

PLANNING, DESIGN AND ACCESS STATEMENT

Temporary change of use from Care Home (C2) to temporary accommodation for seasonal agricultural workers for 12-month period.

Former Royal Bay Care Home, 86 Aldwick Road, Bognor Regis, PE21 2PE

1.0 Introduction and background to application

- 1.1 This statement has been prepared to support a planning application for the temporary change of use of the former Royal Bay Care Home at 86, Aldwick Road, Bognor Regis for temporary accommodation for seasonal agricultural workers, for a period of 12 months.
- 1.2 The application is made on behalf of Pro-force Ltd, a recruitment company specialising in providing key workers to local food/agricultural/horticultural businesses. Pro-Force is part of a larger group of companies which includes Cre8 Property who provides/manages accommodation for seasonal workers and Evergreen Training, which provides training for the agricultural/horticultural sector, including specific training courses and apprenticeships. The Applicant Company's branch office lies immediately opposite the application site.
- 1.3 The application property was purchased by Cre8 Property Limited in November 2019 following the closure of the Care Home in April 2019. The original intention was to re-open the Care Home as a residential training centre, run by Evergreen Training. However due to the current challenges surrounding COVID-19 it is no longer possible to run the apprenticeship programme and Evergreen Training has had to temporarily cease operations.
- 1.4 During this challenging period, Pro-Force has continued to recruit key workers, under very difficult conditions, to help ensure that there is a sufficient available workforce to maintain the food supply to the Nation. The requirement for social distancing measures has significantly reduced the capacity of their existing accommodation, and the hot weather during April and May significantly brought forward the peak cropping times thus further increasing the demand for vegetable and fruit pickers. In addition, one of Cre8's existing accommodation sites (South Downs Holiday Park, Bracklesham Bay, nr Chichester) is no longer available as it has been acquired by a housing developer and is to be redeveloped for housing. (See <https://publicaccess.chichester.gov.uk> Application reference 20/00336/REM & 18/00753/OUT).
- 1.5 The proposed use of Royal Bay Care Home for accommodation for seasonal key workers to serve the agricultural/horticultural sector is therefore a temporary measure to re-accommodate workers from the South Downs site (which is now closed) and to help with the loss of bed spaces as a result of Covid-19 social distancing measures, thus helping to meet the high demand for agricultural and horticultural key workers.

1.6 The application is supported by the following drawings and documents:-

Document description	Drawing no
Site location plan	20200616-273_royal-bay_site_location_plan
Site block plan	20200616-273_royal-bay_site_block_plan
Existing ground floor plan	20200616-273_royal-bay_existing_groundfloor plan
Existing first floor plan	20200616-273_royal-bay_site_block_plan existing first floor plan
Existing second floor plan	20200616-273_royal-bay_site_block_plan existing second floor plan
Proposed ground floor plan	20200616-273_royal-bay_site_block_plan proposed ground floor plan
Proposed first floor plan	20200616-273_royal-bay_site_block_plan proposed first floor plan
Proposed second floor plan	20200616-273_royal-bay_site_block_plan proposed second floor plan
Planning, Design and Access Statement (Gemini Planning Services)	

2.0 Site and Surroundings

2.1 The application site lies on the corner location on the northern side of Aldwick Road, close to the junction with Nyewood Lane on the edge of the Aldwick area of Bognor Regis.



Fig 1 – Aerial photograph of application site (Source: Bing Maps)

2.2 The building is a substantial traditional red brick 3-storey villa-style building which has been extensively extended in the past to largely fill its extensive plot. The front of the building is set back from the road behind a landscaped frontage and car park which is accessed from

Aldwick Road. The car park has capacity for 13 cars. At the rear, the more recent additions to the property provide a frontage to Oxford Street.



Fig 2 –Photo of front of application site (source: Google Maps)

- 2.2 To the south, are residential properties fronting Oxford Street and to the north (opposite the site) and adjacent to the west are a mix of retail and commercial premises, including Tesco's Express, and Pro-Force's offices within the local retail centre.



Fig 3 – Photograph of application site in street scene (Source: Google Maps)



Fig 4 - photograph of rear of site (Source: Google Maps)

3.0 Planning History

- 3.1 The most recent and relevant planning applications available on the Council's website are those set out below.

Application reference	Description and Decision
BR/279/93	Amended design to conservatory. Permission 07/01/94.
BR/111/93	Proposed first floor extension for 3 en-suite bedrooms over existing kitchen/boiler room/laundry. Permission 11/08/93.
BR/24/93	Amendment to BR/249/92 – revised design to rear extension/conservatory. Permission 1993.
BR/249/92	Proposed alterations and extension to existing class C2 premises. Permission 13/01/92
BR/87/92	Alterations and extensions to existing institutional care home to provide additional bedrooms and services. Permission 08/07/92

4.0 The Proposals

- 4.1 The application seeks planning permission for the temporary use of the former care home for residential accommodation for up to 80 seasonal agricultural workers, for a temporary period of 12 months. These will be workers relocated from the existing South Downs accommodation which has had to close. Any additional workers (to backfill any leavers) are likely to come from Eastern Europe or the Ukraine. The residents will be working at local farms and businesses, including Nature's Way, Barfoots, Roundstones Nursery, and Chichester Food Park. (See later). Due to the difficulties with finding alternative accommodation, there are already currently 15 workers living on-site. These are working on a local farm.
- 4.2 The workers will be accommodated in a combination of single and double rooms, together with a larger rooms suitable for 3-4 occupants, utilising the existing care home room layouts. As a minimum, each room has a toilet and basin, whilst some rooms have ensuite bathrooms. There are shared shower facilities on the 1st floor provide shower facility for those bedrooms without ensuite bathrooms. There are shared self-catering kitchen facilities for the residents.
- 4.3 A total of 5 staff will be needed to run the accommodation (a site manager, 2 welfare staff and 2 maintenance staff). Two of these staff will be resident with the remaining living off-site.
- 4.3 The following safeguards/systems will be put into place.
- Inductions tailored to facility and local environment;
 - Check In/Out inventories;
 - Residents Handbook (includes facility overview, fire & emergency plans, important contact numbers, site rules, accommodation rules, induction overview etc.)
 - Weekly room checks (Audit);

- Daily Site Checks (Audit);
- Weekly Site Checks (Audit);
- Weekly Fire & Emergency Lighting Checks (Audit);
- Online Audit & Maintenance Software system which manages the audits and maintenance requirements;
- Quarterly Resident Forums;
- Stronger Together membership;
- Whistle blowing hotline;
- Accommodation Standards; and Site Management Structure Document.

4.4 Indoor facility includes a large lounge area with pool table and football table facility. Unfortunately, during COVID-19 restrictions social areas will remain closed. Normally training would be undertaken however during the current restrictions, the only training will be standard work-related training/onboarding.

4.5 The majority of workers (estimated 80%) will travel to their place of work by minibus. It is estimated that there will be circa 50 vehicle movements per day (ie 25 in and 25 out). The majority will depart between 6am and 8am in the mornings and return between 15.30 and 17.30.

5.0 Public consultation

5.1 Prior to the submission of the application, a letter was hand-delivered to the immediate neighbours explaining the background and informing them of the imminent planning application submission. (See Appendix A).

6.0 Planning Policy

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that “where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise”. For the purposes of this application, the Development Plan comprises the Arun Local Plan 2011-2031 (Adopted 2018).

The Adopted Arun Local Plan

6.2 Relevant policies include:-

- Paragraph 8.1 – sets out the strategic objective to “strengthen Arun’s economic base and provide local job opportunities”.
- Paragraph 11.2.1 – states that “horticulture is a key employment sector and the horticultural industry has a significant presence in the area”.
- Paragraph 11.2.3 goes onto emphasise that this sector is one of four key sectors that is particularly strong in the local economy and offers good opportunities for economic development and job creation.

- Paragraph 11.2.4 – recognises that “employment in horticulture is particularly seasonal and consequently there are demand to house transient and/or migrant workers”.
- Policy SD SP2 – new development should be focused within the defined Built up Area.
- Policy T SP1 – supports transport and development proposals which are designed to reduce the need to travel by car

6.7 Government policy/guidance - NPPF 2019

- Paragraph 11 – decisions should apply a presumption in favour of sustainable development. This means approving development proposals that accord with an up-to-date development plan without delay. (NB case law dictates that this means accordance with the Development Plan as a whole – see).
- Chapter 5 focuses on building a strong competitive economy with a particular focus on supporting a prosperous rural economy. Supporting economic growth is given “significant” weight.
- Paragraph 80 - 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.
- Paragraph 84 – this encourages sites that are physically well-related to existing settlements and the use of previously developed land, where suitable opportunities exist, (but also recognises that business needs in rural areas may have to be met adjacent to or beyond existing settlements, and in locations that are not well served by public transport).
- Paragraph 102 – encourages walking, cycling and public transport use.
- Paragraph 108 sets out the following three key transport tests:
 - *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
 - *a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - *b) safe and suitable access to the site can be achieved for all users; and*
 - *c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”*
- Paragraph 109 identifies situations where development should be refused on transport grounds, noting that: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network or road safety would be severe.”*
- With regards to selecting suitable sites for development, the revised NPPF in paragraph 103 states: *“Significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.”*
- Paragraph 117 - Planning policies and decisions should promote an effective use of land, while safeguarding and improving the environment. Strategic policies should

set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

- Paragraph 118 – planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for identified needs, and promote and support the development of under-utilised land and buildings.

7.0 Material planning considerations

- 7.1 The main considerations with this application are considered to be:- need for the accommodation; economic benefits; impact on neighbours; highway matters.

Need

- 7.3 The applicant Pro-Force Ltd along with Evergreen Training and Cre8 Accommodation Solutions Ltd, have provided the following information outlining the demand and need for agricultural workers accommodation at this location.

Specific Event/Circumstances

- 7.4 Pro-Force have recently lost the use of a large accommodation site in Bracklesham Bay, the South Downs Worker Village, a 400-person facility. This facility has recently received planning permission for the redevelopment of the site to provide residential housing (see planning application reference 20/00336/REM & 18/00753/OUT). Whilst Pro-Force has managed to increase their accommodation availability through the increase of accommodation units on farms in a number of locations it has not been possible to fully replace the facility.
- 7.5 Part of the strategy to replace a proportion of these beds is the construction of a new on-farm caravan site in Pagham (planning reference P/108/19/CLP, P/108/19/CLP, P/108/19/CLP and P/78/19/CLP). This planning application has been refused and the applicant is considering their options, however in any event, it will not be concluded in time to meet the urgent demand.
- 7.6 A consequence of COVID-19 and the guidelines on social distancing, self-isolation and quarantining has resulted in a reduction in capacity of all of the existing accommodation. The availability of a local workforce, with existing accommodation, has in recent weeks significantly increased as workers are furloughed and or lost their employment as a result of the global epidemic. Whilst this has helped to ease the situation somewhat, it has been insufficient to fully resolve the issue. The article here (and reproduced in Appendix C for ease of reference) provides a good overview of the challenges faced by farmers trying to ensure that they have suitable labour to pick their crops this year.

Need – Background (Pre-COVID-19)

- 7.7 UK food production depends on securing an adequate supply of labour to get the harvest in and to process the produce. But farm and factory businesses have reported, both prior to and since the EU referendum, that they find it hard to hire sufficient workers. Each year, farms rely on tens of thousands of temporary workers, with some 80-90,000 of these currently coming from outside of the UK.

- 7.8 Pro-Force is one of two companies selected by Defra and the Home Office to trial the new Seasonal Worker Pilot (SWP) scheme (see announcement [here](#)). This is also reproduced in Appendix F. The SWP is designed to pilot a new immigration subcategory for seasonal workers in the agricultural sector. The SWP allocation was increased from 2,500 to 10,000 workers in 2020 due to both the success of the pilot and the significant demand for more workers in 2019. A consequence of the new immigration scheme, which limits employment to 6 months within edible horticulture only, is an additional increase in demand for temporary housing. This increase in demand is driven by the following factors:
- Workers are unable to find work outside of the sector
 - Workers are here for a restricted timescale and therefore find it harder to source suitable accommodation in the right location
 - Workers typically do not have their own transport
 - They struggle to provide references for landlords
 - They struggle to raise deposits required by 3rd party landlords
 - They struggle to find accommodation at affordable prices
- 7.9 Accommodation provided by the employer to the employee as part of their employment must meet specific criteria in terms of employment law, including ensuring that the accommodation cost does not result in a breach in minimum wage legislation. As such, workers are charged a maximum of the Accommodation Offset rate, currently £57.40 per week. This includes all electricity, heating, water, welfare and laundry services. Deposits cannot be charged.
- 7.10 The use of a temporary workforce in the area is a long-established requirement driven by the seasonal nature of the crops grown in this high density farming area. Whilst Pro-Force do actively try and recruit British workers and operate three High Street recruitment offices in the area, it has not been possible for the following range of reasons:-
- this is a relatively low unemployment area and fewer people are looking for the type of work on offer;
 - British workers have little incentive to come off benefits;
 - Relatively isolated farm locations makes transport difficult ;
 - The work is often physically demanding, repetitive and in uncomfortable conditions; and
 - Migrant workers have historically shown lower levels of absenteeism and turnover.
- 7.11 The Government commissioned report by the Migration Advisory committee titled: *MAC A Points-Based System and Salary Thresholds for Immigration* concludes
- “If sector-based routes were introduced, this may also lower the implied reduction in lower-skilled migration in our modelling. We have previously recommended against separate sector-based routes for low-skilled migrants to encourage employers to compete on wages and working conditions to make their sectors more attractive (**with the exception of seasonal agricultural workers**). This was discussed in our EEA report where we said*

“...workers should have the option to be mobile across sectors and occupations and there is no case for giving privilege to some lower-skilled sectors over others in access to labour”

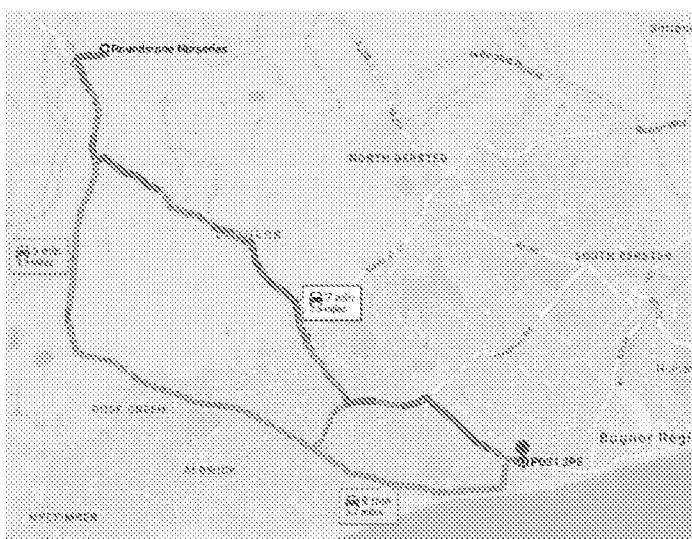
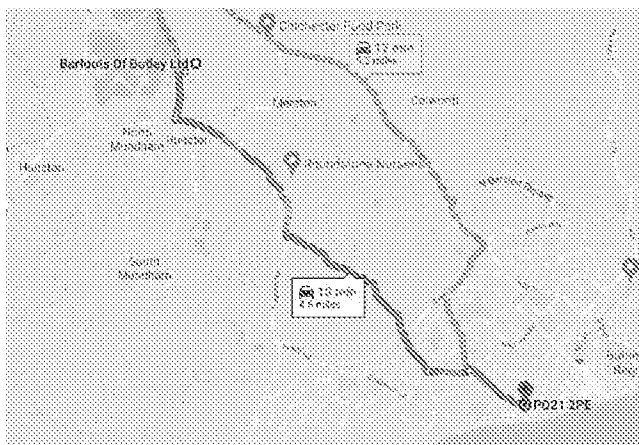
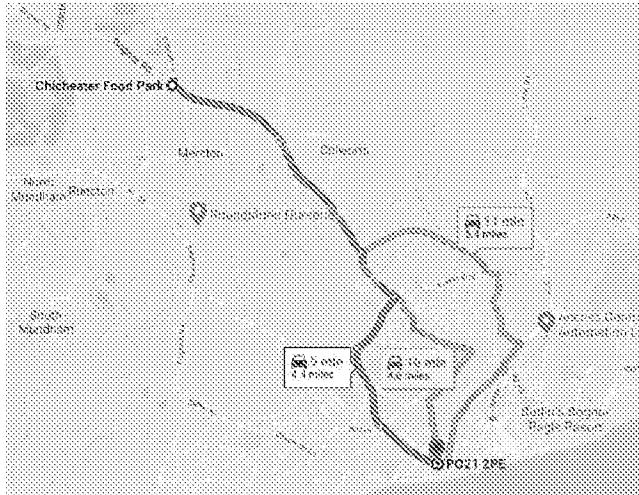
- 7.12 This clearly demonstrates that it is widely recognised that the demand for seasonal agricultural workers will not be met by the local population. See link to the above report: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/873155/PBS_and_Salary_Thresholds_Report_MAC_word_FINAL.pdf
- 7.13 Record levels of employment in Europe compounded with Brexit has already had an effect on the supply of migrant labour as we struggle to find the labour this season that we will require to meet the demands of the local growers and other businesses. This is believed to be in part as a result of the fall in the value of the pound and in part due to the perception that they are less welcome then before and the uncertainty of the future requirements to gain access to the UK.
- 7.14 In order to ensure that we are able to meet our growers requirements and prevent a repeat of the 2007 & 2008 labour shortage which saw crops left in the ground and produce having to be imported; it is imperative that we are able to provide accommodation of a high standard and at a low cost to attract the work force to the UK. See: <https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/news-parliament-2015/feeding-the-nation-labour-constraints-report-published-16-17/>
- 7.15 This particular area has also seen significant expansion in facilities that require significant seasonal workforces in recent years such as the Natures Way Food, Wight Salads, Rolls Royce, Newey Group, Vitacress and Langmead Farms. We have included a number of letters in **Appendix B**, from local employers in the area who have written to support the case for the demand. These letters were provided in support of the application for the South Downs accommodation at Bracklesham Bay but remain relevant to the issue of need/demand for seasonal accommodation and to this application.

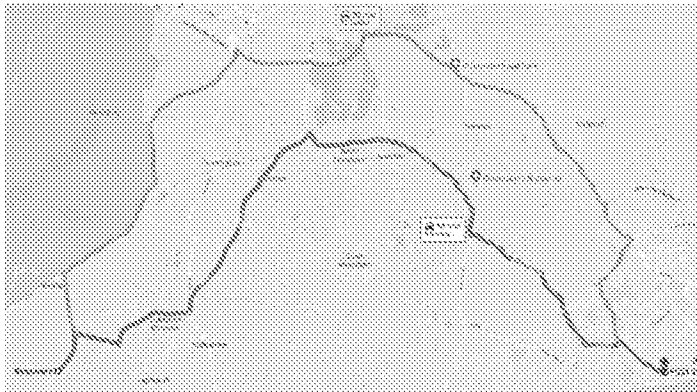
Location

- 7.16 The site is located close to a large number of businesses requiring seasonal workers with current businesses being supplied located in:
- Runcton;
 - Batchmere;
 - Bognor Regis;
 - Merston;
 - Dreyston;
 - Bosham Sidlesham;
 - Highleigh;
 - Almodington
 - Midhurst; and
 - Selsey.

Current Employment Provision

- 7.17 Occupants at the site will provide key workers predominantly to the following facilities: Chichester Food Park (4.4 miles from site) Roundstones and Batchmere (2.3miles from site). The optimal vehicle route for these locations from the site are illustrated below.





7.18 There are insufficient numbers of existing consented sites for farm worker accommodation (traditionally in the form of caravan sites) in the area to meet the demand that we have. Standards are also very poor.

Utilising other types of accommodation

7.19 Utilising traditional private accommodation, such as private houses of multiple occupancy, by the workforce is not an option due to:

- A lack of availability;
- Significantly higher cost of accommodation (for workers on the minimum wage); and
- Increased cost and logistical problems associated with transport.

Impact of not providing accommodation

7.20 Without accommodation our only source of labour is the Eastern European community already in the area with their own accommodation or those that are coming over speculatively to obtain seasonal work in the area. We already operate high street recruitment branches in Bognor Regis, Southampton and Portsmouth but are still unable to source sufficient labour from the local pool due to the high demand for this pool.

7.21 The increased demand for labour and lack of specific accommodation will put further pressure on the already stretched existing housing stock with more workers looking for temporary housing. These workers are often exploited and left vulnerable by being housed in unsuitable conditions and being charged market and above rates for overcrowded shared rooms. When there is a lull in the supply of work they will still have to pay their rent which can lead to poverty and the resultant social impact.

7.22 Workers living in our accommodation are charged the Minimum Wage Accommodation Offset rate, £57.40 per week, which is inclusive of the accommodation, facilities, welfare support, water, gas and electricity. When Pro-Force employed workers have not worked an equivalent of 15 hours in a week they are not charged for accommodation. This ensures that minimum waged, potentially vulnerable workers, are not exploited and are always left with sufficient funds to purchase groceries whilst they are living in our accommodation.

7.23 In summary, not having dedicated accommodation will have the impact of increased pressure on existing housing, increased poverty and the resultant social issues and ultimately an inability to meet the growers labour demands leaving crops in the ground.

Impacts on the Local Community

- 7.24 The seasonal workers are a vital component of the local agricultural and horticultural businesses, without whom this entire industry would be at risk of not being able to compete in the international market; impacting significantly the permanent employment in the area.
- 7.25 The facility employs a number of full time employees to manage, maintain, and provide welfare to the residents. When the site is fully operational the number of employees will total five. In addition to the direct employees the facility requires extensive support from a number of subcontractors including plumbers, electricians, gas engineers, fire alarm, garden services etc.
- 7.26 We will provide indoor games facilities (including pool tables, table football and darts), lounge area, high speed internet and a tv. We also have a training facility where we undertake inductions and provide a range of MVQ level and other agricultural or language training courses. All these facilities help to ensure that our residents are happy, entertained on site and will ultimately reduce the impact on the local community. Clearly the provision of these items will be reviewed under the current COVID-19 restrictions.

Business Operation

- 7.27 Pro-Force Ltd, in partnership with Cre8 Accommodation Solutions, in partnership with Pro-Force Ltd currently operate a number of Agricultural Worker Accommodation sites. These include:
- Canterbury (Kent) – 500 person capacity site;
 - Canterbury (Kent) – 400 person capacity site;
 - Bognor – 110 person capacity site;
 - Southampton – 133 person capacity site;
 - Faversham (Kent) – 50 person capacity site;
 - Swanton (Kent) – 90 person capacity site;
 - Isle of Wight – 243 person capacity site;
 - Chichester – 230 person capacity site;
 - Newquay – 236 person capacity site;
 - Newquay – 30 person capacity site;
 - Newquay – 190 person capacity site;
 - Newquay – 20 person capacity site; and
 - Leeds – 450 person capacity site.
- 7.28 In order to manage such a diverse range of properties, with the diverse seasons, languages, age and cultures we have developed extensive systems to ensure that we meet both our internal standards and those of the governing bodies whilst providing a safe and secure home to the residents during their stay. (See list of systems and safeguards above and below).

Economic benefits

- 7.29 Planning policies at national and local level recognise the importance of building a strong and competitive economy. In the case of this specific application, as set out extensively above, there is an urgent recognised need for key workers in the agricultural/food production industries to ensure that there is sufficient food to supply the nation. In the wake of the COVID-19 crisis, there will also be a general focus on re-building the economy and

helping existing businesses back on their feet and supporting them as they have to find new ways of working in the light of social distancing requirements. These economic benefits should carry significant weight in the decision-making process, as required by the NPPF.

Residential amenity

7.30 The accommodation will be supervised and managed to ensure neighbours are not impacted. The Applicant and its sister company has a good track record in managing such facilities, such as the South Downs accommodation. Safeguards and protocols will be put into place to ensure that the accommodation meets acceptable standards (ie set internally and externally by the governing bodies) whilst providing a safe and secure home to the residents during their stay. These extensive systems will also ensure the amenity of the local community is safe and secure. One of the policies is to ensure that there is an “open door” approach to anyone who might have questions or concerns to raise. To re-iterate, the established systems and safeguards will include:

- Inductions tailored to facility and local environment;
- Check In / Out inventories;
- Residents Handbook (includes facility overview, fire & emergency plans, important contact numbers, site rules, accommodation rules, induction overview etc.);
- Weekly room checks (Audit);
- Daily Site Checks (Audit);
- Weekly Site Checks (Audit);
- Weekly Fire & Emergency Lighting Checks (Audit);
- Online Audit & Maintenance Software system which manages the audits and maintenance requirements;
- Quarterly Resident Forums;
- Stronger Together membership;
- Whistle blowing hotline;
- Accommodation Standards; and
- Site Management Structure Document.

7.31 The following is an extract taken from the Officer Delegated Report (full version included within Appendix D) for the planning application reference EWB/18/03100/FUL, which was for the Renewal of planning consent EWB/17/01722/FUL for the continued use of the South Downs site to provide agricultural workers accommodation for a temporary period of 3 years and to amend Condition 3 to increase numbers from 300 to 400. The extract is the Consultee Response from the CDC Community Warden:

CDC - Community Warden

I visit the South Downs site most days, popping in to chat to the Proforce team and the Eastern European workers. I offer local knowledge and information and expertise, and over the months a strong relationship has built up. Proforce call me when "incidents" occur on my patch, where EE workers have been threatened or abused by locals, and I gladly share intelligence with them to try and reduce the chances of these incidents reoccurring. As to the conditions at the site, I have to say that they are very good. Surprisingly good in fact. Jessica Rodwell, the Accommodation Manager, and her welfare team run the place in a friendly and sympathetic way, and I love the way that they treat the workers. They show lots of respect and care to the workers, whilst making sure that the rules are adhered to. I see, almost daily, that the respect is mutual, with the workers clearly appreciating the way that the Proforce team treat them.

Nothing seems to be too much trouble; so much so that Jessica was telling me that the number of "returnees", ie workers returning after spending time at Bracklesham last year is well above 50%. As an outsider, every time I go to the site, I get the feeling that it is a happy place!! As for the increased numbers, I am sure that Proforce have explained the business plan, but from my perspective I have to say that it seems very viable, especially as the top number(400) is only for 8 to 12 weeks during the busiest part of the season. There are chalets ready and waiting for the proposed increase in staff, and all in all the site is clean, tidy and welcoming. The 10 kitchens for the workers are all very serviceable and only yesterday I saw that a massive drying area is being prepared so the workers can dry their clothes. I get very little negative feedback from locals. It must be a couple of months since I heard a moan!! The last incident that I dealt with was a minor one, where a group of the workers were bartering for goods in a charity shop. Once Proforce were aware, they immediately offered to install CCTV in the affected shop, providing the staff with considerable reassurance. I honestly cannot see the increase in numbers being an issue. The place is run professionally and all of the EE workers that I have spoken to are more than happy with the conditions.

- 7.32 This clearly demonstrates the good track record held by the Applicant in delivering and running accommodation of this nature and the measures taken to ensure local residents are not unduly impacted.

Transport and highway issues

- 7.33 There is ample on-site parking available to accommodate minibuses and cars needed to transport workers to their places of work. As outlined above, there would be circa 50 traffic movements per day taking the workers to their places of work. The site is in a highly accessible location close to existing retail and leisure facilities which will be within easy walking distance for the prospective residents. The proposal can be accessed safely by both car and non-car modes and the vehicular trips generated by the development can be accommodated satisfactorily on the local highway network. In any event the proposal is for a temporary period only and therefore any impacts would similarly be temporary.
- 7.34 In conclusion, the impact of the proposed use of the former care home on the operation of the local highway network will be minimal and will certainly fall well short of the "severe impact" test set by the NPPF.

8.0 Conclusion

- 8.1 In conclusion it is considered that this is an entirely appropriate and acceptable temporary use of an empty site and building, that will provide much-needed accommodation for seasonal agricultural workers, who are currently identified as “key workers” during the COVID-19 pandemic and who are already in high demand.
- 8.2 The proposal as submitted complies with all relevant Development Plan policies (as required by statute) and national policy set out in the NPPF. There is therefore no justifiable reason why permission should not be granted.

LIST OF APPENDICES

Appendix A – letter to residents

Appendix B – letters from local businesses

Appendix C – Article from Recruitment publication

Appendix D – Delegated Officer’s report for South Downs accommodation site

Appendix E – Extract from Commons Select Committee – Feeding the Nation

Appendix F - Extract from DEFRA’s Seasonal Workers Pilot Scheme