

Louise Chater Clerk to North Mundham
Parish Council
1 Charlmead
East Wittering
Chichester
West Sussex
PO20 8DN

Your Ref: OWPC25211
Our Ref: P/108/19/CLP 13-11-2019
Please ask for:
Mr S Davis

6th December 2019

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Development Management Procedure) (England) Order 2015 - Article 39

Application for Lawful Development Certificate for the Proposed Use - Use of caravan site for spring seasonal workers.

Newlands Nursery Pagham Road Pagham

Thank you for your internet representation made on 6th December 2019 which has been recorded as '**an objection**' with the comments as follows:

Dear Sir or Madam,

North Mundham Parish Council has an interest in this application, which relates to a site close to the boundary of the Parish. The Council has resolved to object.

We note the similarity to an earlier application P/78/19/CLP. It appears that this latest application together with the other two very similar applications is intended to achieve the same result - namely the establishment of an effectively permanent development allowing the siting of 31 caravans on this site. It is also clear from the application that these caravans are intended to replace existing accommodation at the South Downs Worker Village in Bracklesham. Correspondence associated with the application indicates that the operation at Newlands Nursery is highly automated and the majority of the workers to be accommodated will be working elsewhere.

We therefore question whether the establishment of 31 caravans on this site is an appropriate use of permitted development rights, since it is clear that they are not primarily intended to support an agricultural operation on the site but to establish a residential facility. By attempting to invoke permitted development rights, the applicant has avoided addressing numerous supporting issues which would normally be subject to scrutiny for development of this size. These include transport, the effect on local wildlife, the impact on the Pagham SSSI, light pollution, noise, and drainage.

We fail to see how this development can be considered to be appropriate and sustainable, for a number of reasons:

Access - the B2166 has no pavements or cycle lanes, and provides no safe routes for cyclists or pedestrians. And yet the applicant emphasises that few of the workers to be accommodated on the site will be allowed to keep cars. They will be at the mercy of the bus service which is infrequent or non-existent in the evenings and at weekends.

Living conditions - the application does not show the internal layout of the caravans. The external dimensions are given as 10 m x 3.8 m. We do not believe that 38 sqm constitutes adequate long-term housing for six adults

Facilities - the Design and Access Statement notes that the proposed development is sited close to Runcton. Runcton has one public house. There are restaurant facilities at Manor

Nursery, and proposed but not yet operating at Runcton Farm Shop. Neither open in the evenings.

In summary, we believe the proposal to house so many workers in a rural area is not compatible with the site's location. No evidence has been presented to justify the requirement to house seasonal workers on this site. To accept a new residential facility for seasonal workers on this site without any supporting justification sets an unacceptable precedent for other such developments elsewhere. We believe the intended development on this site should not be allowed to proceed. In this context we agree with the argument of local residents that these proposals do not comply with the conditions for the use of the site imposed by the original planning permission P/89/05. We are therefore persuaded that the only realistic option to regulate the use of the site is the issue of an Article 4 Directive to remove the Permitted Development Rights for the site.

Kind regards,

*Louise Chater PSLCC
Clerk North Mundham Parish Council*

Unfortunately it is not possible for the council to respond to each representation individually but your views will be considered before the application is determined and I shall write to inform you of any decision made.

If the application is to be determined at the Development Control Committee and your letter has been received after the agenda has been published, you will not receive a separate letter notifying you of the date of the meeting and the procedures for public speaking. In such circumstances, it is recommended that you track the progress of the application on the website or telephone for further information. Please be advised that any comments received after the the Development Control Agenda has been produced will be reported to the meeting. Please also note that only a small number of all planning applications are determined at the Development Control Committee, most are determined by officers under delegated power.

All representations are published on our website so please make sure your views are clear and only include information that you are happy for the public to view. Do not include personal information or information from third parties unless you have their permission to do so. If a complaint is received that permission has not been given for comments included about a third party, the Council reserves the right to redact/remove all relevant information. Do not include information that is defamatory or breaches equality or other legislation. If you do not wish your comments to appear on the website and on the file, please confirm this in writing and I will arrange for it to be destroyed, although this does mean that its contents will be disregarded. For details of what we do with your personal information please refer to our privacy statement comments on planning applications which is available on our website www.arun.gov.uk/planning-privacy-statements.

In the event of a subsequent written representations appeal, against a refusal of planning permission on a householder application, any representations made on the application will be automatically forwarded to the Secretary of State. Unlike all other types of appeal, there will be no further opportunity to comment at the appeal stage.

Yours faithfully

Neil Crowther
Group Head of Planning