

C Galley
Touchwood
Pagham Road, Lagness
PO20 1LL

Your Ref: OWPC25319
Our Ref: P/108/19/CLP 13-11-2019
Please ask for:
Mr S Davis

20th 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 17th December 2019 which has been recorded as '**an objection**' with the comments as follows:

Regarding Permitted Development, the accommodation should be seasonal, and involve persons employed on the land in the same occupation. It must be emphasised that the exemption from the need for planning permission only relates to a short-term solution to provide adequate labour to meet the demands during peak periods of activity. A Planning Inspector's decision in December 2002 about a site in West Lancashire clarified that caravans can only be kept on the site for one particular season, that is, during the planting, growing or harvesting of a single crop, but not the whole crop cycle, and not if the development is to avoid the need for planning permission. The nature of the horticultural businesses with multi-cropping and rolling planting programmes resulting in overlapping crop cycles, means that farmers can not claim the GPDO exemption rights.

Also, Full Planning Permission is required in the following cases:

- if the workers will be housed for longer than one normal planting, growing, or picking season;*
- if caravans and other related buildings (e.g. canteens and toilets) are to be kept on site permanently;*
- if a change of use to an existing building is involved;*
- if hardstandings and permanent services (e.g. water supply or septic tank) need to be provided; or*
- if a new building is required*

There is absolutely no way in which these three certificate of Lawfulness can be granted under Permitted Development Rights.

Once again, we are asking for Arun Planning to remove all this sites Permitted Development Rights under an article 4 directive.

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