

CSR Ref: 25242

CUNNANE STRATTON REYNOLDS

Head of Planning Services
Arun District Council
Th Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

11th July 2025

Dear Sir/Madam,

Planning application for permanent use of land for agricultural workers accommodation following previous grants of temporary planning permission under Arun District Council Reg. Ref. AL/61/20/PL for 2 no. and temporary permission under AL/94/22/PL for a further 3 no. for 14 no. chalets, low level lighting, retention of existing hardstanding, utilisation of existing individual foul treatment plants and existing permitted access, and associated works.

Nyton Rest, Nyton Stables, Nyton Road, Aldingbourne, Chichester, PO20 3TU.

I refer to the above and have pleasure in enclosing this further planning application for your determination.

Introduction

This planning application is for the permanent retention of the current use of the above site for agricultural workers accommodation and our client is willing to accept a planning condition limiting the accommodation to that currently provided on site and limited to occupation by agricultural workers.

This application follows the initial grant of temporary planning permission issued under Arun District Council Reg. Ref. AL/61/20/PL for a period of 2 no. years for exactly the same development and the further grant of temporary planning permission under Reg. Ref. AL/94/22/PL, for the same development again. That most recent grant of planning permission was issued on 24th August 2022 meaning that that permission is due to expire on 23rd August this year. This application is therefore lodge before the expiry of the most recent temporary permission expiring this august.

We emphasise that this is exactly the same application as that previously determined positively twice by the local planning authority.

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Having been granted planning permission for temporary use, and the site operated without complaint, our client is seeking planning permission for the permanent use of the site for agricultural workers accommodation and believe there is a strong case to approve this application. To facilitate this our client will accept a planning condition restricting the accommodation provided to agricultural workers only such is the need and circumstances of this case.

The Planning Application

This planning application follows the format and content of AL/61/20/PL and AL/94/22/PL and therefore comprises the following documentation:

- Completed planning application forms completed via the planning portal;
- This cover letter (incorporating planning, design and access statement);
- Location plan;
- Existing and Proposed Site Plan Drawing No. 1483-02 Rev B;
- Existing and Proposed Cross Section 1483-04 Rev A;
- An updated letter from an employment agency (Pro-Force) who are specialists in agricultural workers recruitment setting out the ongoing need for agricultural accommodation; and,
- The Prescribed Change of Use Fee.

The Development to be Retained on a Permanent Basis

The development the subject of this application to be retained on a permanent basis comprises 14no chalets of which 12no are for agricultural workers and the remaining 2 no. to be used by showpersons who will effectively be 'on site managers' for the development as they have been on site for the previous 5 years approximately. Permission is also sought for the permanent retention of the existing hardstanding area, the provision of 3 no. fire evacuation points, and the provision of a washroom/laundry room. It is anticipated that chalets 3 to 14 will be occupied by workers only and that the remaining 2 no. chalets will be occupied by showperson families in their capacity as showpersons and site managers.

Vehicular access into the site will continue to be from Nyton Road and the existing access permitted at this point.

The features of the subject development have been set out previously and there are no changes to what previously was granted planning permission under AL/61/20/PL and AL/94/22/PL. The existing chalets on site as reasonably spread throughout the site and are at least 6m apart. The chalets are indistinguishable from the chalets that would be used by showpeople on site already and on the adjoining site the subject of planning permission under Reg. Ref. AL/107/18/PL.

Each chalet is lower and provides a lesser footprint than a traditional single storey bricks and mortar dwelling. All units currently on site are capable of being removed and are clearly not permanent notwithstanding the requirement on this occasion for a permanent planning permission the chalets on site having a reduced lifespan to traditional bricks and mortar homes. The widths and lengths of the chalets on site are less in footprint than traditional bricks and mortar homes. The heights of the chalets are never more than 3m and are usually raised on a plinth of 15cm to 60cm above ground to ensure that homes are not damaged by surface water. The chalets have either flat or very slightly pitched roofs. The chalets are usually less in height than the surrounding boundary trees and hedging including Field Maple which grows to approximately 6m.

There is no fixing or maintenance of machinery to be undertaken on site and therefore no requirement for any hours of business or hours of working conditions required. There is no storage of equipment required.

Adequate lighting is sought to be provided for health and safety reasons. Low level 'dwarf lighting' has previously been approved and provided on site with minimal impact to surrounding neighbours, indicated generally by a lack of prior objections and on lighting in particular, in terms of potential for light spill, light glare and sky glow. The lighting requirements in this instance are less than those for showpeople who would need to maintain equipment and vehicles and would need a higher lighting mast and greater level of illumination to accommodate such activity. Such circumstances do not arise in this instance for purely accommodation purposes.

There is no change to the physical features of the temporary planning permissions previously granted under AL/61/20/PL and AL/94/22/PL respectively.

Neither our client, nor ourselves as their agent, are aware of any complaints raised against the narrow type of accommodation to be retained on site, from any source or on particular topic since the first temporary permission was granted in 2020. As indicated previously we believe the existing development the subject of this application to be run efficiently and effectively due to the permanent presence of the applicant's representatives on site.

We trust the local planning authority will be in a position to grant planning permission on a permanent basis with the works and usage having been trialled over the period of the two previous temporary planning permissions without cause for complaint.

In our opinion there is no CIL due and no affordable housing contribution required as per the previously stated and approved positions of the local planning authority on the two prior temporary permissions.

The Application Site

As previously indicated this application site is one of 4 no. plots within the larger Nyton Farm Shop site. The application area is identified as Plot A of Plots A, B, C and D granted planning permission for showpeople under AL/47/14/PL for change of use to 4 permanent plots and provision of pony paddock. This application site was used for that purpose and a hardstanding area that is in existence today is used by the existing agricultural workers on site. The intention is to retain two chalets on site, occupied by showpeople for management purposes as indicated above.

The existing site already has the necessary water and service connections making it ideal for the continued use sought on a permanent basis.

The application site is not prone to flooding. It is level, is not prominent and is just below the level of Nyton Road.

This is not therefore a green field site, it is brownfield, and showpersons accommodation is retained and a different form of chalet based, permanent accommodation is provided for and which should be set against the loss of showpersons land in planning policy terms whilst the two showpersons chalets granted under AL/47/14/PL are retained with additional agri-workers accommodation

proposed.

There was some debate with the landscape personnel of the local authority previously on the status of the boundary treatment approved under AL/47/14/PL, as a prior concern from the local Parish Council was that the proposed to be retained development, would need to be effectively screened from neighbours. We are aware that as part of the determination of the most recent temporary planning permission under AL/94/22/PL the local authority landscape officer inspected the boundary treatment of the larger site and found it to be broadly in compliance with permission AL/47/14/PL.

External lighting was approved as a compliance matter under AL/98/20/DOC.

Condition no. 6 of AL/47/14/PL relating to landscaping scheme including boundary treatment partly approved under AL/23/17/DOC.

Parking is available on site although car ownership amongst agri workers is likely to be less than for the mainstream population.

Location and Surrounding Area

This application site is located relatively centrally within the overall Nyton Farm Shop site which is a large landholding owned by the showpersons community. To the east, and beyond a relatively dense and mature boundary hedging, is Aldingbourne Nursery which is closely related in planning terms to the retrospective use sought. There are numerous agri or horticultural businesses in the area which make this an ideal location for agricultural workers accommodation by providing accommodation near to agri workers source of accommodation.

The appropriateness of this location for the use to be retained has already been considered by the District Council on two separate occasions and found it to be suitable. We believe this still to be the case after those 2 no. temporary permissions referenced above.

Whilst we note the planning officer's previous comments under AL/61/20 that it is still considered appropriate to describe the area as rural we believe that this refers to the broader local area, as the subject site has already been developed, the existing services and hardstanding provided under previous permissions are being used and in this regard we see the application site being brownfield and not greenfield. The local authority has accepted that there are three permanent travelling showpersons plots on adjacent lands to the west, a further such 11 no. plots to the north west, the Aldingbourne Nurseries site to the east and south indicating a semi rural location.

The application site is ideally located on the road network for the existing and intended use. Nyton Road merges with the Arundel Road (A27) approximately 500m from the application site. The A27 is a major distributor road linking Chichester to the east and Arundel to the west. It is intended that the agri-workers accommodated will continue work in the Chichester and Arundel area which is well served by the strategic road network.

The nearest settlements are Aldingbourne, about 1km to the south; Nyton, Westergate and Eastergate, approximately 2.5km to the east; and Norton approximately 1 km to the north east. In the wider context, Chichester and Tangmere are both located nearby. These settlements provide post offices, a variety of shops and supermarkets, garages and fuel stations, public houses, churches, village halls, GP surgeries and recreational grounds – all the necessary amenities for workers being based in the area. Norton in particular is within walking distance to support this

resident population.

The application site benefits from local public transport connections with bus stops located at the junction of Nyton Road and Marsh Lane within relatively easy walking distance of the application site. Further bus stops are located to the south west of Nyton Road serving Chichester, Barnham and Bognor Regis. There is a railway station at Barnham, some 4.5km away with regular and frequent services to London Victoria via Gatwick Airport, Brighton, Portsmouth, Southampton and various destinations in West Sussex. We note that the planning officer previously commented that the footpath network in the area is comparatively undeveloped and whilst we would accept that we believe that this is not a dangerous environment for pedestrians generally or for the agricultural workers the subject of this further planning application. There are no records of any accidents involving pedestrians or cyclists in the area as far as we are aware over the 5 years or so of the subject development existing on site.

Planning History

As indicated above, a general planning permission was granted for this first plot of 4 granted permission for 2 no. chalets on site within which travelling showpeople who will manage the site will continue to reside under AL/47/14/PL.

Temporary permission was granted for the same use and activity under AL/61/20/PL and later AL/94/22/PL. this planning application is for an extension of 3 no. years to the 2 year planning permission issued by Arun District Council under AL/61/20/PL. We believe that if permission has been granted for an initial period of 2 no. years that it can reasonably be extended by a period of a further 3 no. years in the absence of demonstrable harm.

There are no current or historic enforcement proceedings on the application site.

Responses Received on Most Recent Temporary Permission AL/94/22/PL

A review of the public file and a review of the previous planning officer's report for AL/94/22/PL indicates the following comments on essentially the same proposed development as on this occasion:

Internal and Statutory Authorities

Southern Water – no objection and recommended no planning conditions;

WSCC Highways – no objection and recommended no planning conditions. They also stated that there were no concerns from a highway safety or capacity point of view and that there are no changes to the way the site is accessed from the highway., or to parking requirements;

Landscape Officer – no objection and no recommended conditions;

Drainage Engineers – no objection and no planning conditions recommended.

Environmental Health – no objections or comments.

South Downs National Park – No objection was received. The application site was considered to be a notable distance away from the boundary of the National Park, in between which is intervening development including the A27. For this reason, and the fact that the caravans and other buildings are relatively low level, the development was considered not to have any significant impact upon the setting of the National Park.

None of the above should change as the previous temporary permission reverts to permanent permission should this planning application be approved.

Third Party Submissions

Aldingbourne Parish Council previously raised a number of concerns related to the most recent application for temporary permission based on compliance with prior planning permissions. Such concerns were addressed prior to the presentation of the planning application to the planning committee in 2022 and as addressed in the planning case officer's committee report. Those prior concerns included the following

- Loss of travelling show persons accommodation;
- This was a countryside site so the proposal is not in accordance with the development plan;
- There was no clear evidence of an essential need for agricultural workers accommodation;
- There was no evidence as to whether the workers are required seasonally or all year round;
- This was not a sustainable location and therefore is car reliant;
- There was no information on the level of occupation or trips to and from the site;
- Concerns on parking; and,
- Intensification of built development on the site would lead to visual harm.

All of these concerns proved to be without foundation. For example, there was no loss of existing showpersons accommodation as this was retained in the form of two chalets for showpeople to manage and supervise the accommodation to be retained for agricultural workers. This is a brownfield site within built up form acknowledged in the initial grant of planning permission for 4 no. showpersons plots of which this is Plot 1 and acknowledging the retention of chalets or caravans that now have received planning permission, albeit temporarily, on two previous occasions. There is an established need for agri workers accommodation and the letter attached to this application from 'Pro Force' acknowledges this ongoing need. The seasonality or otherwise of the agri workers is not a material planning consideration but we acknowledge that farming activity is increasingly a year-round activity. This is an entirely suitable location for the subject development and there are several horticultural and agri related businesses in very close proximity to the application site. Please see an up to date list of farms on which current agri residents work for which planning permission for retention is being sought. The highways authority has no concerns on traffic generation from the subject development and there is no justifiable suggestion that the last near 5 years have generated sufficient to come anywhere near to justifying a traffic based concern not obvious so far to Hampshire County Council as the highways authority. Likewise, there are no justifiable concerns on parking and this acknowledged for both prior applications. There is no visual harm caused as acknowledged by the planning case officer in his previous report on AL/94/22/PL.

Development Plan Policy

The planning authority acknowledge the relevant development plan to be the Arun District Local Plan 2011-2031 (ALP), the Joint Minerals Plan 2018, and the Aldingbourne Neighbourhood Development Plan 2019-2031 (ANDP).

The case planning officer's report on the most recent application for temporary permission identifies the following policies from each of the above plans as being relevant:

ALP 2011-2031

Policy CSP1 Countryside

Policy DDM1 Aspects of Form and Design Quality

Policy DSP1 Design

Policy ENVDM5 Development and Biodiversity

Policy HDM3 Agricultural Forestry and Horticultural Dwellings

Policy HSP5 Traveller and Travelling Showpeople Accommodation

Policy LANDM1 Protection of Landscape Character

Policy QEDM2 Light Pollution

Policy QESP1 Quality of the Environment

Policy SDSP1 Sustainable Development

Policy TSP1 Transport and Development

Policy TDM1 Sustainable Travel and Public Rights of Way

Joint Minerals Local Plan 2018

Policy M9 Safeguarding Minerals

ANDP 2019-2031

Policy EH1 Built Up Area Boundary

Policy EH10 Unlit Village Status

Policy EH12 Protection of Bat Habitats

Policy GA1 Promoting Sustainable Movement

Policy GA3 Parking and New Developments

Planning Policy Guidance

NPPF National Planning Policy Framework

PPTS Planning Policy for Travellers Sites

Supplementary Policy Guidance

SPD11 Arun Parking Standards 2020

SPD13 Arun District Design Guide (SPD) January 2021

Accordance with Planning Policy and Guidance

The proposed development is consistent with planning policy and guidance as follows:

Policy CSP1 Countryside

It had previously been considered by the local planning authority that the proposal was considered to conflict with Policy C SP1 of the ALP. Material considerations in this case would indicate that planning permission should be granted in this instance including prior grants of temporary permission and the justified need for agri accommodation in the absence of any harm being caused to any interest of acknowledged importance.

Policy DDM1 Aspects of Form and Design Quality

The impact of this proposal on residential amenity has previously been considered by the local planning authority and found to be in accordance with policies D DM1 or QE SP1 in respect of the preservation of residential amenity.

Policy DSP1 Design

The proposal accords with this policy which seeks to make the most efficient use of land. This is certainly the case in this instance given that it is brownfield and retains the permitted showpersons accommodation and at the same time providing much needed agri accommodation without any significant impact on the environment or on nearby residence. The proposed to be retained layout is reasonable and practical having been approved on several previous occasions.

Policy ENVDM5 Development and Biodiversity

In regard to biodiversity policies the local authority previously considered that as the site is not greenfield nor adjacent to woodland, and has permission as a travelling show persons plot and the development would not result in the loss of trees there would be no harm to bats, crossing the site or otherwise using nearby trees. It was acknowledged previously by Arun District Council that although the proposal did not include measures to improve biodiversity this was not a reasonable requirement in this instance as the site was not greenfield and had already been developed and with no harm being caused to biodiversity the proposal was considered to be on balance in accordance with ALP policy ENV DM5 and ANDP policy EH6.

Policy HDM3 Agricultural Forestry and Horticultural Dwellings

ALP policy HDM3 allows for accommodation for seasonal horticultural workers but only in exceptional circumstances where there is clear evidence that the structures are absolutely essential for the provision of staff accommodation to facilitate the economic running of a farm or

horticultural holding and subject to criteria. The proposal provides essential accommodation for farm workers necessary for the economic running of farms but not a farm within which the application site is located. The proposal nevertheless provides much needed accommodation for farm workers and farms but it just happens to be that these workers are not in this location. We believe that the 'structures' referred to in policy HDM3 are permanent structures which the proposed chalets are not. As the Council will be aware there is a severe housing shortage in the south of England and that is really beyond dispute. We would argue that there is a need for such accommodation so that temporary agricultural workers do not unnecessarily take from the main housing stock of the district which would be an inefficient use or waste of much sought after bricks and mortar permanent housing. An updated letter from Pro-Force submitted with this application indicates clearly that there is a demand for such workforce and consequently such accommodation. We believe that policy HDM3 is complied with as is the case with ALP policy CSP1. There is an accepted need for agricultural workers as there was at the time of the previous determination and the need remains strong approximately three years later. The chalets are already in place and all are occupied and there are absolutely no vacancies amongst the chalets provided for the farm workers and in fact there is a requirement for additional agricultural workers accommodation. We believe this policy requirement is met and that both policy EH1 and HDM3 (all criteria) are met.

Policy HSP5 Traveller and Travelling Showpeople Accommodation

It was alleged previously that the proposal would result in the loss of existing travelling showpersons accommodation in conflict with policy HSP5. It should be noted however that this application site is the same as plot A of AL/47/14/PL and that such a plot would only provide for 2 no. chalets in any case. In this instance 2 no. chalets are being retained and therefore there is NO loss of travellers showpersons accommodation. There is merely the additional provision of agricultural workers chalets but there is no loss of travellers accommodation and such accommodation is still being retained on site albeit to assist in management of the proposed temporary facility. The proposal is therefore fully in accordance with ALP Policy H SP5 as there is no loss of approved accommodation as recognised by the planning case officer under AL/94/22/PL.

Policy LANDM1 Protection of Landscape Character

In respect of impact on landscape character or impact on the setting of the National Park the local planning authority has already acknowledged there to be no significant impact in regard to AL/61/20/PL and AL/94/22/PL and that ALP policies DDM1 and LANDM1 are complied with. The council had previously acknowledged that no chalet is higher than 3m, will not be seen from nearby public viewpoints and although the units may be visible from higher ground to the north there is such a long distance involved in that instance that the units would readily assimilate into the environment within the surrounding showpersons accommodation immediately adjoining.

Policy QEDM2 Light Pollution

This same proposal, for a temporary period from initially 2 years to a further 3 years was considered to be in accordance with ALP policy QE DM2 in regard to outdoor lighting. Lighting already provided on site is low level and is not considered obtrusive and in no way impactful and in fact we are aware of no complaints lodged against the existing development in regard to obtrusive or impactful

lighting. The lighting proposed is considered the minimum for safe operation of the site and for security purposes. The proposal is consistent with ANDP policy EH10 also for the same reasons. The local authority reached the same conclusion previously for AL/61/20/PL in respect of ALP policy QE DM2 or ANDP policy EH10.

Policy QESP1 Quality of the Environment

The impact of this proposal on residential amenity has previously been considered by the local planning authority and found to be in accordance with policies DDM1 or QESP1 in respect of the preservation of such residential amenity.

Policy SDSP1 Sustainable Development

The proposed development is a sustainable form of development that is consistent with the principal components of sustainability set out in the National Planning Policy Framework and in which circumstances the local planning authority are required to apply a positive approach to determination.

Policy TSP1 Transport and Development

ALP policy TSP1 seeks to ensure that development provides safe access on the highway network and promotes sustainable transport. We would argue that the proposal as it provides multi person transport akin to public bus does in fact provide a sustainable form of transport and as previously stated car ownership will be non-existent on site for the agricultural workers and a maximum of 4 no. spaces are provided for visitors. West Sussex County Council, as the highways authority, accepted our client's position on this potential issue previously and will likely do so again on this occasion. Please note that, given concerns about pedestrian and cyclist safety, there are no reports or recordings of accidents and we believe that bus or minibus transport is a highly sustainable and safe form of transport for the workers involved. WSCC supported the previous application and should do so again in accordance with policy. There is no impact upon on street parking and therefore the proposal is consistent with policy TSP1.

Policy TDM1 Sustainable Travel and Public Rights of Way

The subject development is within a reasonable cycling distance to Westergate and therefore is in accordance with ALDP Policy TDM1. Minibuses are acknowledged in previous applications as being available to transport the site's agri worker residents to their place of work and home and in doing so present the site's residents with opportunities to shop locally on the way.

There is no negative impact on any right of way.

Joint Minerals Strategy Policy M9

It is not considered that the proposal could be considered contrary to criteria in minerals policy M9 as the extraction of minerals under the site would not be possible and any conflict should be afforded very low weight. The site is acknowledged by the previous case officer as having permanent planning permission as a travelling showpersons plot and so prior extraction of minerals under the site would not be possible.

ANDP 2019-2031

Policy EH1 Built Up Area Boundary

Policy EH1 states that development will not be allowed outside of built up area boundaries except where it is in accordance with development plan policies in respect of the countryside. As such, the proposal would be in accordance with EH 1 if it meets the criteria of ALP policy HDM3, which it does.

Policy EH10 Unlit Village Status

Lighting already provided on site is low level and is not considered obtrusive and in no way impactful and in fact we are aware of no complaints lodged against the existing development in regard to obtrusive or impactful lighting. The lighting proposed is considered the minimum for safe operation of the site and for security purposes. The proposal is therefore consistent with ANDP Policy EH10 and this has been confirmed by Arun District Council in their determination of the two planning applications for temporary planning permission.

Policy EH12 Protection of Bat Habitats

It is noted that there was no objection from the council ecologist and there is no significant impact on any local bats particularly given the now established use of the application site and the low level of external lighting proposed which is also consistent with Policy

Policy GA1 Promoting Sustainable Movement

The proposal is consistent with ANDP Policy GA 1 which seeks to promote sustainable (non-car) forms of transport and the coaches/buses provided already meet that requirement and are a sustainable form of non-car based transport. The proposal is also consistent with the relevant parking standards and a previous case demonstrating the need for only 4 no. spaces was previously presented, accepted by WSCC, and our position on this remains the same on this occasion.

Policy GA3 Parking and New Developments

Th Arun Parking Standards SPD does not set out parking standards for caravans or agricultural workers accommodation and it is not appropriate according to the previous planning case officer to impose a full residential standard which would equate to 28 allocated spaces and 2 no. visitor spaces. The previous planning officer acknowledged that car ownership amongst temporary agri workers is unlikely to be high

The form of transport provided and the nature of the accommodation proposed mean in our view that policy T DM1 is complied with and reflected in an almost car free development through emphasis on a non-car transport mode and there would be no requirement for connection to any cycle network as would be the case for permanent accommodation.

Supplementary Policy Guidance

SPD11 Arun Parking Standards 2020

Th Arun Parking Standards SPD does not set out parking standards for caravans or agricultural workers accommodation and it is not appropriate according to the previous planning case officer

to impose a full residential standard which would equate to 28 allocated spaces and 2 no. visitor spaces. The previous planning officer acknowledged that car ownership amongst temporary agri workers is unlikely to be high and accordingly the same case officer previously observed that just 1 no. car and 1 no. minivan was present on his site visit.

SPD13 Arun District Design Guide (SPD) January 2021

We believe these guidelines to be of lesser value due to the nature of the accommodation being provided.

National Planning Policy Framework (NPPF) 2019

An updated National Planning Policy Framework (NPPF) was published by the Communities and Local Government Department in December 2024 which sets out the governments planning policies for England. It incorporates a presumption in favour of sustainable development, and such proposals should be approved without delay.

The NPPF is clear in its intention in para 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. As set out within paragraph 8 of the NPPF there are three dimensions to sustainable development: economic, social and environmental.

Paragraph 11 of the NPPF defines the presumption in favour of sustainable development as approving developments that accord with the development plan without delay and, where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless: 'inter alia' any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole. We believe there are no adverse impacts in this case.

Para 48 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Para 61 states that local planning authorities should seek *'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.'* This certainly applies in this case and the need to provide agri accommodation to enable the rural economy to contribute to national wellbeing.

Para 82 states that *'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs . . .'*

Para 83 seeks *'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.'*

Para 85 states that *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to*

support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.' This is particularly relevant to the current proposal.

Para 88 states that the sustainable growth and expansion of all types of business in rural areas and the development and diversification of agricultural and other land-based rural businesses are to be encouraged in planning decisions.

Para 89 is particularly relevant to the proposed development and supports the grant of planning permission in this instance as follows:

'Planning . . . decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'

Para 124 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 125 states that proposals that utilise underdeveloped sites, or brownfield land, and that meet housing needs, as diverse and as location specific as they may be, should be supported in the absence of any significant harm being caused. Such an approach would warrant the grant of planning permission in this instance.

Planning Merits in Favour of the Proposed Development

A Benign Impact

There is no significant impact from development being made permanent in this instance. There has effectively been a trial period of nearly 5 years during which there have been no complaints from third parties.

Non-Impact on Traffic and Highway Safety

There are therefore an additional 12 no. agricultural workers' chalets proposed in this instance. We do not envisage any more than 3 no. workers per chalet and in a substantial number of the 12 chalets proposed there may be no more than 2 no. workers. We suggest a maximum yield of 30 no. workers in practice accruing from 6 no. chalets occupied by 2 no workers and 6 no. chalets occupied by 3 no. workers as a maximum estimate. It is not anticipated that the chalets will be occupied by families or by children.

The proportion of trips to and from the site by private car/vehicle

We estimate that none of the workers residing on site will have access to, or will use, a car. The main premise is that if workers have their own access to a car they will not require accommodation

in this location and they will likely drive themselves to their place of work from wherever else they reside. It is likely that residents within the site will not have their own car and that this is in part an attraction for living within the premises proposed where rural employers can access large numbers of staff efficiently. There are likely to be no private work based car trips into and out of the site. It is anticipated that travel to places of work will be by minibus. We had indicated coaches would be used previously but minibus or bus will be the source of travel to and from work for residents. There may be occasional visitors and therefore some 4 visitor car parking spaces are proposed to be provided. We will not be providing the 18 no. spaces mentioned in the cover letter submitted with the application as these are not required.

The number of daily private car/minibus movements on site

We estimate, as indicated above, that there will be a maximum of 30 workers on site. They will not use private cars to get to and from work. It is anticipated that there will be a minibus provided by their employer(s) with a typical capacity of 17 seats per minibus. This means that a single minibus may make a 'double run' to and from the site (round trips into and out of the site twice each day) or alternatively 2 no. minibuses will be used if pick ups or alternatively drop offs nearly coincide and demand warrants it. Irrespective of whether there is one minibus or two minibuses there will be a maximum of 2 no. minibus movements in and 2 no. maximum minibus movements out each working day which may in this case may be over a seven day working week. If there are fewer workers to be picked up on Saturdays or Sundays only one minibus and one trip in and one trip out will be required.

As regards visits to residents, it is likely that these will be undertaken by private car. It is anticipated that at any one time, especially in the evenings only one in three chalets of the 12 to be provided would have visitors hence the provision of 4 no. visitor car parking spaces.

It is anticipated that a typical working day will have 6 vehicle movements associated with agricultural workers inbound (2 no. by minibus for workers and 4 no. by private car for visitors) and the same figure of 6 outbound. On a Saturday or Sunday there may be more social visits into and out of the site for those that remain on site over the weekend. This may result in perhaps an additional 4-8 no. car movements in and 4-8 no. out on any Saturday or Sunday. It is likely that visitors to the site may also avail of public bus services.

It is anticipated that shopping will occur on trips back via minibus to the application site otherwise shopping trips will be made in workers free time and via local bus service or by residents walking to the nearest shops. Where other non-work related transport is required this is likely to be by public transport. As previously stated, the application site benefits from local public transport connections with bus stops located at the junction of Nyton Road and Marsh Lane within relatively easy walking distance of the application site. Further bus stops are located to the south west of Nyton Road serving Chichester, Barnham and Bognor Regis. There is a railway station at Barnham, some 4.5km away with regular and frequent services to London Victoria via Gatwick Airport, Brighton, Portsmouth, Southampton and various destinations in West Sussex.

Concerns on parking

There may be occasional car use to the site as indicated above. This is potentially for visitors to the site, those delivering food, take aways etc. To cover this requirement, it is still proposed to provide 4 no. visitor car parking spaces as shown on the attached site plan (Drawing No 1483-02 REV B). The subject chalets are located in such a position as to accommodate a swept path for arriving and departing minibuses and to facilitate a pick up and drop off point for workers. This drop off area provides a shelter similar to that seen at bus stops.

Please note that in addition to the above car parking and coach movements, the two showpersons' chalets that are still proposed to be retained are likely to require car parking. That parking will be undertaken in close proximity to each chalet and we have indicatively shown an area within the north eastern corner of the site where parking for showpersons chalets 1 and 2 can be accommodated. Please be aware that some showpersons may be absent from the site during times of fairs and festivals and so will their cars. On occasions that there are no fairs elsewhere cars at each of these 2 no. chalets are likely to be parked on site and will undertake daily traffic movements out of and into the site. For example, children will likely be driven to school in the morning and will be returned home in the afternoon on Mondays to Friday. Trips to the local shops will also be undertaken as well as trips in the evening to sports, leisure and social activities. These trips are modest in number and supplementary to the agricultural workers generated traffic movements identified above.

The Demand for Agricultural Workers

We previously stated that there was a requirement for some 80,000 agricultural workers in the UK (<https://www.fwi.co.uk/business/business-management/staff/coronavirus-uk-eases-restrictions-on-foreign-seasonal-workers>). The majority of these were to be required in the south of England. As far as we are aware that situation has not changed over the 2 no. years since the previous application was lodged. In fact, the letter attached for Pro-Force indicates that demand for farm workers in England remains high.

The attached most recent Pro-Force letter states very clearly that there remains a need for agricultural workers in this area on local farms and that the subject would greatly assist in ensuring that there are sufficient agricultural workers in the area to meet current and future need.

Agricultural Workers as Key Workers

As previously indicated the Government in response to the need for additional farm workers has identified this employment sector as key workers in the context of Covid with those travelling into the country to work on farms being able to start immediately because of the importance of the work to safeguard the UK's food supply.

Management of the Proposed Development

Finally, please note that there is permission for a showpersons plot on this site and that

management of the site would be undertaken on site on a 24 hour seven days a week basis by the showmen in the proposed to be retained two persons chalets shown on the attached site layout plan. We believe the management provided to have been excellent and we believe that the facility for which planning permission is sought to be extended has operated peaceably and without complaint which is testimony to the high level of management provided.

Affordable Housing

A requirement to provide for affordable housing does not apply in this instance.

Community Infrastructure Levy

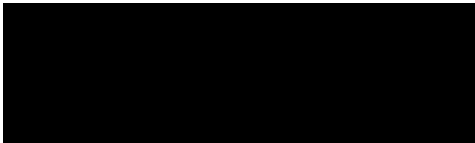
Please see the completed CIL form which forms part of this application.

We very much hope that you will consider this application favourably.

Please note that the applicant will be paying the requisite planning application fee directly to the Finance Section of the local authority as they have done in the past.

If you have any queries please contact the undersigned at the address given below.

Yours sincerely,



Eamonn Prenter MIPI MRTPI

Director

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