

PLANNING STATEMENT

Continued use of former Care Home (C2) as temporary accommodation for seasonal agricultural workers.

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

1.0 INTRODUCTION AND BACKGROUND TO APPLICATION

- 1.1 This Planning Statement has been prepared to support a planning application for the continued use of the former Royal Bay Care Home at 86, Aldwick Road, Bognor Regis for temporary accommodation for seasonal agricultural workers. It follows a temporary 24-month permission granted for this use in 2020 (ref BR/213/20/PL).
- 1.2 The previous temporary permission was granted subject to a number of planning conditions including:-
- A restriction on the number of seasonal agricultural workers to 58 (plus 2 live-in staff).
 - Noise mitigation measures comprising:-
 1. New team members to sign an Accommodation Agreement which sets out rules and regulations concerning the use of accommodation;
 2. Setting of a quiet time between 22:00 hours and 07:00 hours including no loud music and no gathering of residents in groups;
 3. No use of the external amenity space between 22:00 hours and 07:00 hours;
 4. Access from the main front entrance only;
 5. No gathering of persons on the fire escape staircase;
 6. Restriction on the times of the mini-bus pick up with the earliest arrival/departure no earlier than 06:30 hours;
 7. Mini-bus engine to be turned off during pick-up & drop-off;
 8. The on-site accommodation of a Team Accommodation Manager/Warden.
- 1.3 This re-submission application seeks permission to enable the continuation of provision of this much-needed accommodation.
- 1.4 Since the previous application was granted permission, the national situation with regard to agricultural and horticultural labour shortages has continued to worsen. The Applicant company is now one of 4 companies on the Government's approved list to provide accommodation for workers needed by the agricultural and horticultural sectors.
- 1.5 At no time has the Applicant been made aware that the use of the property for seasonal agricultural workers has caused harm to any neighbours/third parties. No complaints have been received directly by the Applicant from any members of the public, Planning/Environmental Health Officers, community wardens or Police since the use was first commenced in 2020. (It should be noted that the application site lies immediately adjacent to a Tesco Express convenience store. Such stores do tend to attract groups of young people however these are NOT residents of Royal Bay).

- 1.6 The Applicant has made significant efforts to forge good relationships with immediate neighbours as evidenced in the attached separate statement made by Pro Force's Accommodation Manager. (See Statement and "thank you" card in Appendix A).

2.0 BACKGROUND TO APPLICANT AND LABOUR MARKET

- 2.1 The Applicant, Pro-Force is a recruitment company specialising in the recruitment of key workers to local food/agricultural/horticultural businesses. Pro-Force is part of a wider group of companies including Cre8 Operations Ltd, which provides and manages accommodation for seasonal workers and Evergreen Training, which provides training courses and apprenticeships for the agricultural/horticultural sector.
- 2.2 Pro-Force is one of only four companies in the UK to have been selected by the Government to be an operator of the Extended Seasonal Worker Scheme regulated by the Home Office. (See below). Pro-Force has offices in Eastern Europe, including in Kyiv, Ukraine where it is busy supporting its staff during the current conflict.
- 2.3 As the accommodation "arm" of the business, Cre8 Operations Ltd has a long and highly-regarded track record in providing accommodation for seasonal workers in the UK. It currently operates and manages accommodation for approximately 9,800 seasonal workers all over the UK, from Cornwall in the South West, to Kent, Sussex, the Isle of Wight, Norfolk, the Midlands, Herefordshire, Yorkshire, Cheshire and Scotland.

Overview/background to labour market for seasonal agricultural/horticultural workers

- 2.4 Food production depends on securing an adequate supply of labour to get the harvest in and to process produce. Both prior to and since the initial EU referendum, farm businesses in the UK have found it increasingly difficult to hire sufficient workers and each year have been heavily reliant on tens of thousands of temporary/seasonal workers, with some 80-90,000 of these regularly coming from outside of the UK.
- 2.5 Brexit has amplified the problem as from 2021 the immigration system means only EU workers with Settled Status are able to take up or travel to the UK for up to six months for low-skill seasonal roles. This restricted timescale not only makes the UK a less attractive option for workers from the EU, but also makes it even more challenging for workers to find suitable accommodation in the right location and at a price that is affordable. Furthermore workers typically do not have their own transport, and struggle to provide references for landlords, and to raise deposits.
- 2.6 The special circumstances of seasonal agricultural workers was singled-out and emphasised in the Government-commissioned report by the Migration Advisory Committee titled: MAC A Points-Based System and Salary Thresholds for Immigration which stated:-
- "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*)".
- 2.7 It is widely recognised that the demand for seasonal agricultural workers cannot be met by the local population. See link below 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

- 2.8 In recognition of the specific problems in the horticultural sector, the Government announced a “Seasonal Workers Pilot” in 2019 enabling the recruitment of a limited number of temporary seasonal (migrant) workers for specific roles in the horticultural sector. Two operators were selected for the pilot, of which Pro-Force was one. The pilot was extended on 22 December 2020, for a further year, with an expanded quota of 30,000 places (known as the “Extended Pilot”), giving rise to the need for an additional two operators, as well as the retention of Pro-Force as one of the two original operators. (See Extracts in Appendix A) or link to Defra website below.

<https://www.gov.uk/government/publications/seasonal-workers-pilot-request-for-information/seasonal-workers-pilot-request-for-information>

- 2.9 During the COVID pandemic, agricultural and horticultural workers were given “key worker” status. Quarantining rules and the social distancing measures introduced to reduce infection had the effect of significantly reduced the capacity of existing accommodation.
- 2.10 During the first COVID lock-down in Summer 2020 a heavily advertised “Pick-for-Britain” campaign was launched. This was unsuccessful as it only attracted a small number of local people and only 11% of the total estimated workforce of pickers and packers needed. The campaign was abandoned in Spring 2021.

<https://www.thegrocer.co.uk/hiring-and-firing/pick-for-britain-scheme-for-uk-based-farm-workers-scrapped/655189.article>

- 2.11 Notwithstanding this, Pro-Force, has continued to try and actively recruit British workers. Success however has remained limited 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
 - 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.

- 2.12 So with the reduced supply of labour from the EU due to Brexit and the inability of the domestic market to provide anything like the workers required, there is still a critical shortage of seasonal labour supply on farms throughout the country and particularly in this area. The Government is still continuing to try and promote domestic labour markets (See article below), however the reality is that there remains a heavy dependency on seasonal workers from outside of the UK, and hence the Government confirming on 24 December 2021, that the visa scheme to allow seasonal workers to come to the UK will continue with 30,000 visas available for 2022 but with the potential to increase by 10,000 if necessary.

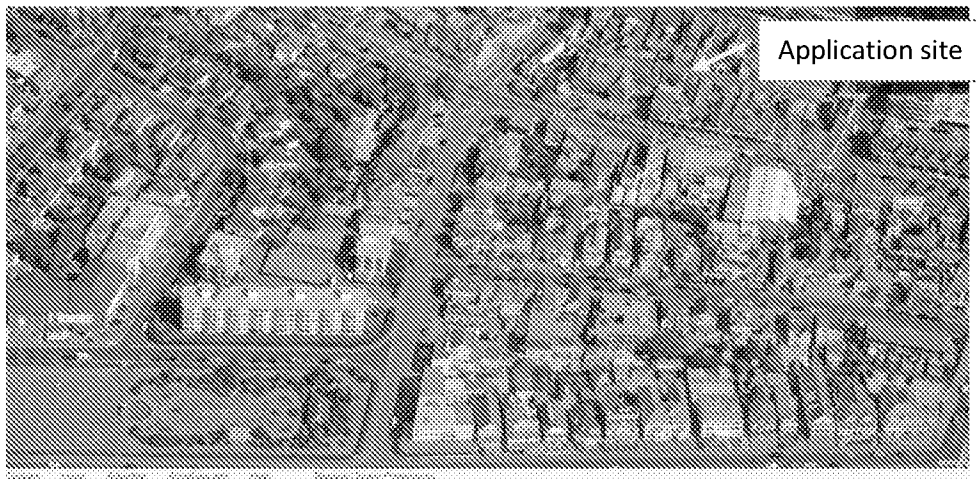
[DWP to promote Brexit ‘career opportunities’ in fruit picking to stop food rotting in fields again | The Independent](#)

- 2.13 With this continued dependency on overseas labour comes the need to provide suitable, high quality accommodation at an affordable price in order to attract labour from the EU and beyond. The accommodation at Royal Bay is therefore of great importance to the Applicant company and to the economy in general in providing exactly the type of high quality accommodation needed to attract and retain seasonal workers who are essential to the survival of the agricultural and horticultural sectors.

3.0 SITE AND SURROUNDINGS

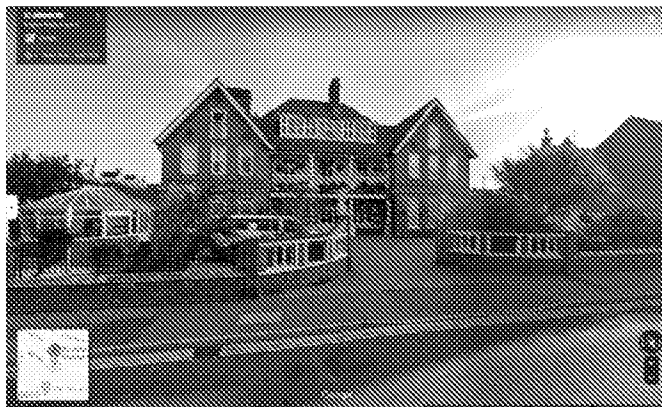
- 3.1 The application site lies on the corner location on the northern side of Aldwick Road, close to the junction with Nyewood Lane on the edge of the Aldwick area of Bognor Regis.

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



- 3.2 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)

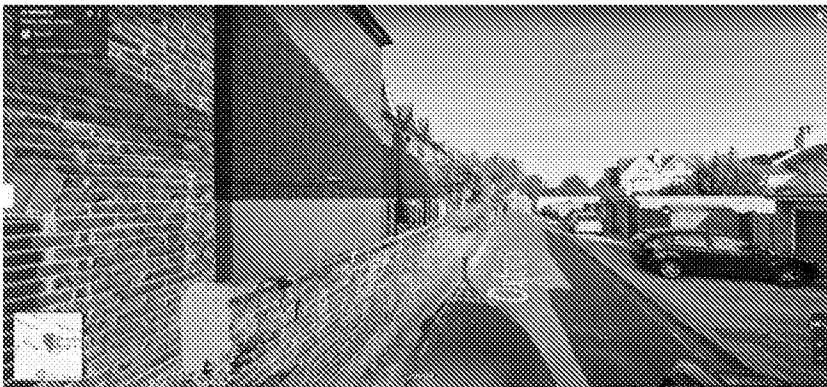


- 3.3 To the south, are residential properties fronting Oxford Street and to the north (opposite the site) and adjacent to the west are a mix of retail and commercial premises, including Tescos Express, and Pro-Force's offices within the local retail centre.

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



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



- 3.4 The Applicants have recently undertaken repairs to the building including repainting the exterior of the building, replacement fascia boards and internal refurbishments (replacement flooring etc). Landscaping works have also been undertaken with regular maintenance (which previously was not happening), tidying, new soft planting, hanging baskets etc.

4.0 THE PROPOSALS

- 4.1 The proposal is to allow the continued use of this vacant care home for seasonal agricultural workers and in accordance with the controls put in place as part of the previous permission.

Occupancy and Accommodation

- 4.2 As existing, the proposed residents of Royal Bay work at local farms and nurseries including Nature's Way, Barfoots, and Roundstones Nursery. (See later). No more than 58 workers will be accommodated at any one time, in accordance with the conditions on the original

permission. All of the other noise mitigation conditions will continue to be complied with, namely:-

1. New team members to sign an Accommodation Agreement which sets out rules and regulations concerning the use of accommodation;
2. Setting of a quiet time between 22:00 hours and 07:00 hours including no loud music and no gathering of residents in groups;
3. No use of the external amenity space between 22:00 hours and 07:00 hours;
4. Access from the main front entrance only;
5. No gathering of persons on the fire escape staircase;
6. Restriction on the times of the mini-bus pick up with the earliest arrival/departure no earlier than 06:30 hours;
7. Mini-bus engine to be turned off during pick-up & drop-off;
8. The on-site accommodation of a Team Accommodation Manager/Warden.

- 4.3 The workers are accommodated in a combination of single and double rooms, together with larger rooms suitable for 3-4 occupants, utilising the original 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. (Workers 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 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 the accommodation).
- 4.4 Indoor recreation facilities include a large lounge area with a pool table and a football table facility. Work-related training is provided as and when required.
- 4.5 A total of 5 staff will continue to run the accommodation (a site manager, 2 welfare staff and 2 maintenance staff). Two members of the Accommodation Team staff are on-site overnight, every night. There is also a member of staff present at all times during the day, everyday, including weekends and Bank Holidays.
- 4.6 The following safeguards/systems will continue to be applied:-
 - Inductions tailored to this specific site and local environment (with particular emphasis on the proximity of residential neighbours)
 - Check-in/out inventories
 - Residents Handbook (including facility overview, fire and emergency plans, important contact numbers, site rules, accommodation rules, induction overview etc). A copy is provided with this application.
 - Weekly room checks
 - Daily site checks

- Weekly site checks
- 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.

- 4.7 In spite of the relaxation of national rules regarding social distancing etc, Royal Bay still enforces measures to prevent spread of infection. There are still hand sanitisers in place, and workers are encouraged to wear masks in communal areas. This is on-going as workers work at different sites and on different shifts using the same shared facilities. If a worker has symptoms and tests positive for COVID they are required to isolate in their rooms. They are provided with cooking facilities (microwave) and support for shopping etc and are regularly checked by Accommodation/welfare staff. They are not allowed out of their rooms until they have 2x negative PCR tests. (See Covid-19 Risk Reduction Policy, March 2022 submitted with this application).
- 4.8 Workers have a designated smoking area at the rear of the site. They are not allowed to smoke anywhere else on the site.
- 4.9 Refuse storage is provided at the front of the site and current arrangements for collection by private contractors will continue as existing. The fencing around the refuse storage area is in the process of being replaced after recent storm damage.

Transport Arrangements

- 4.10 As set out in the original application, workers are transported to their places of work by minibus. These arrangements will continue. There are between 6 and 9 minibus movements in the morning and between 6 and 9 minibus movements in the afternoon, depending on the nature of the seasonal work being undertaken and the respective labour requirements of the work places. In accordance with the planning conditions, the morning movement of minibuses will continue to take place no earlier than 06h30 (and before peak traffic) so that workers can reach their places of work for an 08h00 start. The minibuses will then continue to pick up workers at 16h00 arriving back at the site at 17h00.
- 4.11 In addition to the above there are a small number of staff vehicles accessing the site resulting in an estimated 6 additional traffic movements per day (3 in, 3 out). These relate to the site management team, maintenance and welfare team operating the facility and typically take place at 08h00 and 17h00. These arrangements will continue.
- 4.12 The transport statement for the original application has been re-submitted for this application for completeness. The assessment examined trip rates of the previous use as an elderly care home (based off a recently agreed trip rate within West Sussex) concluding that the site could generate 6 no. 2-way movements during AM and PM peak hours and 85 trips over a typical day for this care home use. This was then compared with the anticipated trip rate from the proposed use, using residential trip rates and specific information about the application. The assessment concluded that, compared with the previous lawful care home use, there would be no net change in traffic generation during peak hours and, over the

course of a typical day there would be a net reduction of 7 movements, even using worse case assumptions (ie minibus use and an element of double-counting for personal car trips).

- 4.13 The transport statement also demonstrated that there is adequate on-site parking for all vehicles as well as sufficient turning/manoeuvring space for cars and minibuses to ensure that vehicles can safely access and egress the site in forward gear.
- 4.14 There have been no changes in circumstances since this transport assessment was carried out and accepted by the Highway Authority and the Council.

5.0 PLANNING HISTORY

- 5.1 The following applications are of relevance to the current proposals.

Application Ref	Description and Decision
BR/213/20/PL	Temporary change of use from Care Home (C2) to temporary accommodation for seasonal agricultural workers for 12-month period (re-submission following BR/138/20/PL).
BR/138/20/PL	Temporary change of use from Care Home (C2) to temporary accommodation for seasonal agricultural workers for 12-month period. Refused 21/08/2020.
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

6.0 PLANNING POLICY AND THE CORRECT APPROACH TO DECISION-MAKING

- 6.1 The correct approach to determining this application is as follows. The Local Planning Authority's (LPA) statutory duty is two-fold. Firstly, under S70 (2) of the Town and Country Planning Act it must *"have regard to...the provisions of the Development Plan, so far as material to the application"* and *"other material considerations"* AND secondly, under S38(6) of the Planning and Compulsory Purchase Act 2004 to *"make determination in accordance with the plan unless material considerations indicate otherwise"*.
- 6.2 This has been held to mean that the LPA must:-
 - a) FIRST correctly identify relevant policies in the Development Plan; then
 - b) SECONDLY correctly apply those policies to the proposal in question; and then
 - c) decide whether the proposal accords with the Development Plan "as a whole" before then going onto
 - d) consider whether other material considerations indicate that a different decision should be made.

- 6.3 In carrying out step c) above, in the event that different development plan policies pull in different directions, the decision-maker must decide which policies take precedence over others/or which policies should carry greater weight. In any event, it is a well-established principle that a proposal does not have to accord with each and every policy in order for it to be *“in accordance with the development plan”*. This was confirmed by the recent Court of Appeal Judgment - Corbett v Cornwall [2020] in which the Judge quotes from numerous authorities, including the earlier R v Rochdale MBC ex parte Milne case [2000] EWHC 650 (Admin) where Sullivan J, as he was then, stated in paragraphs 49-51:-

“49 In the light of that decision I regard as untenable the proposition that if there is a breach of any one policy in a development plan, a proposed development cannot be said to be “in accordance with the plan”. Given the numerous conflicting interests that development plans seek to reconcile... the needs of more housing, more employment....the protection of ...attractive landscapes etc, it would be difficult to find any project of any significance that was wholly in accordance with every relevant policy in the development plan”.

“50 ... it is enough that the proposal accords with the development plan as a whole. It does not have to accord with each and every policy therein”.

- 6.4 When carrying out step d), It is well established that the policies within the NPPF constitute “other material considerations” and should be given significant weight.

Relevant Planning Policies

The Adopted Arun Local Plan (2011-2031)

- 6.5 Relevant policies include:-
- 6.6 Paragraph 8.1 – sets out the strategic objective to strengthen Arun’s economic base and provide local job opportunities
- 6.7 Paragraph 11.2.1 – states that “horticulture is a key employment sector and the horticultural industry has a significant presence in the area”.
- 6.8 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.
- 6.9 Paragraph 11.2.4 – recognises that “employment in horticulture is particularly seasonal and consequently there are demands to house transient and/or migrant workers”.
- 6.10 Policy SD SP1 – explains the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 6.11 Policy SD SP2 – new development should be focused within the defined Built up Area.
- 6.12 Policy T SP1 – supports transport and development proposals which are designed to reduce the need to travel by car
- 6.13 Policy QE DM1 – noise pollution

6.14 Policy QE SP1 – requires that all development to contribute positively to the quality of the environment and ensures that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

6.15 Policy H SP4 (ALP) states where applications for houses in multiple occupation are not covered by permitted development rights, they will be favourably considered where proposals contribute to the creation of sustainable, inclusive and mixed communities and meeting the detailed criteria:

a. Do not adversely affect the character of the area including eroding the balance between different types of housing, including family housing;

b. Do not contribute to the generation of excessive parking demands or traffic in an area;

c. Provide adequate areas of open space.

6.16 Government policy/guidance – (NPPF 2021)

Paragraph 11 – decisions should apply a presumption in favour of sustainable development.

Paragraph 38 – LPAs should approach decisions in a positive and creative way.

Chapter 6 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 81 - 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 83 - Planning policies and decisions should recognise and address the specific locational requirements of different sectors

Paragraph 86 - Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

Paragraph 92 – provides safe and health communities including encouraging social interaction as well as ensuring places are safe and accessible.

Paragraph 84 – this encourages use of previously developed land,

Paragraph 110 sets out the following three key transport tests including appropriate opportunities to promote sustainable transport modes can be – or have been – taken up; safe and suitable access can be achieved for all users; and 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 111 – development should only be refused on transport 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.

Paragraph 120 d) - promotes and support the development of under-utilised land/buildings,

Paragraph 122 - Decisions need to reflect changes in the demand for land

Paragraph 124 - Decisions should support development that makes efficient use of land

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

- 7.2 As set out above, there is a critical national shortage of seasonal agricultural/horticultural labour and the country is heavily dependent on recruiting overseas to meet the needs of the sector and prevent food and crops from rotting in fields. The availability of high-quality accommodation is of great importance to entice workers to Britain, especially since Brexit.
- 7.3 In 2020, Pro-Force lost the tenancy and use of a large 400 person accommodation site in Bracklesham Bay, (the South Downs Worker Village) when the previous owner of the site sold the land to a developer for housing. Whilst Pro-Force has managed to increase accommodation elsewhere on farms in a number of locations it has not been possible to fully replace the facility and therefore it is still heavily reliant on the accommodation at Royal Bay.
- 7.4 It should be noted that part of the strategy to replace a proportion of the Bracklesham Bay accommodation was at the Newlands Nursery site at Pagham. This has not been successful (see applications below) and hence puts further pressure on existing accommodation at Royal Bay.

PLANNING & BUILDING CONTROL SITE SEARCH

Reference	Location	Type	Status
<u>P/108/19/CLP</u>	Newlands Nursery Pagham Road Pagham PO20 1LL	Planning Cert Propod Use	Refused
<u>P/109/19/CLP</u>	Newlands Nursery Pagham Road Pagham PO20 1LL	Planning Cert Propod Use	Refused
<u>P/110/19/CLP</u>	Newlands Nursery Pagham Road Pagham PO20 1LL	Planning Cert Propod Use	Refused
<u>P/78/19/CLP</u>	Newlands Nursery Pagham Road Chichester PO20 1LL	Planning Cert Propod Use	Withdrawn

- 7.5 This particular area has also seen significant expansion in facilities that require significant seasonal workforces in recent years such as the Nature's Way Food, Wight Salads, Newey Group, Vitacress and Langmead Farms. The original application included a number of letters from local employers in the area who wrote in support of increased accommodation for seasonal workers to supply this sector. Existing on-farm accommodation is generally of a lower standard and thus is less attractive to workers. Utilising traditional private

accommodation, such as private houses of multiple occupancy, is not an option due to low availability, a significant higher cost of accommodation and increased costs and logistical problems associated with transporting workers to their places of work.

Economic benefits

- 7.6 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 is also a general focus on trying to re-build the economy and help existing businesses back on their feet. As required by the NPPF, these general economic benefits should carry significant weight in the decision-making process.
- 7.7 The re-use of Royal Bay for accommodation purposes also has a significant benefit to the local economy by supporting town centre businesses (expenditure by workers/staff) and knock-on benefits through the supply chain. For example use of the local flooring business opposite the site to supply new flooring.
- 7.8 Social benefits include providing bespoke accommodation and meeting specific housing needs. The Applicant has gone to great efforts to integrate the facility with the local community (see separate statement in Appendix A) through written and verbally contact directly with neighbours and local businesses and involvement in community events such as Bognor-in-Bloom.

Residential amenity

- 7.9 In spite of objection to the original planning application, the Applicant is not aware of any specific complaints since Royal Bay has been occupied. A few initial teething problems when residents first moved-in were quickly and efficiently dealt with (see supporting statement) and there have been no written complaints from local residents, the council, police or wardens to the Applicant's knowledge. The accommodation is closely and carefully supervised with on-site presence at all times to ensure the strict rules are adhered to and to ensure neighbours are not impacted. There is no evidence to suggest the safeguards and protocols put into place are not complied with. The "open door" policy is still in place to whoever may wish to engage but none has done so to-date.
- 7.10 The Applicant has retained a strong relationship with the Council's former Community Warden for Bracklesham Bay who still regularly visits Royal Bay on their days off. When dealing with the Bracklesham Bay site, it is notable that the Warden commented as follows:-

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.

- 7.11 The management procedures/protocols put in place by the Applicant have been wholly successful in ensuring neighbours' amenities are protected, as evidenced by the lack of complaints made directly or indirectly to Pro-Force (as well as the positive feedback/thanks received from neighbours). There is no evidence therefore that the use of the building is detrimental to residential amenities and as such the proposal complies fully with Policy QE SP1.

Transport and highway issues

- 7.12 During the past year it has been shown that there is ample on-site parking available to accommodate the minibuses and cars needed to transport workers to their places of work. The site is in a highly accessible location close to existing retail and leisure facilities which are within easy walking distance for the prospective residents. The Highway Authority raised no objections to the original permission. It is therefore unlikely that a different conclusion will be reached.
- 7.13 In conclusion, the impact of the proposed use of the former care home on the operation of the local highway network has been found to be minimal and certainly no greater than the lawful use C2 care home use. It certainly falls 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 use of this property and site within the town centre. It provides much-needed accommodation for seasonal agricultural workers, who are essential workers for the agricultural and horticultural sectors which are recognised as key sectors by the Council's own policies. In the absence of any complaints from local residents, Council Officers, local wardens, or the

police, the Applicant is confident that the use of this building over the past two years has not caused material harm to the amenities of the area, to neighbours' nor to highway safety. Indeed, evidence provided in this application suggests to the contrary, ie that this is a well-run/managed facility, the workers and staff have been welcomed by residents and the use provides positive social and economic contributions to the local economy/area both directly and indirectly.

- 8.2 The proposal is considered to comply 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.

APPENDIX A – see separate Statement by Accommodation Manager