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From [REDACTED]

Sent: 24 January 2020 21:29

To: Simon Davis <Simon.Davis@arun.gov.uk>

Subject: P/19/108/CLP. - P/19/109/CLP. - P/19/110/CLP

Dear Simon

I have just seen that Briggs response to your email has just gone up on the portal, though written on the 8th.. I worry that this delay is unintentionally giving us less time to return our comments on their response.

It seems that they have no intention of clearly committing the Nursery to having to move the vans or of re-writing the Design and Access statement, closing any loop holes within. Thus allowing them absolute power to have the caravans on site all year. They repeat the phrase moving the vans when practically possible. It seems to have become a bit of a mantra they have through out every application they have made "when reasonable and practical"!!!

However, there are many cases to show that knowing that there is a possibility of leaving vans longer than any single crop cycle means you can not use Permitted Development and you have to apply using a full planning application with all the due checks and measures. This does not mean they will not get this Seasonal Workers Caravan Park, but they just can not push it through under Permitted Development Rights. Therefore these Certificates of Lawfulness must be refused. They are not allowed to fit any permanent infrastructure, sewage system, water supply, hardstanding etc etc without a full planning application either. I fail to understand why they would not want to go through the correct procedure of a full planning application unless of course they felt there were many reasons why they would not be granted such permission?

I repeat my request that the all Permitted Development Rights for this Nursery is withdrawn under Article 4. This site is not suitable for a seasonal workers site. Again I request that Arun reviews the original planning application of 2005 to see the original constraints put on this nursery which does not allow for a caravan site for workers.

I am confident that your colleagues in Aruns legal department will already have this in hand and will see the lack of clarity in Briggs application and therefore reject it. However, should there be any doubt in that, I request that this has a full review at an open Planning Committee meeting where we can make representation.

With kind regards

Abi

Abi Hudlass-Galley

Sent from my iPad