



From: Abi Hudlass-Galley [REDACTED]
Sent: 24 November 2019 16:00
To: Planning <Planning@arun.gov.uk>
Subject: Objection P/19/108/CLP

Newlands Residents Objection

Dear Mr Davis

It will come as no surprise to you that the residents are in dismay that the Application (x3) have returned - though we are not surprised ourselves in the least. We appreciate that Mr Alex Newey is not going to give up on trying to get his way.

All our reasons for objecting to the Workers Village at Lagness (Coming Soon South Coast Workers Village as described on the Pro-Force website - nice to see they are so confident and prepared!) remain the same. The busy dangerous unlit road, lack of amenities for workers, no room for earth banking, security issues, situated in between our 6 homes and of course the illegal working hours and vehicles for this site. However we appreciate that legally, no one is interested in these facts.

The GPDO states that the temporary siting of vans is only allowed during a particular season (not seasons) on land in the same occupation as long as caravans are removed when circumstances cease to exist. This only relates to the short-term solution of providing adequate labour to meet demands during peak periods of activity. It has already been proven in past cases that caravans can only be kept on site for one particular season ie during planting or growing or harvesting, but not for a whole crop cycle. That the nature of horticultural business where multi-cropping and rolling planting programmes result in overlapping crop cycles, means that farmers can not rely on GPDO and Permitted Development Rights and will need to put a full planning application in. We understand the temptation to add a degree of permanency/convenience by making up ground on which the caravans are situated with hard standing, but this should be refused, as such works would constitute a permanent development and suggest that the caravans are intended to be permanent fixtures in which case the PDR are not appropriate and full Planning Permission and a Caravan Site licence is required.

So, All three of these Applications combined are illegal and should be rejected. The GPDO and Permitted Development Rights deals with the issues surrounding the accommodation for temporary agricultural workers and states that planning permission is not required for temporary seasonal accommodation. 31 caravans on site for 11 months of the year with no intention of moving them for the 12th month (**reinstated to**

it's pre-Development condition as soon as this is reasonable and practical) is not temporary. Even 11 months with the intention of moving them is not temporary either!

A PDR is only applicable if the caravans are occupied by seasonal workers specifically on agricultural land on which they are working for that season (and no longer). It is evident from case law that workers housed in caravans on the site being "shared" across different agricultural locations would mean that Permitted Development Rights would fall away. This would suggest that the caravans have to be 'on' the land which is being harvested. So again, a full Planning Application with all the relevant back up Impact Assessments needs to be completed.

We note with interest that neither of the questions you asked in your letter if the 10th September 2019 have been answered. They seem to be relying on dividing the application up into individual seasons and admitting fully it's a hub - that this is an answer in its self. Again, this means full Planning Permission and Impact Assessments should be sought. One wonders why they are not seeking this route already, could it be they have a large degree of worry that it would not pass such scrutiny?

As you know, the original Planning Permission for the Greenhouse in 2005 had severe restrictions on what this nursery could do - Staff numbers, staffing hours, lighting hours, HGV numbers & staff Vehicles) - Restrictions that Arun Planning Included for good reason. One assumes you were not wasting time when investigating the original 2005 application. As you also know, these restrictions are already being broken. One assumes this is also why the Nursery do not want to put a full Planning Application in.

We are very much looking forward to coming to the Planning Control Committee Meeting and look forward to discussing the complete removal of Permitted Development Rights from this nursery.

With kind regards

Newlands Residents Group.