



WICKS FARM, FORD, WEST SUSSEX

- CONTINUED USE OF
HORTICULTURAL WORKERS
ACCOMMODATION -

APRIL 2026

FELLOWS
PLANNING

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Prepared on behalf of:

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I. Introduction

- I.1 This application statement has been prepared to support the temporary planning permission for the continued siting and use of horticultural workers accommodation at Wicks Farm, Ford for a further period of five years. The proposal represents a renewal of the previously approved development under reference F/1/23/PL and would continue to support the established horticultural enterprise.
- I.2 This document has been prepared by Fellows Planning Limited and the Project Design Team on behalf of Berry Farming Limited. It outlines the proposals which seek to retain the caravan accommodation for agricultural and horticultural workers on site, comprising 14 individual units (accommodating up to 56 workers), together with welfare facilities, associated landscaping and parking. Before setting out the detailed proposals, it is important to go through the background of this proposal and any changes that have since occurred the horticultural enterprise.
- I.3 Wicks Farm has developed a new growing system for strawberries and blackberries, which makes the most of the abundant levels of south coast sunlight. The fruit is grown using a new innovative, vertical hydroponic strawberry production systems, yielding 5 times more berries per unit area when compared to the traditional 'tabletop' growing methods. This pioneering technique has meant that the farm uses 20% of the land to produce the same amount of fruit.
- I.4 To improve the overall sustainability of the fruit growing, other technological advances have been made during the project to extend the UK growing season into early Spring and late Autumn using LED lights, also saving on food miles associated with imports in the process. The patented vertical hydroponic berry production system has a 90% lower carbon footprint than traditional table-top techniques and uses over 50% less water. The design of the glasshouses and its associated infrastructure for irrigation, filtration and sterilisation systems, enables water to be recirculated within the growing system, reducing the overall amount we use to grow the crops, amounting to 80% less water use than traditional farming methods.
- I.5 These advances in technology have meant that the number of full-time staff needed to be employed throughout the year has increased (compared to that originally envisaged when polythene cladding design was proposed) to maintain the highly sophisticated systems in place. In addition to this, given the increase in production year on year, additional seasonal horticultural workers have been required for the extended growing season.
- I.6 It remains well documented that attracting staff to the agricultural, horticultural and fresh produce industries continues to be extremely challenging. Ensuring Wicks Farm has access to a reliable seasonal workforce, many of whom undertake skilled and essential roles in supporting the operation of the vertical farming systems, remains critical to the success and ongoing viability of the horticultural enterprise. The continued provision of safe, well managed and affordable on-site accommodation is therefore essential to support the workforce requirements of the farm and ensure appropriate welfare standards are maintained.

- I.7 Since the original application was prepared, the policy context surrounding seasonal agricultural labour has continued to evolve. Whilst labour shortages initially intensified during the Covid-19 pandemic and following the UK's withdrawal from the European Union, the need for seasonal overseas labour within the horticultural sector is now widely recognised as a long-term structural requirement of the industry.
- I.8 The UK Government has subsequently extended the Seasonal Worker Scheme on a longer-term basis in recognition of the continued reliance of the horticultural sector on seasonal migrant labour to support domestic food production and food security.
- I.9 Labour shortages within the horticultural sector nevertheless remain significant. Businesses operating within the fresh produce supply chain continue to face substantial challenges in recruiting and retaining sufficient seasonal labour, particularly in rural areas where access to affordable accommodation and sustainable transport options remains limited.
- I.10 For intensive horticultural operations such as Wicks Farm, the availability of appropriately located worker accommodation remains fundamentally important to the successful operation of the enterprise, particularly during peak growing and harvesting periods.
- I.11 Sometimes the shortage of workers means that for the horticultural sector, some crops remain unpicked, or are being picked later than planned, and some produce is left longer in storage. It is fundamental that these labour challenges don't force farmers and growers to reduce production, impacting on the effectiveness of the business and leading to less choice of UK goods for consumers. Berry Farming have continued to increase its production by using additional polytunnels, reduce its carbon emissions and become even more sustainable in the long-term.
- I.12 Travelling to rural locations such as Ford remains both difficult and costly for seasonal workers, particularly given the limited public transport options available. The availability of suitable and affordable accommodation within the local area also remains extremely constrained. The provision of accommodation directly associated with the farm therefore significantly reduces travel requirements and supports the efficient operation of the horticultural enterprise. Berry Farming will continue to provide minibuss transport for shopping and leisure trips to further reduce unnecessary travel demand and support the wellbeing of workers accommodated on site.
- I.13 The need for agricultural and horticultural worker accommodation within the wider district remains acute, particularly given ongoing pressures on local housing affordability and the limited availability of suitable short-term accommodation within rural areas of Arun District. The District has historically performed poorly in relation to their 5 year land supply of housing at 3.23 years¹. The closure of the South Downs Caravan Site at Bracklesham Bay to make way for redevelopment, which accommodated over 400 agricultural staff, continues to have implications for the availability of seasonal worker accommodation across the wider area.

¹ Arun District Council Monitoring Report 1st April 2024 – 31st March 2025 (November 2025)

- I.14 Since the closure of the Bracklesham Bay accommodation site, a number of proposals for seasonal worker accommodation have come forward within the district in response to the recognised operational needs of the horticultural sector.
- I.15 Most notably, permanent planning permission has now been granted at Nyton Rest, Aldingbourne under reference AL/67/25/PL dated 18 February 2026 for agricultural workers comprising of 14 no. chalets. Whilst each planning application must be considered on its own merits, the decision demonstrates the Council's continued recognition of the important role seasonal worker accommodation plays in supporting established agricultural and horticultural enterprises within the district.
- I.16 The approval at Nyton Rest also reflects the ongoing and long-term nature of labour requirements within the horticultural sector and the acknowledged need for appropriately managed accommodation linked to agricultural production. A letter from Pro-Force Group (dated 27/06/25) was provided and this clearly indicates that there is a continued demand for the workforce and consequently the accommodation at the site. A copy of this evidence is provided in **Appendix One**.
- I.17 The proposed accommodation at Wicks Farm differs from many other seasonal worker accommodation sites in that it directly supports the agricultural operation undertaken on the same holding. This significantly reduces the need for workers to be transported from dispersed accommodation sites elsewhere within the district and enables the workforce to be appropriately managed in close proximity to the farm.
- I.18 Importantly, the accommodation approved under reference F/1/23/PL has now been successfully operated without giving rise to any known material planning, amenity or operational issues. The current application therefore seeks to continue an established and operationally essential facility which directly supports the ongoing horticultural enterprise at Wicks Farm.

I.19 Planning Background

- I.20 Wicks Farm has an extensive planning history. In September 2019, permission was granted for 2 multi-span tunnels and ancillary buildings, drainage ponds and associated works (under planning permission F/30/18/PL). This permission was subsequently varied under planning reference F/8/20/PL in June 2020 to replace the approved polythene cladding with glass, enabling the delivery of approximately 6 hectares of high-tech glasshouse development on the site. This followed the installation of associated gas infrastructure in April 2021 to improve reliability and energy efficiency.
- I.21 Since then, a further planning application for an additional 1.28 hectares of high-tech glasshouses, reservoir and nursery area was approved in September 2021 under planning reference F/7/21/PL and is currently under construction. This brings the total glasshouse provision at Wicks Farm to approximately 7.28 hectares, with further expansion planned in the future.

- I.22 Earlier planning applications relating to the glasshouse development anticipated a substantial seasonal workforce associated with the operation of the horticultural enterprise. As the vertical growing systems have evolved and production has intensified, staffing requirements have similarly increased beyond those originally anticipated during the early phases of development. The enterprise now operates on a significantly larger and more sophisticated basis than originally envisaged, with extended growing seasons and increased annual yields requiring a larger and more consistent workforce throughout the year.
- I.23 As the business has continued to expand, including the construction of the additional glasshouse development to the east and the growth of blackberry propagation activities, the demand for both permanent and seasonal labour has correspondingly increased. Further details relating to production yields and workforce requirements are provided later within this statement.

I.24 The Purpose of this Application

- I.25 This application has been submitted to seek planning permission for 14 units of agricultural and horticultural workers accommodation with two associated welfare units providing showers, toilets, laundry, kitchen and lounge facilities at the entrance to the main site. Each mobile home / chalet will provide accommodation for up to 4 people, providing accommodation for up to 56 workers altogether. The amenity facilities will ensure that workers have a separate social area with specific facilities, away from the mobile homes.
- I.26 It is also relevant to note that Part 5, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (SI 2015/596) ("GPDO") allows the siting of caravans for occupation by seasonal farm workers where certain criteria are met. It does have limited restrictions but cross refers to the Caravan Sites and Control of Development Act 1960 which in turn provides compliance criteria. This application would comply with the permitted development criteria in terms of establishing the caravans required to accommodate staff employed at the farm, their size and the structures being moveable etc. The current application seeks a more comprehensive and better planned form of development including associated welfare facilities, landscaping and supporting infrastructure, the permitted development framework nevertheless represents a material consideration in demonstrating the established principle of providing seasonal worker accommodation associated with agricultural operations.
- I.27 The current application seeks permission for the continued retention of the accommodation and associated facilities for a further temporary period of five years, or alternatively on a permanent basis should the Council consider this appropriate. Retaining the accommodation in situ outside peak seasonal periods avoids the significant operational and logistical difficulties associated with repeatedly removing, storing and reinstating the units on an annual basis. The proposal also reflects the increasingly extended growing season and the presence of year-round employment associated with the operation of the horticultural enterprise.
- I.28 The proposal is supported by the operational evidence set out within this statement, which demonstrates the clear and continuing need for seasonal worker accommodation directly associated with the established horticultural enterprise at Wicks Farm.

I.29 The approved layout adopted a landscape-led approach intended to help integrate the accommodation within the wider agricultural setting. Whilst the accommodation has operated successfully without giving rise to any known material amenity or operational issues, some elements of the approved landscaping scheme were not implemented during the temporary consent period. The current application therefore seeks to regularise the development as it presently exists on site, whilst also retaining the structural landscape framework originally approved, including reinforcement planting along the southern boundary hedgerow and additional planting adjacent to the broadleaf woodland in the western corner of the site. The layout continues to provide appropriate spacing between accommodation units to safeguard residential amenity and includes a wildlife-friendly drainage pond within the lowest part of the site to support biodiversity enhancements and improve the setting for residents. The development also includes 5 car parking spaces, a communal bin store positioned adjacent existing vegetation, turning provision for refuse and emergency vehicles, drop-off and collection space for minibuses, together with secure covered cycle parking for each accommodation unit. Collectively, these measures ensure the accommodation remains appropriately planned and functionally integrated with the wider horticultural enterprise.



Figure 01 - Photograph taken inside the glasshouse at Wicks Farm

2. The Site & Surroundings

- 2.1 The site forms part of Wicks Farm, located in Ford Parish in a predominantly rural location. The site is located to the north of Ford Lane, approximately 900m to the west of the village of Ford, 1.4km to the north east of the village of Yapton and 1.8km to the north west of the village of Clymping. The town of Littlehampton lies approximately 3km to the south east of the site. Ford Lane Business Park and Trading Estate are located adjacent to Wicks Farm, to the east and Ford Airfield Industrial Estate lies approximately 865m to the south.
- 2.2 The farm has undergone lots of recent change, with a new high-tech glasshouse development to the immediate northeast, with a concrete accessway from the glasshouse offices, leading to the main farm entrance. To the north of the extensive glasshouse development is a series of lagoons and beyond is the railway line running in an east-west direction towards Ford Station. A smaller glasshouse is located to the south east, and a mix of agricultural buildings to the south. There is also a recent consent to build a horticultural distribution centre for Bleach's of Lavant and a Waste Transfer Station in the centre of the farm some, which is partially complete. This utilised a partly implemented Anaerobic Digestion Plant which was no longer viable to build.
- 2.3 A short row of residential dwellings (1-7 Wicks Cottages and Fir Tree Cottages) face the lane just beyond the farm, the closest of which is located within 276m of the application boundary / the nearest mobile homes. There is also a detached dwelling know as Wicks Farmhouse set back from the lane, some 155m to the southwest and Ford Lane Business Park to the southeast. Within the complex of buildings (sometimes also mistakenly called Wicks Farm too) is Edgcumbers Coffee Roasters and Tea merchants café and small shop alongside an array of commercial businesses.
- 2.4 The southern boundary of the application site runs through the existing farmyard area (excluding the existing weighbridge, agricultural barns and newly completed highways depo) providing a vehicular access to Ford Lane. The access is lined with trees and vegetation along the southern aspect before it becomes more open where it adjoins the neighbouring agricultural field and lagoon. The existing route way then heads east along the glasshouse development before it opens out into the neighbouring agricultural field which includes the newly constructed additional glasshouse. Beyond this to the east, are rows of poly tunnels now used to propagate blackberry's. The southern area of the field is proposed for accommodation, tucked behind the small woodland block, in front of the southern hedgerow boundary.
- 2.5 The Ford Lane access links with North End Road to the west and Ford Road to the east. Ford Road provides the most direct route to the strategic road network, with the A259 lying some 2.4km to south at Clymping.
- 2.6 The landscape setting is predominantly flat arable land, where fields are bounded by hedgerow. There are no public rights of way which run through the site, but there a number of footpaths that run close to it, with the nearest approximately 95m to the east of the proposed accommodation, running up from the north of Ford Lane, between the Trading Estate and Business Park, over the railway line and towards Slate Barn Farm to the north. Another footpath runs

approximately 630m to the west, crossing Ford Lane and runs south towards Church Farm but views are limited due to the intervening built form / glasshouses.

- 2.7 The site is located within Flood Zone 1 (defined as land having less than 1 in 1,000 annual probability of river or sea flooding). Flood risk is therefore low.
- 2.8 The Ford Parish Council Neighbourhood Development Plan 2 (2025) has identified the neighbouring field to the west of the main farm as a 'Local Gap' between Ford and Yapton (policy EH7), but this is outside of the proposal area (please see Figure 02 for details). To the north of the site is a Biodiversity Opportunity Area, identified by Policy ENV DM3 of the Arun Local Plan (2018).
- 2.9 The main development site sits within the agricultural field with the newly completed glasshouses. The wider site is characterised by traditional field patterns, divided by hedgerows and scattered copses and woodland. The site itself is roughly rectangular in shape with the majority of the southern boundaries formed by well-established hedgerows and hedgerows trees. It is gently undulating, with the lowest part of the site located to the east where the pond is proposed.
- 2.10 There are no special site-specific environment or landscape designations which should preclude the development of the site. There is significant potential to enhance the ecological interest of the site through a carefully considered landscape strategy and sensitive ecological management which would also help assimilate the development into the local and wider landscape.



Figure 02 – Site Location, public rights of way and nearest settlements

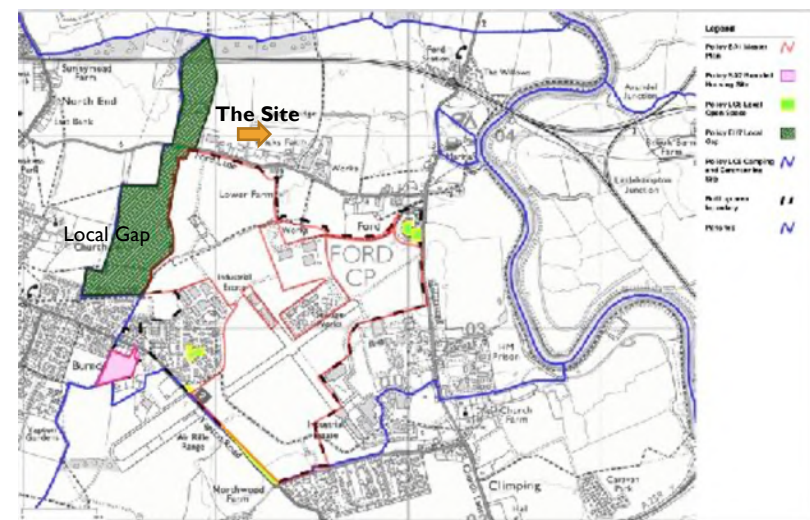


Figure 03 – Ford Neighbourhood Development Plan (2019) Proposals Map - Note new Ford Parish Council Neighbourhood Development Plan 2 doesn't define the 'Local gap'



Figure 04 – Photographs of the proposed site



Figure 05 – Photographs of the proposed site and wider context



Figure 06 – Photographs of the proposed site and wider context

2.11 Context

- 2.12 Wicks Farm is located on the northern side of Ford Lane, in a rural location, outside of the built-up area boundary. The farm has a detailed planning history, including the establishment of the 7.28 hectares of high-tech vertical farming enterprise with associated lagoons and landscaping. There is also a previous permission for an Anaerobic Digestion Plant (which has been implemented but as never made operational). This has since been amended so this will be used as horticultural distribution facility instead. The character of the area includes sporadic commercial uses interspersed on farms and in agricultural buildings.
- 2.13 It should also be noted that one of the entrances to the strategic mixed-use development at Ford Airfield for 1,500 homes is located to the immediate south of the site (ref. F/4/20/OUT). A new junction/roundabout is proposed immediately adjacent the vehicular access into the farm but demonstrated in previous schemes that the farm activities will be able to continue when Ford Lane is improved albeit is some time off yet.

2.14 Site Accessibility

- 2.15 There are a large number of employment sites in the Parish including a recycling plant, sewerage works, several general and light industrial employment sites and a proposed waste incinerator site (recently withdrawn at Ford Circular Park).
- 2.16 Wicks Farm has been previously considered suitable and accessible for an AD Plant. This part of the site is accessed from the south west vehicular access from Ford Lane. Ford Lane is located to the south of the site and runs west to east direction serving many of the other commercial premises found dispersed along the road. Ford Lane does join Ford Road which heads north to Ford Train Station. The train station is within cycling (6 minutes) and walking distance (20 minutes) of the site. There is limited access to bus services at present, the nearest being to the west along Burndell Road. The glasshouse occupier does offer staff a minibus service for its workers, for both shopping and leisure trips. Its current staff are collected from various locations via minibus too.
- 2.17 There is a network of public rights of way nearby, including the footpath beyond the agricultural field to the east (see figure 01 on page 9). A mown path around the perimeter of the field could be created to provide a direct connection for future residents. This leads to the industrial estate or the café to the south.
- 2.18 The planning history is outlined in more detail in the next section, with photographs of the site on earlier pages 10-12.

3. Planning History

- 3.1 The site falls within both West Sussex County Council (WSCC) and Arun District Council (ADC) administrative areas. The planning history has been split between waste-related development under WSCC and horticultural, farming and other related development falling with ADC.
- 3.2 There is extensive history at the site, some of which is listed in the tables found on pages 15-17, using both Council's public access system. It does appear that some history may relate to the industrial complex to the east as opposed to solely this area of the farm and horticulture complex but some older planning history does not have any documents associated with it apart from the decision notice so we have had to make some assumptions.
- 3.3 Of most relevance is the approval of the new 1.28 ha high-tech glasshouse, reservoir and parking area (reference F/7/21/PL) to the north of the proposal site. This application was approved in September 2021 and is adjacent the existing 6 ha of glasshouses, reservoir and nursery area immediate to the north west of the site (reference F/30/18/PL). The larger glasshouses became operational in 2019, which saw the production of 60 tonnes of British strawberries within initial trials, this later grew to 1000 tonnes in 2021, using the hydroponic strawberry production methods.
- 3.4 More recent permissions relate to an extension to the main glass house building to form a chilled packaging room for produce, new combined heat and power plant, proposed floating solar arrays within two existing water storage lagoons with associated infrastructure. The floating arrays have yet to be installed as part of these proposals. Since then, utility infrastructure has been approved, and a connection to mains gas supply which required subsequent new infrastructure to be provided under F/37/24/PL and telecoms application F/27/24/TEL.
- 3.5 The main entrance into the site was improved as a result of a previous Anaerobic Digestion Plant permission with its associated infrastructure including a digestate lagoon and landscaping (under planning reference WSCC/026/16F). The AD plant was located to the immediate north of the main farm complex of buildings which runs parallel to Wicks Lane beyond a strong tree belt. The AD plant was partly implemented following a series of amendments but never became operational. The scheme also included another polythene glasshouse to the east (always envisaged to be used separately to the generation of biomethane) and has been in situ for several years.
- 3.6 Some of the buildings associated with the AD Plant have now been given permission to be used as a horticultural distribution facility and a paper and cardboard pre-baled Waste Transfer Station. The buildings are largely complete, including the associated offices. The purpose of the application was to relocate Bleach's of Lavant distribution centre from their premises to the south of Wicks Lane, which is being demolished as part of the Ford Airfield Strategic mixed-use development (under refence F/4/20/OUT).

- 3.7 The Ford Airfield Strategic allocation is for up to 1500 dwellings, 60 bed care home, two form entry primary school, employment floor space, retail and commercial uses, public open space, sports pitches and associated facilities. This was approved on the 30 May 2023 and is of relevance to the proposals given it is located immediately to the south of the access.
- 3.8 The new access arrangements to the new development include a new junction/roundabout on Ford Lane. This was taken into account when West Sussex considered the horticultural distribution facility proposal and found this to be acceptable (either as it is today or with the new junction in place).
- 3.9 There is also a prior approval for an agricultural barn to the south west of the site, located within the corner of the agricultural field (local 'gap') which was given a 5-year permission under reference F/24/18/AG. This has subsequently been implemented.
- 3.10 The most relevant planning history is summarised in the table below, determined under Arun District Council.

Arun District Council			
Planning Reference	Description of Development	Decision	Date
F/26/25/PL	Demolition of existing storage container and erection of single storey office and welfare facilities (Note - adjacent highways depo)	Approved	06 January 2026
F/37/24/PL	Space for 2 No. CHP (Combined Heat and Power) packaged units, Switch Gear, Transformer, Buffer Tank and extension to car park. This application is in CIL Zone 3 (Zero Rated) as other development.	Approved	11 February 2025
F/27/24/TEL	Prior approval under Schedule 2, Part 16, Class A for the installation of a 20m slim line monopole supporting 2 No. antennas, 1 No. wraparound cabinet, 1 No. equipment cabinet and ancillary development including 1 No. remote radio unit.	No Objection	17 December 2024
F/8/23/PL	Proposed extension to existing glasshouse to form a chilled packaging room, new combined heat and power plant, proposed floating solar arrays within two existing water storage lagoons with associated infrastructure. This application is in CIL Zone 3 (zero rated) as other development.	Approved	29 September 2023
F/7/23/PL	Change of use of land to highway depot including parking and turning areas and the erection of an office building and a salt storage building.	Approved	01 August 2023

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.	Approved Conditionally until May 2026	25 April 2023
F/5/22/DOC	Approval of details reserved by condition imposed under F/7/21/PL relating to conditions 3-surface water drainage scheme, 4-discharge of flows to watercourses, 5-maintenance and management of surface water drainage, 6-landscape screening scheme, 7-contamination and 9-ecological enhancements.	Approved	18 July 2022
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 August 2022
F/14/21/DOC	Approval of details reserved by condition imposed under ref F/30/18/PL relating to Condition Nos 4 – discharge flows to watercourses, 5 – maintenance & management of surface water drainage and 8 - formal consent for discharge flows to watercourses.	Refused	04 November 2021
F/7/21/PL	Building a new 1.28 Ha high-tech glasshouse, reservoir and parking area adjacent to the existing 6 Ha glasshouse, reservoir and nursery area. This site is in CIL Zone 3 (Zero Rated) as other development.	Approved	10 September 2021
F/2/21/PL	Variation of condition 2 imposed under F/30/18/PL referring to approved plan numbers to include a gas tank.	Approved	09 April 2021
F/24/20/DOC	Approval of details reserved by condition imposed under ref F/30/18/PL relating to Condition Nos 4 – discharge flows to watercourses, 5 – maintenance & management of surface water drainage and 8 - discharge flows to watercourses.	Approved	26 November 2020
F/21/20/DOC	Approval of details reserved by condition imposed under ref F/30/18/PL relating to Condition No 3 – surface water drainage.	Approved	13 October 2020
F/17/20/DOC	Approval of details reserved by condition imposed under ref F/5/19/PL relating to Condition No 5 – surface water drainage.	Approved	25 August 2020
F/9/20/DOC	Approval of details reserved by condition imposed under ref F/30/18/PL relating to Condition No 3 – surface water drainage.	Refused	19 August 2020
F/10/20/DOC	Approval of details reserved by condition imposed under ref F/5/19/PL relating to Condition No 5 – surface water drainage.	Refused	30 July 2020

F/8/20/PL	Variation of condition 2 following the grant of F/30/18/PL relating to the change of cladding from polythene to glass.	Approved	16 June 2020
F/6/20/DOC	Approval of details reserved by condition imposed under ref F/30/18/PL relating to Condition Nos 4 – discharge flows to watercourses, 5 - surface water drainage, 7 - flood compensation area, 8 - discharge of any flows to watercourses, 9 - landscaping scheme, 10 – tree protection scheme, 12 – ecological enhancements and 17 - travel plan.	Part Approved	19 August 2020
F/3/20/DOC	Application for approval of details reserved by condition imposed under F/5/19/PL relating to condition 3- Arboricultural Method Statement.	Approved	26 June 2020
F/23/19/PL	Variation of condition 2 (plans condition) to show new site access & red edge & removal of conditions 13 & 14 following the grant of F/30/18/PL dealing with the use of an existing access instead of creation of new access.	Approved	17 April 2020
F/30/18/PL	2 multispans tunnels, 2 ancillary outbuildings, drainage pond, associated drainage works, external hardstanding for vehicle parking, access and turning.	Approved	27 September 2019
F/24/18/AG	Prior notification for agriculture-steel portal framed agricultural building to be used for the storage of fresh produce.	Approved	11 December 2018
F/21/11	New glasshouse north of farmyard & farm cottages	Approved	01 December 2011

3.11 West Sussex County Council's most relevant planning history to the site is listed below:

West Sussex County Council			
Planning Reference	Description of Development	Decision	Date
WSSCC/009/22	Proposed change of use of partly implemented anaerobic digestion plant to a recycled cardboard and paper waste transfer station and horticulture distribution facility with alterations to previously consented building, new detached office building with associated infrastructure and works.	Approved	16/01/2023
WSSCC/003/19/F	Amendment of condition 2 of planning permission WSSCC/061/16/F to amend design of silage clamps	Approved	11 April 2019
WSSCC/019/17/F	Proposed installation of a digestate lagoon with associated pipework and landscaping to replace the digestate lagoon approved under planning permission WSSCC/061/16/F (WSSCC/026/16/F as amended)	Approved	12 May 2017

WSCC/061/16/F	Variation of Conditions 12 and 13 (Landscaping Scheme and source of Waste Materials) of planning permission WSCC/026/16/F	Approved	22 March 2017
WSCC/026/16/F	Proposed extension to existing glasshouses; development of an on-farm Anaerobic Digestion Plant and associated infrastructure for the generation of biomethane, CO ₂ , electricity and heat, grid connection, digestate lagoon, access and landscaping.	Approved	22 November 2016

3.12 Previous Approval of 14 units of Staff Accommodation under planning reference F/1/23/PL

3.13 This application seeks temporary planning permission for the continued siting and use of seasonal worker accommodation at Wicks Farm for a further period of five years, or alternatively permanent planning permission should the Council consider this appropriate. The proposal represents a renewal of the previously approved development under reference F/1/23/PL and would continue to support the established horticultural operation undertaken by Berry Farming Ltd. The development has been implemented substantially in accordance with the approved plans and has operated successfully in support of the berry farming enterprise. Whilst some minor deviations from the approved layout have occurred on site, including the omission of part of the hardstanding / turning head at the north eastern end of the access track (which remains grassed), the non-implementation of some soft landscaping, and the slight repositioning of certain caravans and ancillary buildings further to the south east, these changes are limited in nature and do not materially alter the overall form, appearance or operation of the approved development.

3.14 Planning permission under reference F/1/23/PL was granted for a temporary period and is due to expire on 25 April 2026. The current application has therefore been submitted to secure the continued retention and operation of the seasonal worker accommodation beyond this period.



3.15 Previous refusal of 14 units of Staff Accommodation under planning reference F/4/22/PL

3.16 The above application had followed a previous refusal and earlier pre-application submission under reference PAA/133/211. In summary the pre-application response indicated that:

1) Its countryside location being unacceptable in principle and not justified, and therefore in conflict with policies C SPI and H DM3 of the Arun Local Plan.

This application has sought to justify that the proposal is for staff working exclusively on this site.

2) The proposed Pre-Application development of 26 accommodation units is excessive.

This application reduces that number from 26 units to 14.

3) The Pre-Application failed to make provision for adequate parking.

It is asserted in the planning application that followed that there is ample existing parking provision on the wider glasshouse site.

3.17 Despite reducing the scale of the number of units proposed down to 14, the application was subsequently refused for the following three reasons:

1) The development introduces temporary workers accommodation into a Countryside location with no clear and compelling evidence to demonstrate that there are exceptional circumstances for the use where the structures are absolutely essential for the provision of staff accommodation to facilitate the economic running of an agricultural or horticultural holding. Its countryside location is unacceptable in principle and is not justified, and therefore conflicts with policies C SPI and H DM3 of the Arun Local Plan.

2) The stationing of 14 caravans with their occupation by up to 56 rural workers is a significant over-development, and an over-intensive use of the site which will result in a significant number of comings and goings of occupants at unsociable hours and thereby having an unacceptable level of general noise and disturbance to neighbouring occupants preventing the quiet enjoyment of their properties, in conflict with policies D DM1 and QE SPI of the Arun Local Plan and the National Planning Policy Framework.

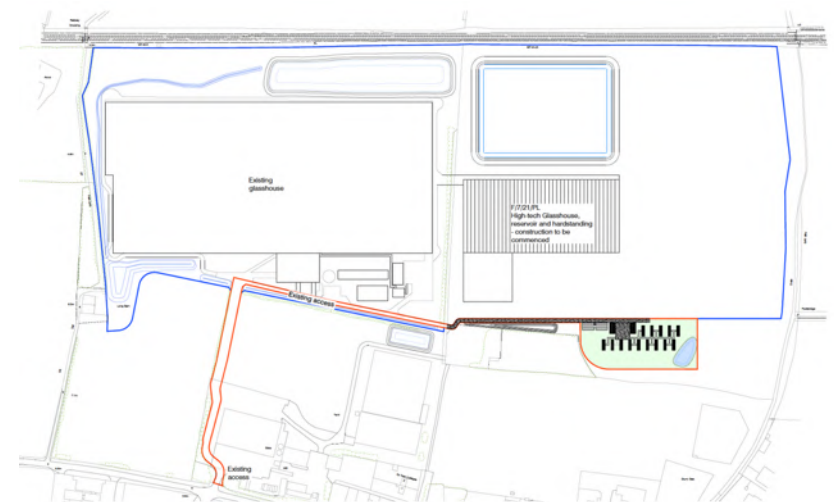


Figure 08 –Previous refusal under reference F/4/22/PL

- 3) The submitted Site Plan does not show any space or provision for on-site car parking, turning and manoeuvring which could result in on-street parking pressures and highways safety issues, contrary to policies T SPI and T DMI of the Arun Local Plan, the Arun District Council Parking SPD, policy GA2 of Ford Neighbourhood Plan and the National Planning Policy Framework.

3.18 The previous refused layout is illustrated in figure 6 and 7 below and above.

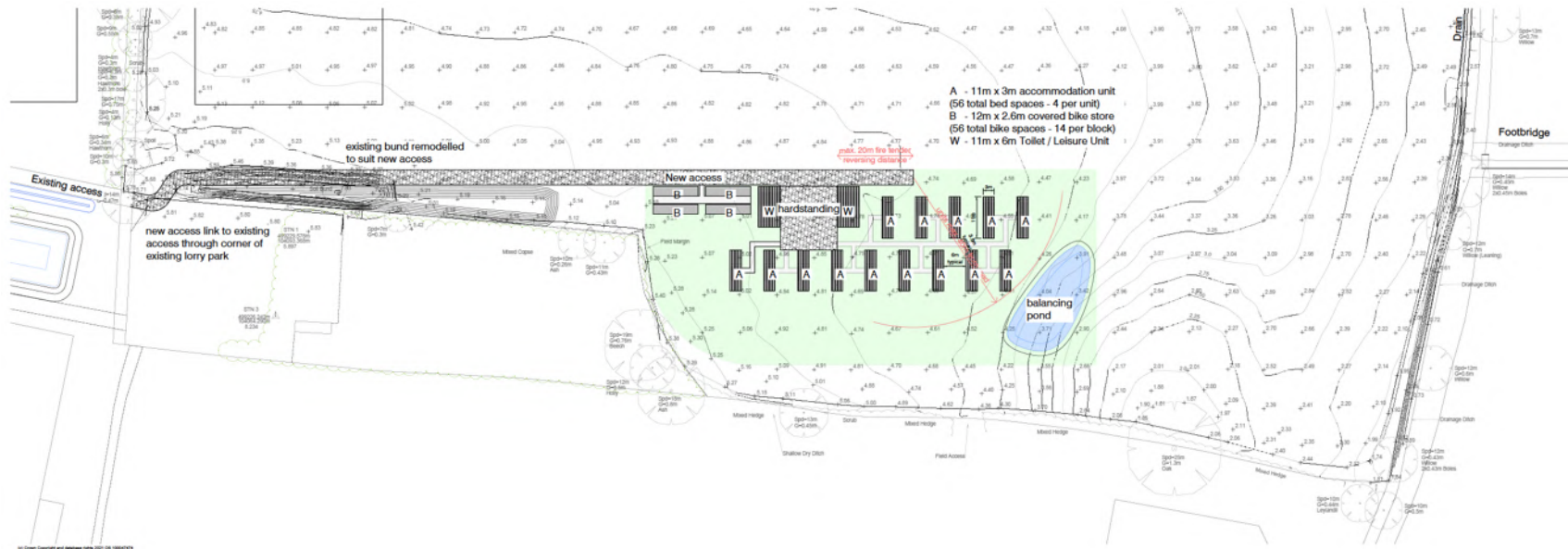


Figure 09 – Previous refusal under reference F/4/22/PL

- 3.19 The officer's report concluded that insufficient evidence was provided demonstrating that all 14 units of accommodation were needed. Therefore the requirements of policy C SPI and H DM3, alongside any established fall-back position is provided below. Also justification given why 5 car parking spaces is now included in the proposal, but highlights the fact that most agricultural workers do not have access to their own transport. The above issues highlighted were addressed in the resubmission, approved under reference F/1/23/PL on the 25 April 2023.

3.20 Why is the accommodation needed?

- 3.21 Since the original application was prepared, Berry Farming Ltd has continued to invest significantly in its business operations with the aim of improving land use efficiency, increasing productivity and enhancing the overall sustainability of the enterprise. The horticultural operation at Wicks Farm has evolved substantially since the initial pilot production trials undertaken in 2019, with ongoing improvements to the vertical growing systems resulting in consistently

increasing fruit yields year on year. The site now produces between approximately 1,350 and 1,550 tonnes of strawberries per annum, with yields increasing from approximately 200 tonnes per hectare in 2023 to around 228 tonnes per hectare during the most recent growing season. Future production forecasts anticipate yields increasing further to approximately 250 tonnes per hectare.

- 3.22 The technological and operational improvements introduced at the site have also enabled a significantly extended growing season, with fruit production now taking place throughout the year in order to improve customer resilience, reduce reliance on imported produce and support wider sustainability objectives. In particular, strawberries harvested at Wicks Farm between October and February are estimated to have a carbon footprint approximately 70% lower than imported strawberries sourced from Egypt.
- 3.23 In addition to the glasshouse operations, the business has also expanded its blackberry propagation activities since the previous application was submitted. Approximately 1.8 hectares of polytunnels are now used for blackberry propagation, producing around 55,000 plants per annum for subsequent off-site production and harvesting. The operation also makes efficient use of excess water and nutrients generated from the strawberry production systems to support the blackberry propagation process, further improving the sustainability credentials of the enterprise.
- 3.24 The continued expansion and intensification of the horticultural operation has resulted in an ongoing and substantial requirement for seasonal labour. Whilst improvements in efficiency and management practices have reduced the peak workforce requirement from the originally anticipated 215 employees to approximately 185 employees during peak periods, the demand for labour at the site nevertheless remains significant. These workers are required to support both the strawberry production and blackberry propagation activities undertaken at Wicks Farm.
- 3.25 The proposed 14 accommodation units would provide accommodation for up to 56 workers and therefore only accommodate a proportion of the total workforce required during peak seasonal periods. The proposal accordingly demonstrates a clear and continuing operational need for seasonal worker accommodation directly associated with the horticultural enterprise. The provision of on-site accommodation remains critical to ensuring that Berry Farming Ltd can recruit and retain sufficient labour to support the ongoing operation and future resilience of the business.
- 3.26 The occupants of the proposed accommodation would undertake a range of essential horticultural activities associated with the operation of the farm, including crop picking, general husbandry, potting, planting, propagation activities and maintaining the daily output and quality of the fruit production systems, under the supervision of the Farm Manager, Production Manager and Team Leaders.

4. Planning Policy

- 4.1 Applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. For the purposes of this application, the statutory development plan is considered to comprise the Arun District Local Plan (2018), the West Sussex Waste Local Plan (2014), and the Ford Parish Council Neighbourhood Development Plan 2 (2024 – 2041) (Made in 2025).
- 4.2 The key policies in the development plan, which are material to the determination of the proposals, are summarised below. In addition, reference is made to relevant national planning policy guidance and other policies that guide the decision-making process and which are material to the assessment of the application.

National Planning Policy Framework (NPPF)

- 4.3 The National Planning Policy Framework (NPPF) sets out the Government's overarching planning policies for England and establishes a presumption in favour of sustainable development. The Framework recognises the economic, social and environmental objectives of the planning system and confirms that significant weight should be placed on supporting economic growth and productivity, particularly within sectors that contribute to innovation, food production and rural enterprise.
- 4.4 Paragraph 84 of the NPPF confirms that planning policies and decisions should avoid isolated homes in the countryside unless one or more specified circumstances apply, including where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside. Whilst the proposals relate to temporary seasonal workers' accommodation rather than permanent dwellings, the principle of supporting essential rural workers in appropriate countryside locations is clearly recognised within national policy.
- 4.5 The proposals relate to an established horticultural and berry growing enterprise where the availability of seasonal labour is essential to the continued operation and expansion of the business. The accommodation is directly linked to the operational requirements of the enterprise and supports the efficient management of seasonal growing, harvesting and associated glasshouse production activities.
- 4.6 The NPPF also recognises that sites to meet rural business needs may need to be located adjacent to or beyond existing settlements and in locations not well served by public transport. In such circumstances, development should be sensitive to its surroundings, avoid unacceptable impacts on local roads and exploit opportunities to make the location more sustainable. The proposals respond positively to these objectives through the use of an existing operational area within the farm complex, the provision of landscaping and ecological enhancements, and the minimisation of daily commuting requirements associated with the workforce.

- 4.7 Chapter 6 of the NPPF ("Building a strong, competitive economy") confirms that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on supporting economic growth and productivity, taking into account both local business needs and wider opportunities for development. This is particularly important in sectors where the UK can be a leader in innovation and productivity.
- 4.8 The proposed accommodation forms an important component of the wider horticultural enterprise and directly supports the recruitment and retention of the seasonal workforce required for the operation of the business. The proposals therefore support continued investment in innovative glasshouse berry production techniques and domestic food production within Arun District and the wider region.
- 4.9 Paragraph 88 of the NPPF confirms that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas together with the development and diversification of agricultural and other land-based rural businesses. The proposals directly support these objectives by facilitating the ongoing operation and expansion of an established horticultural enterprise.
- 4.10 The NPPF also places significant emphasis on achieving well-designed and visually attractive development which responds positively to local character and landscape setting. The revised layout and landscape strategy have been carefully designed to integrate the accommodation within its rural surroundings through enhanced planting, ecological improvements and a reduction in the visual prominence of hardstanding areas.
- 4.10 At paragraph 96(c) of the NPPF it is acknowledged that decisions should aim to achieve healthy, inclusive and safe places which support access to healthy food. The provision of accommodation, its storage and the associated amenity facilities to support the growth and harvesting of soft fruit would duly support such a vision and policy requirement.
- 4.11 In addition to this, the Council is unable to demonstrate a healthy five-year land supply of housing. Therefore, the contribution made by retaining horticultural workers accommodation for up to 56 people will not add further pressure on the already stretched local housing stock. Mainly by reducing this on-going pressure. Regard should also be made to the NPPF objective of significantly boosting the supply of homes (paragraph 61).
- 4.12 Overall, the proposals accord with the core objectives of the NPPF by supporting sustainable rural economic growth, domestic food production, biodiversity enhancement and the ongoing operation of an established horticultural enterprise, whilst ensuring that environmental and landscape impacts remain appropriately mitigated.

Arun Local Plan 2011 – 2031 (adopted 2018)

4.13 The most relevant planning policies have been listed below:

• CSPI Countryside	• HDM3 Agricultural forestry and Horticultural Rural dwellings	• DDMI Aspects of form and design quality
• QESPI Quality of the Environment	• TSP1 Transport and Development	• TDMI Sustainable Travel and Public Rights of Way
• DSP1 Design	• LAN DM1 Protection of landscape character	• W SPI Water
• W DM2 Flood Risk	• W DM3 Sustainable Urban Drainage Systems	• QE DM2 Light pollution
• QE DM4 Contaminated Land	• ENV DM5 Development and biodiversity	• HOR DM1 Horticulture
• SD SPI Sustainable Development	• EMP SPI Strategic Economic Growth;	

Ford Neighbourhood Development Plan 2 2024 – 2041 (adopted 2025)

• EH4 Surface water management	• SPI Spatial Plan for the Parish	• EE1 Support for Business.
• H1 Quality of Design	• GA2 Parking and new development	• EH1 Protection of trees and hedgerows
• EE1 I Ford Industrial Estate.	• Policy BUA1 Built Up Area (BUA) Boundary of Ford.	• EE9 Rural Buildings

4.14 The Arun Local Plan Policy Map 2 (central area) does not identify any constraints associated with this part of Wicks Farm. We previously noted the adjacent strategic housing development at Ford and the biodiversity opportunity area to the north of the site.

4.15 The Strategic Economic Growth Policy EMP SPI enables the expansion of existing employment sites (c) and the integration of other uses and forms of development where it facilitates the delivery of economic objectives and fosters growth and innovation (k). Given the recent expansion of high-tech glasshouses at Wicks Farm, it makes sense accommodation for its workers is provided on site, in a similar way to other rural enterprises in the area.

4.16 Horticulture Policy HOR DM1 in the Arun Local Plan also recognises the importance of the horticulture industry as a key employer in the district. The commercial horticulture industry has a significant presence in the areas surrounding Angmering, Barnham and Pagham. The Local Plan states that in addition to growing horticultural products, the industry is evolving to meet customer demand and is importing, processing, packaging and distributing produce all year round. Therefore, given Wicks Farm is an important producer of summer fruits, based in Ford, supporting this important land-based industry is backed up by this planning policy. It is therefore hoped that the Council will see the importance of securing future accommodation for the established business.

- 4.17 The site is located outside the Built-Up Area Boundary (BUAB), in the designated Countryside. New residential accommodation in the countryside is normally unacceptable in principle and precluded by Arun Local Plan countryside policy C SPI. However, policy C SPI contains several exception tests, where countryside development is justified. This includes where it is (a) for the operational needs of agriculture, horticulture, forestry and (f) in accordance with other policies in the Plan which refer to a specific use or type of development. In respect of (f) one such policy in the Development Plan which refers to a specific use or type of development is H DM3 which refers to 'rural workers dwellings'.
- 4.18 Policy H DM3(3) states that temporary seasonal horticultural workers' dwellings will only be permitted in exceptional circumstances where there is clear evidence that the accommodation is essential to support the operation of a farm or agricultural holding and where a number of criteria are satisfied. These include demonstrating that there are no suitable alternative means of accommodation available, that occupancy can be appropriately controlled through planning conditions, that the structures are sited and designed to minimise visual impact, that adequate living conditions are provided, and that appropriate access, fire safety, ventilation, servicing and drainage arrangements are secured.
- 4.19 In this case, there is a clear and ongoing operational need for seasonal worker accommodation associated with the established berry enterprise at Wicks Farm. The farming operation has continued to expand and modernise through investment in vertical hydroponic growing systems and significantly extended growing seasons, resulting in sustained labour demands across much of the year. In addition to the glasshouse operations, the business has also expanded its blackberry propagation activities since the previous application was submitted. Approximately 1.8 hectares of polytunnels are now used for blackberry propagation, producing around 55,000 plants per annum for subsequent off-site production and harvesting. The operation also makes efficient use of excess water and nutrients generated from the strawberry production systems to support the blackberry propagation process, further improving the sustainability credentials of the enterprise. The proposal seeks to extend the previously approved temporary permission from three years to a further minimum period of five years in recognition of the continued operational requirements of the business. The accommodation remains temporary in nature and directly linked to the horticultural enterprise.
- 4.20 The operation at Wicks Farm now comprises one of the UK's most advanced semi-vertical glasshouse growing systems, extending to approximately 6.5 hectares and supporting near year-round strawberry production. The business has continued to invest significantly in sustainable growing technologies, including hydroponic systems, precision irrigation and climate-controlled production methods. Since establishment, the operation has reportedly tripled yields per square metre, halved water usage and reduced carbon emissions per kilogram of fruit produced by approximately 67%.
- 4.21 The continued expansion and intensification of the horticultural operation have resulted in an ongoing and substantial requirement for seasonal labour. Whilst improvements in efficiency and management practices have reduced the peak workforce requirement from the originally anticipated 215 employees to approximately 185 employees during peak periods, the demand for labour at the site nevertheless remains significant. These workers are required to support both the strawberry production and blackberry propagation activities undertaken at Wicks Farm.

- 4.22 In addition to the above, General Permitted Development rights allows the siting of caravans for occupation by seasonal farm workers under Part 5, Class A of the GPDO. This should be given significant weight in planning terms, as this fall-back position establishes the principle of temporary seasonal worker accommodation associated with the holding. The current application differs from that fallback position in that it provides a coordinated and properly planned accommodation site with associated amenity facilities, drainage infrastructure, landscaping and managed access arrangements. The proposals include communal amenity buildings, appropriate spacing between caravans, a revised grasscrete turning head arrangement, cycle parking and a comprehensive landscape strategy intended to integrate the development into its rural setting whilst supporting biodiversity enhancements. The proposal also avoids the impractical and unnecessary requirement to repeatedly remove and return the caravans between seasons, thereby reducing associated vehicle movements and operational disruption.
- 4.23 Saved Local Plan Policy D DMI sets out that development will be permitted where it is in keeping with the local character by virtue of scale, design, massing, height, prominence, materials, layout, landscaping and siting and avoid any material loss of amenity to existing and adjoining residential occupiers. The planning officers report which approved the accommodation for a 3-year period under reference F/1/23/PL stated that:
- “The site is located within the designated Countryside on a rural lane comprising a mix of dwellings, gardens and agricultural businesses. The site is within the farm complex adjacent to a substantial glasshouse complex. The site itself is also physically contained by boundary treatments to the south and east and the farm complex to the south and west. Open agricultural land can be found to the north. As such, the siting of caravans on the application site is not incompatible with the character of existing built form and uses in the area and would not result in a significant incursion into the open countryside nor harm significant views across the open countryside and landscape. It is acknowledged that the structures are single storey, located well within the confines of the sites' developed area away from the frontage with Ford Lane, and the site is well contained and screened.”
- 4.24 The planning officer went on to say that...
- “Based on the structures being single storey, their set back siting within the site away from the lane, and the existing and proposed fencing/vegetative screening they would have an acceptable visual impact. As such, the structures have been sited to minimise the visual impact on the surrounding area, as per policy H DM3, and would integrate sufficiently and have an acceptable impact on the appearance and character of the street scape and countryside, in accordance with ALP policies D DMI and FNP policy H1.”
- 4.25 This application therefore seeks to continue and extend the temporary accommodation previously approved under application reference F/1/23/PL, whilst regularising a number of minor amendments arising from the implemented scheme and updated landscape strategy. The proposals retain the key principles previously accepted by the Council, namely that the accommodation represents an appropriately contained and landscape-led form of development associated with the operational needs of the established horticultural enterprise at Wicks Farm.

- 4.26 The revised proposals maintain the established character and appearance of the development, including the retention of appropriate spacing between caravans, the incorporation of a revised grasscrete turning head arrangement, and a rationalised landscaping scheme which continues to provide effective visual containment and biodiversity enhancements. The following planning assessment demonstrates that the proposal remains appropriate in scale, temporary in nature, and compatible with the surrounding countryside character and operational requirements of the berry enterprise.

Supplementary Planning Documents and Guidance (SPD's and SPG's) and other planning guidance

- Planning Practice Guidance (PPG)
- National Design Guidance (NDG)
- SPD11 Arun Parking Standards 2020
- SPD13 Arun District Design Guide (SPD) January 2021

- 4.27 The above documents are material considerations in any forthcoming planning application.

5. West Sussex Growers

- 5.1 In order to properly understand the need for the continued temporary accommodation at Wicks Farm, it is important to recognise the significance of the horticultural sector within West Sussex. The West Sussex growing sector is nationally important, containing the largest concentration of glasshouse production in England and contributing produce with a retail value of more than £1 billion per annum. The sector also supports approximately 9,000 full-time equivalent (FTE) jobs, alongside a substantial seasonal workforce associated with harvesting, packing and distribution activities (West Sussex Economic Strategy 2025 - 2035).
- 5.2 The Arun and Chichester District areas are recognised centres for commercial horticulture due to favourable soil conditions, light levels and established agricultural infrastructure. Businesses within the sector supply major retailers across the UK and continue to evolve in response to changing consumer demand, technological innovation and the need for more resilient domestic food production systems.
- 5.3 The horticultural sector has undergone significant change over the last two decades. In response to international competition, labour pressures and changing retail requirements, businesses have increasingly invested in modern growing technologies, automation and more efficient production methods. This includes hydroponic systems, controlled environment agriculture and extended growing seasons designed to improve productivity, sustainability and resilience.

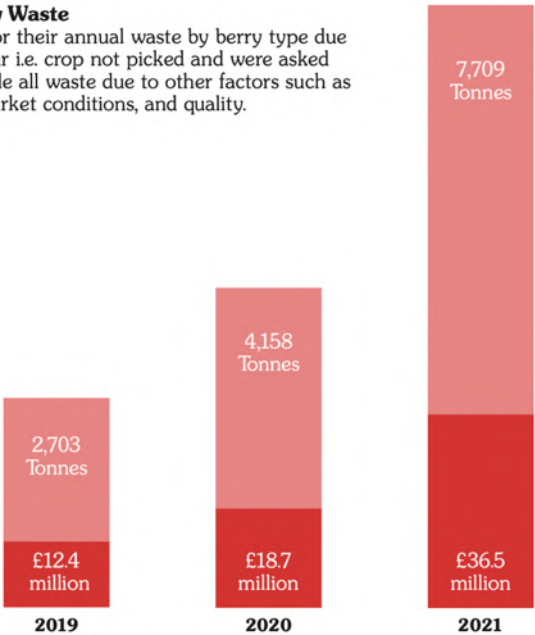
- 5.4 The operations at Wicks Farm represent a clear example of this modern and evolving horticultural sector. The site now comprises one of the UK's most advanced semi-vertical glasshouse growing systems, extending to approximately 6.5 hectares and supporting near year-round strawberry production. The business has invested significantly in climate-controlled hydroponic growing systems, precision irrigation and energy-efficient infrastructure to improve productivity and environmental performance. Since establishment, yields per square metre have reportedly tripled, water use has halved and carbon emissions per kilogram of fruit produced have reduced significantly.
- 5.5 The Berry Farming operation now supports overlapping growing cycles, allowing strawberry production to continue for much of the year, alongside the continued expansion of blackberry propagation and production. Wicks Farm reportedly produces approximately 1,000 tonnes of summer strawberries, 250 tonnes of winter strawberries and 250 tonnes of blackberries annually, with produce harvested, cooled and packaged onsite. The business therefore forms an important component of the wider regional and national food supply chain.
- 5.6 Despite its importance to the local economy, it is a sector that is not well understood. This includes the struggles the sector faces with having sufficient workers. This is even after the national campaigns during the pandemic asking everyone to 'Pick for Britain'.
- 5.7 This on-going issue of Labour shortages in the food and farming sector has been raised and evidenced in the Houses of Parliament² in March 2022.
- 5.8 Despite continued investment in automation and technology, the soft fruit sector remains heavily reliant upon seasonal labour, particularly during harvesting and crop management periods. Recruiting and retaining sufficient workers remains a significant challenge across the horticultural sector, particularly within rural areas where suitable short-term accommodation is limited. The provision of onsite accommodation is therefore an important factor in ensuring that businesses such as Wicks Farm can maintain a stable and reliable workforce throughout the growing season.
- 5.9 Labour shortages within the horticultural sector have increasingly resulted in produce being left unharvested, contributing to financial losses and unnecessary food waste at a time when there is a strong national focus on improving domestic food resilience and reducing reliance on imported produce. The continued provision of suitable onsite accommodation at Wicks Farm will assist the business in attracting and retaining workers, helping to ensure crops can be harvested efficiently and the operation can continue to function competitively and sustainably.
- 5.10 The application therefore supports not only the operational needs of Wicks Farm itself, but also the wider objectives of maintaining investment, innovation and productivity within the West Sussex horticultural sector. The proposal will assist in sustaining an established rural employer that continues to invest in sustainable growing practices, advanced agricultural technology and long-term food production resilience.

² <https://committees.parliament.uk/writtenevidence/42845/default/>

Figure 10 – Berry Industry Waste due to lack of labour

UK Berry Industry Waste

Farms were asked for their annual waste by berry type due only to lack of labour i.e. crop not picked and were asked to specifically exclude all waste due to other factors such as pest and disease, market conditions, and quality.



Annual waste doubled from 2020 to 2021 and is now a staggering £36.5 million across the sector.



Pro rata for whole UK industry	2019	2020	2021	Expected for 2022
EU Resident	33,763	29,558	18,704	10,578
SWS Scheme	1,472	3,989	13,608	20,064
UK Resident	374	2,429	771	266
Total	35,609	35,976	33,081	30,908

Benefits of Vertical Farming:



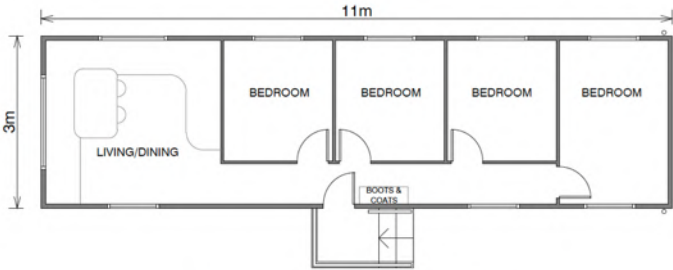
5.1 | This is at a time when the summer fruits industry is doing all it can to innovate and improve its energy efficiency, productivity and sustainability credentials. This includes working in a socially, ethically and environmentally responsible manner. The key benefits of vertical farming are highlighted above.

6. The Proposals

6.1 Planning permission was previously granted for the temporary siting of horticultural workers' accommodation at Wicks Farm for a minimum period of three years. This application seeks permission to retain and continue the use of the accommodation for a further five year temporary period in order to support the ongoing operational needs of the established horticultural enterprise.

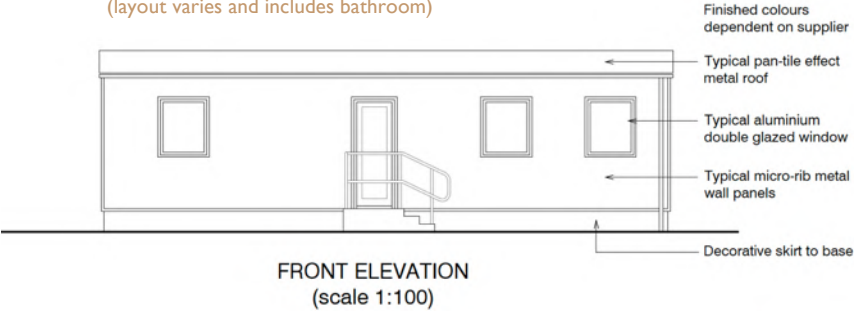
- 6.2 Berry Farming continue to make significant investments in summer fruits and are redefining how strawberries are grown sustainably in the UK. Wicks Farm has adopted innovative vertical hydroponic strawberry growing systems designed to increase climate resilience and improve land use, resource efficiency and productivity. As part of the ongoing advancement of the horticultural operation, and through optimisation of plant performance, the growing season has been extended from May through until November. This has resulted in an increased labour requirement, particularly given the scale of the farming operation. Providing accommodation for workers remains essential to ensuring the efficient operation of the business. Workers are organised into teams with varying roles dependent upon qualifications and experience, including planting, husbandry, picking, production work, storage, forklift operation, cleaning and equipment management.
- 6.3 Rural workers continue to be required to support the farming operations. Whilst the mobile homes could theoretically be removed from the site at the end of each season and returned when required, the Council will be aware of the strong fallback position under Schedule 2, Part 5, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). However, the repeated removal, storage and return of the accommodation is impractical, financially burdensome and environmentally inefficient. Retaining the accommodation on site provides operational certainty for the business and avoids unnecessary vehicle movements associated with transporting the units elsewhere between seasons. The accommodation is required during, and in preparation for, the main growing season, although occupation levels naturally reduce between November and February.
- 6.4 Consideration has been given to the possibility of accommodating seasonal workers within nearby settlements rather than on site. However, this would place the business at a substantial competitive disadvantage compared with other agricultural enterprises. Seasonal workers are generally employed for periods of up to six months and are unlikely to commit to long-term private rented accommodation or incur additional travel costs. The provision of onsite accommodation is therefore important in attracting and retaining workers. Furthermore, many workers do not have access to private vehicles and rely upon transport provided by the business. Accommodating workers centrally on the farm reduces travel demand and associated traffic movements.
- 6.5 The proposal therefore seeks the continued temporary use of the land for the siting and storage of mobile homes associated with the horticultural enterprise, together with two associated amenity buildings providing shower and toilet facilities, laundry areas, kitchen facilities and communal leisure space. The amenity buildings as constructed measure approximately 9.25m x 7.45m and 12.3m x 7.45m respectively, both with a height of approximately 2.7m. These facilities provide an important communal function and assist in ensuring the accommodation remains suitable and attractive for both existing and prospective workers.
- 6.6 The development comprises 14 mobile homes accommodating up to four workers each, enabling a total of up to 56 workers to reside on the farm. Each caravan measures approximately 10m by 3.8m and units are separated by the recommended 6 metre spacing distance. Indicative elevations and internal layouts of the caravans are included within the accompanying drawings. To facilitate occupation, the accommodation is connected to the existing mains drainage infrastructure serving the wider site.
- 6.7 The continued use of the accommodation on site reduces the need for daily minibuss movements associated with transporting workers from alternative accommodation. Vehicle trips are generally limited to shopping and leisure journeys several times a week. Retaining the accommodation in situ also avoids the need for larger vehicle movements associated with removing and storing the caravans elsewhere outside the growing season.

- 6.8 The proposals include five car parking spaces, reflecting the limited level of private car ownership amongst workers. Additional visitor parking is available within the wider farm complex and adjacent to the main office. The layout has been designed to minimise vehicle movements within the living area, limiting access primarily to minibuses, emergency vehicles and refuse collection vehicles. In response to the as-built arrangement on site, the proposals now incorporate a grasscrete turning head at the end of the internal routeway to ensure suitable vehicle manoeuvring can be achieved whilst maintaining a softer landscaped appearance. The parking area and communal bin store are discretely positioned adjacent to existing vegetation.
- 6.9 To promote sustainable travel, secure cycle storage is provided for each mobile home. A bike repair station is also available within the central farm complex and a communal covered bike shelter is provided along the western boundary near an informal outdoor seating area. Access to nearby public rights of way is available across the field to the northeast, connecting southwards through the industrial estate and providing access to local services including the café and farm shop.
- 6.10 The revised design and landscape strategy includes:
- The siting of the mobile homes within the corner of the field adjacent to the woodland block, using existing landscape features to inform the layout and minimise visual impact.
 - A loose arrangement of mobile homes interspersed with areas of soft landscaping to maintain a spacious appearance and reinforce the rural character of the site.
 - A revised landscaping scheme which rationalises the extent of planting previously approved, including a reduction in the extent of native infill planting and certain tree planting areas, whilst retaining key planting and landscape buffers necessary to soften views and integrate the development into its surroundings.
 - A central routeway with pedestrian paths linking the accommodation units, with hardstanding areas minimised where possible.
 - The revised layout incorporates a grasscrete turning head at the end of the routeway, providing the necessary vehicle manoeuvring area whilst reducing the visual impact of hard surfacing within the rural setting.
 - The retention of a balancing pond within the natural low point of the site to assist with drainage and biodiversity enhancement.
 - An overall landscape strategy focused on reinforcing the existing tree framework, supporting biodiversity net gain objectives and maintaining separation from the adjacent glasshouse development.
 - A sensitive lighting approach controlled through condition, with lighting limited to essential downward-facing fittings positioned above entrances only.

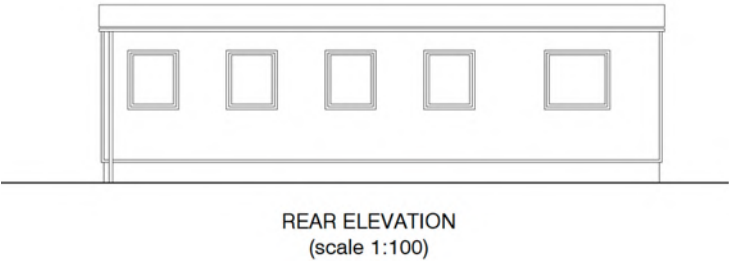


ACCOMMODATION UNIT - 4 BEDROOM
(scale 1:100)

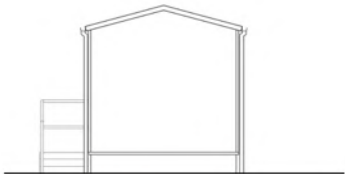
Illustrative floor plan of mobile home used to accommodate workers (layout varies and includes bathroom)



Illustrative elevation of mobile home used to accommodate workers (fenestration and step design varies)

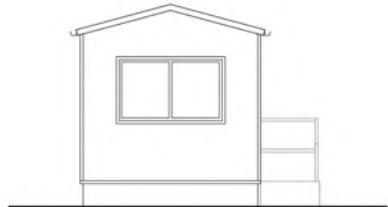


Illustrative elevation of mobile home used to accommodate workers



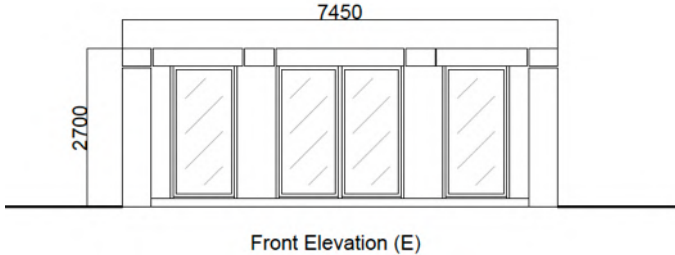
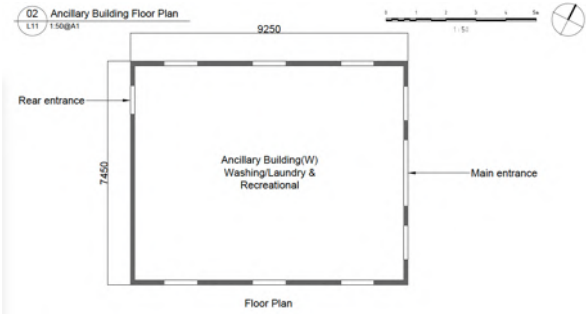
SIDE ELEVATION
(scale 1:100)

Illustrative side elevation of mobile home to be used as workers accommodation



SIDE ELEVATION
(scale 1:100)

Illustrative side elevation of mobile home to be used to accommodate workers



Ancillary Buildings for staff



Figure 11 – Current proposals – Horticultural workers accommodation and amenity

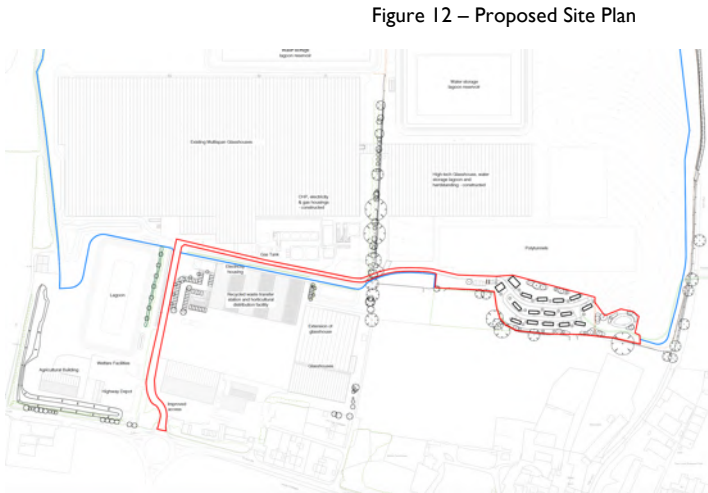


Figure 13 – Previous Layout



Figure 14 – Proposed Site Layout

7. Principle of Development / Planning Assessment

- 7.1 The continued production of British-grown produce and the resilience of domestic food supply chains remain matters of significant national importance. The horticultural sector plays a critical role in meeting consumer demand for locally grown produce, whilst reducing reliance on imported goods. Businesses such as Wicks Farm have invested heavily in modern growing technologies, efficient production systems and sustainable farming practices in order to support this objective. However, the success of these operations remains fundamentally dependent upon access to a reliable and appropriately housed workforce.
- 7.2 The proposal seeks to extend the previously approved temporary permission for seasonal horticultural workers' accommodation from three years to a further minimum period of five years. The accommodation continues to support the operational requirements of the established berry enterprise at Wicks Farm, including the site's advanced semi-vertical hydroponic growing systems and associated blackberry propagation activities. The growing season has significantly extended beyond traditional seasonal patterns, with production activities now occurring across much of the year. As such, the operational need for seasonal and semi-permanent labour remains substantial and ongoing.
- 7.3 The continued provision of onsite accommodation is essential to enabling the business to recruit and retain workers within a highly competitive labour market. Suitable short-term accommodation within rural areas is limited and many seasonal workers do not have access to private vehicles. Providing accommodation in close proximity to the place of work therefore assists in reducing travel demand, improving operational efficiency and maintaining the attractiveness of employment opportunities at the farm. The co-location of worker accommodation with the horticultural enterprise also represents a sustainable form of development, reducing the need for daily travel movements between off-site accommodation and the farm.
- 7.4 The application site lies outside the Built-Up Area Boundary within the designated countryside, where new residential development would not normally be acceptable in principle under Arun Local Plan Policy C SPI. However, Policy C SPI provides a number of exceptions where countryside development is justified, including development required for the operational needs of agriculture and horticulture and development supported by other specific policies within the Development Plan.
- 7.5 In this regard, Arun Local Plan Policy H DM3(3) specifically supports temporary seasonal horticultural workers' accommodation where there is clear evidence that the structures are essential to support the operation of the agricultural holding and where relevant criteria are satisfied. These include demonstrating the absence of suitable alternative accommodation, ensuring appropriate occupancy controls, minimising visual impact, providing suitable living conditions and securing satisfactory servicing, drainage and access arrangements.
- 7.6 The proposal satisfies the requirements of Policy H DM3(3). The operational need for seasonal worker accommodation has already been accepted by the Council through the previously approved temporary permission and the accommodation has now been established on site. The business continues to expand and evolve, with the glasshouse operation supporting near year-round production alongside blackberry propagation activities. The development therefore continues to serve a legitimate and ongoing agricultural need directly associated with the operation of Wicks Farm.
- 7.7 The accommodation remains temporary in nature and the application simply seeks a longer temporary operational period to provide certainty for the business and its workforce. The proposal also regularises a number of minor amendments associated with the implemented scheme, including revised amenity

building dimensions, updated access arrangements, a revised grasscrete turning head and an amended landscaping strategy. The revised landscaping proposals rationalise certain planting areas whilst retaining the key landscape framework necessary to integrate the development within its rural surroundings and support biodiversity enhancements.

- 7.8 The principle of seasonal worker accommodation at the site is also reinforced by the fallback position available under Schedule 2, Part 5, Class A of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), which permits the siting of caravans for seasonal agricultural workers on a temporary basis. Whilst the fallback position would necessitate the repeated removal and return of caravans between seasons, the current proposal provides a more coordinated, sustainable and visually coherent form of development with improved amenity facilities, drainage infrastructure, landscaping and managed access arrangements.
- 7.9 Importantly, the proposal assists in supporting the continued productivity and resilience of the horticultural operation. As set out earlier in this statement, labour shortages across the sector have increasingly resulted in crops being left unharvested, contributing to financial losses and food waste at a time when national policy objectives seek to strengthen domestic food production and supply resilience. The provision of suitable onsite accommodation therefore forms an important component of ensuring the ongoing viability and competitiveness of the enterprise.
- 7.10 In terms of character and appearance, the mobile homes and ancillary amenity buildings remain modest in scale, single storey in form and well contained within the wider farm complex adjacent to existing glasshouse development and established vegetation. The site benefits from mature boundary screening and the revised landscape strategy will continue to soften views of the development and reinforce the existing landscape framework. The proposal therefore represents an appropriately contained and operationally necessary form of rural worker accommodation which accords with the objectives of the Development Plan when read as a whole.

Character and Appearance

- 7.11 Policy D SPI of the Arun Local Plan states that development should seek to make efficient use of land but reflect the characteristics of the site and local area. Arun's Local Plan policy D DMI looks at aspects of form and design quality, including character, appearance, density, scale, innovation, adaptability, residential amenity impact, trees and crime prevention. New buildings should be harmonious with their surroundings and successfully integrate with the surrounding environment. Arun's Local Plan policy LAN DMI states that development should respect the particular characteristics and natural features of the relevant landscape character areas.
- 7.12 The amended scheme retains the approved loose arrangement of caravans and associated amenity buildings, whilst rationalising elements of the previously approved landscaping strategy to better reflect what is achievable and maintainable on site. The proposals retain the important structural planting and tree groups between the accommodation clusters and along key boundaries, whilst reducing some of the previously approved infill planting areas. The revised layout also includes a grasscrete turning head and retains appropriate circulation and spacing throughout the site, including the established 6 metre separation distances between caravans.

- 7.13 Policy H DM3 (3) states temporary seasonal horticultural workers dwellings shall only be granted in exceptional circumstances, including (c) The structures are sited in order to minimise their visual impact on the surrounding area. Policy QE DM2 requires that proposals which include outdoor lighting must be accompanied by a lighting scheme and that there should be no adverse impacts on the wider landscape, particularly with regard the SDNP International Dark Sky Reserve designation.
- 7.14 The site is located within the designated Countryside on a rural lane comprising a mix of dwellings, gardens, agricultural and commercial businesses. The site is within the farm complex adjacent to a substantial glasshouse and one that is nearly at completion. The site itself is also physically contained by boundary treatments and other developments. The only public views are from the public rights of way to the east where the vegetation that lines the route is more sparse, seen in the context of the large expanse of glasshouses.
- 7.15 In the previous application, the planning officer stated that "As such, the siting of caravans on the application site is not incompatible with the character of existing built form and uses in the area and would not result in a significant incursion into the open countryside nor harm significant views across the open countryside and landscape. It is acknowledged that the structures are single storey, located well within the confines of the sites' developed area away from the frontage with Ford Lane, and the site is well contained and screened."
- 7.16 Other key landscape characteristics includes intensive arable cultivation with the erosion of hedgerows and hedgerow trees due to modern farming practices. The application seeks to strengthen these positive landscape features wherever possible.
- 7.17 It is also important to note that the topography of the site is gently undulating. Sections were previously produced to demonstrate how the mobile homes and the proposed balancing pond within the lower parts of the site fits comfortably within the landscape.
- 7.18 As identified above, the proposals are located in the corner of a horticultural enterprise. The retention of established built-form will be largely contained by the existing vegetation and makes use of an underutilised space. The design of development is considered appropriate in relation to the character, appearance and functioning of the built and natural environment. The implemented scheme is considered to respect the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area.
- 7.19 Overall, the temporary nature of the seasonal workers accommodation within the existing large scale horticultural enterprise, coupled by the fact that the site is fairly well contained by existing mature vegetation, helps to demonstrate that the proposed development can be successfully integrated into the rural landscape. The single storey structures which are loosely arranged amongst a carefully considered planting scheme will also have an acceptable visual impact. Consequently, the scheme will represent a design that is in-keeping with the character and appearance of the locality and therefore accords with Policies D SPI, D DM1, LAN DM1 and FNP2 policy H1. External lighting can continue to be controlled by an appropriately worded condition in accordance within policy QE DM2.

Residential Amenity

- 7.20 Policy D DM1 of the Arun Local Plan states new development will have minimal impact to users and occupiers of nearby property and land, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance. QE SPI states the Council requires development to contribute

positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity. Policies QE DM1, QE DM2, QE DM3 and QE DM4.

- 7.21 The previous officers report acknowledged that 'the structures are single storey, located some distance from neighbouring properties and the site is well screened. As such, the structures would not have a detrimental impact on the outlook, light or privacy levels of the nearest residential properties.'
- 7.22 The nearest residential properties are Wicks Farm House some 155 metres to the south and 1-7 Wicks Cottages and Fir Tree Cottages which are some 276m to the southwest. Each of the properties are some distance away from the proposed new accommodation and there is intervening mature vegetation and buildings in some cases. The use has now been established for a three-year period.
- 7.23 The planning officer assessed the implications on residential amenity in the previous application, and stated that
'The structures are single storey, located approx. 200m from neighbouring properties and the site is well screened as detailed above. As such, the structures would not have a detrimental impact on the outlook, light or privacy levels of the nearest residential properties.'
- 7.24 In terms of the seasonal workers typical hours, each team has a different shift pattern. These start from 6.15am until 8am typically and are staggered. The afternoon shift does start at 3pm but unlike animal welfare, working patterns are during the day and during daylight hours only. There will be very limited activity out of hours activity.
- 7.25 Having regard to the site characteristics, there are no immediate neighbours that could be affected by the development though overlooking, loss of privacy or overbearing nature. It is therefore not considered that there will be any issues with the proposal regarding neighbour amenity nor would the scheme give rise to general tranquillity concerns.

Highways

- 7.26 In the previous planning application (reference F/1/23/PL) West Sussex County Council (WSCC), the Local Highway Authority (LHA) raised no objection to the proposals. WSCC also noted that no alterations to the existing site access off Ford Lane were proposed or required.
- 7.27 WSCC acknowledged in the previous application that the site is for 56 agricultural workers who are not all anticipated to have access to private vehicles of their own. The employment use of the land had already been considered in terms of vehicle trip rates under the previous applications; therefore, the addition of live on-site units is likely to reduce AM and PM peak hour movements to and from the site using Ford Lane. As such, the LHA raised no objection to the scheme.
- 7.28 Despite no objection being raised by the LHA and some acknowledgement that this is not a 'typical permanent residential dwelling type of use' the officer acknowledged that in those instances the ADC Parking SPD does allow parking provision to be determined on a case by case basis. The officer went on to conclude that it is anticipated that no parking would spill onto the highway thus the proposal would accord with the NPPF and ALP policy T SPI and the ADC Parking SPD.

- 7.29 The scheme seeks to retain the provision of five car parking spaces near the entrance to the accommodation. This is alongside the spaces that are found within the wider farm complex, which includes EV car charging points. As majority of the seasonal workers come from abroad, the majority of workers do not have access to a vehicle. The business therefore arranges for a minibus collection and drop off service to take workers for leisure and shopping trips at least four times a week. The layout includes adequate space for turning within the site, along with adequate parking provision for mini-buses, fire tenders and refuse trucks on days this is needed. Albeit it is noted that the mini bus tends to operate from the car park adjacent the farm's offices.
- 7.30 The site includes covered parking provision for bicycles, to encourage their use by workers. This is because Ford train station is approximately 6 minutes away by bicycle. It is difficult to walk there as some sections of Ford Lane do not have a pavement. That said there is a network of public rights of way in close proximity to the site, and to the south is a café and small shop. Therefore, whilst the site is in a rural area, it does have some access to local facilities and amenities. This will of course increase in time once the Airfield development is built out, but this is some way off.
- 7.31 The existing parking provision is considered appropriate in regard to the nature of the use and has sufficient turning and manoeuvring for vehicles within the site. It also has a safe and suitable access and promotes sustainable means of travel. It is therefore not considered to give rise to parking issues off-site and is considered appropriate form of development from a highway's perspective.

Fire Safety and Emergency Access

- 7.32 The layout of the accommodation site has been designed to incorporate appropriate fire safety measures and emergency access arrangements. The caravans maintain the recommended minimum 6 metre separation distances between units in order to limit fire spread risk and provide safe circulation throughout the site. Four fire points are positioned within the caravan park, with manual warning systems ("klaxon" alarms) installed to provide means of alert in the event of fire, alongside portable fire extinguishers. LPG cylinders provide gas to the caravans, with spare cylinders securely stored within an external caged compound located near the site entrance and away from the accommodation and amenity buildings.
- 7.33 Vehicular access arrangements have also been revised to include a grasscrete turning head to ensure appropriate manoeuvring space for emergency and service vehicles. The internal routeway has been designed to accommodate fire tender access where required, whilst maintaining a landscape-led appearance appropriate to the rural setting.
- 7.34 The amenity buildings provide appropriate laundry, welfare and utility facilities for the accommodation site and are connected to the existing drainage infrastructure serving the wider farm complex. A fire hydrant is located within the main farm complex and additional water sources are available within the lagoons associated with the adjoining glasshouse operations. Berry Farming Ltd also undertakes regular Fire Risk Assessments for the caravan accommodation site to ensure appropriate ongoing management and compliance.

Ecology and Trees

- 7.35 The previous application were supported by an Ecological Assessment prepared by the Ecology Partnership Ltd, which which identified the site as being predominantly arable land with semi-improved grassland field margins. These habitats were considered to offer very limited ecological value due to their

intensive management. The assessment concluded that the boundary and buffer habitats were of greatest biodiversity interest within both the site and wider local area.

- 7.36 Given the passage of time since the earlier surveys, updated ecological work has been undertaken by South Downs Ecology. The updated assessment confirms that the site comprises areas of modified grassland surrounding the seasonal workers' accommodation together with an unmade access track. An area of vacant land supporting ruderal vegetation and tall forbs is present to the east of the site. Existing development includes several mobile homes together with areas of crushed hardstanding, concrete and tarmac access roads.
- 7.37 To the west of the site lies an area of broadleaved woodland comprising species including pedunculate oak, field maple, ash and sycamore. The woodland supports a relatively low-diversity ground flora including ivy, nettle and lords-and-ladies. Overall, the woodland habitat is considered to be of local ecological value.
- 7.38 To the south of the site lies an unmanaged hedgerow measuring approximately 4 metres in height and 2 metres in width. Species recorded include hawthorn and ivy, with occasional ash trees. The hedgerow is considered to be of ecological value at the site level. No works are proposed to these habitats as part of the development and enhancement measures will instead be undertaken through the proposed landscaping scheme. Any necessary works would be undertaken under ecological supervision and during the appropriate season.
- 7.39 To the east of the site is an area of disturbed ground supporting tall ruderal vegetation and ephemeral species including bristly oxtongue, burdock, creeping thistle and broad-leaved dock, together with common grass species such as false oat-grass and creeping bent. A balancing pond is also present within this area, although partially obscured by vegetation. Overall, this habitat is considered to be of ecological value at the site level.
- 7.40 The ecological assessment confirms that the existing mobile homes and amenity buildings are of negligible value for roosting bats. The mobile homes are constructed from uPVC materials with corrugated plastic roofs, whilst the service buildings are modern metal structures lacking suitable roosting features. No mature trees within the site were found to support Potential Roost Features (PRFs). The woodland to the west of the site is, however, likely to provide value for commuting and foraging bats and may support roosting opportunities.
- 7.41 Earlier ecological work undertaken in 2021 identified a badger sett on the edge of the adjacent woodland. This was not readily identifiable during the 2025 survey, although evidence of mammal excavations was noted to the north-west of the site. These features were considered indicative of foraging activity rather than an active sett. Mitigation measures were implemented during the establishment of the temporary accommodation to avoid disturbance to badgers. The site itself is considered to be of limited value to badgers due to the existing levels of activity and disturbance, although areas of grassland and tall ruderal vegetation provide some limited foraging opportunities.
- 7.42 The original ecological enhancement measures included the provision of a balancing pond, supplementary hedgerow and tree planting, and the creation of field margin buffers within the development. A sensitive lighting scheme has also been implemented to minimise the impacts of artificial lighting, particularly along the southern boundary, with lighting primarily focused around the shared amenity buildings.

- 7.43 Overall, the updated ecological assessment concludes that the proposals would have a 'low' ecological impact and no further protected species surveys are required. Given that the application principally seeks the retention and continued use of the existing accommodation, no significant impacts upon habitats, protected species or designated ecological sites are anticipated.

Biodiversity Net Gain

- 7.44 The proposals do not involve the loss of existing habitat and therefore no adverse ecological impacts are anticipated. The application principally seeks the continued retention of the existing accommodation and associated infrastructure.
- 7.45 As the development was originally implemented pursuant to a planning permission granted prior to the introduction of mandatory Biodiversity Net Gain requirements in February 2024, the appropriate baseline position is that which currently exists on site. As the application seeks to retain the existing habitats, the proposals would fall within the de minimis exemption from mandatory BNG requirements. Nevertheless, in order to demonstrate compliance with local planning policy objectives, a separate Biodiversity Net Gain Assessment has been prepared demonstrating the delivery of measurable biodiversity enhancements.
- 7.46 The amended landscaping and ecological proposals have also been reviewed in the context of Biodiversity Net Gain requirements. Whilst elements of the previously approved planting scheme have been rationalised to better reflect the operational realities and management of the site, the proposals continue to deliver meaningful ecological enhancements through reinforced boundary planting, habitat connectivity, additional tree planting, retained grass margins and the balancing pond habitat area. The submitted biodiversity calculations confirm that the scheme is capable of delivering a measurable biodiversity net gain.
- 7.46 The revised landscaping proposals, to be implemented during the next planting season, include:
- Creation of 0.06 ha of mixed scrub, poor condition;
 - Creation of 0.04 ha of mixed scrub, moderate condition; and
 - Enhancement of 0.08 km of the existing hedgerow from species-poor to species-rich
- 7.47 Additional tree planting is also proposed across the site, although this has not presently been included within the biodiversity metric calculations.
- 7.48 The biodiversity calculations demonstrate that the site currently comprises a baseline of 2.13 habitat units, with the proposals delivering a net gain of 0.23 habitat units (+10.80%). The site also contains a baseline of 1.32 hedgerow units, with the proposals resulting in an increase of 0.29 hedgerow units (+22.32%). Accordingly, the scheme would exceed the 10% biodiversity net gain target were the mandatory requirements to apply.
- 7.49 The proposed ecological enhancements are considered both achievable and proportionate to the scale and nature of the development. The measures are not considered to constitute "significant" on-site biodiversity enhancements and could therefore be appropriately secured through a Biodiversity Enhancement and Management Plan by condition, without the need for a legal agreement, formal monitoring schedule or associated monitoring fees.

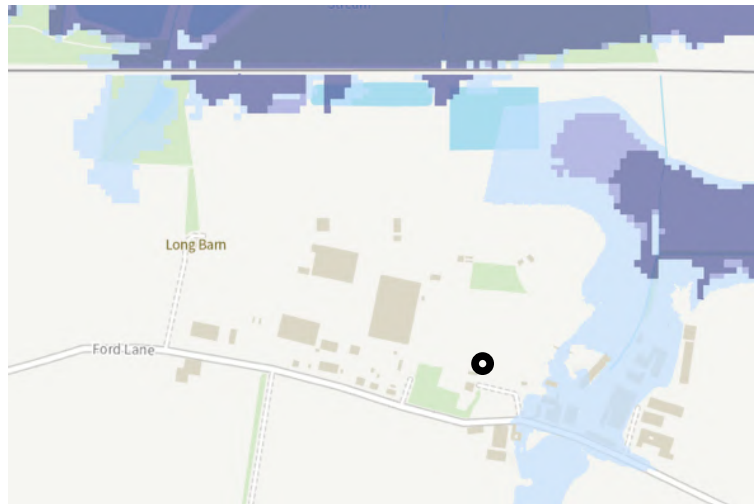
Sustainability

7.50 The proposals seek to retain on-site accommodation for seasonal workers who are essential to the continued operation and development of the established berry farming enterprise at Wicks Farm. The provision of on-site accommodation significantly reduces the need for daily commuting from a wide catchment area, thereby reducing vehicle movements and associated carbon emissions. The scheme also seeks to minimise the extent of impermeable surfacing and is supported by wider ecological and landscape enhancements across the site. Collectively, the proposals represent a sustainable form of rural development which supports the long-term viability of the horticultural enterprise whilst delivering environmental benefits.

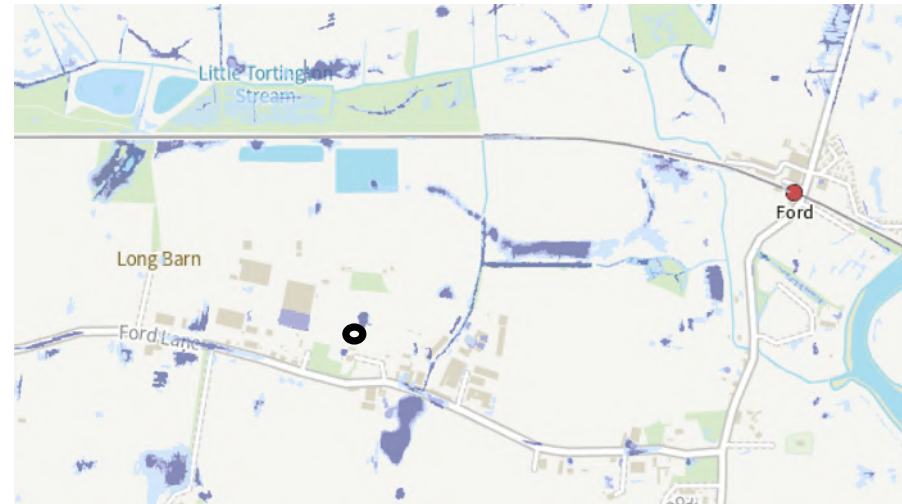
Flood Risk Assessment (FRA) and Surface Water Drainage

7.51 The accommodation area itself is located outside areas identified as being at risk of flooding from rivers or the sea, and the proposals would not increase flood risk elsewhere. The Environment Agency's Long Term Flood Risk Mapping confirms that the accommodation area is not situated within an area at risk of flooding from rivers and seas. Whilst some peripheral areas of the wider landholding are shown to experience an increased probability of flooding under future climate scenarios between 2036 and 2069, these areas broadly reflect earlier flood mapping and do not affect the accommodation area proposed to be retained. Surface water flood risk across the site is identified as very low and is anticipated to remain so under future climate scenarios.

Flood Risk from Rivers and the Sea



Flood Risk from Surface Water



Source: <https://check-long-term-flood-risk.service.gov.uk/map?eastng=499017&northing=104281&map=SurfaceWater>

● High ● Medium ● Low

Figure 15 – Long-term flood risk

- 7.52 The site is not located within the Lidsey Wastewater Treatment Works catchment area and the proposals would therefore have no adverse implications in this respect. No known historic flooding incidents affecting the accommodation area have been identified through a review of the information available at the time of preparing this statement.
- 7.53 Although the wider application site exceeds 1 hectare in area, this primarily results from the inclusion of the existing vehicular access, internal routeways serving the wider farm complex and the associated landscaping and planting areas. The operational accommodation area itself is significantly smaller in extent and largely comprises existing development and infrastructure already in situ.
- 7.54 The original development approved under the earlier permission sought to minimise the extent of hardstanding across the site and incorporated measures to reduce water consumption wherever practicable. Surfacing within the accommodation area principally comprises permeable loose stone, scalplings, with the addition of a grasscrete area, which remain free-draining and are proposed to be retained. Runoff from the caravan roofs drains directly to adjacent permeable ground.
- 7.55 Surface water flow paths across the site broadly follow the existing topography. The western part of the accommodation area is relatively level at approximately 5.0m AOD before gradually falling eastwards. Beyond the area where the caravans and buildings are located, the land slopes down to approximately 2.0m AOD where the balancing pond is situated at the lowest topographical point.
- 7.56 The site is predominantly permeable and naturally free-draining. In the event of prolonged or extreme rainfall exceeding the infiltration capacity of the ground, temporary localised ponding may occur within flatter areas of the site. Such ponding would be expected to dissipate naturally through infiltration and evaporation as conditions allow, with any overland flows directed by the natural landform toward the lower eastern part of the site.
- 7.57 There is currently no formal engineered surface water drainage system serving the accommodation area, with drainage occurring naturally through infiltration and topographical conveyance. The balancing pond located within the eastern low point should, however, continue to be appropriately maintained and periodically cleared to ensure that it remains functional and does not become overgrown or obstructed over time.
- 7.58 According to the JBA Groundwater Emergence Map, groundwater conditions within the wider Ford parish are variable (between 0.5m and 0.025m), with some areas identified as having groundwater levels close to the ground surface, particularly in proximity to drainage channels and railway corridors. No site-specific groundwater investigations or monitoring have been undertaken in relation to the accommodation area, although some wider information is available across the broader farm complex.
- 7.59 Should groundwater emergence occur on site during particularly wet periods, its behaviour would likely mirror that of surface water flooding, resulting primarily in temporary localised ponding. Given the site's topography, any such water would naturally tend to migrate eastwards toward the lower areas of the site, away from the location of the caravans.

- 7.60 The site is connected to the existing mains foul drainage network serving the wider farm complex, with the amenity buildings and caravans draining to the established public sewer system. In addition, the scheme incorporates a balancing pond within a natural low point on the site where surface water periodically collects during wetter periods of the year, thereby assisting with on-site surface water management whilst also providing potential biodiversity benefits.
- 7.61 Under the previous planning permission, the Council's Drainage Engineer confirmed that no specific drainage conditions were necessary and that any detailed matters could appropriately be addressed through the Building Regulations process. Given that the current application principally seeks the retention and continuation of the existing accommodation arrangement, no material changes are proposed that would alter that position.
- 7.62 The development is therefore not considered likely to give rise to unacceptable drainage or flood risk impacts and remains consistent with the requirements of the NPPF together with Arun Local Plan policies W SPI, W DM3 and H DM3, and Ford Neighbourhood Plan policy EH4.
- 7.63 Consideration has also been given to whether any material changes in flood risk circumstances have arisen since determination of the earlier application. The Strategic Flood Risk Assessment prepared in support of the Ford Parish Council Neighbourhood Development Plan identifies certain lower-lying parts of the wider farm holding as falling within Flood Zones 2 and 3. However, the accommodation area itself, together with the associated access arrangements, remains outside identified areas of fluvial flood risk and is therefore considered sequentially appropriate.

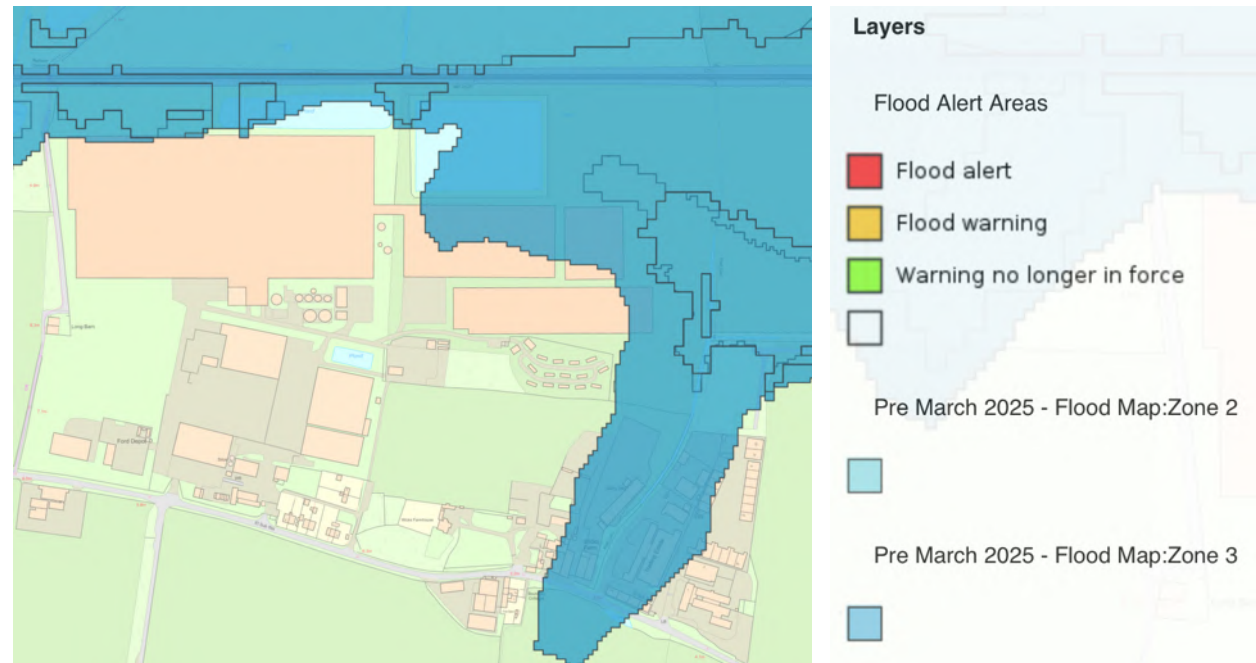


Figure 16 Flood Risk Areas highlighted for Ford Parish Council Neighbourhood Development Plan 2

(Source: <https://shared.xmap.cloud/?map=dee9b41b-d5b2-401e-b219-3dbbe98964c6>)

Contamination

- 7.64 Given the agricultural history of the site, the risk of significant soil or groundwater contamination is considered to be very low. Potential off-site contamination sources are limited to small-scale fuel and vehicle maintenance storage associated with the wider agricultural or horticultural operations together with tanks serving the adjacent glasshouse development to the north and west, all of which are located some distance from the accommodation area itself.
- 7.65 These conclusions are consistent with the findings of the Preliminary Geo-Environmental Risk Assessment prepared by Delta-Simons in support of the horticultural distribution facility approved under planning permission WSCC/009/22. In light of the established agricultural use of the land and the findings of the previous assessment, it is not considered proportionate or necessary for further intrusive investigation work to be undertaken in connection with this temporary development proposal. Should unexpected contamination be encountered during any works, this could be appropriately addressed through a standard unexpected contamination condition if considered necessary by the Council's Environmental Health Officer.

Waste Infrastructure Statement

- 7.66 The application site falls within a Waste Consultation Area due to the presence of previously approved waste-related development within the wider farm complex to the west. Planning permission was originally granted for an Anaerobic Digestion (AD) plant within the complex, although whilst partially implemented, the facility never became operational. Subsequently, planning permission was granted under reference WSCC/009/22 in January 2023 for the use of a similar building as a horticultural distribution facility together with a paper and cardboard pre-baled Waste Transfer Station. Whilst elements of that permission have been implemented, the waste transfer use itself is not currently operational, as the operator has paused expansion plans at the present time.
- 7.67 The approved Waste Transfer Station is limited to the handling and storage of paper and cardboard recycling materials only and is therefore not anticipated to give rise to significant amenity impacts typically associated with more intensive waste management operations. Furthermore, the approved facility is located approximately 230 metres to the west of the accommodation area, with substantial physical separation provided by existing glasshouses, agricultural buildings, landscaping and woodland planting between the two areas.
- 7.68 Having regard to the nature and scale of the approved waste use, together with the degree of separation and intervening development, it is considered that the retained accommodation would not prejudice the operation of the approved Waste Transfer Station, nor would occupiers of the accommodation be likely to experience unacceptable impacts in terms of noise, odour, disturbance, traffic or general environmental quality. The proposal is therefore compatible with the safeguarded waste infrastructure and does not undermine the objectives of safeguarding waste management capacity within the area.

Overall Assessment and Other Material Considerations

- 7.69 In determining the previous application, the Council acknowledged that there is a pressing and ongoing national need for agricultural workers and associated accommodation, particularly within the horticultural sector, and recognised that the temporary nature of the development limited the extent of any long-term impacts. The Local Planning Authority also referred to the comparable seasonal workers' accommodation development at Nyton's Rest (reference AL/61/20/PL), where planning permission was granted despite identified policy tensions due to the significant weight afforded to the need for seasonal

agricultural labour accommodation. That permission was subsequently extended under reference AL/94/22/PL and has since been granted permanent consent under application AL/67/25/PL earlier this year.

- 7.70 The earlier refusal of planning permission related principally to concerns regarding the level of justification provided and misunderstandings surrounding the innovative horticultural and vertical growing techniques undertaken at Wicks Farm, together with the ongoing difficulties faced by the business in securing sufficient seasonal labour. These matters remain highly relevant given the continued expansion of glasshouse operations and increasing production demands associated with technological advances within the enterprise.
- 7.71 The provision of accommodation for 56 seasonal workers remains substantially below the total workforce requirements of the business, which evidence indicates is considerably higher during peak seasonal periods. Nevertheless, the accommodation is critical to supporting the ongoing operation and viability of the enterprise. Whilst temporary accommodation could potentially be established under permitted development rights in alternative forms, the current proposals provide a more coordinated, appropriately planned and landscape-led solution whilst avoiding the need for repeated seasonal removal and storage of units.
- 7.72 The accommodation is essential to supporting a horticultural sector which has experienced increasing labour shortages following the UK's withdrawal from the European Union and wider changes within the seasonal labour market. The proposals therefore directly support a strategically important horticultural business that contributes to the local rural economy, national food production and the Government's wider objectives of improving domestic food security and reducing reliance upon imported produce.
- 7.73 Arun's Local Plan policy C SPI states that development outside the Built-Up Area Boundary will only be permitted where it accords with policies within the Development Plan relating to specific forms of countryside development. Policy H DM3 ("Agricultural, forestry and horticultural rural dwellings") provides support for accommodation associated with rural workers, including temporary accommodation for seasonal horticultural workers where exceptional circumstances are demonstrated and where there is clear evidence that such accommodation is essential to facilitate the economic operation of the farm holding.
- 7.74 In this regard, the application demonstrates that:
- The proposal provides essential accommodation for seasonal workers necessary for the effective operation of the horticultural enterprise at Wicks Farm;
 - The provision of purpose-built seasonal worker accommodation reduces pressure on existing housing stock within the district;
 - There remains an ongoing need to attract and retain seasonal workers in what is an increasingly competitive labour market;
 - The rural location of the site and limited public transport accessibility make recruitment of locally based labour particularly challenging;
 - Labour shortages are already resulting in produce remaining unharvested, with implications for the long-term viability of the sector and domestic food production;

- Evidence submitted through labour provider correspondence, industry representations and Parliamentary reports confirms the continuing national and regional shortage of seasonal agricultural workers and associated accommodation.

- 7.75 The proposal therefore provides clear and compelling evidence that seasonal workers' accommodation remains urgently required in this location. There is no readily available alternative accommodation capable of serving the operational requirements of the business or accommodating the required number of workers within the local area. This is particularly relevant in the context of wider housing affordability pressures and the limited availability of suitable accommodation within the district.
- 7.76 The revised layout responds positively to the rural and agricultural character of the area and seeks to integrate the accommodation more effectively within its landscape setting through enhanced planting and ecological measures. The proposals represent a temporary and proportionate form of development which would not result in permanent harm to the character or appearance of the countryside and would deliver wider operational, ecological and landscape benefits during the temporary consent period.
- 7.77 Overall, the proposals would support innovation and productivity within the horticultural sector whilst assisting in addressing the well-documented shortage of seasonal agricultural and horticultural labour. The temporary nature of the development also enables the ongoing operational need for on-site accommodation to be reassessed at the end of the proposed permission period. Having regard to the economic, social and environmental benefits associated with the scheme, the proposals are considered to represent sustainable development and are acceptable when assessed against the Development Plan as a whole and the presumption in favour of sustainable development set out within the NPPF.

8. Conclusion

- 8.1 The proposals relate to the continued temporary retention of seasonal workers' accommodation within an established and expanding horticultural enterprise at Wicks Farm. The accommodation remains essential to supporting the operational requirements of the business, particularly in the context of ongoing labour shortages within the agricultural and horticultural sectors and the increasing demand for seasonal workers during peak growing and harvesting periods.
- 8.2 The revised layout and landscape strategy respond positively to the rural and agricultural character of the area and seek to integrate the accommodation more effectively within its wider setting. Existing vegetation and proposed planting will continue to soften views of the development whilst ecological enhancements, including strengthened boundary planting, habitat improvements and biodiversity measures, will deliver wider environmental benefits across the site.
- 8.3 The proposals make efficient use of an existing operational area within the farm complex and avoid the need for workers to commute daily from a wide catchment area. The provision of on-site accommodation therefore reduces traffic movements associated with the enterprise and supports more sustainable

travel patterns. The development also incorporates appropriate parking, cycle storage, drainage and fire safety arrangements commensurate with the temporary nature and operational characteristics of the use.

- 8.4 Technical assessments submitted in support of the application confirm that the development would not give rise to unacceptable impacts in relation to highways, drainage, flood risk, ecology, biodiversity, contamination or residential amenity. The proposals are also capable of delivering measurable biodiversity net gain through enhanced landscaping and habitat creation measures.
- 8.5 Overall, the proposals represent a sustainable and proportionate form of rural development which directly supports an important horticultural enterprise within Arun District. The temporary accommodation is critical to maintaining and developing innovative growing practices, supporting domestic food production and sustaining investment within one of the District's key land-based industries. Having regard to the identified economic, social and environmental benefits, the proposals are considered acceptable in planning terms and compliant with the Development Plan when read as a whole.

Artificial intelligence tools, including ChatGPT, have been used to assist in reviewing and refining the wording of this Planning Statement for clarity and conciseness. The content has been checked, and the Applicant's agent accepts full responsibility for its accuracy.



Figure 16 – Proposed Site Layout



Figure 17 – Aerial View of the western area of the Horticultural Enterprise

