

Recommendation Report for Planning Permission

REF NO: F/29/26/PL

LOCATION: Wicks Farm
The Glasshouse
Ford Lane
Ford
BN18 0DF

PROPOSAL: Agricultural and horticultural workers' accommodation, consisting of 14 individual units (56 workers), welfare facilities with associated landscaping and parking for a period of 5 years. This site is in CIL Zone 3 (Zero Rated) as other development.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	This application seeks planning permission for the siting of agricultural and horticultural workers' accommodation, consisting of 14 individual units (56 workers), welfare facilities with associated landscaping and parking for a period of 5 years.
SITE CHARACTERISTICS	The site is an area of agricultural land to the south of existing glasshouses at Wicks Farm.
CHARACTER OF LOCALITY	The site is in a semi-rural area, with a mix of business uses and some residential units to the south.

RELEVANT SITE HISTORY

F/1/23/PL	Agricultural and horticultural workers' accommodation, consisting of 14 individual units (56 workers), welfare facilities with associated landscaping and parking for a period of 3 years (resubmission following F/4/22/PL). This site is in CIL Zone 3 (Zero Rated) as other development.	ApproveConditionally 25-04-23
F/4/22/PL	Provision of 14 No staff accommodation units for 56 people and welfare facilities for a minimum of 3 years. This site is in CIL Zone 3 (Zero Rated) as other development.	Refused 18-08-22

Planning history noted. This application seeks a renewal of the temporary permission granted under F/1/23/PL.

REPRESENTATIONS

Ford Parish Council - No response received.

No representations were received from nearby occupiers.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

ENVIRONMENT AGENCY - No objection.

NATURAL ENGLAND - No objection.

ENVIRONMENTAL HEALTH - No objection.

WSCC HIGHWAYS (LHA) - No objection.

- There is no evidence to suggest that the existing access is operating unsafely.
- There is no additional trip generation associated with the proposals.

ECOLOGY - No objection subject to conditions.

- The site is within a Biodiversity Opportunity Area and the proposed habitat enhancement is compliant with policy ENV DM3.
- The BNG report shows that the proposals will exceed the mandatory 10% biodiversity net gain.

DRAINAGE ENGINEERS - No objection

- This application seeks a renewal of the temporary permission granted under F/1/23/PL. At this time engineers had no comments or requests in relation to surface water drainage.
- If the development were to become permanent, engineers would request full compliance with the national standards for sustainable drainage.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted. Conditions requested by the ecology officer have been attached.

POLICY CONTEXT

Designation applicable to site:

Outside Built Up Area Boundary

Area of Special Control (Adverts)

Permitted Waste Site

Arun Valley IRZ

Groundwater flooding (>75%)

Flood Zone (with Climate Change)

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

SDSP1	SD SP1 Sustainable Development
SDSP2	SD SP2 Built-up Area Boundary

HDM3	H DM3 Agricultural forestry and horticultural Rural dwellings
DDM1	D DM1 Aspects of form and design quality
DSP1	D SP1 Design
TSP1	T SP1 Transport and Development
WDM2	W DM2 Flood Risk
ENVDM3	ENV DM3 Biodiversity Opportunity Areas

Ford Neighbourhood Plan 2024-2041 Policy BUA1	Built Up Area (BUA) boundary
Ford Neighbourhood Plan 2024-2041 Policy EH4	Surface water management
Ford Neighbourhood Plan 2024-2041 Policy GA2	Parking and new development

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to comply with relevant Development Plan policies in that the proposal provides temporary accommodation for rural workers for which there is a clearly evidenced need.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

- (2) in dealing with an application for planning permission the authority shall have regard to -
- (a) the provisions of the development plan, so far as material to the application,
 - (aza) a post examination draft neighbourhood development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.

OTHER MATERIAL CONSIDERATIONS

There are no other material considerations to be weighed in the balance with the Development Plan.

CONCLUSIONS

PRINCIPLE

The site is outside the built up area boundary, where Arun Local Plan (ALP) policy SD SP2 seeks to concentrate development. Ford Neighbourhood Plan policy BUA1 states that development outside the built up area will not be permitted unless it is for the purposes of agriculture, forestry or recreation. ALP policy C SP1 relates to development in the countryside and states that development will be permitted in the countryside where it is in accordance with other policies in the Plan which refer to a specific use or type of development. ALP policy H DM3 refers specifically to the provision of dwelling for rural workers outside of the built up area boundary.

H DM3 (3) states temporary seasonal horticultural workers dwellings shall only be granted in exceptional circumstances, where there is clear evidence that the structures are absolutely essential for the provision of staff accommodation for running a farm or agricultural holding and where various conditions are met. These are that (a) there is no suitable alternative means of providing the accommodation, (b) the accommodation is approved on temporary basis only with use of planning conditions to ensure seasonal and temporary occupancy, (c) structures are sited to minimise visual impact on area, (d) the accommodation provided is adequate, (e) accommodation meets requirements in terms of access/fire/ventilation and light/services and (f) drainage issues are addressed.

The proposal is primarily for seasonal accommodation, although the supporting documentation emphasises that the growing season has been extended by advances in technology, and there is an increased need for staff on the site year round. The Design and Access Statement (DAS) also highlights yearly increases in yields, with future production forecasts expected to increase further. The site has also expanded its blackberry propagation business. The application cites a need for 185 workers at peak periods, meaning that the existing accommodation only accommodates a fraction of the necessary workforce, with a capacity of 56 workers. We are informed that the provision of onsite accommodation is critical to recruiting and retaining sufficient labour, and the application highlights difficulty with finding other affordable accommodation options locally. The continuing need for the caravans has been adequately demonstrated.

The impact on the visual amenity of the area, the quality of accommodation, access and drainage implications are addressed in the conclusions below.

Subject to the considerations set out above, the principle of the development is acceptable in accordance with ALP policies H DM3, C SP1 and SD SP2, subject to compliance with other relevant development plan policies.

DESIGN AND VISUAL AMENITY

The caravans have been in situ since 2022, and the current application seeks to extend the permission for the development, and will not result in any change to the appearance of the site. The caravans are visible from the public footpath to the west. The caravans and welfare facilities are not unduly prominent and the proposed landscaping plan would help to soften their appearance, as they become a longer term feature within the landscape. The proposals are acceptable in accordance with ALP policy H DM3 and D DM1.

QUALITY OF ACCOMMODATION

The Nationally Described Space Standards are not applicable in this instance as this application does not intend to create new permanent dwellings. Notwithstanding this, the caravans should be designed to provide 'adequate accommodation' as per ALP policy H DM3 and policy H1 of FNP which requires new housing to be of high quality and to contribute positively to the environment.

The accommodation comprises 14 No. mobile homes, with each unit containing 4 bedrooms with a living/dining area. Each of the bedrooms will have an internal area of approx. 4.5sqm, this is sufficient for a single bed and basic furniture and is considered an appropriate amount of space when considering the temporary nature of the accommodation.

The caravans are appropriately spaced, and provide sufficient access to natural light. Two ancillary buildings are also provided with washing and laundry facilities, and space for exercise and recreation.

Given the temporary nature of the accommodation, the proposed mobile homes with the two ancillary buildings provide an adequate standard of amenity for their occupiers.

FIRE SAFETY AND EMERGENCY ACCESS

ALP policy H DM3 states that proposals for seasonal workers' accommodation should demonstrate appropriate fire safety measures and access for emergency vehicles. The caravans maintain the recommended minimum 6m separation distances between units in order to limit fire spread risk and provide safe circulation throughout the site. The application states there are four fire points amongst the caravans with manual warning systems ("klaxon" alarms) installed to provide means of alert in the event of fire, with portable fire extinguishers. The site must comply with other legislation in relation to fire safety.

The proposals provide appropriate turning space for emergency vehicles, and the caravans are accessible for emergency vehicles.

FLOOD RISK AND DRAINAGE

The site is within an area which is at future risk of flooding from rivers and sea, accounting for climate change. This is shown on the EA's Flood Risk Map for Planning. The EA has been consulted on the application, as the application proposes mobile homes for year-round occupation, and raises no objection to the proposals. Given that the application seeks permission for the caravans for a period of 5 years, and the site is not at current risk of flooding, the proposals are acceptable in terms of flood risk.

ADCs Drainage Engineers raised no objection to the proposal given that the use of the land would be temporary.

The proposals comply with ALP policies W DM2 and W DM3.

TRANSPORT

ALP Policy T SP1 requires development proposals to provide safe access on to the highway network and to incorporate appropriate levels of parking in line with the Arun Parking Standards (although the guidance does not specify requirements for agricultural uses). ALP Policy T DM1 also requires development to make provision for facilities for sustainable modes of transport such as cycling, to meet the parking standards, including cycle storage.

The LHA have raised no objection. No alterations to existing highways arrangements are proposed, and these have been operating without any known highways safety concerns. The provision of on-site accommodation for at least part of the workforce is likely to reduce vehicular movements at peak times.

The five parking spaces which were proposed are to be retained and car parking is available elsewhere on site. The seasonal workers who would be living in the accommodation are not all anticipated to have access to private vehicles, and the application states that the employer provides minibuss travel for trips for shopping and leisure. As such, the LHA have not raised any concerns over car parking provision. There are no specific parking standards for this type of development set out in the Arun Parking

Standards SPD and so parking provision must be determined on a case by case basis, based on the Travel Plan and need.

In this instance, the proposed parking is considered sufficient, and the proposal is in accordance with the NPPF, ALP policy T SP1 and the ADC Parking Standards SPD.

ECOLOGY

The application does not propose physical alterations to the site, aside from landscaping. The site is within the Arun Valley SPA Impact Risk Zone 2, and is also within a Biodiversity Opportunity Area. ALP policy ENV DM3 requires applications retain and incorporate locally valued and importance habitats. The proposal does not involve habitat removal, and the proposed habitat enhancement measures exceed the mandatory 10% requirement. The proposed enhancements, including the recommendations set out in the Preliminary Ecological Assessment are secured by condition.

The council's ecologist has been consulted on the proposals, and has raised no objection subject to the implementation of the proposed enhancements.

SUMMARY

The proposed development is acceptable in terms of Policy H DM3 (a) - (g) and therefore meets the requirements for Policy C SP1 of the ALP and BUA1 of the Neighbourhood Plan. As such, the proposed development in this countryside location is acceptable in principle. The development is in accordance with the other relevant development plan policies as set out above, and is therefore recommended for approval.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

CIL DETAILS

This application is CIL liable, therefore, developer contributions towards infrastructure will be required

(dependent on any exemptions or relief that may apply).

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The use of land and structures hereby permitted shall be discontinued permanently and the land restored to its former condition, or to a condition to be agreed in writing by the Local Planning Authority, on or before the expiration of the period ending 5 years from the date of this permission.

Reasons: To enable the Local Planning Authority to review the special circumstances under which this permission is granted in accordance with H DM3 of the Arun District Local Plan.

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

- Location Plan DD599L03 REV C
- Proposed Block Plan DD599L04 REV D
- Proposed Site Plan DD599L09 REV B
- Floor Plans and Elevations 001
- Bike Store and Elevations DD599D01 REV A
- Hard and Soft Landscape Proposals Plan 1 OF 3 DD559L05 REV E
- Hard and Soft Landscape Proposals Plan 2 OF 3 DD599L06 REV E
- Hard and Soft Landscape Proposals Plan 3 OF 3 DD559L07 REV E
- Ancillary Building Sections DD559L10 REVB
- Ancillary Building Floor Plan and Elevations Sheet 1 of 2 DD599L11 REV A
- Ancillary Building Floor Plan and Elevations Sheet 2 of 2 DD559L12 REVA

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Arun Local Plan policy D DM1.

- 3 The residential caravans hereby permitted to be stationed on the site shall not be occupied otherwise than as unit of accommodation limited to a person employed in horticulture by Berry Farming Limited at Wick Farm, Ford Lane.

Reason: To prevent the use of the accommodation for purposes unrelated to the agricultural use of the farm in accordance with Policy H DM3 of the Arun Local Plan.

- 4 Within 6 months of the grant of this permission, a Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Biodiversity Net Gain Assessment and accompanying metric (George Sayer, 24 April 2026) and in section 8 of the Ecological Impact Assessment (George Sayer, 24 April 2026), shall be submitted to and approved in writing by the Local Planning Authority.

The enhancement measures shall be implemented in accordance with the approved details within 6 months of the approval of such details and all features shall be retained in that manner thereafter.

Reason: To enhance protected and priority species and habitats in accordance with Arun Local Plan policies ENV SP1 and ENV DM5 and allow the Local Planning Authority to discharge its duties under the NPPF and s40 of the Natural Environment and Rural Communities Act 2006 (Priority habitats and species).

- 5 **INFORMATIVE:** Statement pursuant to Article 35 of the Town and Country Planning

(Development Management Procedure) (England) Order 2015 (as amended). 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 NPPF.