



December 2020

Supporting Agricultural Statement Permanent Siting of Seasonal Worker Accommodation Units

At

The Green House Sussex Ltd

Pollards House

Lake Lane

Barnham

West Sussex

PO22 0AD

**Gate House
Beechwood Court
Long Toll
Woodcote
RG8 0RR**

1	INTRODUCTION.....	3
2	BACKGROUND.....	3
3	PROPOSAL	5
4	PLANNING POLICY.....	5
5	APPRAISAL	8
6	OTHER DWELLINGS	9
7	CONCLUSION.....	10

1 Introduction

- 1.1 Reading Agricultural Consultants Ltd (RAC) is instructed by The Green House Sussex Ltd (the applicant) to provide a supporting agricultural statement for the siting of 11 mobile home units for occupation by seasonal agricultural workers involved in glasshouses and packhouse production at Pollards House. These will comprise eight new mobile home units and the retrospective siting of three mobile home units adjacent to the packhouse.
- 1.2 The applicant operates a successful nursery business growing tomatoes in Glasshouses and is reliant on seasonal labour for the peak growing and harvesting seasons (March to October annually).

2 Background

- 2.1 The Green House Sussex Ltd was established in 1977 (formerly known as Eric Wall Nursery Ltd) and has been growing tomatoes in the glasshouses at Pollards House since.
- 2.2 The glasshouses grow six varieties of tomatoes; Roterno, Sunstream, Sophie-Jane, Arlinta, Ruby Jewel and Twixia; with a growing season of March to October each year. The nursery has around 33 miles of tomato plants growing in the glasshouses.
- 2.3 The glasshouses are heated by automatic gas fired hot water boilers which are controlled by the computer system. In addition to the heating, flue gases are pumped from the boilers into the glasshouses to avoid depletion and increases in carbon dioxide levels which are crucial for photosynthesis.
- 2.4 During the summer months CO₂ is required during the daytime but the heating is not. The boilers are run throughout the day and CO₂ is used in the glasshouses with hot water from the boilers stored in insulated tanks and then pumped into the glasshouses at night to heat them.
- 2.5 Each glasshouse is fitted with its own equipment to monitor the environment 24/7. Temperature, humidity and watering are all automatically controlled by the computer system. The nursery grower can enter the required environment into the computer system and manipulate the heating, venting and watering to achieve optimum growing conditions.
- 2.6 As a result, any emergencies day or night are notified by alarms to the on-duty managers. No manager lives on site and they share a rota for covering the out of hours emergencies.

- 2.7 The tomatoes are pollinated by bumble bees as the business uses predatory insects as pest control instead of pesticides. The hives of around 80 bees are introduced into the greenhouses for pollination.
- 2.8 Young tomato plants are brought into the glasshouse in December for harvesting to begin in early March and continue through to the end of October each year. At the time of RACs visit to the site in mid-November the glasshouses were all being cleared out and prepared for the arrival of the young plants.
- 2.9 By the end of September the plants will have grown to their full length; about 30 feet long and each producing around 30 trusses.
- 2.10 The tomatoes are sold on contract to supermarket customers, notably Tesco, Waitrose, Sainsbury and Lidl.
- 2.11 The farm is a member of the following assurance schemes and audited accordingly:
- Sedex Members Ethical Trade Audit (SMETA);
 - BRC Global Standard for Food Safety;
 - Red Tractor Assurance; and
 - Linking Environment and Farming (LEAF).
- 2.12 Like most horticultural businesses in the UK, The Green House Sussex Ltd relies on seasonal labour of which the majority are European workers who arrive on the farm in March and leave after the harvest in October.
- 2.13 The site is divided into two teams; the glasshouses and the packhouse.
- 2.14 The glasshouses have 45-50 permanent staff and 20 seasonal staff.
- 2.15 The packhouse relies mostly on seasonal labour with around 10 permanent staff and 50 seasonal staff. Some of the seasonal packhouse workers remain on site after the season to help in the clearing and preparation for the arrival of the new tomato plants.
- 2.16 All seasonal workers have Settled Status as part of the EU Settlement Scheme however, the provision of accommodation for seasonal workers is vital. This was made more evident with the outbreak of Covid-19 and the restrictions on movement of people and flights and therefore a resulting difficulty in obtaining a sufficient seasonal labour workforce.

- 2.17 Indeed, the NFU has revealed that in the 2020 season only 11% of seasonal workers were UK residents. The Horticulture Seasonal Worker Survey covering 244 growers showed that more than 30,000 people are seasonal workers – equating to nearly half the workforce.
- 2.18 In a statement, a spokesperson for the Department Environment, Food and Rural Affairs (Defra), said: "Seasonal workers are essential to bring in the harvest every year, which is why we are continuing to work hard to ensure our farmers and growers have the support and workforce they need. Now the UK has left the EU, Defra is working closely with the Home Office to ensure that there is a long term strategy for the food and farming workforce as part of future immigration policy."

3 Proposal

- 3.1 The applicant proposes the siting of 11 mobile home units (eight new and three retrospective) and a service building for seasonal occupation by workers employed by The Green House Sussex Ltd.
- 3.2 The units will be sited permanently but only be occupied by workers between March to October each year and unoccupied November to February.
- 3.3 The units, each measuring 10.9m x 3.6m, will provide accommodation for multiple workers with basic facilities and the service building will provide an area for laundry.

4 Planning Policy

- 4.1 National planning policy guidance for development in the countryside is set out in the National Planning Policy Framework (NPPF) (revised July 2018 and updated February 2019).
- 4.2 Paragraph 11 of the NPPF sets out the core land-use planning principles that should be adopted and these expressly include:
- A presumption in favour of sustainable development;
 - Positively seek opportunities to meet the development needs of the area and be sufficiently flexible to adapt to rapid change;
 - Provide for objectively assessed needs for housing and other uses;
 - Approving development proposals that accord with an up-to-date development plan without delay; and,

- 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.

4.3 Paragraph 38 requires that decision makers:

- should approach decisions on proposed development in a positive and creative way;
- work proactively with applicants to secure developments that will improve the economic;
- social and environmental conditions of the area;
- seek to approve applications for sustainable development where possible.

4.4 Paragraph 77 et seq deals with housing in the countryside and notes;

“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs...”

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services...”.

4.5 However, paragraph 79 maintains the presumption against isolated new dwellings in the countryside unless they are essential, noting:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside...”*

4.6 Section 6 of the NPPF is concerned with ‘Building a strong, competitive economy’ and at paragraph 80 it notes:

“planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt...”

4.7 At paragraph 83 ‘Supporting a prosperous rural economy’ it notes:

“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 businesses;...”*

4.8 New Planning Practice Guidance titled 'Housing Needs of Different Groups' (July 2019) provides some guidance relevant to paragraph 79 of the NPPF in the section '*How can the need for isolated homes in the countryside for essential rural workers be assessed?*'

4.9 These include:

- *Evidence of the necessity for a rural worker to live at or in close proximity to their place of work to ensure the effective operation of agricultural, forestry or similar land-based rural enterprise (for instance where farm animals or agricultural processes require on-site attendance 24 hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);*
- *The degree to which there is confidence that the enterprise will remain viable for the foreseeable future;*
- *Whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;*

4.10 It further notes that: "Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings".

4.11 The Arun District Council Local Plan 2011-2031 (adopted 18 July 2018) notes that Horticulture is a key employment sector in the Arun District; including protected cropping (glasshouses and polytunnels), open field productions and horticultural-produce packing facilities. Paragraph 11.2.4 states that "*employment in horticulture is particularly seasonal and consequently there are demands to house transient and/or migrant workers.*"

4.12 Policy H DM3 of the Local Plan deals with Rural Workers' Dwellings and has a specific subsection for Temporary Seasonal Horticultural Workers' Dwellings. The supporting text in paragraph 12.8.2 notes:

"There has been a tradition within the Arun District to provide temporary accommodation for seasonal workers on a season by season basis in the horticultural industry. With respect to such development proposals, the occupation of the accommodation is limited to particular seasons only and would not be permitted for permanent residential use."

4.13 Part 3 of Policy H DM3 states:

"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:

- a. There is no suitable alternative means of providing the accommodation;*
- b. 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;*
- c. The structures are sited in order to minimise their visual impact on the surrounding area;*
- d. The structures are designed to provide adequate accommodation which complies with the minimum health standards;*
- e. The structures are designed and sited to meet normal planning and technical requirements including access, hardstanding, fire resistance and light ventilation;*
- f. Any drainage issues are satisfactorily addressed; and*
- g. All other necessary services to serve the dwelling(s) exist.”*

5 Appraisal

- 5.1 There is a need for caravans on the application site to accommodate seasonal workers for a number of reasons which are detailed below.
- 5.2 Experience suggests that it would be unlikely that local residents would wish to work for a rate close to national minimum wage, in horticulture, with very early starts (around 5am to harvest before the glasshouses get too hot), at weekends, and in hot weather etc. This was evidenced in 2020 with the low number of local workers despite the increasing unemployment and calls for labour in the agricultural/horticultural sector – two local workers came to work in the applicant’s nursery but did not last due to the hard manual labour and high temperatures in the glasshouses.
- 5.3 It is accepted that there is great organisational, time and cost efficiency for employees and employers in having the labour force resident on site, as staff are on hand for the early hours of harvesting in the glasshouses and working in the packhouse.
- 5.4 The glasshouses at Pollards House cover 101,374m² and produce an average of 4,000 tonnes of tomatoes each year.
- 5.5 There are no standard labour requirements for intensive horticultural units, although results from Reading University’s Horticulture Production in England suggest that the average nursery

of a similar type to The Green House Sussex Ltd employs the equivalent of 5 full-time workers per hectare of protected cropping (glasshouses and polytunnels), in addition to casual labour. This demonstrates that the application site, with 10 hectares of protected cropping, would be expected to employ the equivalent of 50 full-time workers.

- 5.6 The caravan accommodation and facilities are essential to be able to attract seasonal workers to the farm. Almost all the workforce employed come from Eastern Europe and as detailed below there are difficulties in obtaining privately rented properties.
- 5.7 The seasonal workers are an accepted and vital component of agricultural and horticultural businesses across the UK, and particularly in the Arun District area, and without them these rural sectors would be at risk of not being able to compete with the international markets.
- 5.8 As detailed in the Planning Statement (prepared by Dowsett Mayhew), the criteria C-G of Policy H DM3 are satisfied.

6 Other Dwellings

- 6.1 There are four cottages adjacent to the site at Pollards House which were originally in the ownership of the business many years ago however, over the years they have been sold off. One of the properties is privately owned by a manager employed at Pollards House and this is not available to the business for use. If the manager should cease to be employed at the application site the dwelling will remain unavailable to the business unless it is available for sale and purchased by the business.
- 6.2 The seasonal workers are not able to afford rental levels for local accommodation, with searches of online property portals showing properties within one mile of the application site ranging from £760pcm for a one bedroom flat to £1,600pcm for three bedroom or four bedroom houses in Barnham.
- 6.3 Generally, workers would not be able to obtain a rental tenancy, as applicants will need to prove an income 2.5 times the annual rent, need landlord references, require a credit check, bank references and in some cases a guarantor for the rent.
- 6.4 Rental of properties further afield would require either:
 - A reliance on public transport which would not match the early working hours or variable finishing times and is not conveniently available; and/or

- Private car ownership would not suit all seasonal workers who come to the UK for the harvest season with the cost of purchasing the vehicle, taxing and insuring as well as fuel costs.

- 6.5 Rental of accommodation off site is not suitable for The Green House Sussex Ltd as the workers would not wish to take on six or twelve month tenancy agreements for seasonal work lasting nine months each year.
- 6.6 In addition, the rental of a private property would be limited as the workers are people from different families and therefore the properties must be registered as Houses in Multiple Occupation (HMO's).

7 Conclusion

- 7.1 The caravans proposed to be sited on the application site will be occupied by seasonal agricultural workers employed by The Green House Sussex Ltd. The seasonal accommodation for horticultural farms is acceptable in policy terms.
- 7.2 The use of the caravans will ensure the viable and efficient operation of the horticultural business and allows the business to be competitive and responsive to its large customer base.
- 7.3 The use of the land is not permanent (albeit the caravans will be sited permanently with seasonal occupation and overwintering), but is reversible, as the land can reasonably be restored to its previous use of a grassed area if the caravans were to be removed.
- 7.4 The use of the caravans for seasonal agricultural purposes can be controlled by planning condition, which will prevent any permanent open market residential occupancy.
- 7.5 The caravans cause no harm or visual impact to the character and amenity of the surrounding countryside and landscape or to the locality.
- 7.6 RAC considers that the proposed use and development of the land accords with National and Local Planning Policy Policy H DM3.