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Your Ref: OWPC25058
Our Ref: P/109/19/CLP 13-11-2019
Please ask for:
Mr S Davis

26th November 2019

Dear Sir/Madam

Town & Country Planning Act 1990 (as amended)

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

Application for Certificate of Lawful Development Certificate for a Proposed Use - Use of caravan site for summer seasonal workers
Newlands Nursery Pagham Road Pagham

Thank you for your internet representation made on 26th November 2019 which has been recorded as '**an objection**' with the comments as follows:

I should like to object to these three linked applications, on the grounds that they seek to mislead the Council, local residents and the public, and are unlawful under permitted development.

The grounds for my objection are:

- 1. The material flaws of these interlinked applications remain. They have simply been divided into three applications on re-submission, to make the process of review and objection more onerous*
- 2. This is a Hub Development, not temporary accommodation for on-site workers. Notably, in my 6 weeks as resident in the vicinity, in the land adjoining the proposed site, I have seen two personnel, in one glasshouse, on one occasion. Does a staffing pattern of that scale require permanent accommodation across 31 caravans? This site will be used as a hub facility*
- 3. There is insufficient evidence to support the staff projection and seasonal productivity output detailed*
- 4. The proposed site lies within the curtilage of residential property*
- 5. The impact on the local wildlife and biodiversity would be truly devastating*
- 6. I am of no doubt that this site would be a permanent feature and a blight on the landscape. With creative interpretation, it is highly unlikely that the fixtures would be removed out of season/year-round, with the 'reasonable and practical' clause being tested to its fullest extent*
- 7. The only access to amenities is via an unlit, rural road by foot/cycle, posing a significant risk to life of all road users. Can we genuinely allow loss of life to be sanctioned in this way?*

In its current form, the applications are misleading, the facts incomplete, the planning questions raised in the previous application remain open, and the prior objections valid. If this Certificate of Lawfulness were to be passed, it would open a flood gate for disingenuous interpretation of local planning laws, rendering the Council powerless. A truly frightening thought.

Given the manner in which this matter has proceeded to date, I would further request that due consideration be given to a permanent Permitted Development Rights removal from this land and any associated, subsidiary and successive parties to the title(s), to prevent any future actions being undertaken without due planning authority scrutiny.

In summary, the applications are disingenuous at best; blatantly deceptive at worst. The applicant seeks to undermine the Planning Office's authority in the most distrustful manner, and this must be halted.

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