

**From:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Sent:** 13 December 2019 10:13  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Subject:** FW: P/19/109/CLP

Letter of objection

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |  
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Save the environment - think before you print.

**From:** Abi Hudlass-Galley [REDACTED]  
**Sent:** 13 December 2019 10:10  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Cc:** Planning <[Planning@arun.gov.uk](mailto:Planning@arun.gov.uk)>  
**Subject:** P/19/109/CLP

Dear Mr Davis

Just read the letters from Briggs. I see that you are fully on to the issue of removal of caravans, and hopefully this side is simply dealt with as a matter of law. I also see that other matters have been put aside until this is dealt with, however I must raise (again) a few issues.

I am concerned that Briggs have stated that their staffing requirements for operations on the nursery is "beyond question". By whose authority are they able to state this? For years they have boasted that it was one of the most automated, advance horticultural sites in Europe, requiring minimal staff. For years we have lived beside it and walked around the glasshouses and have seen for ourselves how few staff are required. This begs the question, are they intending to increase production and if so are they intending to break the conditions set in the 2005 planning consent ignoring limited working hours, lighting and vehicles/HGV's using the premises? They have certainly mentioned shift work and 24/7 operations?

One also questions the figures they gave regarding seasons. How is it that these staffing figures that are "beyond question" are the same for each season and yet the production drastically differs varying from less than a million up to nearly 7 million trays? These "beyond question" staffing figures are surely very questionable?

Their response to your emails, as I am sure you are already aware, seem to be rather rambunctious and full of bluster. They seem to feel that they must not be questioned. They appear to have no intention of updating their design and access statement leaving so much ambiguity for the future that they could get away with anything, and it would be left for the Arun Planning Enforcement Officer to legally deal with where these "beyond question" staff are placed and when and how many caravans are to be removed - indeed if any are.

It is still apparent that this sort of development requires a full planning application with all the impact assessments regarding the road, the community and infrastructure, the environment and the residents. We therefore ask again that Arun Planning remove the Permitted Development Rights under an Article 4 directive.

Kind Reagrds

Abi Hudlass-Galley