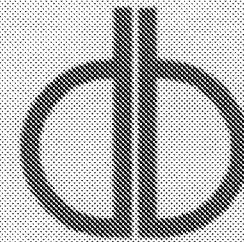


[Redacted]

[Redacted]

From: Abi Hudlass-Galley [Redacted]
Sent: 28 May 2019 16:06
To: Planning
Subject: P/38/19/PL - Pages 1 - 7 - Objection Dissection of Statement
Importance: High



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Objectives

- Enable investment and improvement in facilities for agricultural workers welfare through the provision of permanent infrastructure and service connections for agricultural accommodation that is to be occupied on a seasonal basis.
- Storing seasonal units on site while un-occupied to avoid the significant disruption to the business, traffic and environmental impacts caused by the repeated disconnection, removal, storage, return and reconnection of units that would otherwise be required every year.
- Improvement to facilities that encourage the retention and return of seasonal workers; enabling training opportunities and development of horticultural skills that is key to the long term viability and sustainability of the farm enterprise.

Context

Newlands nursery is an established horticultural enterprise as part of the Roundstone Group that has an annual turnover of £32m and employ 142 FT, 7 PT and 350 Seasonal workers over 11 sites along the South Coast area.

The applicants provide accommodation for seasonal workers for the business and the number of seasonal workers on site varies as the season progresses with peak demand in the summer months and like many other local horticultural businesses these seasonal workers are essential to the viability and vitality of the horticultural enterprise.

Seasonal workers are currently housed at South Downs Worker Village (the former South Downs Holiday Park in Bracklesham Bay, operated by the applicant and are based to Roundstone's site.

Whilst the South Downs Worker Village has provided a valuable facility for the seasonal workers, the owners of the site have obtained planning permission from Chichester District Council (18/00753/OUT) to redevelop the site for permanent housing that does not meet the demand for seasonal workers accommodation.

With the impending eviction from the Bracklesham site, the applicant is working to resolve the inevitable shortfall on seasonal workers accommodation that will result by providing seasonal workers accommodation at various sites within the Roundstone Group's land holdings that will provide accommodation close to the source of employment and, as this would be on land within the group's ownership, providing secure accommodation for the groups seasonal workers in the future.

Agricultural holdings enjoy permitted development rights for seasonal workers accommodation during the growing season (GPDO Schedule 2, Part 5, Class A) and the group would be able to take advantage of these rights to establish the seasonal workers accommodation on their holding during each farming season.

Therefore, this application seeks to remove the GPDO restriction requiring the caravans to be removed at the end of each season and brought back at the start of the next so that the un-occupied caravans can be stored on site during the 'off-season'.

There is no intention to create permanent dwellings or occupy the units between the end of November and the end of January (off-season) each year.

The retention of the units allows for permanent services to be laid and better quality accommodation provided for the workforce that return each year, enabling a reduction in the movements on and off site and in the frequency that the units have to be connected and disconnected to the sewerage system, reducing risk of spillages.

If the units cannot be retained on a year round basis their removal, storage and replacement is an additional cost burden and the disruption caused by hauling accommodation units along country roads and avoidable health and safety risks in connecting and disconnecting waste, water and fuel facilities would recur at the beginning and end of each season.

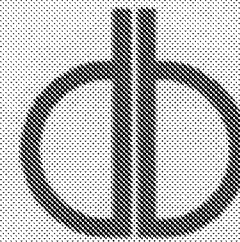
Plot Barns, Ham Farm, Bosham New Series, PO18 8TJ

architecture@douglasbriggs-partnership.co.uk www.douglasbriggs-partnership.co.uk

WORKERS COMING FROM
BRACKLESHAM SITE
- WHY DO THEY NEED
SUBSIDISED HOUSING
WHEN FARMERS GET
SUBSIDIES

VARIOUS SITES -
NOT JUST
ROUNDSTONE NEWLY
REDEVELOPED
LAGNESS.

NO RISK IF
CORRECT
EQUIPMENT?



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Socio Economic Context

UK food & horticultural production depends on securing an adequate supply of labour to get the harvest in and process the produce.

Farm, horticultural businesses have reported, both prior on since the EU referendum, that they find it hard to hire enough workers to bring in their crop and many horticultural businesses rely on attracting temporary workers from outside the UK, who require a good standard of accommodation to be provided on or near to horticultural sites during the season, returning to their homes in the off-season.

While the Roundstone group does recruit workers living permanently in the local area, the number of potential workers in the area, capable and willing to undertake the range of skilled, unskilled and physically demanding work in varying weather conditions and occasionally at unsociable hours, required to harvest horticultural crops is comparatively low. **REQUIRE CHEAP LABOUR THEY CAN EXPLOIT.**

This is compounded by the high cost and lack of supply of affordable housing within the local area, making permanent relocation for seasonal employment unviable for many farm workers.

The Chichester coastal plain has seen significant investment and expansion in local horticultural and farming enterprises, where the demand for seasonal labour has risen significantly over the last few years and there are insufficient numbers of seasonal workers accommodation sites to meet this demand.

Record levels of employment in Europe, compounded with the uncertainty created by Brexit negotiations has already had an effect on the supply of migrant labour, making the need for providing an attractive package of living and working conditions all the more important for attracting and retaining good quality skilled staff.

Central government have recognized the shortages of agricultural labour in the Migration Advisory Committee Report and introduced a new Seasonal Workers Pilot Scheme for the 'post Brexit world' starting in 2019-2020, which include visa conditions that require workers to be employed within pre-defined sectors (including agriculture) making the need to provide accommodation as part of the employment package all the more important.

In summary, having dedicated accommodation for seasonal workers, close to horticultural centres of employment, regulated by government legislation to ensure it is subsidised and only used by farm workers is an essential requirement for the applicant's business to survive and flourish. Providing good quality accommodation, facilities and welfare support that will continue to attract high quality seasonal labour, year on year is vitally important to the future of the business.

Increased pressure on an already stretched housing stock that is beyond the reach of many seasonal workers and recent approvals that has removed existing facilities has created a significant shortfall in the availability of accommodation for seasonal workers at peak times.

Ultimately without the good quality accommodation and facilities required to attract skilled and motivated seasonal workers, horticultural enterprises will not be able to harvest their crops.

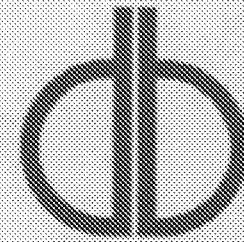
EXACTLY.

3,000? HOMES
BEING BUILT
NEARBY

- MOSTLY AUTOMATED
AT THIS SITE

TV NEWS SAYS
STILL FLOCKING FROM
DIFFERENT EUROPEAN
COUNTRIES.

& THE WELFARE
FOR RESIDENTS?
WHAT ARE THEY
DOING ABOUT
THAT?



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Proposals

The applicants are part of a parent group that owns Newlands Nursery and includes Roundstone Nurseries.

The applicants specialise in recruiting seasonal workers to meet the needs of the horticultural enterprise and as part of the package provide attractive, comfortable seasonal accommodation for labourers working in the group as part of their employment package.

The applicant's operated the South Downs Worker Village in Bracklesham, whose application (17/01722/FUL) received a substantial amount of public support, demonstrating the need for this type of seasonal accommodation.

However, the South Downs Worker Village lost to housing development (18/00753/OUT) results in a renewed shortfall of seasonal accommodation to meet the needs of the horticultural enterprise and a requirement for the applicants to pursue a strategy of providing a number of smaller sites closer to each horticultural site to accommodate the seasonal labour required for the work in their agricultural holdings.

The site at Newlands Nursery is owned by the applicant's parent group and would provide 31 units that would be occupied by between 93-186 workers through the season (February to November inclusive).

Seasonal labour is essential to the operation of the horticultural enterprise and the seasonal accommodation is reasonably necessary for persons employed in farming operations on land in the same occupation, thus meeting the permitted development requirements.

However this application does not seek approval of seasonal workers accommodation while occupied during the season, nor is there any intention to create permanent dwellings.

The units will not be occupied between the first day of December and the last day of January (off-season) and this application only seeks a change of use of the land to facilitate the year-round retention of the caravans on site in the off-season while not in occupation.

The retention of the caravan units on site is important as it avoids the unnecessary expense, disturbance, environmental and traffic impacts of repeatedly replacing and removing caravans to and from the site at the beginning and end of each season and enables the applicant to invest in improving the facilities provided to their staff.

The quality and affordability of the accommodation attracts good quality recruits that return year after year, building the necessary skills and allowing the horticultural enterprise to invest in further training and employee development.

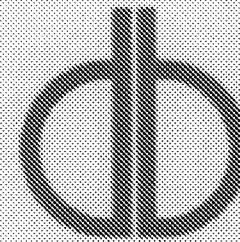
— LIES

DOES NOT MEET
PERMITTED DEVELOPMENT
RIGHTS. - WORK ON
THE SAME LAND -

- ONLY THEIR
SEASON & ALL
THE WORKERS
NOT OTHER NURSERIES
SEASONS.

~ LAND EMPTY AT
THE MOMENT.

- ? & NOW THEY ARE
CONCERNED ABOUT
ENVIRONMENTAL &
TRAFFIC IMPACTS.



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Amount and Scale



Newlands nursery is an established horticultural enterprise with glasshouses and processing facilities, all contained within a single site of Lagness Road to the North East of Pagham Road.

The Seasonal workers accommodation falls within permitted development rights for agricultural holdings and the 31 units to be stored accommodate approximately 93-186 workers through the season (February to November inclusive).

The number of workers changes as seasonal requirements demand with the maximum number of workers per caravan not to exceed 6 for welfare reasons.

The applicant operates seasonal accommodation for the whole group and has calculated the optimum number at the Newlands site to meet current demand.

NO IT DOESN'T

WILL BE USED ON
OTHER SITES & BY
LANGMEADS ETC
ETC.

Appearance and Landscape



The applicants have selected the proposed location following assessment of the holding and the wider landscape as well as operational need.

The site is located within a well contained site on the South side of the nursery. The accommodation is close to the core facilities of the nursery and the units are of a standard appearance, common in similar sites within the local area.

NO MENTION
OF RESIDENTS

The units are comparatively low in height and well screened by the existing glasshouse structures to the North and West, existing trees and hedgerows to the South and East that reduce the visibility of the site in the wider landscape, with only occasional views of the tops of the glasshouses visible from Pagham Road to the South.

LIES - NOT
PROPERLY SCREENED

* NAVET OWN PROPOSED RECRUITMENT FOR SEASONAL WORKERS

Plot Plans, Horn Farm, Boxham West Sussex, PO1 1X 8 FJ1
architect@douglasbriggspartnership.co.uk www.douglasbriggspartnership.co.uk

THIS WILL BE USED AS A HUB -

Newlands Nursery IN OTHER WORDS THE EMPLOYEES WO'DN'T BE
DISTURBED WHEN OFF DUTY BY THE NOISE & HUSSELE & BSSLE
THAT RESIDENTS HAVE TO COPE WITH - THEY ARE MOVED
TO WHERE THEY WILL DISTURB US ALL THE TIME

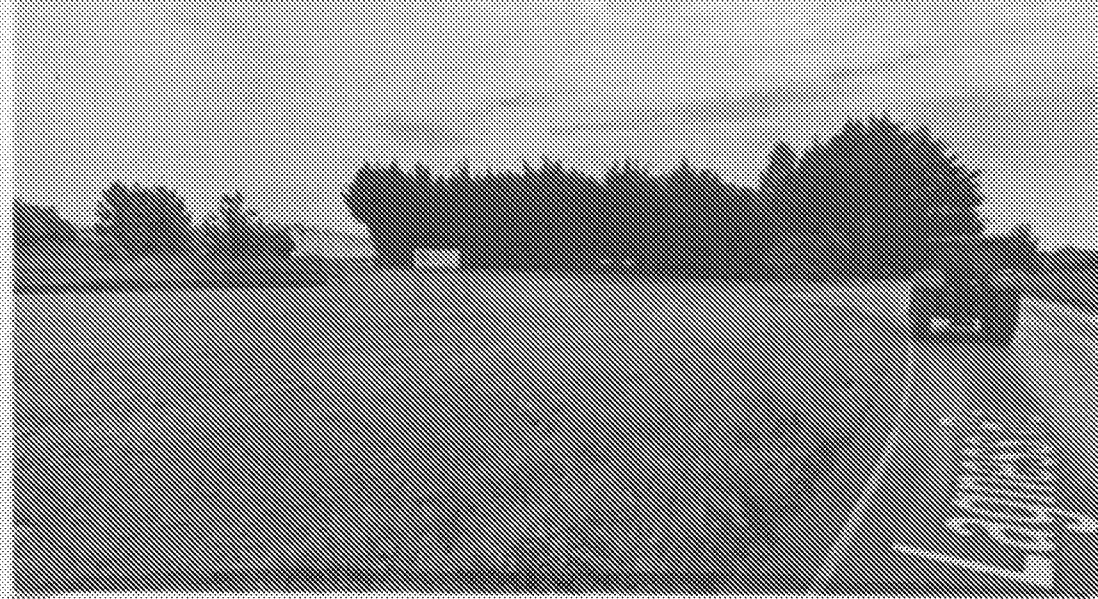
The site is located close to the core facilities of the Newlands Nursery, but far enough
away from the main activities within the loading yard so that workers would not be
disturbed by other activities when off-duty.

Legislation and regulatory requirements stipulate minimum distances between units and

The layout takes advantage of existing vegetation and glasshouse structures to reduce
the visibility of the site in the wider landscape.

Parking, Access and Highway Considerations

Access to the site is via the main entrance to the Nursery off Legness Road.

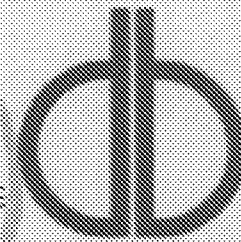


There are no known environmental constraints on this site to restrict or impede
accessibility. The application site is served by an existing access and no change is
proposed.

While this application does not relate to the occupation of the seasonal
accommodation (permitted development) the applicant has sought to minimise the
adverse impacts of their enterprise as a whole by:

- Providing seasonal accommodation for workers on the farm, close to where they
work, thereby avoiding the need to travel to and from work.
- Providing welfare and other staff facilities on site for the seasonal staff.
- Providing a staff bus service and working with public transport providers that
operate close to the site.
- Encouraging sustainable means of transport, such as use of the cycle routes.
- The number of staff who are permitted to own cars is strictly controlled. Parking
on roads surrounding the farm is strictly forbidden and subject to disciplinary
action.

The retention of these unoccupied units during the off-season, avoids the significant
disruption to the business and transport network that would be caused by the
disconnection, removal, storage, return and reconnection of the units that would
otherwise be required every year.



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

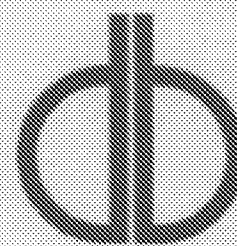
Not enough.

It was left for
wildlife to flourish
& it may flood

PROVE THE % OF
HOURS EACH WORKER
WILL WORK AT THIS
SITE.

THE WILL BE BASED
TO A ROOM VARIOUS
SITES

WHO WILL POLICE?



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Flood Risk

The site lies outside Flood Zones 2 and 3 and does not exceed one hectare in size and therefore a site specific Flood Risk Assessment is not required.



Extract from EA Website

Foul Sewerage and Utilities Assessment

The storage of the caravan units on site during the 'off season' enables sewage connections from units to be retained in place, reducing risks to the environment that arise from the repeated removal and replacement.

The site includes a sewage treatment plant that will serve the caravans.

Consents to discharge are covered by separate legislation and as this application is for the storage of seasonal workers accommodation when not in use, a sewage capacity and drainage impact assessment is not required.

Biodiversity

The proposed off-season storage of the caravans will have little if any adverse impact on the biodiversity of the site.

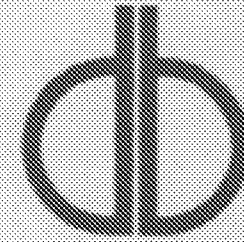
Investment in permanent facilities is likely to assist wildlife habitats to be established over time without the unnecessary disturbance and having to keep space clear to assist replacing and removing caravans to and from the site at the beginning and end of each season.

Risk to
Environment
WITH LITTLE
(WE ALREADY HAVE
EXPERIENCE)

CONNECTING
DISCONNECTING
Should not be a
risk

But the site as
a whole does.
THERE IS NOTHING
THERE AT THE
MOMENT?

It is totally misleading to
say the site will assist
wild life habitats
This is a joke surely?



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Planning Context

The site lies between Othchester and Sognor Regis and forms part of an established agricultural holding where the following policies apply.

National Policy: National Planning Policy Framework

The National Planning Policy Framework was originally published in April 2012 and revised in July 2018 and states:-

"1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced."

"10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development"

At paragraph 11, the NPPF defines the presumption in favour of sustainable development for decision making as:-

"11. Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

It is important to understand that the presumption does not envisage a simple 'weigh the good against the bad'. The presumption instead pre-weights the scales so that they start off weighted towards granting permission and the balance is only tipped against doing so where adverse effects would significantly and demonstrably outweigh the benefits.

The NPPF makes it clear the purpose of the planning system:-

"7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."

"9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework. They are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."

While seasonal workers accommodation falls within Permitted Development, the NPPF recognises the need to provide for a specific local needs in rural areas:

"77. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this."

Fox Barns, Ham Farm, Bosham West Sussex, PO20 1X* (11)

architectural@douglasbriggspartnership.co.uk www.douglasbriggspartnership.co.uk

- It does - our
homes need
protecting

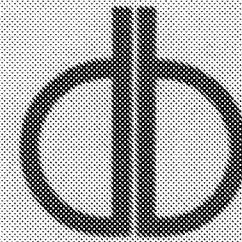
- Huge adverse
effect on
residents of the
general area.

FOR WHO?

NOT THE COMMUNITY
& ROAD USED
FOR SUE

- Yes!

- YES LOCAL
NEEDS FOR
RESIDENTS TO



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

The proposals are important for the on-going success of the farm business, countering weaknesses and addressing challenges of the future and as such meet the governments aims with respect to building a strong, sustainable, competitive economy where the NPFF states;

"80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation", and in areas with high levels of productivity, which should be able to capitalise on their performance and potential."

"83. Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."

The proposals are located adjacent to the existing nursery base, reducing the travel requirements and taking advantages of existing facilities of the nursery, according with the NPFF where the proposals exploit opportunities to make the location more sustainable by removing the requirement to transport units on and off site at the beginning and end of each season;

"84. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

The application proposals are a sustainable approach to providing suitable accommodation for seasonal workers and limiting the environmental effects of the infrastructure required by enabling units to be stored on site and removing the environmental risks and traffic impacts associated with their relocation and removal and the beginning and end of each season.

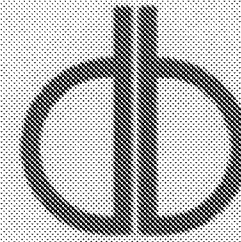
But adding to environmental impact - more traffic on road etc etc

* UNLESS THE BUSINESS ISN'T HORTICULTURE BUT IN REALITY THE RECRUITMENT BUSINESS. THAT IS WHAT WILL BE DELOANS!

NO LOCAL SERVICES ARE AVAILABLE. ONLY BY VEHICLE

It does ^{UN} have an acceptable impact on local roads + AN UNACCEPTABLE IMPACT ON RESIDENTS

THEY HAVE MANAGED TO GROW THE BUSINESS FINE BEFORE HOUSING WOODS HERE *



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Local Policy: Arun Local Plan 2011-2031 (July 2018)

The Local Plan Policies were adopted on 18th July 2018 and together with relevant 'made' Neighbourhood Plans, forms the statutory Development Plan for the district. It is considered that the proposals accord with the aims and intentions of the local plan policies. In particular:

Vision & Objectives

The Local Plan includes the District Council's vision for the future of the district and includes:-

"4.6 The range and quality of education opportunities in the District will have increased, including planned expansion of the University of Chichester Campus at Bognor Regis. Opportunities for knowledge-based economic regeneration will have been developed, through graduate programmes, work placements, and other opportunities"

"4.7 Arun will play host to a successful and vibrant business economy, providing a wider range of better quality jobs, supported by a better trained and more skilled workforce"

"4.8 The provision of better job opportunities and more affordable homes will have helped to create a more balanced and diverse local population..."

The horticultural sector has undergone regeneration in recent years, developing a skills base in horticulture that provides a core part of the local economy. The provision of good quality facilities for seasonal workers brings the same workers back year after year, where the applicant's business supports and encourages training in horticultural trades as staff progress and develop skills. The quality of accommodation is essential to attracting and keeping quality staff that are willing to invest in their own and the Arun economy's future.

Policy SD SP1 Sustainable development

"When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland)."

This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken."

As above, it is considered that proposals constitute sustainable development which accords with current policy, where applications that accord with policy should be approved where no material considerations indicate otherwise.

Policy SD SP2 Built-up Area Boundary

"Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this local plan."

Policy C SP1 Countryside

"Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:

- for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan, or
- for quiet, informal recreation, or

WHAT TRAINING?

WAFFLE

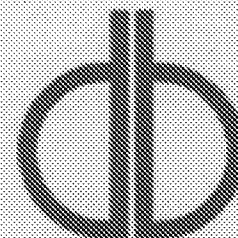
skill base?

Educational opportunities?

Oh for heavens sake - come on!

- At what cost?

- Is it - no!



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

- c. for green infrastructure; or
- d. for the diversification of the rural economy; or
- e. for road and/or cycle schemes; or
- f. in accordance with other policies in the Plan which refer to a specific use or type of development.

The Council will take into account cumulative impact of development in the consideration of planning applications.

To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.

Policy SD SP3 Gaps Between Settlements

The generally open and undeveloped nature of the following gaps between settlements as identified on the Policies Maps will be protected to prevent coalescence and retain their separate identity.

Development will only be permitted within the gaps if:

- a. It would not undermine the physical and/or visual separation of settlements; — YES - it will
- b. It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development; — PRIVATE DWELLINGS
- c. It cannot be located elsewhere; and
- d. It maintains the character of the undeveloped coast;
- e. or, if a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.

Seasonal Workers Accommodation requires a countryside location and is essential to the operational needs of the horticultural enterprise, as recognised by the permitted development rights for agricultural land.

The site location is well contained within the existing nursery site, not widely visible and will have little if any potential to undermine the visual separation of settlements.

Employment & Enterprise

Arun's Economic Strategy six objectives are described at paragraph 8.1.4 of the Local Plan.

- Improve education, skills and employability of the local population.
- Increase business competitiveness and growth - focusing on existing businesses;
- Encourage the level and rate of new investment, particularly in high growth sectors - focusing on new enterprises and inward investment;
- Maintain and improve business infrastructure;
- Maintain and improve the area's infrastructure, facilities and physical environment, and Maintain and improve transport networks across the District and wider area.

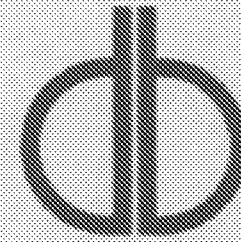
Policy EMP DMT Employment Land: Development Management [parts]

1. Enhancement of employment premises and sites

The Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

The Council will promote and support positive measures to upgrade existing employment areas through:

- a. Supporting appropriate proposals for development-redevelopment of employment floorspace, upgrading or modernisation of existing premises and/or proposals which make more efficient use of under-used employment sites and premises; and
- b. Working with landowners and developers to achieve better management



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

HAVE THEY
LOOKED AT
ALTERNATIVES

of employment areas, including measures which increase sustainability
and reduce crime IF ONLY

6. Economic growth outside the Built-up Area Boundary

Planning permission will be granted on sites outside the built-up area,
provided that the proposal demonstrates:

- That it is an appropriate sized extension of an existing employment site,
or no acceptable alternative can be identified within existing permitted or
allocated sites, or within or through redevelopment of existing
commercial premises;
- That it would not intensify uses at the site to the detriment of existing
public access routes and highways;
- A high standard of design, layout and landscaping appropriate to the
context;
- That it is capable of being well served by public transport or otherwise is
readily accessible by means other than by private car to a significant
residential workforce if employment intensive uses are proposed;
- Access arrangements and parking facilities will be provided in
accordance with the Council's adopted standards;
- A sympathetic relationship to the surrounding areas that shows
consideration of the landscape, habitat, built and historic environment
contexts, the opportunities to deliver on-site habitats and protect key
species DESTROYING IT
- A satisfactory relationship with neighbouring uses in order that the
amenities of nearby residents, in particular, are protected; and
- Where appropriate, crime prevention measures are incorporated

NO CONSIDERATION
OF RESIDENTS

it is to the detriment

NO THOUGHT TO FENCING

FEW BUSES OVER
THAN THERE PEOPLE
WORK BUS TO & FROM
SITES!

NONE

WE ARE BEING
DESTROYED

NO CRIME PREVENTION
MEASURES TAKEN

NO DISGUISSING 31
CARAVANS UNLESS
FULLY SCREENED

8. New agricultural buildings

Agricultural buildings will be permitted provided that:

- Their scale, siting, design materials and use of landscaping minimise the
visual impact on the landscape; and
- New buildings are grouped with any existing buildings in order to
minimise visual impact on the landscape. Isolated buildings will be
permitted where their location is essential to the agricultural activity
being undertaken where they are not situated in a prominent location.

While not a 'B-Class' use, the nursery is a significant employment base for the
horticultural business and seasonal workers accommodation is essential to the
operation of the nursery. The units are grouped with other structures on the nursery
base and would not be prominent in the local landscape. — YES IT WILL BE

ONLY QUANT
ACTUAL
SEASON
FOR
ONSITE
WORKERS
NOT
THOSE
GANG BUSSES
ELSEWHERE

It is important to note that this application does not relate to the provision of
caravans while occupied as 'seasonal workers accommodation' accords with the
permitted development rights. That said, the existing caravan site is well screened
in the landscape and close to existing approved sites and the farm base.

The retention of caravans meets an identifiable need for improving facilities for
and quality of seasonal workers accommodation and achieve better management
by enabling the storage of caravans out of season and avoiding the business
disruption and temporary drainage arrangements associated with their temporary
location and repeated removal.

IT IS NOT - ITS
VERY CLOSE TO
RESIDENTS.
(VISUAL + NOISE
ISSUES)

The retention and storage of the seasonal workers caravans on site does not
increase the impact of the use of the site on the landscape or character of the
surrounding area.

they are not
there at all,
so it does.

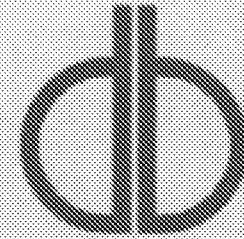
Policy SKILLS SP1 Employment and Skills

The Council will encourage development proposals that support the
following:

- Raise skills levels and increase employability;
- Tackle skills shortages in existing and potential business sector clusters

First Barns, Ham Farm, Business West Sussex, PO1 1X 6 111

architecture@douglasbriggspartnership.co.uk www.douglasbriggspartnership.co.uk



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

- that are, or have the potential to be, strengths in the local economy;
- e. Promote skills on strategic housing and employment sites particularly with regard to construction skills;
- d. Address barriers to employment for economically inactive people; and
- e. Provide for the development of childcare facilities within or close proximity to employment sites."

— WHERE?

While the application does not relate to the provision of the caravans while occupied, seasonal accommodation addresses one of the key barriers to employment in the South- the cost of housing.

The retention of the caravans on site enables the provision of good quality facilities for seasonal workers that brings the same workers back year after year, where the applicant's business supports and encourages training in horticultural trades as staff progress and develop skills.

Policy HOR DM1 Horticulture (part)

"1. New glasshouse, polytunnel and associated packhouse development will be permitted provided that:

- a. It is of a height and bulk which would not significantly damage the character or appearance of the surrounding landscape, unless it can be demonstrated that the need for a larger scale development is outweighed by the economic benefit of the scheme to the rural economy;
- b. It relates sympathetically to the natural, built and historic environment;
- c. Pollution to soil, water or air generated from the development into the surrounding environment, including the cumulative effects, is within regulated acceptable limits;
- d. Long public views across substantially open land are retained where the landscape value is defined as major or substantial for the corresponding Landscape Character Area in the Arun Landscape Study;
- e. Adequate water resources are available or can be provided (ie. above ground reservoirs);
- f. Adequate surface water drainage capacity exists or can be provided as part of the development;

g. Vehicular access from the site to the road network is adequate and uses roads capable of accommodating the vehicle movements likely to be generated by the development without detriment to highway safety and the residual cumulative impact to residential amenity is not severe;

h. There is minimal impact on health or general amenity resulting from internal artificial lighting after 6.00 pm on the occupants of nearby residential properties and minimal impact on the appearance of the site in the landscape by the minimisation of light spillage and glare to keep the natural environment intrinsically dark at night;

i. Noise levels resulting from machinery usage, vehicle movement, or other activity on the site, which when measured against the existing ambient noise levels in the locality would not be likely to unacceptably disturb occupants of nearby residential properties or would not be likely to adversely affect enjoyment of the countryside;

j. Any glasshouse structure(s) and/or polytunnel(s) and/or packhouse(s) deemed redundant to the horticultural or agricultural industry on the development site, are removed and the land is remediated from any contaminated material(s) and the land is used only for the direct diversification of horticulture or other productive green environment or a countryside-based enterprise activity which supports the rural economy. Council will impose this through planning conditions and/or use planning obligation agreements;

k. Proposals include full details of new landscaping, screening and of any trees or vegetation to be retained on the site; and

THIS IN REALITY IS
FOR MIGRANT SEASONAL
WORKERS A NOTHING TO
DO WITH IMPROVING THE
LOCAL SKILLS BASE.

- It does damage

- It is not
sympathetic

- Litter is not
acceptable.

- ?

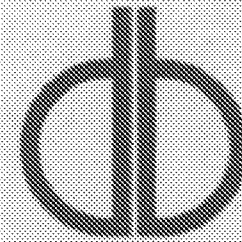
Big Issue for A10

HUGE LIGHT
POLLUTION

Will totally
destroy our
"enjoyment" of
our homes

THEY HAVE PROPOSED
NO IMPROVEMENT
/ NO SECURITY
MEASURES OF
SCREENING/
FENCING

NEEDS TO BE
INDEPENDANTLY
VERIFIED -
MEASURED
AGAINST
NO NOISE
NOT SOME
MADE UP NOISE
Created on the
day.



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

1. The applicant has submitted sustainability and options appraisals, mitigation measures, and a soil resources plan for the development site."

Noting that this policy is drafted for new glasshouse, polytunnel and packhouse developments, the proposals for the retention of the seasonal workers accommodation comply with the policy tests set out above.

Policy H DM3 Rural worker' dwellings (part)

3. Temporary seasonal horticultural workers' dwellings

Permission for temporary accommodation for seasonal horticultural workers will only be granted in exceptional circumstances, where there is clear evidence that the structures are absolutely essential for the provision of staff accommodation to facilitate the economic running of a farm or horticultural holding and providing that:

- There is no suitable alternative means of providing the accommodation;
- The structures are recognised as an interim measure and approved on a temporary basis only, subject to seasonal and temporary occupancy conditions. Planning conditions/obligations shall be used to limit the duration of the proposed use;
- The structures are sited in order to minimise their visual impact on the surrounding area;
- The structures are designed to provide adequate accommodation which complies with minimum health standards;
- The structures are designed and sited to meet normal planning and technical requirements including access, handstanding, fire resistance and light ventilation;
- Any drainage issues are satisfactorily addressed; and
- All other necessary services to serve the dwelling(s) exist.

It is important to note that this application does not seek approval of seasonal workers accommodation while occupied during the season as this, falls within permitted development rights, nor is there any intention to create permanent dwellings as the units will be unoccupied during the 'off-season'.

That said, the horticultural enterprise currently uses the South Downs Workers Village in Brocklesham (Chichester District) but due to recent approvals (16/00753/OUT) this site will become unavailable and the applicant has pursued a strategy of locating replacement seasonal workers accommodation on each of their horticultural sites to serve the needs of farming operations within the same occupation and there are no suitable alternative means of providing this accommodation.

The applicants recognise that the accommodation is approved on a temporary basis and are willing to accept conditions limiting the season for occupation. This application only seeks the 'off-season' storage of the caravans to avoid the business, environmental and traffic disturbance related with the removal and replacement of the units at the beginning and end of each season.

The units are clustered close to the existing structures and sited so as to minimise their visual impact and are of a standard design that meets normal technical requirements and health standards.

All the services necessary for the units exist at the nursery and the proposals to retain the caravans on site, while unoccupied during the 'off-season' allows for improvements in infrastructure and drainage, minimising risks to the environment associated with the removal and replacement of temporary units.

Policy T DM1 Sustainable Travel and Public Rights of Way

"New development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified. Access to alternative modes of transport including public

- Look for
ALTERNATIVE?

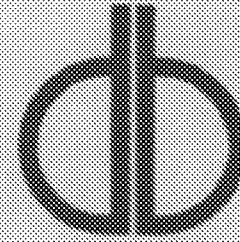
MAKES THEM HARD
TO CLEAR AT THE
END OF SEASON

NO IT DOESN'T.

SHOULD BE SAME ?
SITE

COUNCIL NEEDS TO
SEE EVIDENCE OF
THIS & NOT JUST
TAKE THEIR WORD.
THEY ARE
VERY ECONOMICAL
WITH THE TRUTH

- SO THEY WON'T
BE CUTTING OFF
THE CUT-THRU ?



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

transport services, the public right of way and cycle networks, must be available and accessible to all members of the community. Proposals for all new development must:

- Be located within easy access of established public transport services, existing pedestrian and cycle networks, the committed and aspirational cycle networks and the green infrastructure network which links the development with key destinations including places of work, education, leisure and town centres;
- Where applicable, contribute to the extension of public transport services to serve the development and community transport services to ensure that a wide range of transport services are available to all residents;
- Make provision for cycling and pedestrian facilities to meet the County Council Parking Standards, including cycle storage, convenient and secure cycle parking in association with retail and educational uses and sufficient secure parking and changing/showering facilities at places of work;
- Contribute towards the provision of a joined up cycle network and Public Rights of Way network, taking into account the aspirational cycle network, which provides convenient, accessible, safe, comfortable and attractive routes for pedestrians and cyclists and, where appropriate, horse riders, both within the development and in the form of links between the development and:
 - places of work, education, leisure and food retail;
 - the South Downs National Park;
 - along the coast particularly between Bognor Regis and Littlehampton;
 - along the coast to Chichester;
 - Bognor Regis to Arundel; and
 - Littlehampton to Goring.

While the policy has clearly been drafted for permanent housing developments within BUAB in mind, the seasonal workers accommodation is located in close proximity to the workers employment base, removing the need for workers to commute. The site is also located close to Runcion, with access to cycle routes bus stops and other services.

It is important to note that this application does not seek approval for the units while occupied as this falls within permitted development. The proposed retention of these unoccupied units during the off-season, avoids the significant disruption to the business and transport network that would be caused by the disconnection, removal, storage, return and reconnection of the units that would otherwise be required every year.

Policy W DM3 Sustainable Urban Drainage Systems

"To increase the levels of water capture and storage and improve water quality, all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development, at an early stage of the design process.

Proposals for both major and minor development proposals must incorporate SUDS within the private areas of the development in order to provide source control features to the overall SUDS design. These features include:

- Green roofs
- Permeable driveways and parking
- Soakaways
- Water harvesting and storage features including water butts."

The site is not located within a zone identified as at risk of flooding and the proposed units are raised from the ground. The site layout includes sustainable drainage features such as permeable surfaces throughout and soakways for surface water drainage to ensure the run-off rate is no greater than the greenfield run-off rate.

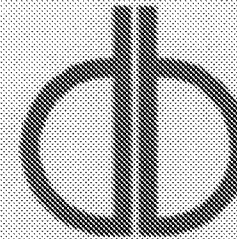
Finn Barns, Ham Farm, Bosham West Sussex, PO3 1R #111

architectural@douglasbriggspartnership.co.uk www.douglasbriggspartnership.co.uk

YET EARLIER
YOU SAID OTHER
SITES ???
P13 - 3rd Paragraph

But no pedestrian
or cycle path to
get there - what
other services!

No it
doesn't



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Neighbourhood Policy:

The site is located within the Pagham Neighbourhood Plan area. Pagham Parish Council and Arun District Council withdrew the original plan from the examination process at an early stage and is currently undergoing further consultation and review.

The draft policies of the Pagham Neighbourhood Plan are therefore considered 'emerging policy' with the degree of weight given, related to their progress through the consultation process and conformity with the Local Plan and National Policy.

Policy 5: Employment & Enterprise

"The Neighbourhood Plan will protect existing employment and business uses from a change of use, unless it can be demonstrated their continued use is no longer viable. The Neighbourhood Plan will support proposals to expand existing employment uses and new opportunities, provided their impact on flood risk, local amenity, traffic landscape and the Pagham Harbour Special Protection Area can be satisfactorily mitigated."

Policy 9: Agricultural Land

"The Neighbourhood Plan will support proposals that ensure the continued efficient use of agricultural land, encouraging appropriate developments thereon that maximise its use for the provision of sustainable energy and horticultural food production, provided:

- they are located away from the immediate built up area, on poorer grade land and are sympathetically landscaped to ensure that open vistas are retained and enhanced to the west of the Pagham Road;
- that any ecological or environmental impact of any such development on the green infrastructure is minimised, including, but not limited to, fertilisers, noise pollution, light pollution and traffic movements;
- that the highest quality and most versatile agricultural land which is outside of immediate flood zones and closest to the built up boundary is retained and protected for agricultural use and production and soil conservation;
- there is no degradation in biodiversity value or in the integrity of the strategic gap; and
- they help deliver new green infrastructure that is relevant to the rural context, including, but not limited to, the use of farmland, woodland, wetlands or other features to provide such services as flood protection, carbon storage, water purification, bio-digester/power generation or geothermal heat exchangers

Planning applications must include a flood risk assessment to demonstrate how a scheme will not increase pluvial or fluvial flood risk on any adjoining land, to the satisfaction of the local planning authority and the Environment Agency."

The draft Pagham Neighbourhood Plan supports appropriate expansion of existing employment uses outside the Built-up Area Boundary (BUAB) and in recognising that the highest grades (1, 2 and 3) and most versatile agricultural land are a valuable, indispensable source of food production, supports farming enterprises that lie outside the BUAB which provide valuable local employment.

The seasonal accommodation provides for the needs of the horticultural enterprise that makes efficient use of high quality agricultural land by creating a controlled growing environment within the glasshouses, with a range of horticultural facilities at the nursery, providing employment for the seasonal staff living in the accommodation during the season.

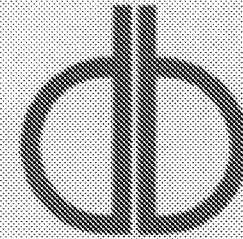
The proposals enable minimisation of the environmental impact of the accommodation which is located on land unsuitable for crops, not located within a flood zone and sympathetically landscaped in according with the emerging Neighbourhood Plan.

WE ARE HERE

?

HAVE TAKEN AWAY
A PREVIOUSLY
DESIGNATED
WILDLIFE AREA

HUGE IMPACT
ON RESIDENTS



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

Involvement of local interests

There has not been any pre-application involvement of local interests with respect to this particular application.

WHY NOT

Precedent

The proposed caravans as "the use as a caravan site of agricultural land for the accommodation during a particular season of a person or persons employed in farming operations on land in the same occupation" (Caravan Sites Control of Development Act 1960, Schedule 1, paragraph 7) would be permitted development (GPDO Schedule 2, Part 5, Class A) provided they are removed from the site when not in occupation (GPDO Condition A.1).

This application seeks to allow year round retention of the units but only seasonal occupation, i.e. the storage of empty caravans on site during the off-season.

It is noted that there are numerous other local farms and horticultural businesses where temporary accommodation can be found and on many the accommodation is retained year round but only occupied on a seasonal basis.

It is considered that the year round retention of the units will accord with other farms in the District and surrounding areas.

Conclusion

Seasonal workers are essential to the operation of the horticultural enterprise and the provision of high quality facilities (including seasonal accommodation) encourages good quality seasonal workers to return year after year which in turn enables the development of a horticultural skills base within the industry.

The recent loss of existing seasonal accommodation to housing development and pressures on the industry as a whole have driven a demand for good quality seasonal accommodation to attract seasonal staff, where the applicants have taken a positive sustainable approach to providing for these needs by investing in high quality accommodation in close proximity to their horticultural sites.

This application does not seek approval for the provision of seasonal workers accommodation (permitted development) only seeking approval to facilitate the retention of the seasonal workers accommodation on site while not in occupation (out of season).

The year round retention of the units with seasonal occupation will avoid the significant disruption to the business and transport network that would be caused by the disconnection, removal, storage, return and reconnection of the units that would otherwise be required every year.

The storage of the caravans on site during the 'off season' enables sewage connections from units to be retained in place, reducing risks to the environment that arise from the repeated removal and replacement of the units.

The proposed year-round retention with seasonal occupation represents sustainable development that accords with current national and local policies and will support the ongoing improvement of this established local horticultural business and the social, economic and environmental benefits that provides.

- WHERE IS THE
PROOF -
DON'T TAKE
THEIR WORD FOR
IT.

it will not be long
- before caravans
become dilapidated
& fall into disrepair
& still Roundstones
will get their
subsidy.

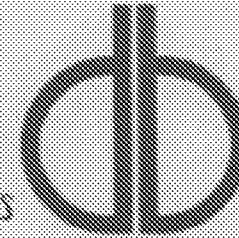
explain 'Season' % of workers time employed in
that season at
this site?

- What risks?
Do the job properly!

NO MENTION OF OUR LIVES
BEING DESTROYED!

Appendix A
Local List

1. Affordable housing statement – not applicable
2. Biodiversity survey and report – Biodiversity Checklist only why
3. Land contamination assessment – not applicable
4. Economic Development statement – not required but contained in Planning Design and Access Statement above.
5. Retail Impact Assessment – not applicable
6. Flood Risk Assessment – Site under 1Ho, not in flood zone 2 or 3, not required
7. Foul Sewerage, Utilities and Drainage Impact Assessments – not required but contained in Planning Design and Access Statement
8. Land Engineering Works Statement – not applicable
9. Landscaping Strategy – As existing, see plans
10. Lighting assessment – not required
11. Noise assessment – not required
12. Bin storage and collection provision – not applicable
13. Parking Plan – not applicable
14. Planning Application Summary – see Planning Design and Access Statement
15. Street Scene – not applicable
16. Structural survey – not applicable
17. Telecommunications Development – not applicable
18. Transport Assessment – not applicable
19. Transport Statement – not applicable
20. Tree survey/Arboricultural Implications – not applicable
21. Tidsey Foul Water Environmental Assessment – not applicable
22. Validation Checklist – Enclosed
23. Plan and Drawing Requirements – Enclosed
24. Historic Environment Record Search – not applicable
25. Pagham Harbour Access Management Contribution – not applicable
26. Heritage Statement – not applicable



DOUGLAS BRIGGS
PARTNERSHIP

INTEGRATED
ARCHITECTURE
AND
TOWN PLANNING

THERE IS A NEW ESTATE
OF 3000 - 40% Will
be affordable housing

pg 12 - Policy for DMI
(A)(H)(I)
WHY NOT INCLUDED?

Why not
applicable?

THEY ARE!

WHY DO ROUNDSTONES
SAY NONE OF THIS IS
APPLICABLE - WHEN IT
IS?