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On behalf of:
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Improvements to Lower Link Farm
ADDENDUM TO ENVIRONMENTAL STATEMENT
November 2009

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Addendum to the Environmental Statement

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I. Introduction

1.1 The Improvements to Lower Link Farm Environmental Statement (ES) reports the findings of an Environmental Impact Assessment (EIA) of a scheme of improvement works at the existing Vitacress Salads site at Lower Link Farm, St Mary Bourne, Hampshire. The proposed development will improve the quality and freshness of VSL's salad products; will remove inefficiencies; and will reduce the costs of the operation. The proposed development will also deliver environmental benefits such as reduced energy usage and CO₂ emissions.

1.2 The ES was submitted with a planning application by Vitacress Salads Ltd (VSL) to Basingstoke & Deane Borough Council (BDBC) in October 2008.

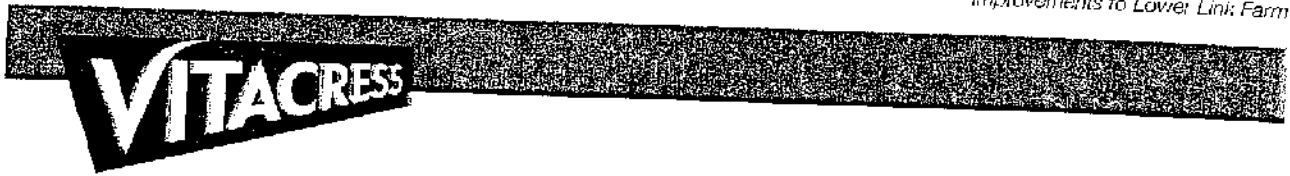
1.3 This document has been produced in response to a written request from BDBC dated 15th September 2009 to provide additional information, which it later clarified represented a request under Regulation 19 (1) and 19 (10) of the EIA Regulations, on the following matters:

- Information on the raw materials used in the existing operations at Lower Link Farm, including the origin, quantity and type of produce, and an assessment of the potential impacts on the ecology and water environment;
- Information on the waste generated by the existing operations at Lower Link Farm including details of the storage and treatment of waste and an assessment of the potential impacts on the ecology and water environment;

- Information on the past and current levels of production at Lower Link Farm, including seasonal variations in production; and,
- An assessment to the degree to which the development applied for could lead to the capability for increased productive capacity on the site.

1.4 VSL has given consideration to the Regulation 19 request issued by BDBC and determined the appropriate information necessary to submit in response to the request. The information set out in this document is considered to be a proportionate response to BDBC's request. The next section of this document responds to each of the above matters in turn.





2. Response to Regulation 19 Request

2.1 Information on the raw materials used in the existing operations at Lower Link Farm, including the origin, quantity and type of produce and an assessment of the potential impacts on the ecology and water environment

Raw Materials

2.1.1 The key raw materials used in the operations at Lower Link Farm can be summarised as follows.

Salad leaves and vegetables

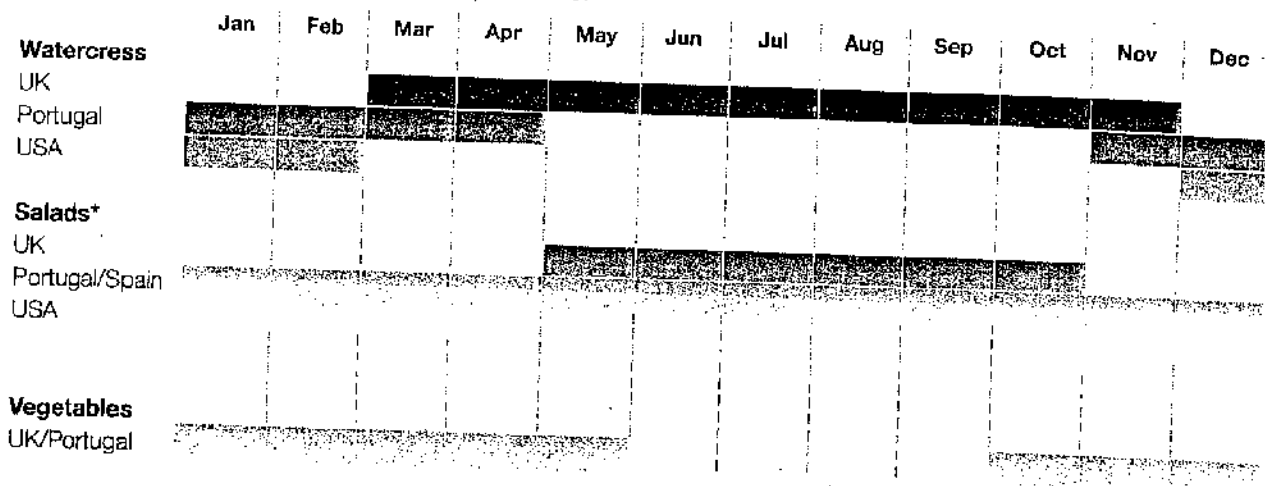
2.1.2 The salad leaves and baby vegetables processed at Lower Link Farm are seasonally sourced from Lower Link Farm, and other VSL owned or controlled farms in the UK, Spain and Portugal. These sources account for over 90% of the supply. The balance is sourced from VSL audited and approved farms in Italy, France, and occasionally from suppliers in the USA and Kenya. The seasonal source of salad

products was illustrated in Figure 1.1 in the ES submitted with the planning application. The situation has changed since the submission of the application, with less products being imported from overseas, particularly Kenya. Figure 1.1 below identifies the seasonal sources for salad products at 2009:

2.1.3 The proportion of the different types of salad products that are used in the existing operations at Lower Link Farm fluctuates both seasonally and in response to the demands of individual customers. Of the total of salad products passing through the packhouse at Lower Link Farm, the approximate split between the different types of salad produce is as follows:

- 15% watercress
- 30% spinach
- 15% wild rocket
- 25% other salad leaves
- 15% organic salad leaves

Figure 1.1 – Seasonal source of salad products.



*additional occasional shipments of organic wild roquette from Kenya.

2.1.4 In the year ending 31st March 2009, VSL's operations at Lower Link Farm used a total of 7,861 tonnes of salad leaves. This total includes salad leaves grown on site (watercress) and that grown and harvested elsewhere for transportation to the packhouse at Lower Link Farm. The salad leaves are delivered to the site in plastic crates on a just in time basis, ready for the operations in the packhouse.

2.1.5 In addition to the quantities listed above, VSL operations have for many years involved the storage and distribution of quantities of vegetables alongside its salad operations. In the year ending 31st March 2009, VSL's operations used a total of 2,636 tonnes of vegetables, principally potatoes. All potatoes and vegetable products are transported within the 60 HGV movements a day identified in the ES and Transport Assessment. During 2009, the business of storing and distribution potatoes at Lower Link Farm ceased, thereby significantly reducing the amount of vegetables used to an average of 6 pallets per week.

2.1.6 The proposed development will not, by itself, lead to changes to the nature and quantities of salad leaves and vegetables used at Lower Link Farm. Those quantities are directly related to customer demand.

Water

2.1.7 As noted in paragraph 11.21 of the ES, for its salad washing process VSL pumps water from five boreholes within the site at Lower Link Farm under the terms of an abstraction licence issued by the Environment Agency. VSL is licenced to abstract up to 9.9 million cubic metres of water per annum (para 11.125 of the ES refers) from boreholes across the site - no water is abstracted from the Bourne Rivulet. Of the water that is abstracted, approximately 98% is returned to the river under the terms of the discharge consents from the Environment Agency that govern the quality of the water that can be discharged. As a result, 2% of the water abstracted is considered to be of consumptive use (including evapo-transpiration).

2.1.8 The vast majority (about 90%) of the water abstracted is used in the irrigation of the watercress beds located at the site. The remainder (about 10%) is

used for salad washing operations within the packhouse. Wash water is then filtered and pumped to watercress beds. The actual rate of abstraction varies seasonally, in response to climatic conditions, within the terms of the abstraction licence. The abstraction is considered to be non-consumptive as the water is used for irrigation or washing within the packhouse, and then returned to the environment through discharges from the site (see further information in the "waste products" section below).

2.1.9 VSL has introduced a number of measures at Lower Link Farm to reduce its water abstraction, including improvements to the processes within the packhouse and, importantly, the recirculation of filtered wash water from the packhouse for use in irrigation of the watercress beds.

2.1.10 The proposed development will not, by itself, lead to changes to the quantity of water abstracted.

Packaging

2.1.11 Salad leaves are mixed and washed within the packhouse building at Lower Link Farm, before being packed ready for dispatch to customers. The plastic crates used to deliver the salad leaves to the site are washed and reused.

2.1.12 Primary plastic packaging used for the finished salad products is delivered to the site from suppliers and stored on site ready for use.

2.1.13 Crates used for the dispatch of packed salad products to customers are either returned washed by the customers, or returned unwashed. Over recent years the proportion returned washed has increased significantly. The lack of covered storage at the site means that returned washed crates are currently shrink wrapped for transit purposes and then stored outside which is not consistent with VSL's high standards of hygiene.

2.1.14 In the 2008/9 financial year a total of 243 tonnes of primary plastic packaging (i.e. film) was delivered to the site for use. On average this requires 3 HGV deliveries per week, but this varies depending upon the season and production levels.

2.1.15 The proposed development will not, by itself, lead to changes to the quantity of packaging used.

Other raw materials

2.1.16 In addition to the key raw materials identified above, other raw materials used in the operations at Lower Link Farm include power for lighting, heating and machinery, fuel for vehicles and equipment, detergents and chemicals used for cleaning, and products for agricultural use including watercress plants and gravel for the beds (when required).

2.1.17 The proposed development will not lead to any significant changes in the nature and quantities of other raw materials used.

Assessment of the potential impacts on the ecology and water environment

2.1.18 The submitted ES at Chapter 11 provides a full description and review of the current baseline aquatic ecology and water environment and an assessment of the impacts of the proposed development. It concludes that the overall impact of the proposed development on water quality and hydrology once appropriate mitigation measures have been incorporated is considered to be insignificant. The proposed development will not, by itself, lead to changes to the nature and quantities of salad leaves and vegetables used, the quantity of water abstracted, the quantity of packaging used, or any significant changes in the nature and quantities of other raw materials used. It is considered that the assessment provided at Chapter 11 of the ES remains accurate and does not need to be updated.

2.2 Information on the waste generated by the existing operations at Lower Link Farm including details of the storage and treatment of waste and an assessment of the potential impacts on the ecology and water environment.

Waste

2.2.1 The main waste products arising from the operations at Lower Link Farm can be summarised as follows.

Waste water

2.2.2 The discharge of waste water from VSL's operations at Lower Link Farm is controlled through eight discharge consents granted by the Environment Agency. These consents govern the volume and quality of water that can be discharged to the environment from the site. Water is either discharged directly to the Eastern or Western Channel of the Bourne Rivulet (as identified in Figure 11.1 in the ES).

2.2.3 Water abstracted for irrigation purposes is passed through the watercress beds and then discharged to the Bourne Rivulet.

2.2.4 Water arising from bed washing operations is clarified through the following process: the water is passed through a suspended solids settlement tank; then passed through the growing watercress crops; before being discharged to the Bourne Rivulet.

2.2.5 Wash water from the packhouse operations is passed through a series of filter systems in the packhouse; then over a 2mm parabolic screen to remove leaf debris; then over settlement trays to remove sediment; then passed through the watercress beds; before being discharged into the Bourne Rivulet.

2.2.6 As set out in para 11.27 of the ES, VSL has introduced a number of measures in recent years to improve the quality of water discharged from the site.

2.2.7 Approximately 98% of the water used on the site is discharged to the Bourne Rivulet. The only consumptive use of water on site is that discharged to foul drainage; that exported as a component of the bagged salad products; and that proportion lost through evapo-transpiration from the watercress beds. This is estimated to be a combined total of less than 2% of the abstracted total.

2.2.8 The proposed development will not, by itself, lead to changes in the quantity or quality of water discharged from the site.

Green waste from the packhouse operations

2.2.9 Green waste from the packhouse operations includes salad leaf particles and other natural materials removed either as part of the washing and mixing processes, or that which is filtered from the packhouse wash water prior to its recirculation through the watercress beds and discharge to the Bourne Rivulet

2.2.10 Green waste is stored on site prior to its collection for composting. In the 2008/9 financial year a total of approx 460 tonnes of green waste was removed from the site for composting. On average this requires 3-5 HGV skip collections per month.

2.2.11 The proposed development will not lead to any significant changes in the quantity of green waste from the packhouse operations, which will continue to be removed from the site for composting. The development will however relocate the green waste storage area within the proposed intake bay area.

Agricultural waste arising from watercress growing

2.2.12 The agricultural operations on the site result in the generation of agricultural waste. Agricultural green waste is stored on site prior to removal for composting, as detailed above.

2.2.13 As part of the process of growing watercress, the watercress beds are cleared and cleaned periodically before being prepared for new plants to be planted. This typically occurs 3 times per annum for each individual watercress bed.

2.2.14 The beds are formed of gravel on a consolidated chalk/gravel and flint base, and the clearing process involves the removal of the old crop and with it a certain amount of gravel bound in the root mat followed by thorough wash down to remove accumulated sediments. The gravel is replaced and the bed leveled ready for replanting. Plant debris and gravel removed from the beds is temporarily stored in a stockpile on the north western part of the site. The gravel from this stockpile is re-used on the farm and some has been exported to other VSL watercress

farms. The company has also worked with the EA to find an outlet for a proportion of accumulated gravel that is in excess to anticipated own-use demand.

2.2.15 The quantity of agricultural green waste removed for recycling is included within the green waste figure in para 2.2.10 above. The quantity of gravel removed and stockpiled on site varies from zero to 200 tonnes per month depending on the season.

2.2.16 The proposed development will not alter the nature and quantity of agricultural waste arising.

Packaging waste

2.2.17 Cardboard waste is passed through the existing compactor on site, prior to its removal for recycling. Plastic packaging waste is stored on site prior to its removal for recycling.

2.2.18 In the 2008/9 financial year a total of 90 tonnes of cardboard and plastic packaging waste was removed from the site. This now requires less than 1 HGV collection per month on average.

2.2.19 The proposed development will not alter the nature and quantity of packaging waste arising. However, the proposed development will relocate the existing compactor to a new location to the north of the service yard.

Other Waste

2.2.20 In addition to the waste areas identified above, the office and ancillary operations on the site produce waste streams that are collected for recycling such as paper, plastic, glass, cardboard, toner cartridges and other office products. Any residual waste is collected through the normal commercial waste collection service for removal, retrieval and recycling where appropriate and ultimately disposal at licenced waste sites.

Assessment of the potential impacts on the ecology and water environment

2.2.21 The submitted ES at Chapter 11 provides a full description and review of the current baseline aquatic ecology and water environment and an assessment of the impacts of the proposed

development. It concludes that the overall impact of the proposed development on water quality and hydrology once appropriate mitigation measures have been incorporated is considered to be insignificant. The proposed development will not, by itself, lead to changes in the quantity or quality of water discharged from the site, or any significant changes in the quantity of green waste, agricultural waste or packaging waste arising at the site. It is considered that the assessment provided at Chapter 11 of the ES remains accurate and does not need to be updated.

2.3 Information on the past and current levels of production at Lower Link Farm, including seasonal variations in production.

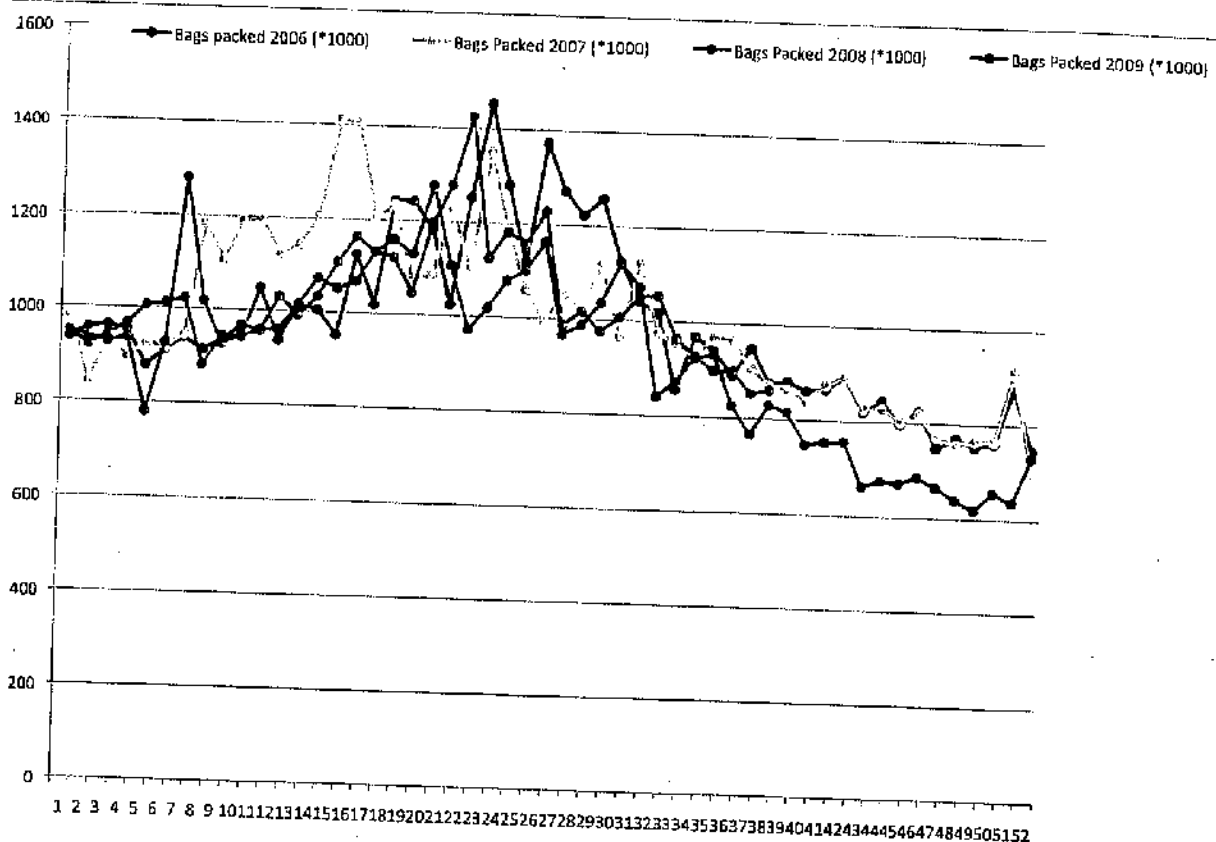
2.3.1 As a customer focused agricultural enterprise, VSL's production levels at Lower Link Farm are driven by customer requirements. VSL's contracts with key customers specify the quantity and type of salad products required and the times and locations that the customer requires deliveries to be made.

2.3.2 Production levels therefore fluctuate throughout the year in response to customer's requirements. Customer demand is itself largely dictated by the seasonal demand for packed salad products amongst consumers, with variations in demand highly influenced by prevailing weather conditions.

2.3.3 On the basis of historic production levels, VSL's peak monthly production occurs in the summer. There is also a strong demand during the Christmas week.

2.3.4 The following graph gives the details of the seasonal fluctuation in production at Lower Link Farm. This reflects the changes in demand from customers.

2.3.5 The graph shows that there is a clear annual trend, with more sold in the summer than in the winter (an approximate ratio of 2:1). The graph also shows that during the summer the peak week varies from year to year depending mainly on the weather.



2.3.6 VSL does not consider that a forecast of the future production levels for Lower Link Farm is relevant to the consideration of the proposed development for which planning permission is sought. This was clearly stated in paragraphs 3.29 to 3.31 of the ES submitted with the planning application. Production levels at the site are driven by customer requirements which are in turn dictated by the state of the wider economy, consumers' seasonal demand for salad products and prevailing weather conditions. The proposed development will not alter this position.

2.3.7 The productive capacity at the site is determined by the physical size of the area of the packhouse building that is devoted to the washing, mixing and packing of salad products. This physical space will not be altered by the development for which permission is sought.

2.4 An assessment of the degree to which the development applied for could lead to the capability for increased productive capacity on the site

2.4.1 The Council has specifically requested an assessment of the degree to which the development applied for could lead to the capability for increased productive capacity on the site. Put simply, it will not.

2.4.2 The existing intake and dispatch operations, whilst inefficient in cost and environmental terms, are not a constraint on the productive capacity of the packhouse. Production within the packhouse, as has been stated numerous times, is dictated by customer requirements for VSL's products. There is flexibility within the packhouse to vary production in response to customer requirements and the ability to do this is essential to the business.

2.4.3 There are three theoretical ways to increase capacity in the packhouse. The first would be to reduce downtime. Nothing in this proposal will reduce downtime. The second is to build more productive floor space in which to put additional machines. This proposal will not add productive floor space. The third would be to introduce new technology if it were to become available. No new technology exists at this

time and nothing in this proposal is associated with new technology. The proposals will close two breaks in the cold chain, reduce double handling of salad products and associated vehicle movements within the site, thus enabling a more cost effective and environmentally sensitive operation of the site.



3. Conclusions

3.1 The proposed development will not change the nature of the operational processes that take place at Lower Link Farm. It will improve the quality and freshness of the salad product, remove inefficiencies and reduce costs of the operation, and deliver environmental benefits including reduced energy usage and CO2 emissions.

any reduction in downtime, any new machines or new technology to be implemented in the packhouse operations.

3.2 Section 2.1 of this ES addendum identifies the nature and quantities of the raw materials used in the current operations at Lower Link Farm and the effect of the proposed development on these operations. The information identifies that the proposed development will not give rise to any significant change to raw material usage at the site.

3.2 Section 2.2 of this ES addendum identifies types, quantities and destination of waste generated by the current operations at Lower Link Farm and the effect of the proposed development on these operations. The information identifies that the proposed development will not give rise to any significant change in waste generation at the site.

3.3 Section 2.3 of this ES addendum identifies the production levels at Lower Link Farm, including seasonal variations in those levels. Production levels at the site are driven by customer requirements which are in turn dictated by consumers seasonal demand for salad products and prevailing weather conditions. The proposed development will not alter this position.

3.4 Section 2.4 of this ES addendum provides further explanation that the development applied for does not lead to the capability for increased productive capacity on the site, as it does not involve

