'; 'Colin Frampton'; 'Dave Abbott'; 'David Fox'; 'Graham Bryant'; 'Greg Allen'; 'Ian Riggs'; 'Jonathan Zwinkels'; 'Martin Brassfield'; 'Martin Emmett'; 'Mike Norris'; 'Mike Plummer'; 'Paul Bennett'; 'Paul Sopp'; 'Peter Zwinkels'
Subject: RE: ADC - Horticulture LDO Consultation

Dear John,

Thank you for the e-mail.

We will include your comments in the evaluation of responses which we will prepare for the Planning Committee.

However, I wanted to make a couple of general points.

It is important not to lose sight of what we are trying to do and why. The LDO which is being funded by a DEFRA grant to the tune of £50,000 is intended to give those businesses operating within the 12 areas greater freedoms to undertake relatively small scale and uncontroversial developments without having to apply for planning permission thereby hopefully saving those businesses time and money. However, what this has never been about is facilitating significant expansion of any particular area. That is not to say that can’t happen, but it’s not the purpose of this LDO. There are lots of reasons why we took this approach, but one very practical one is that budget would not have been sufficient to undertake the necessary investigatory work for significant site expansion on just one site let alone all twelve. If a business wants to expand their site they can still do that but they will have to apply for permission in the normal way.
The same board principle applies to the size limitations in the LDO. These determine what can be permitted under the auspice of the LDO. If a business wants to do something which breaches one of these limitations they can still apply for planning permission as they would now. That being said, if you believe any particular LDO limitation is too restrictive either generally or specifically at a given location then it would be helpful to know why and what would be a reasonable alternative.

Only time will tell whether the LDO has been actually helpful in the way envisaged.

I hope these comments are helpful.

Regards
Karl

---

From: John Hall (WSGA)  
Sent: 14 April 2016 15:44  
To: horticultureldo; Karl Roberts  
CC: 'Bob Horn'; 'Chris Moncrieff'; 'Colin Frampton'; 'Dave Abbott'; 'David Fox'; 'Graham Bryant'; 'Greg Allen'; 'Ian Riggs'; 'Jonathan Zwinkels'; 'Martin Brassfield'; 'Martin Emmett'; 'Mike Norris'; 'Mike Plummer'; 'Paul Bennett'; 'Paul Sopp'; 'Peter Zwinkels'  
Subject: ADC - Horticulture LDO Consultation

Hello Karl,

West Sussex Growers Association (WSGA) is very supportive of the proposed Horticulture: Local Development Order in the Arun District Council area, and we are grateful to have the opportunity to respond to the consultation process.

Individual members of the Association will no doubt make their views known to you; however on behalf of the Executive Committee of WSGA, I would like to highlight some points that we feel require further discussion:-

1. LDO Area – The 12 mapped areas shown under Appendix A are far too limited. Much more land needs to be made available for the future expansion of existing businesses and for new horticultural business developments in other areas.

2. General Provision – See point 1.

3. Maximum Area – Boundaries are not drawn widely enough. In many examples (see maps) the proposed boundaries barely extend beyond existing glasshouses on the site.

4. Siting – 30m distance from existing buildings is too restrictive. 10m to 15m is more realistic.
5. Building Scale – An 8m height limit for some buildings will be too restrictive. There are already many horticultural packhouses and distribution centres taller than 8m in the Arun and Chichester Districts. – A limit of 2,000m$^2$ is too small for packhouses. – Some reservoirs may need to be greater than 3,600m$^2$ in open water area and cover more than 1Ha. – Some reservoirs will need to have banks greater than 2m in height. – External plant areas may need to exceed 50m$^2$.

6. Ancillary Plant – Integrated ancillary plant and engineering works should be permitted under the LDO.


11. Landscape – 15m building distance from hedges is too restrictive. 5m to 10m is more realistic.

We would be very pleased to attend a meeting with your team to discuss these points further.

Kind regards, John.

John Hall MBA MI Hort
West Sussex Growers’ Association
113 Limmer Lane
Felpham
West Sussex
PO22 7LR

w: www.wsga.co.uk

http://www.arun.gov.uk
NLPG UPRN 100062237016
DX 57406 Littlehampton

Important Notice This e-mail is intended exclusively for the addressee and may contain information that is confidential and/or privileged. If you are not the intended recipient (or authorised to receive it for the addressee), please notify the sender and delete the e-mail immediately; using, copying, or disclosing it to anyone else, is strictly prohibited and may be unlawful. Any views, opinions or options presented are solely those of the author and do not necessarily represent those of Arun District Council. The information in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000, therefore we cannot guarantee that we will not provide the whole or part of this e-mail to a third party. The Council reserves the right to monitor e-mails in accordance with relevant legislation. Whilst outgoing e-mails are checked for viruses, we cannot guarantee this e-mail is virus-free or has not been intercepted or changed and we do not accept liability for any damage caused. Any reference to "e-mail" in this disclaimer includes any attachments.

http://www.arun.gov.uk
NLPG UPRN 100062237016
DX 57406 Littlehampton

Important Notice This e-mail is intended exclusively for the addressee and may contain information that is confidential and/or privileged. If you are not the intended recipient (or authorised to receive it for the addressee), please notify the sender and delete the e-mail immediately; using, copying, or disclosing it to anyone else, is strictly prohibited and may be unlawful. Any views, opinions or options presented are solely those of the author and do not necessarily represent those of Arun District Council. The information in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000, therefore we cannot guarantee that we will not provide the whole or part of this e-mail to a third party. The Council reserves the right to monitor e-mails in accordance with relevant legislation. Whilst outgoing e-mails are checked for viruses, we cannot guarantee this e-mail is virus-free or has not been intercepted or changed and we do not accept liability for any damage caused. Any reference to "e-mail" in this disclaimer includes any attachments.
Dear Sir

I attach Historic England's comment on the above consultation document.

Yours faithfully,

Alan Byrne
Historic Environment Planning Adviser
National Planning and Conservation Department

Historic England | South East | Eastgate Court
195-205 High Street | Guildford | GU1 3EH

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: HistoricEngland.org.uk/EAS

We are the public body that looks after England's historic environment. We champion historic places, helping people to understand, value and care for them, now and for the future.
Sign up to our enewsletter to keep up to date with our latest news, advice and listings.

HistoricEngland.org.uk Twitter: @HistoricEngland

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available.
Dear Sir

Arun District Council - Introduction of Horticulture Local Development Order

Historic England does not object in principle to the LDO, and recognises the benefit of sustaining the horticultural production sector to the local economy of Arun.

A LDO must not be made so as to grant planning permission for development affecting a listed building (DMPO 2015 Article 38 (12)). It should be noted that it is not possible to extend permitted development rights to listed buildings or scheduled monuments and a reference to this effect should be included in the LDO (e.g. at para 5.11). Development affecting a nationally listed heritage asset will require consent under the appropriate procedure relating to that class of asset irrespective of any other development rights that may exist and this should be made explicit in the document.

The document, possibly in the design guide (Appendix D), should include a note on the potential effects on the character of listed buildings and other heritage assets, e.g. character and appearance of conservation areas, and their settings. Any development will need to comply with relevant legislation on these matters (for instance, S.66 Planning (Listed Buildings and Conservation Areas) Act 1990), and take into account national policy advice on protecting and enhancing the significances of heritage assets and their settings (NPPF para 132).

Development directly affecting a Scheduled Monument is very unlikely to be acceptable. As damage to a scheduled monument is a criminal offence with potentially serious repercussions it is important that the Order identifies this to developers and provides appropriate guidance.

*
It is noted that requiring archaeological investigation as a condition of the development 'where appropriate' is included in Appendix C, Condition 8, but there is a lack of guidance in respective of where this would apply. An additional Informative in Appendix D may be useful in this respect.

To ensure no listed buildings, scheduled monuments or other heritage assets are negatively affected by the proposal an assessment for potential heritage impacts of all the sites included in the draft LDO should take place prior to adoption, and any specific or potential effects that are identified should be included in the Appendix B Description of LDO Areas. Alternatively (or additionally), it should be made clear to developers that the council will assess these effects as part of the pre-development notification process and may refuse or withhold consent if harm to the significances of heritage assets will result from the development proceeding.

A clause in the design guide (Appendix D) that relates to the historic environment and heritage assets and the requirements of the relevant legislation and guidance would be appropriate.

I hope these comments are of help to you. Please contact me if you have any queries on the above matters.

Yours faithfully

Alan Byrne
Historic Environment Planning Adviser
Dear Arun District Council Horticulture LDO team,

Thank you for inviting Highways England to comment on the Arun District Council - Introduction of Horticulture Local Development Order.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network.

We do not have any comments.

Best Regards
Sent on behalf of Elizabeth Cleaver

Thomas

Thomas Pettyt
Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ
Web: www.highwaysengland.co.uk

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | https://www.gov.uk/government/organisations/highways-england | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

1
Carolyn Nysingh

From: Caroline Wood
Sent: 11 May 2016 08:14
To: horticultureldo
Subject: Response for the Horticulture LDO
Attachments: Horticulture LDO response 100516.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please find attached a letter relating to the LDO.

best wishes

Caroline Wood
Director, Coastal West Sussex Partnership

www.coastalwestsussex.org.uk
To whom it may concern,

**RE: Horticulture LDO Consultation**

The Coastal West Sussex Partnership (CWS) welcomes the work that Arun District Council is undertaking to bring forward a Local Development Order to give the horticultural businesses operating in the defined areas greater freedoms to deliver small scale developments without applying for planning permission which will hopefully save businesses time and money.

The CWS Partnership Board brings together leaders and officers from both the private and public sector around a common purpose to support business development and sustainable economic growth, working collectively on economic issues that affect the coast.

The horticultural industry is an incredibly important industry sector for Coastal West Sussex, particularly in the Arun and Chichester area and is now worth approximately £1 billion per annum at retail values and employs over 8,000 FTEs with an increasing number of those people needing higher and more technical skills to work in this technologically advanced sector and therefore actions like this that support the sector should be welcomed although it does just raise a couple of questions:

1. The LDO is proposed to operate over 12 sites although horticultural businesses do operate in other areas across the Arun District. Therefore if this proves to be effective, will the LDO be extended to cover more sites and thereby offering the businesses on other areas the same opportunities?

2. The business needs of the sector are changing and developing all the time with businesses often needing larger and higher buildings. Therefore what flexibility can be afforded to businesses within the LDO area or is that then subject to regular planning applications?

3. How will the impact of the LDO be measured over time to understand what benefits it has brought to both the horticultural business and the Local Authority.

Yours sincerely

Caroline Wood
Director, Coastal West Sussex Partnership.
Only 20 minutes past the deadline!
Hopefully you can take the attached letter into consideration.
With kind regards
Tom

Tom Ormesher
Regional Environment & Land Use Adviser

NFU South East Region
Unit 8 Rotherbrook Court
Bedford Road
Petersfield
Hampshire
GU32 3QG

Thank you for Backing British

This e-mail is from the National Farmers' Union ("the NFU") or one of the organisations ("the Organisations") permitted by the NFU to use the NFU network. The information contained in this e-mail and in any attachments is intended for the named recipient and may be privileged or confidential. If you receive this e-mail in error please notify the NFU immediately on 024 7685 8500. Do not copy it, distribute it or take any action based on the information contained in it. Delete it immediately from your computer. Neither the NFU nor the sender accepts any liability for any direct, indirect or consequential loss arising from any action taken in reliance on the information contained in this e-mail and gives no warranty or representation as to its accuracy or reliability. Nor does the NFU accept any liability for viruses which may be transmitted by it. It is your responsibility to scan the e-mail and its attachments (if any) for viruses. The NFU may monitor and read both incoming and outgoing e-mail communications to protect its legitimate interests.

NFU, Registered in England No. 245E
Dear Sir/ Madam,

The Arun Horticulture Local Development Order

We would like to register our strong support for the proposed horticultural LDO in Arun District.

Horticulture delivers approximately one third of the value of the entire agricultural output of South East England (approximately £0.65 billion in 2014 - source: ONS). As such horticulture is the largest, most valuable sector in our region. Just 1.5% of the total farmed area in South East England accounts for nearly 16% of the total horticultural area in England. The sector has the highest productive output on the least amount of land and is therefore a critical component in delivering national food security. What's more, nationally there are half a million jobs in farming and growing underpinning a further 3.2 million jobs in the food services industry; and for every £1 that farming contributes to the UK economy, our food manufacturers and wholesalers contribute a further £5.

We have every reason to believe that your support of this essential industry will have a positive effect on the jobs and growth within the District as a whole. We therefore commend your proposal to support the horticultural industry.

Many parts of the horticultural sector do not receive the same level of subsidy and support payments that other farming sectors benefit from. This sector therefore needs support in other ways to ensure that it has the right circumstances to grow and do business.

We understand and support the need to specify carefully the scope of the LDO; and we recognise that the planning risks should be effectively controlled by ensuring that the LDO applies mainly to existing glasshouses and polytunnels. In most cases we do not foresee there being any undue restriction on the business requirements of growers in the LDO area; however we suggest that the effects of the policy should be kept under review, to make sure that growers have in practice been able to make good use of the Order. In this regard ADC may wish to consider inserting a need for an interim review after 5 years to address any teething problems that the Order might have.

In terms of water storage reservoirs, we are slightly uncertain as to how the Order will operate in light of some elements of the General Permitted Development Order. In particular Schedule 2, Part 6 Class C conditions that "no mineral extracted during the course of the operation shall be moved to any place outside the land from which it was extracted, except to land which is held or occupied with that land and is used for the purposes of agriculture".

In the context of Part C, potential volumes of water storage are likely to be constrained by the level of excavation permitted within this scope (we estimate this will enable 5-10 megalitres of water storage).
Depending on the ground conditions in the LDO area, site won material may not be appropriate for use in constructing the new reservoir. In such a case the developer may have to apply for planning permission to remove the surplus material from site. We suggest that this might be an unnecessary constraint that could be dealt with in advance through the LDO.

Demand for Irrigation Reservoirs

Evidence is sparse on the extent of irrigation reservoir capacity in England; however EA data indicates that approximately 25% of current abstraction demand was fulfilled by winter abstraction in 2009/10 and 34% of spray irrigation volume is licenced for storage. This demonstrates that roughly one third of irrigation demand is probably met through reservoir storage based upon those average EA figures.

In the South East, typical irrigation volumes are currently applied at 197 m$^3$/ha for apples/ pears to 2,495 m$^3$/ha for substrate grown strawberries (Dracott 2015). If average irrigated area in England is approximately 20 hectares per farm holding, this equates to a need of approximately 50 mega litres per year, which has to be met through a combination of direct abstraction and reservoir/ winter storage. Looking forward, Knox (et al) 2013 predicts an increase in irrigation demand of between 40% and 167% depending upon different socio-economic scenarios and climate change.

Current average farm storage reservoirs tend to store approximately 12 ML on average. This may only account for a small proportion of irrigation demand, which could potentially diminish through the increased evapotranspiration demands likely to be seen through climate change.

The implication is that on farm water storage will not diminish in importance for growers but will become more important. We therefore suggest that Arun DC should keep under review the demand and availability of storage reservoirs; to see whether the LDO is fit for purpose in delivering sufficient volumes of water needed to support the sector. Should further flexibility be needed we suggest that ADC might consider reviewing restrictions around site won minerals as this may enable reservoirs to be increased in depth without significant requirements for additional space.

We are very pleased that ADC has had the foresight to introduce such a forward looking policy and we hope it delivers substantial benefits to the local economy. We commend your intentions to “facilitate redevelopment and investment in the sector”.

Yours sincerely

[Redacted]

Tom Ormesher
Environment and Land Use Adviser
NFU South East
Dear Sue

Thank you for letting Natural England have sight of this document. Generally the focus lies beyond our remit, but I have two brief comments.

- Whilst trees and hedges seem have some measure of protection within the LDO, ditches and ponds have not. These are all part of the habitat network that will help to deliver the government’s ambition to halt the decline in biodiversity.

- A number of the sites are close to the National Park (eg Binfield). I trust that the NP Authority has been consulted on potential changes in the setting of the designated landscape.

There is currently significant pressure from consultations on land-use proposals and appeals, the completion of local plans, the review of existing plans, and work on neighbourhood plans (there are over 500 parishes in Kent and Sussex). This makes it difficult to devote the time that consultations deserve. Nevertheless, I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England, please use the appended form.

Yours sincerely

Lead Adviser
Sussex & Kent Area Team (Area 14)

Natural England,
International House,
Dover Place, Ashford,
Kent, TN23 1HU.

www.gov.uk/natural-england

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please send all new consultations to consultations@naturalengland.org.uk.
In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Follow us:

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.
Feedback
Planning Consultations and Wildlife Licensing

We value your opinion

At Natural England we value our customers and seek to improve the quality of our services based on feedback and suggestions from you. If you would like to let us have your views, we would be grateful if you could take a few minutes to answer these questions and return it to us using the "Submit by Email" button.

1. Please indicate if your consultation refers to.
   - Land Consultation
   - Marine Consultation
   - Wildlife Licensing

2. With reference to the recent consultation or application and where applicable, please rate your satisfaction with

<table>
<thead>
<tr>
<th></th>
<th>Very satisfied</th>
<th>Fairly satisfied</th>
<th>Neutral</th>
<th>Fairly dissatisfied</th>
<th>Very dissatisfied</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) The quality of online guidance that Natural England provides</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>b) The ease of contacting someone who could help you</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>c) The extent to which our staff were helpful, friendly and polite</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>d) The extent to which our staff understood your needs</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>e) The clarity of our requests for further information when dealing with your consultation</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>f) The extent to which you understood the advice/information you received</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>g) The practicality and helpfulness of the advice given to you</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>h) The clarity of our communication</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>i) The extent to which we kept you updated and informed on progress</td>
<td></td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>Question</td>
<td>Options</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>---------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>j) The timeliness of us negotiating revised deadlines (where applicable)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>k) Our response within agreed deadlines</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>l) The extent to which you felt you had been treated fairly and with respect</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>m) The ease of completion of application/renewal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>n) The clarity of published guidance for completing an application</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>o) The helpfulness of advice from staff on site visit?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Improving the overall quality of our service

3) Please add any suggestions or feedback you may have to improving our service for you, and include the name of anyone who had been particularly helpful to you. If you have responded 'dissatisfied' or 'very dissatisfied' for any question we would appreciate further details so we can investigate and improve our service in the future.

We would like to update you on any action we have taken following your comments and suggestions. If you would like an update, please add your name and email or telephone number.

Thank you for taking the time to let us have your views.

Ian Fugler, Director for Sustainable Development.

Using and sharing your information

The data controller is Natural England, 4th Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX. Your information will be stored and processed in accordance with the Data Protection Act 1998. This Act gives you, as an individual, the right to know what data we hold on you, how we use it, with whom we share it and for it to be accurate.

Any information you provide will only be used by Natural England for the purposes of service standard monitoring.
Dear all

Thank you for the opportunity to comment on the Arun Horticulture LDO. Please find attached County Council officer comments.

Kind Regards
Lucy

---

From: Lucy Seymour-Bowdery
Sent: 13 May 2016 11:25
To: horticultureldo@arun.gov.uk
Cc: Karl.Roberts@arun.gov.uk; Darryl Hemmings
Subject: Arun Horticulture LDO consultation

Dear all

Thank you for the opportunity to comment on the Arun Horticulture LDO. The County Council is preparing officer comments and to enable a full assessment of the issues, requests a short extension to the deadline. It is anticipated that a response will be provided by next Wednesday 18th May.

Kind Regards
Lucy

---

This email and any attachments are confidential and intended solely for the persons addressed. If it has come to you in error please reply to advise us but you should not read it, copy it, show it to anyone else nor make any other use of its content. West Sussex County Council takes steps to ensure emails and attachments are virus-free but you should carry out your own checks before opening any attachment.
West Sussex County Council response to Arun Horticulture Local Development Order consultation

Arun District Council is proposing to introduce a Local Development Order (LDO) to simplify the planning process for horticultural development in the District. LDOs are made by local planning authorities and give a grant of planning permission to specific types of development within a defined area. They streamline the planning process by removing the need for developers to make a planning application to a local planning authority. This draft LDO sets out general development parameters and includes 12 areas where they would be applied. It is intended that the LDO will be implemented for a period of ten years from the date of adoption.

This note sets out officer comments on the draft LDO, highlighting key issues and suggesting changes which the County Council is requesting be made to the draft LDO prior to its adoption. Whilst the general principle of an LDO for horticultural development is supported, the County Council is objecting to the inclusion of three of the individual LDO Areas for reasons set out below unless supporting transport evidence is provided.

General

The County Council recognises that horticulture is a key employment sector within Arun District. The development and growth of the sector is an important factor in sustaining the local and regional economy and as such, the County Council broadly supports the LDO proposals from an economic growth and development perspective. The approach should enable existing business to upgrade and modernise facilities to negate increasing or future production costs, whilst making existing businesses more competitive. The proposal should make inward investment a more attractive proposition into the sector and region. The planning framework set out complements wider growth ambitions for the District and County; where growing local businesses, supporting and championing the economy are key strategic objectives. Removing the barriers to growth and upgrading infrastructure to enable businesses to thrive and expand is an approach the County Council would welcome.

Transport

No supporting transport evidence or statement has been submitted to support the overall approach set out in the LDO or the inclusion of specific sites. While it is understood that the development permitted as part of the LDO will be small-scale and mainly ancillary to the existing uses, it is requested that this is set out clearly and explicitly in the LDO either in the ‘statement of reasons’ section or the ‘permitted development’ section.
It appears that the traffic generation as a result of proposals brought forward under this LDO will be limited to under Transport Statement threshold levels for any individual site. The sites are spread over a wide area from Pagham to Hangleton (Ferring), therefore, unless otherwise stated (see appendix A & B below), the County Council does not require further work to assess the cumulative capacity impacts from expansions of up to 2000sqm at multiple sites.

**Arun Horticultural Development Local Development Order**

The general development parameters together with conditions and informatives in Appendix C appear to provide sufficient safeguards regarding potential impacts on trees, woodland and hedgerows. Although there are statements around retaining existing hedgerows for example, what is not made explicit is that any proposal should not ‘sterilise’ an area in terms of retaining and enhancing connectivity across the landscape, through linear features such as hedgerows and linking up any other features such as woodland parcels, ponds etc.

Table 1: General Development Parameters – The inclusion of point 8 (highway access) is supported. Please amend to the following:

‘The formation of new accesses or *alterations to existing accesses* to the public highway is not permitted unless subject to separate authorisation’.

The inclusion of point 10 (residential and general amenity) prohibiting development within 5m of an existing Public Right of Way (PROW) is supported. However, there are concerns regarding the wording of the exception. There are instances where vehicle use along an existing PROW already causes path surfaces to be disturbed so as to make public access inconvenient. There is also the hazard vehicle use poses to the public as generally space is limited; and vehicles either delivering, parking or loading obstruct the path or deter use. If vehicle access is to increase along a PROW, the concerns for surface damage, possible conflict and irregular obstruction will only increase. Please either remove this exception in order that any and all proposals that could impact on a PROW and its users are given individual consideration by the Local Highway Authority or provide additional evidence that any potential increase in vehicle access would not lead to unacceptable impacts on PROW.

**Appendix A & B: LDO Areas**

The LDO Areas are on the coastal plain, which is known to be rich in prehistoric and Roman remains but the degree of survival and the level of archaeological potential (for hitherto undiscovered below ground archaeological remains) will vary according to the local topography (and therefore suitability for ancient settlement), and the extent of ground disturbance or the nature of previous horticultural use. Some of the LDO sites have been the subject of archaeological investigation themselves in the course of past planning applications (such as LDO 2 – Sefter Farm, LDO 3 Newlands Nurseries or LDO 11 - The Vinery) and
where archaeological evidence has been found, it would be reasonable to conclude that there is clear potential for such features to continue into adjacent land.

The West Sussex HER shows that there are archaeological features and finds often in close proximity to the sites if not within the LDO areas. Equally, previous experience of former nursery sites which have been granted planning permission for housing development (for example such as at Toddington Lane north of Littlehampton) has demonstrated the capacity for archaeological evidence to survive, but at the same time shown that sometimes the ground below glasshouses can be heavily disturbed to the detriment of archaeological evidence and even light structures like polytunnels sitting on a geotextile membrane can affect the soil colouration and make the recognition or retrieval of data extremely challenging.

Where large areas of glasshouses are proposed it is likely that these will require an absolute level for operational efficiency and that even where sites have minor contours, these will require terracing in or ‘cut and fill’ to create the required level base. This could clearly be detrimental to any below ground archaeology. In addition, facilities such as ponds to collect rainfall run-off from large amounts of glass will remove any below ground features. The archaeological adviser to Arun District Council will need to advise on the implications for each horticultural LDO site as proposals come forward, but with condition 8 there will be a fitting mechanism in place to safeguard archaeological evidence.

**LDO1: Land off Lake Lane, Barnham** – To facilitate a proposal that includes additional HGV movements at this location, it may be necessary to seek improvement to site accesses or Lake Lane, or seek other measures such as HGV routing agreements. These would need to be considered on a site-by-site basis and inclusion of this site in the LDO would preclude the LHA from negotiating such measures if needed.

There is also an existing issue caused by HGVs turning from Lake Lane onto North End Road in close proximity to an at-grade automatic half barrier railway level crossing. The narrow nature of the entrance to Lake Lane means two HGVs cannot pass at the same time at this point, and a risk has been identified with vehicles blocking the level crossing. This is an ongoing issue and a permanent speed restriction for all trains approaching Yapton Level Crossing is now in place. Any future development in this area should not increase the risk of vehicles blocking the level crossing, or prejudice the delivery of a long term solution to this issue.

Any potential intensification of use at this site will require careful consideration by the County Council as the Local Highway Authority. It is therefore requested that this site is either removed from the LDO to enable the County Council to
consider each proposal as part of a planning application on a site by site basis, or additional evidence should be provided to confirm that the cumulative impact on the transport network of proposals in the LDO would not be severe.

**LDO4: Land at Woodgate** – The site that is located to the north of the railway level crossing is served by Hook Lane, which is a small residential road with a width restriction at one end. There is limited non-vehicular provision and pedestrians are required to share the carriageway with vehicles for a majority of the lane. There are a number of extant planning permissions for residential development which will further increase non-vehicular movement along the lane. As a result, Hook Lane could be sensitive to minor fluctuations in HGV traffic. Any potential intensification of use at this site will therefore require careful consideration by the County Council as the Local Highway Authority. It is therefore requested that either the site is removed from the LDO to enable the County Council to consider each proposal as part of a planning application on a site by site basis or additional evidence should be provided to confirm that the cumulative impact on the transport network of proposals in the LDO would not be severe.

**LDO8: Land at Binsted** – The site is accessed via Binsted Lane, which is of insufficient width to enable two HGVs to pass one another; site observation indicates erosion of the verge along the length of Binsted Lane. Non-vehicular users of the road are required to share the limited carriageway space with vehicles. Therefore, the lane could be sensitive to minor fluctuations in HGV traffic. Any potential intensification of use at this site will therefore require careful consideration by the County Council as the Local Highway Authority. It is requested that this site is either removed from the LDO to enable the County Council to consider each proposal as part of a planning application on a site by site basis, or additional evidence should be provided to confirm that the cumulative impact on the transport network of proposals in the LDO would not be severe.

**Appendix D: LDO Design Guide**

In the species list in section 6.4 there is an error: Prunus avium is wild cherry or gean; Prunus padus is bird cherry. The latter is not suitable for this area. Small-leaved lime is not common on the coastal plain. Silver birch [Betula pendula] is preferred to Betula pubescens, unless there are particular situations where this occurs already or it is more suited to the conditions.

Please add Alder to the Specimen Trees and Woodland list.

West Sussex County Council
May 2016
Dear Sirs

Please note the comments of Eastergate Parish Council despite the delay caused by the need to discuss in public at a meeting on the 12th May. The council’s comments are as follows:-

- There would appear to be no LDO proposed for the nurseries on Barnham Road/Eastergate Lane which it is felt may pre-determine the Local Plan before consultation takes place.

- There would appear to be no District wide plan or general strategy for horticulture proposed, but rather a site by site approach.

- There was concern that there would appear to be no public plans for proper consultation with appropriate information to allow an informed response.

- There would appear to be no plans for dealing with applications for new greenhouses within the framework.

- Finally, concerns as always surround the impact of increased traffic movement in the area of any proposed development that would be able to take place if the LDO is approved and the Council would ask that Policy DM 11 of the emerging Local Plan be taken into consideration.

Yours faithfully,

G Sleet
Clerk to Eastergate Parish Council

George Ide LLP
www.georgeide.co.uk
Partners: Robert Enticott, Fraser Poole, Ursula Watt, Ian Oliver, Ian Mellor, Claire Watson, Paul Fretwell, Paul Lewis, Nicholas Smith, Danii Jhurry-Wright
Finance Director: Katie Hutchinson, FCCA
CONFIDENTIALITY NOTICE: This email is intended solely for the above mentioned recipient and it may contain confidential or privileged information. If you have received it in error, please notify us immediately by telephone and delete the email. You must not copy, distribute, disclose or take any action in reliance on it.
SECURITY WARNING: The contents of the attachment to this email may contain software viruses which
could damage your own computer system. While George Ide LLP has taken every reasonable precaution to minimise this risk, we cannot accept liability for any damage which you sustain as a result of software viruses. You should carry out your own virus checks before opening any attachment.

All relationships with clients or any other parties to whom George Ide LLP may, from time to time owe a duty of care are relationships solely with George Ide LLP. George Ide LLP will have sole legal liability for any work done for client, and for any act or omission in the course of that work. No individual Partner, employee, agent or consultant of George Ide LLP will have any personal legal liability for that work whether in contract, tort (including negligence) or otherwise. In particular, the fact that an individual Partner, employee, agent or consultant signs his or her own name, any letter, email or other document in the course of that work will not mean that he or she is assuming any personal legal liability separate to that of George Ide LLP.

George Ide LLP is a limited liability partnership registered in England and Wales number OC336392 and Vat number 931224849. We use the word partner to refer to members of the LLP.

Registered office: 52 North Street, Chichester, West Sussex PO19 1NQ. Offices also at Lion House, Chichester and London.

Horticultural Development Order

Yapton Parish Council (YPC) would like to take this opportunity to comment on the above Local Development Order (Horticulture) February 2016 consultation document.

YPC understand the need for local business to able to plan and put in place a master plan for medium and long term growth strategies. However, YPC is concerned that in the drive to facilitate local horticultural businesses the communities around and adjoining such hubs will become negatively impacted by unintended consequences.

YPC would therefore like to comment on the following site:

**LDO1 - Land off lake Lane**

YPC welcome the growth and modernisation of employment zones within the local area but would urge that historic problems related to such sites are addressed at the same time to ensure that not only the Horticultural Hubs develop and modernise but also adjoining communities experience an overall improvement in the quality of their environment.

Whilst LDO1 does not lie within Yapton Parish itself, current horticultural operations within the proposed LDO1 zone do and have a negative daily impact on the Parish. It is felt that the LDO will have further ramifications on the Parish in terms of impact on Highways and the environment.

YPC note that there will be a significant level of modernisation and expansion within the LDO1 zone. The general assumption must be in justifying this level of internal investment productivity will increase and grow significantly over the LDO period. YPC are concerned that this will lead to an increase in HGV movements outside of the site.

The very nature of the horticultural business leads to a 100% export out of the LDO1 zone placing an on-going increasing number of HGVs onto the local lanes and road network. Indeed the increase in HGV movements was subject to a thorough investigation culminating in an Inquiry on 3rd September 2015 when Stuart Lyons (Haulage) Ltd applied to vary its goods vehicles operator’s licence (OK0175616) for more vehicles entering LDO1 zone. The outcome of this being an approval subject to four conditions one being:

‘Authorised vehicles shall enter Lake Lane by turning right from Yapton Lane and exit Lake Lane by turning left into Yapton Lane so avoiding the Yapton level crossing’

YPC note that within the LDO proposed Condition and Informative (appendix C) that condition 15 Highways, merely tackles on site traffic issues and is silent with regard to Traffic impact on the main public road network surrounding the LDO especially Lake Lane (unclassified road) and Yapton Lane (B2132).

YPC would therefore seek that in relation to LDO1 Condition 15 Highways is made more robust and requires a full traffic survey with future projections for each occupier reflecting the growth of the site and its impact on the local road network before any construction can take place within LDO1.
YPC would seek additional conditions for LDO1 to ensure the safety of the level crossing - that all HGVs accessing and exiting the businesses within LDO1 only enter and exit Lake Lane from the north via Yapton Lane thus avoiding the Yapton level crossing.

YPC would also seek as part of the overall LDO strategy a full access/exit solution to LDO1 businesses is formulated and be implemented within the first few years of LDO1 overall master plan. This should result in removing the need to use Lake Lane as the main access point to LDO1 resulting in a positive benefit to surrounding communities. YPC would welcome a new access point to the horticulture hub via the current Farplants office access point on Yapton Lane which would lead to the majority of HGV movements being internalised and reducing any conflict with the Yapton level crossing.

Response prepared following meeting of Yapton Parish Planning Committee on the 23rd May 2016.