

Delegated Decision Sign off Sheet

Case Number:	EWB/18/03100/F/UL	Case Officer:	Jeremy Bushell	
Proposal:	Renewal of planning consent EWB/17/01722/F/UL for the continued use of the 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.			
Site:	South Downs Holiday Village, Bracklesham Lane, Bracklesham Bay, Chichester West Sussex PO20 8JE			
Applicant/Agent:	Agent Details : Mrs J Rarok Paris Smith, 1 London Road, Southampton SO15 2AE, ,			
Application Type:	Full Application			
Site Visit:	N/A			
Map Ref:	(E) 480841	(N) 97079		
Parish:	East Wittering And Bracklesham	Ward: East Wittering		

Red Card?	N	Stat. Consultee Objections?	N	Parish Objection	N
Third Party Representations?	10	Overall Publicity Expiry Date:	5 February 2019	CIL Liable	N/A
Legal Agreement?	N	Extension of Time?	N/A		
Recommendation:	PERMIT		Expiry Date:	6 March 2019	
Decided Plan(s):	Plan/DRG No.:051-003P Plan/DRG No.:051-002Q1 Plan/DRG No.:051-001 Plan/DRG No.:006 Plan/DRG No.:004 Plan/DRG No.:051-002PQ1				
Recommendation Date:	6 February 2019				
Recommendation By:	Jeremy Bushell				
Signed Off by:					

1. Site Description, Proposal and History

The site lies north and east of the junction of the B2198 Bracklesham Lane with Clappers Lane. It comprises an area of approximately 2.1 hectares and adjoins the settlement boundary for Bracklesham which is formed by Clappers Lane. Adjoining the north and north-east of the site is the Holdens/Island Meadow Parks caravan and camping park. There is an outdoor swimming pool, an outdoor amenity area and car parking to the front of the site for 52 cars plus an overflow car parking area to the rear for around 32 cars. The site is served by a vehicular access point onto both Bracklesham Lane and Clappers Lane. Mature boundary vegetation is located along the southern boundary partly screening views of the site from the south. To the south of the site are a number of semi-detached bungalows on the south side of Clappers Lane. Further mature vegetation is located sporadically on the east, north and west boundaries. To the east of the site are a number of detached dwellings fronting onto Clappers Lane. The last use of the site was for holiday accommodation as part of the Sussex Downs Holiday Village. The site comprises a mix of 10 no. flat-roofed single storey holiday chalet blocks totalling 121 units, staff accommodation at single storey totalling 22 units and a two storey main complex housing a ballroom, dining room, kitchen, games room, bar and arcade. A hotel at first floor in the main complex houses 50 bedrooms. The existing site capacity comprises 422 bed spaces - 322 in chalets (housing 2 to 3 per unit) and 100 in the hotel (housing 2 per unit).

The site was closed down as a holiday park in January 2017. The site has been used for the seasonal accommodation of agricultural workers in the chalet blocks since 3rd April 2017. A years temporary permission for this accommodation use for up to 300 workers expired on 13th December 2018 under planning permission EWB/17/01722/FUL.

The Proposal

The proposal is as succinctly described in the application i.e.

Renewal of planning consent EWB/17/01722/FUL for the continued use of the 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.

Planning History

EWB/17/01722/FUL - Change of use of a former holiday park to agricultural workers accommodation and associated works for a temporary period until 31st October 2019. PERMIT 13.12.2017.

EWB/18/00753/OUT - Redevelopment of the former South Downs Holiday Park with the erection of up to 85 dwellings with vehicular access, Local Equipped Area for Play, public open space, landscaping, footpath links and other related infrastructure. Committee resolution (19.12.18) to PERMIT with S.106 (S.106 in advance state of drafting at time of writing this report).

2. Representations and Consultations

East Wittering and Bracklesham Parish Council

No objection.

Earnley Parish Council

Although Earnley Parish Council has no objection to this application the Parish Council is concerned with the apparent lack of maintenance currently being carried out by the landowner and ask that a condition be put on this application that the site be maintained to prevent it falling into further disrepair.

Chichester Harbour Conservancy

The only thoughts I have on this application relate to loss of reasonably sustainably located visitor accommodation (Policy 30) outside the AONB, yet still allowing a base for people to visit the AONB. Looking at 17/01722/FUL, I see that the granting of temporary permission was the means to say the accommodation would not be lost. I also note that 18/00753/OUT is to be considered a week today at your Planning Committee, involving the complete loss of the holiday accommodation and building 85 dwellings, where this has a favourable recommendation subject to a S.106 being signed.

The site is too remote from the AONB boundary to adversely affect its setting, but if there is any net increase in recreational disturbance to the Chichester Harbour shoreline from continued use as temporary farm worker accommodation, the Conservancy would expect Policy 50 applied from the Local Plan and a contribution made in the usual way, to mitigate any net disturbance.

Planning Officer note: As no recreational pressure contribution was sought for the original temporary permission for 300 workers, it is reasonable to adopt a similar approach for this application which is again for a temporary period albeit it for longer and for more workers.

WSCC - Highways

A travel plan has been provided with the application and highlights the highest potential mix of vehicles to be 77 vehicles in a AM peak 6am to 7.30am returning between 16.30pm and 18.30pm. Example vehicle routes are provided to Chichester Food Park, Batchmere and the A27. The travel plan estimates less than 20% of total traffic would be heading to Batchmere and travelling east along Clappers Lane, this would equate to a maximum of 16 vehicles movements over a 1 1/2hour AM period or 2 hour PM period. (a rise of 4 movements per peiriod).

The level of parking requirements has been calculated utilising the maximum number of onsite vehicles divided by existing residents to provide an average of 5.2 people per vehicle. There is sufficient parking space on site to accommodate a predicted level of 77 car parking spaces.

No objection is raised to the application.

Sussex Police

Due to the age, original use as a Holiday Camp and variety of different original buildings and their internal accommodation, there are limitations to the measures I recommend to provide adequate security. I have no major concerns with the proposals, however, additional measures to mitigate against any identified local crime trends should be considered. (The report then sets these out)

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.

Planning Officer comment: The above comments - particularly the last paragraph - clarify and put into context the communication received from the government's Gangmasters and Labour Abuse Authority which advised the Council that it had received intelligence about living conditions at the site.

10 Third Party Objections

- On-going problem with noise from parties/BBQ's/car repairs etc.
- Site has been stripped of all the trees and vegetation leaving it looking bare and more like a bomb site than when it was in use as a holiday camp.
- No attempt to maintain the fabric of the camp. Fences are pulled down, buildings look in state of disrepair which adds to eye sore.
- Rubbish is regularly thrown over fencing on to Clappers Lane.
- Sewerage system cannot cope.
- Cars are speeding down Clappers Lane

3. Relevant Planning Policy

The principal policies and neighbourhood plans relevant to the consideration of this application are as follows:

Chichester Local Plan 2014-2029:

- Policy 1 Presumption in Favour of Sustainable Dev
- Policy 2 Dev Strategy and Settlement Hierarchy
- Policy 3 The Economy and Employment Provision
- Policy 8 Transport and Accessibility
- Policy 22 Integrated Cstl Zone Mgt for Manhood Pen
- Policy 24 East Wittering and Bracklesham Strat Dev
- Policy 26 Existing Employment Sites
- Policy 30 Built Tourist and Leisure Development
- Policy 37 Accommdtn for Agr and other Rural Workers
- Policy 39 Transport, Accessibility and Parking
- Policy 45 Development in the Countryside
- Policy 46 Alt, COU and/or Re-use of Extg Bldings in the Countryside

Other Local Policy and Guidance

The aims and objectives of the Council's Sustainable Community Strategy are material to the determination of this planning application. These are:

- A1 - A strong local economy where businesses can thrive and grow
- A2 - Employees with good skills relevant to local employers, prepared for national and international competition and with well-paid and secure jobs
- A3 - Vibrant and sustainable City and market towns, with a good range of business and retail types
- B3 - Environmental Resources
- C2 - Encourage healthy and active lifestyles for all
- C3 - A culturally enriched and empowered community
- D4 - Understanding and meeting community needs
- E1 - Traffic management in the district will improve so as to reduce congestion

4. Planning Considerations

This application has to be read in the context of the Planning Committee resolution in December 2018 to permit - subject to a s.106 agreement - the complete re-development of the former South Downs Holiday Park in Bracklesham for an outline scheme of up to 85 new dwellings. That resolution is significant in that it has agreed the principle of the loss of the former tourism/holiday use of the site in favour of a residential use. That issue (i.e. retention of the use for tourism) does not therefore need to be re-visited as part of the consideration of issues under this application.

The 2017 application which permitted a 1 year temporary permission for agricultural workers accommodation on the site was voted through by the Planning Committee in line with officers recommendation and the site is currently occupied by up to 300 seasonal agricultural workers predominantly from eastern Europe who are employed in the local agricultural/horticultural economy. .

The site is run by Cre8/Pro Force who are a specialist recruitment team experienced in the housing and management of workers in the agricultural/horticultural 'industry'. The workers under the current (now lapsed) temporary permission occupy the single storey flat roofed chalet buildings on the site which comprise basic bedrooms with en suite facilities. The main 2 storey building on the site provides the central admin, offices, communal canteen, welfare and social facilities. This building was formerly a hotel and the current application proposals to increase the number of occupants up to 400 from the current maximum 300 would result in the hotel bedrooms at first floor in that building being utilised.

The previous temporary permission established a set of conditions by which the use was to be controlled. During the year in which the workers have been housed at the site it has been possible to assess the impact of their use in terms of the impact on local amenity, the local economy and the highways impact. After some initial reticence from the local community about the nature of the use and the number of workers at the site, an objective overall assessment would, I think, arrive at the conclusion that the use has been well absorbed into the local community at Bracklesham with those initial mis-givings proving to be largely unfounded. The original application attracted 52 third party objections whereas there are 9 objections to this proposal.

Such an impression is borne out by the detailed observations of the Council's Community Warden (see consultation response above) who is in almost daily contact with the management at the site and the workers who are housed there. Contrary to the limited number of third party objections received on the application to extend the temporary use for a further 3 year period and to increase the numbers able to be accommodated there, the site is found to be well run with any issues quickly dealt with by the site managers. The increase from 300 to up to 400 workers on the site could potentially introduce new issues in terms of amenity. However, the period when that many workers are expected to be required is seasonal - a few weeks only during the high season - not all

the time. The applicant anticipates the peak occupancy period of 400 will only ever be over a short period of 3 - 4 weeks in the year, coinciding with the seasonal nature of the work and that the site would have an average occupancy level over the year of about 260 compared to the average occupancy level during the first year of use of 246 (so averaging 26 more workers over the year). From the current site observations there is no reason to believe that the site would be any less well managed even with the potential uplift in numbers.

Agriculture and horticulture remain a central plank of the District's economy on the Manhood Peninsula and there continues to be a necessary reliance on migrant labour to grow and harvest the crops which this area produces. Opportunities to provide alternative, professionally managed accommodation for this number of migrant workers replete with the same or similar range of facilities which are to be found at South Downs Holiday Park are considered to be very limited. A further 3 year permission would at least provide the agricultural industry with some certainty in terms of being able to house its labour force notwithstanding wider uncertainties in connection with Brexit. The alternative is that the site is left vacant until any potential residential re-development is realised. This has implications in terms of the site's further deterioration and the impact this deterioration has on amenity and on security grounds.

No negative consultation responses have been received on the proposals and there is no objection from either East Wittering/Bracklesham or Earmley Parish Council. The long term future of the site is clearly going to be residential once the outline planning application for the 85 homes is concluded but that may not now be for a number of years given the need to secure reserved matters following approval of the outline permission. In the interim the use of site for agricultural workers accommodation to continue to bolster the local economy is strongly supported by officers subject to a re-imposition where necessary of the previous planning conditions on the 1 year permission.

Conclusion

As an extension of the existing use which has been successfully trialed for over 1 year, the proposal is considered to be acceptable and is in accordance with local and national development planning policies.

Officer Recommendation

PERMIT

5. Recommendation

Officers Recommendation is to PERMIT for the following reasons:-

- 1) The use of the site shall be for the accommodation of agricultural workers only and shall be for a limited period of 3 years from the date of this permission, at the end of which time the site shall be restored to its original condition or to a condition to be approved in writing by the Local Planning Authority.

Reason: Permission would not normally be granted for such development in this location but in granting permission exceptionally for a temporary period the Local Planning Authority have had regard to the particular circumstances relating to the proposal.

Note: For the purposes of this condition agricultural workers are defined as those persons employed solely in agriculture as defined in Section 336 of the Town and Country Planning Act 1990.

2) The development hereby permitted shall not be carried out other than in accordance with the approved plans: 051-001; 051-002 Q1; 051-003; 051-002P Q1; 004; 006.

Reason: To ensure the development complies with the planning permission.

3) At no time shall the maximum number of agricultural workers accommodated at the site exceed 400.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity.

4) The development hereby permitted shall continue to provide the 24 no. car parking spaces for staff and visitors to the site as shown in the locations in the submitted Travel Plan. These spaces shall be retained and maintained for car parking purposes only until the use hereby permitted ceases to continue.

Reason: To ensure adequate car parking is provided for the use within the site.

INFORMATIVES

1) The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

2) This permission authorises a Change of Use only and does not authorise any other development that may require planning permission.