

Parish:
East Wittering And Bracklesham

Ward:
East Wittering

EWB/17/01722/FUL

Proposal Change of use of a former holiday park to agricultural workers accommodation and associated works for a temporary period until 31st October 2019.

Site South Downs Holiday Village Bracklesham Lane Bracklesham PO20 8JE

Map Ref (E) 480841 (N) 97079

Applicant Mr Matthew Brown

RECOMMENDATION TO PERMIT



**NOT TO
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1.0 Reason for Committee Referral

Contentious application on which Officers consider decision should be by Committee.

2.0 The Site and Surroundings

- 2.1 The site lies north and east of the junction of the B2198 Bracklesham Lane with Clappers Lane. It comprises an area of approximately 2.1 hectares and adjoins the settlement boundary for Bracklesham which is defined by Clappers Lane. Adjoining the north and north-east of the site is the Holdens/Island Meadow Parks caravan and camping park. There is an outdoor swimming pool, an outdoor amenity area and car parking to the front of the site for 52 cars plus an overflow car parking area to the rear for 32 cars. The site is served by a vehicular access point onto both Bracklesham Lane and Clappers Lane. Mature boundary vegetation is located along the southern boundary screening views of the site from the south. To the south of the site are a number of detached residential dwellings on the south side of Clappers Lane. Further mature vegetation is located sporadically on the east, north and west boundaries. To the east of the site are a number of detached dwellings fronting onto Clappers Lane. The last use of the site was for holiday accommodation as part of the Sussex Downs Holiday Village. The site comprises a mix of 10 no. flat-roofed single storey holiday chalet blocks totalling 121 units, staff accommodation at single storey totalling 22 units and a two storey main complex housing a ballroom, dining room, kitchen, games room, bar and arcade. A hotel at first floor in the main complex houses 51 bedrooms.
- 2.2 The use of the site as a holiday park ceased in January 2017. The site began to be partly used for the seasonal accommodation of agricultural workers in the chalet blocks only on 3 April 2017.

3.0 The Proposal

- 3.1 The application is retrospective in nature and seeks planning permission for the change of use of the former holiday park to agricultural workers accommodation and associated works for a temporary period until 31st October 2019. The occupants will serve as seasonal agricultural workers for business enterprises in the local area. The existing accommodation provision (hotel, staff and chalets) will be utilised to accommodate these seasonal agricultural workers. The proposed accommodation provision is:

- Main Complex /Hotel (Blocks A, B & P) - 51 units;
- Block S (Staff) - 22 units; and
- Chalet (Blocks C, D, E, F, G, H, I, M, K & L) - 113 units.

Within the above units the proposal enables a potential peak capacity of 485 persons to be housed on the site at any one time, however the applicant anticipates the actual peak will be between 430-440 persons (due to voids between booking, holidays etc.). The proposal includes the provision of 8 full time equivalent workers (staff) to manage, maintain and provide welfare for the occupants.

3.2 Vehicle movements include a mix of private car and minibuses (or similar). Based on a maximum anticipated occupancy of 440 persons and assuming the worst case number of private vehicles, the applicant assumes vehicle movements will be as follows:

- 20 Mini buses (nine seat) transporting approximately 240 people (some buses will do multiple trips with a total of 26 to 28 return trips per day).
- 40 (five seat) private vehicles transporting approximately 200 people.
- Typical departure time 6:00am to 7:30am. Typical return time 16:30pm to 18:30pm.

3.3 The application proposes no external alterations to existing buildings or any hard or soft landscaping alterations. There are no current plans to renovate the existing swimming pool or provide it as a facility for the proposed occupants.

4.0 History

99/00315/FUL PER Continuance of use without complying with condition 3 of EW/38/78 which states "No chalet shall be occupied before 31st March or after the 31st October in each year".

5.0 Constraints

Listed Building	NO
Conservation Area	NO
Rural Area	YES
AONB	NO
Tree Preservation Order	NO
EA Flood Zone	FZ1
- Flood Zone 2	NO
- Flood Zone 3	NO
Historic Parks and Gardens	NO

6.0 Representations and Consultations

Parish Council

6.1 The Parish Council has no objection to this application but would like two conditions applied to any permission as follows:

1. That the holiday use remains included in the permission and that at the end of the temporary period it reverts totally to holiday use. East Wittering and Bracklesham's main economy is tourism and the loss of tourist accommodation should be avoided.

2. That the total number of occupants is limited to 300. This application will not provide any economic benefit to the community the applicant confirmed that their residents are bused out to large city supermarkets once a week to shop and they are endeavouring to provide all facilities on site. There is concern that an additional 300 people will put the existing medical provision under too much pressure.

However we are concerned with the wording "former holiday park". We believe that it is possible that a company may wish to take up this option at some date in the near future.

The lack of wording such as "holiday use" at this stage removes a hurdle to developers who may wish use the site for housing in the future. Bracklesham is a holiday destination for many people and Richardsons was particularly popular with the older generation. The holiday village was occupied all year round and provided vital employment for around 60, mainly local, people.

We have now lost those 60 jobs and these could be reinstated if the site reverts back to a holiday park. Should the site be used for housing the loss of those 60 jobs will be permanent and as employment opportunities are limited in the parish, this will lead to further stress on the road network with parishioners seeking employment elsewhere.

The applicant has stated that the workers are taken to Chichester for shopping with a resultant loss of trade to the parish. Entertainment/cafe, shop, etc, are to be provided on-site so there would be little need for the workers to go into the village.

The proposed use does nothing at all for the tourist industry on which the area is reliant. It would detract from the former holiday environment of the area. Tourism and its income is vital to both CDC and the Parish as per the Chichester Plan Local Review 2034 and the emerging Parish Neighbourhood Plan. It is vital to retain the site as capable of continuing to be used as holiday accommodation. We would like to see holiday use remain in the planning application.

The Parish needs holiday accommodation to encourage tourists back into the area and to provide much needed employment for locals and income for local businesses. Local businesses have reported losses since the closure of Richardson's. We have no issue with migrant agricultural workers as they work extremely hard doing jobs that most of us would not want to do or be capable of doing but generally their aim is to earn money and either save it up or send it to families back home. Bracklesham needs this site to remain as a holiday venue in order that the local economy can survive.

Policy 26 of your Local Plan relates to employment and states that employment sites should be retained in employment use unless the site is unlikely to be reused or redeveloped for employment uses. At this stage we do not know for certain that the site is not viable to be continued as a holiday park.

Policy 30 states that the loss of existing tourist accommodation will only be permitted where there is no proven demand for the facility and it can no longer make a positive contribution to the Local economy. As stated above at this stage we do not know for certain that the site is not viable to be continued as a holiday park. The last tourism

accommodation study carried out on behalf of Chichester District Council identified a shortage of holiday accommodation in the Manhood Peninsular and identified East Wittering as a good location for traditional holiday accommodation. The opportunity should not be lost.

The NPPF outlines that the Government is committed to securing economic growth both in urban and rural areas. It supports tourism and a prosperous rural economy. This site is important to the local economy in East Wittering and Bracklesham and forms an important part of the tourism industry of the parish.

We believe that the proposal is contrary to:

- (a) The Chichester Local Plan,
- (b) The Chichester Local Plan Review 2034,
- (c) The emerging Parish Neighbourhood Plan and
- (d) The NPPF.

The site should remain available for tourism use. Only if it is shown that there is no demand after proper marketing, should a change of use be made permanent.

6.2 WSSC - Highways

No Objection. No alterations are proposed to the access arrangements. The site has previously been used, and retains consent for, use as holiday accommodation. This use generates a significantly greater volume of traffic than that generated by use as workers accommodation. To minimise vehicular movements, the Applicant is proposing to use minibus and private vehicles to transport workers between the accommodation and employment locations. A total of 20 minibuses are to be used along with a further 40 cars. The retention of 84 spaces is sufficient to cater for the parking demand of 60 spaces generated by these vehicles. This arrangement is necessary to ensure the effective operation of the site, and it is recommended that a site specific Travel Plan is secured via condition requiring the implementation of these arrangements during operation.

A condition or other control mechanism should be imposed to enable 24 spaces to remain available for visitors and staff.

6.3 Sussex Police

With the level of crime and anti-social behaviour in Chichester district being below average when compared with the rest of Sussex, I have no major concerns with the proposals, however, additional measures to mitigate against any identified local crime trends should be considered. Given that the workforce will be away for the majority of the week, I recommend a security presence on site to protect the facilities during the day and absent periods. In order to provide a safe and secure environment in which people can be expected to live safely and securely (this environment will act as permanent residential dwellings for the occupants for the said period), reducing the opportunity for crime from within as well as externally, and reducing the fear of crime several recommendations are made relating to: securing doors and windows, installing secure external postal boxes, licensing arrangements, intruder alarms, strict control of vehicles registered on site along with some form of parking / access enforcement, utilising the existing vehicle control measures to the former holiday village. This would reduce unwanted unauthorised access and control entry.

6.4 CDC - Community Warden

When news broke that the Richardson's site was going to be used to house Agricultural workers, there was a great deal of rumour mongering and comments on Social Media. A group of local mums were incensed by the negative rumours and baked Welcome cakes for the visitors, and I think that was a real turning point.

Since the guys moved on to the site, I have had very few incidents to deal with where the workers were responsible for any ASB. There have been cases where I have had quiet words with individuals about things like spitting, littering and swearing, but they have always accepted what I have said to them. When there have been cases where I have needed the support from staff on site, Mark Marriot and Jess Rodwell from Cre8 have both been superb.

Looking back to the very early days when locals were saying that the Witterings and Bracklesham would become the crime capital of the south coast, it is amazing how quickly things have mellowed. I deal with hundreds of locals, and I honestly cannot remember the last time I heard anything negative about the site. Crime has not increased, ASB has not increased. In 9 months, things have settled down nicely. There are occasionally complaints about noise at the site when the mini-buses ferry the workers to their workplaces, but Cre8 seem to have dealt well with those and locals have become more tolerant too. It's nice that some local shops now sell Eastern European food and drinks.

My view is that Cre8 are doing a good job. They work well with the community and do their level best to help the workers integrate successfully. I believe the vast majority of local residents now accept the Eastern European workers, and certainly do not see them as a threat or as a danger.

6.5 CDC - Economic Development Service

It is understood that there is a requirement for temporary housing for agricultural workers and we support this, however the retention of the site for tourism use in the longer term should be maintained. Tourism and Horticulture are two of the most economically important sectors to this area. Permanent loss of holiday accommodation/tourism use in this location would not be supported unless thoroughly underpinned by an evidence base as required by the Local Plan.

For horticultural companies in this district, finding appropriate staff for their operations is a challenge, due to the high average house and rental prices. If a company cannot provide accommodation then it is nearly impossible to retain suitably experienced staff.

This site, while needing a considerable amount of investment, is a prime site for tourism, close to the seafront. Holiday Parks, throughout the UK, are experiencing resurgence in popularity as the pound has fallen against the euro, making it more cost effective for many families to remain in the UK for their holidays. A report by Sanderson Weatherall supports this. Their 2017 Market Report "the Sunny Side of Brexit" explains that as well as the UK market "The fall in the value of the pound

made foreign travel more expensive and UK holidays better value for money in the eyes of foreign tourists".

In regards to static holiday pitches, the report also explains, "There has been a gradual improvement over the past 3 years on static caravan pitch values, culminating in a 12% rise over the past 12 months".

The Economic Development Service supports the temporary change of use on the understanding that at the end of this period the use will revert back to holiday use.

6.6 CDC - Contract Services

Request a bin collection point/store at the entrance to the site.

6.7 52 Third Party Objections

- a) The village needs holidaymakers not agricultural workers;
- b) Area infrastructure cannot cope with an influx of an unknown number of people;
- c) Workers should be accommodated on farms where they do seasonal work;
- d) Applicant has totally disregarded planning rules;
- e) Appearance of site is a disgrace;
- f) Chalet units were not built for long term accommodation only built for sleeping and ablutions therefore are not of a suitable standard for the workers;
- g) What workers will need to be accommodated during the winter and what will they be doing?;
- h) Site should be re-developed for much needed houses not for European farmworkers;
- i) Community safety is at risk from large influx of workers;
- j) Medical Centre cannot cope.
- k) Why has an alcohol license been granted?;
- l) People find large groups of workers in the village intimidating;
- m) Anti-social behaviour has increased;
- n) Noise nuisance;
- o) 400 workers totally different to families on holiday;
- p) Accommodation is too far from where the workers are employed;
- q) Local Plan policy resists loss of tourist accommodation unless it is proven there is no demand for the facility and it can no longer make a positive contribution to the Local economy.

6.8 4 Third Party Support

- a) Roundstone Nurseries Ltd - seasonal labour is critical to keeping our business running 12 months of the year. Employ 100 permanent employees but from February to end of June our labour requirements increase to up to a further 300 workers. Hard to recruit workers from local community and have had to rely on the migrant workforce. Crops will fail if Roundstone Nurseries and other businesses do not maintain their labour supply. Holiday park with its existing infrastructure far exceeds one of the other alternative solutions of caravans. With Brexit on the horizon sourcing a supply of labour is high on the list of future challenges.

b) Landlink Estates Ltd and Langmead Farms Ltd - support proposals. Own and operate two worker accommodation sites within the Chichester District being Home Farm, Selsey and River Farm, Petworth. Two further sites within the Arun District, one of which is occupied by workers employed by Pro-Force.

c) We are acutely aware of the severe shortfall and availability of both affordable housing and housing or accommodation facilities specifically for workers. The nature of employment within these industries has changed within the last 5-10 years. The industry now relies much more on agency labour providers such as Pro-Force to provide specialized and skilled labour. Workers employed by agencies are not directly linked to any one holding and may be employed across multiple industries with a fresh produce or processing focus and may not be linked to any particular season. Concept of worker accommodation being seasonal is also a dated theory. In essence there is year round demand for short term labour.

d) Hills Brothers (Chichester) Ltd - business employs average of 80 people of which 34 are seasonal. Over last few years recruitment of seasonal labour has become increasingly more difficult. Number of factors have contributed - high employment levels across Europe, sterling devaluation and concern over Brexit. Imperative to address this shortfall in good quality accommodation. Without seasonal labour we will struggle to harvest our plants during the peak seasons. For these reasons the application is supported.

6.9 Applicant/Agent's Supporting Information

The applicant has submitted a Design and Access Statement which includes a detailed analysis of the Planning issues raised by the application. This can be read in detail on the Council's website but concludes with the following points:

- the existing site is not attractive to serve as holiday accommodation, will need significant investment to be enticing for holiday accommodation use.
- proposals provide viable interim use for seasonal agricultural workers to serve the labour requirements of nearby local employers.
- proposal is for a temporary period until 31st October 2019 with pre-existing uses reinstated at the end of the period.
- seasonal workers are a vital component of the local agricultural and horticultural businesses without which entire industry would not be able to compete in the international market.
- will lead to increased pressure on existing housing stock and ultimately an inability to meet the labour demands.
- proposal ensures the amenity of occupants and the local community is safeguarded
- during the temporary period.
- development is sustainable and in full compliance with the development plan.

7.0 Planning Policy

The Development Plan

7.1 The Development Plan for the area comprises the Chichester Local Plan: Key Policies 2014-2029 and all made neighbourhood plans. There is no made neighbourhood plan for East Wittering and Bracklesham at this time.

7.2 The principal planning policies relevant to the consideration of this application are as follows:

- Policy 1: Presumption in Favour of Sustainable Development
- Policy 2: Development Strategy and Settlement Hierarchy
- Policy 3: The Economy and Employment Provision
- Policy 8: Transport and Accessibility
- Policy 22: Integrated Coastal Zone Management for the Manhood Peninsula
- Policy 24: East Wittering and Bracklesham Strategic Development
- Policy 26*: Existing Employment Sites
- Policy 30*: Built Tourist and Leisure Development
- Policy 37*: Accommodation for Agricultural and other Rural Workers
- Policy 39: Transport, Accessibility and Parking
- Policy 45: Development in the Countryside
- Policy 46*: Alterations, Change of Use and/or Re-use of existing Buildings in the Countryside

*applications which fall under these policies are required to be accompanied by robust and credible evidence that adequate marketing has occurred in order to support the argument that the property/land is no longer required.

National Policy and Guidance

7.3 Government planning policy now comprises the National Planning Policy Framework (NPPF), paragraph 14 of which states:

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking:

For decision-taking this means unless material considerations indicate otherwise:

- *Approving development proposals that accord with the development plan without delay; and*
- *Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in (the) Framework indicate development should be restricted.*

7.4 Consideration should also be given to paragraph 17 (Core Planning Principles), 18-22 (Building a strong, competitive economy), 28 (Supporting a prosperous rural economy), 55 (sustainable development in the rural area - including rural workers), 186-187 (Decision-taking), 196-197 (Determining applications)

Other Local Policy and Guidance

7.5 The aims and objectives of the Chichester in Partnership Community Strategy 2016-2029 which are relevant and material to the determination of this planning application are:

- Maintain low levels of unemployment in the district
- Develop a local workforce that meets the needs of local employers
- Support local businesses to grow and become engaged with local communities
- Support and empower communities and people to help themselves and develop resilience
- Support and promote initiatives that encourage alternative forms of transport and encourage the use of online services

8.0 Planning Comments

8.1 Background

The authorised use of the site as a holiday park ceased in January 2017 when the site was closed down. The Council were notified on 2 May 2017 that an alternative use of the holiday camp use had commenced. A site visit was carried out by officers on 3 May 2017 where it was ascertained that the site was being partially used for the accommodation of seasonal agricultural workers - within the chalet blocks only. On 15 May 2017 a Breach of Condition Notice was served advising that the occupation of the site was not authorised under the terms of the existing planning permission and with a requirement that the agricultural/farm workers should permanently vacate the holiday chalets. Following a subsequent meeting with the applicants/directors of Cre8 Property Ltd and Pro-Force it was agreed that the Council would withhold from taking further enforcement action pending the submission and determination of a planning application seeking to regularise the unauthorised use, for the Council's consideration.. It was additionally agreed that during this period there would be a restriction on numbers residing at the site to 230. The current planning application was submitted and then validated on 18 July.

8.2 The applicant is applying retrospectively for planning permission to accommodate agricultural workers on the former holiday park site for a 2 year period (until the end of October 2019). The applicant has applied for a temporary use rather than a permanent use for 2 main reasons. The site owners, Seaward Properties, have indicated that a lease much beyond 2019 does not fit with their longer term aspirations to bring forward an alternative proposed use of the site. The applicant also has concerns beyond 2019 about the longer term supply of migrant labour under Brexit and whether a facility of this size would therefore still be viable. At the end of the proposed two year period the applicant will have the option of either applying for an extension of the temporary use, applying for a permanent use (notwithstanding the freeholder's position) or the site would revert back to being a holiday park. The granting of a temporary permission as applied for would not in itself automatically extinguish the former use of the site as a holiday park. The site would not, in other words, be left with a 'nil' use after the proposed two year temporary period.

Assessment

The main issues relevant to this application are;

- i) Principle of the change of use and loss of existing tourism use
- ii) Impact on the amenities of the locality and that of neighbouring residents
- iii) Highway implications

i) Principle of the change of use and loss of existing tourism use

8.3 Both agriculture and tourism form key sectors of the District's economy in Chichester. Local Plan policy 30 is quite explicit in its requirement that *'Proposals involving the loss of tourist or leisure development, including holiday accommodation, will only be granted where there is no proven demand for the facility and it can no longer make a positive contribution to the economy'*. The applicant is not proposing a permanent loss of the holiday park. The application submission was not as a consequence *'...accompanied by robust and credible evidence that adequate marketing has occurred in order to support the argument that the property/land is no longer required'* as it would have needed to have been by Local Plan Appendix E for a permanent proposal. Officers are separately aware that the site has, and continues to be, marketed through Flude for holiday use, but that those sale terms do not include either long term leasehold or freehold options. The fact that the existing site would need significant investment to bring it up to modern tourism standards and holidaymakers expectations means that taking it on a short-term leasehold basis is unlikely to be an attractive option to potential major holiday/tourism providers. This is an inherent weakness in the marketing strategy. On the basis of a short term temporary use whilst the site is effectively between holiday park operators and to allow for a revised and credible marketing exercise to be carried out in the interim, officers are satisfied that the proposal is acceptable in principle in the knowledge that it will be required to revert back to holiday use at the end of that period.

8.4 The accommodation of agricultural workers in a rural district so-reliant on agriculture as a key part of the economy is also a significant issue. As a consequence of price pressure from retailers, there continues to be a downward price pressure on local businesses to drive down costs and achieve greater efficiencies and economies of scale and this includes the labour supply. The agricultural labour market in the UK and particularly in this District is now heavily dependent on migrant labour which is increasingly being provided via agency labour providers such as Pro-Force. The rise in agency farm workers has resulted in an attendant need to provide accommodation for them in convenient locations to the agricultural/horticultural holdings where their labour is required. This marks a sea change from the traditional employment pattern of around 10-15 years ago when seasonal workers were employed by specific farms rather than by an agency and were accommodated at their place of employment. The changed circumstances relating to meeting the current needs of the industry and the lack of dedicated workers accommodation in the District are currently being re-appraised by the Council as part of the review of the Local Plan.

- 8.5 In many ways the accommodation at South Downs Holiday Village is well suited to meeting the needs of agricultural workers. The features which made it successful to previous holiday camp occupants apply equally well to the proposed temporary use. The site is self-contained, providing all the facilities and significantly more than would normally be expected for workers accommodation. The main complex/hotel building for instance provides indoor sporting facilities (including a gym, table tennis, snooker tables, 5 aside football and darts), a shop, coffee shop with hot snacks, lounge area, bar, high speed internet and a cinema. The facilities are provided to ensure that the current and proposed occupants are engaged and entertained on site and to ultimately reduce their impact on the local community and local services.
- 8.6 The workers currently at the site are already providing key labour input into the local area and economy at the Chichester Food Park (travel time 14 mins, 8.1 miles) and at Batchmere (6 mins, 2.3 miles). The applicant advises that further businesses at Runcton (Vitacress), Bognor, Merston, Bosham, Sidlesham, Highleigh, Almodington, Midhurst and Selsey are also likely to require seasonal labour from the accommodation at South Downs Holiday Village. The occupants are typically on a six day week and spend the majority of the week off site working at local businesses leaving for site by mini bus typically between 6:00am and 7:30am and returning between 16:30pm and 18:30pm. The seasonal occupants have a 60/40 male-female split, are typically fit because of the nature of the work, are within the age range 18 and 55 and come predominately from a farming or labour intensive background. The work across the sites includes land preparation, husbandry, planting, harvesting, packing, sorting, processing and distribution and is 'year round' but with a higher concentration during the growing months.
The applicant has advised that all the seasonal workers are employed in accordance with the law on preventing illegal working which is set out in sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006.
- 8.7 Officers have carefully considered the use of the site which although in policy terms is in the countryside is not in an isolated location and is immediately adjacent to the settlement boundary for Bracklesham. The application relates to previously developed land and involves the re-use without external alteration of existing buildings. The proposal finds some support in Local Plan policy 46 and there is also strong industry backing for the proposals from West Sussex Growers Association, Wight Salads, Roundstone Nurseries, Langmead Farms and Hill Brothers who collectively point out that the existing housing stock cannot provide for the needs of the agricultural sector in the District. Seasonal workers are seen as a vital component of the local and horticultural businesses without which the industry would be at risk of not being able to compete in the international market. Officers understand these concerns and consider that whilst the marketing of the site to try to find an alternative holiday park operator takes place, it would be appropriate for a temporary period to permit occupation of the site by agricultural workers rather than to have it remain vacant, deteriorating and potentially being vandalised.

8.8 Balanced comments from the Council's Economic Development Service (EDS) recognise that for horticultural companies in this district, finding appropriate staff for their operations is a challenge, due to the high average house and rental prices. If a company cannot provide accommodation then it is nearly impossible to retain suitably experienced staff. However, by the same token the significant importance of tourism to the District is also acknowledged. EDS therefore recommends that the proposal is supported on a temporary basis only to foster the short term need of the agricultural industry to meet its workers accommodation requirements, but longer term the site should continue in tourism use being a prime site close to the seafront. Officers share this view and conclude on the first issue that the use finds support in the Local Plan and is acceptable for a limited period.

ii) Impact on the amenities of the locality and that of neighbouring residents

8.9 The sudden influx of agricultural workers onto the site without planning permission caused an initial degree of unrest locally including media exposure and online petitions. The abrupt change from a site latterly vacant but last used by holidaymakers, to a use for housing agricultural workers met with mixed reaction and a significant level of third party objection is detailed in this report. Concerns were raised about how the migrant workforce with language and cultural differences might integrate into the local community and the potential impact this might have on existing services and amenity as well as the loss of the holiday park use.

8.10 During the intervening weeks the pattern of routine use and the 'impact' has settled down. The site is considered by officers to be well run and given the level of on-site facilities is to a large extent self-contained minimising the impact on the wider settled community. This impression about the impact of the use is reinforced through the observations of the Council's Local Community Warden whose observations are reported at paragraph 6.4;. These observations are that over the last few months the use has settled down. Any incidents of anti-social behaviour are few and isolated and dealt with swiftly by the on-site management.

The Warden's comments conclude by saying, *'My view is that Cre8 [the applicant] are doing a good job. They work well with the community and do their level best to help the workers integrate successfully. I believe the vast majority of local residents now accept the Eastern European workers, and certainly do not see them as a threat or as a danger.* The Committee will also note the comment from Sussex Police at paragraph 6.3 that, *'I have no major concerns with the proposals'*. In fact the Police go on to advise how the site might be made a more safe and secure environment for people to live and to avoid the potential for crime during the majority of times when the workforce are away from the site.

8.11 The impression or otherwise of the use having now settled down after a somewhat turbulent initial period does not of course in anyway condone the fact that it remains unauthorised, it does not benefit from planning permission, and it is subject to potential enforcement action pending the outcome of this application. However, the year round occupation of the existing holiday chalets by agricultural workers as opposed to holidaymakers means that the overall change in impact on 'amenity' in officers' opinion is not significant and is acceptable.

Officers are mindful of the fact that the number of workers currently on the site (an informal restriction of up to 230 arising from the Breach of Condition Notice was agreed with the applicant) could potentially more than double if the application proposals are approved and fully implemented with the site being used to its full capacity. Whilst the current situation appears to officers to have settled down it is not known how a more than doubling of the number of occupants might have a different impact in terms of management, servicing and amenity issues. For that reason, and in recommending approval of the application for a temporary period, it is additionally considered that the upper limit of workers accommodated at the site should not exceed 300 (i.e. 70 additional workers or a 30% increase over the current agreed limit).

8.12 On the second issue officers are satisfied from observations of the site and consultation responses that a site restricted to 300 agricultural workers would not result in material harm to residential amenity and/or the amenity of the site's surroundings.

iii) Highway implications

8.13 The Committee will note the observations of WSCC Highways in respect of the likely impact or otherwise of the use on the local highway network. No new access to the highway is proposed as part of this application and no alterations to the existing access points at Bracklesham Lane and Clappers Lane. The previous use of the site as holiday accommodation would have generated a significantly greater volume of traffic than that which would be generated by the agricultural workers accommodation where the use of 20 minibuses to move workers around will provide a significant reduction in overall trip rates. No objection is therefore raised subject to the formalisation of the transport arrangements through a site specific travel plan and the safeguarding of 24 spaces on site for the exclusive use of staff and visitors to the site. Both these matters can be addressed by condition.

Significant Conditions

8.14 The proposal is recommended for approval subject to two key conditions. The first is to restrict the occupancy of the accommodation to 300 agricultural workers only and the second is to restrict that occupancy for a temporary period of 1 year from the date of the permission rather than the 2 years applied for. The recommended 1 year permission is in the circumstances considered to be reasonable and takes account of the period which the site has already been operating as an unauthorised use. The two conditions work together to enable the Council to review the circumstances under which the permission is given in terms of impact on amenity and to allow a continued more credible marketing exercise to be undertaken promoting the disposal of the site as a holiday park on more flexible terms which recognise the need for inward investment to improve its condition.

Conclusion

8.15 In recommending the application for approval officers have had to balance the competing needs of two key economic sectors in the District - agriculture and tourism. Both are important as the Council's Economic Development service make clear. However, officers are not satisfied that the continued future use of the site for holiday accommodation / tourism purposes has been fully exploited by the site owner since it closed in January 2017. The Local Plan requires robust and credible marketing to support the argument that the property/land is no longer required for its present purpose. It is clear that some significant investment would be needed to bring the site up to more modern standards. The site occupies a prime site close to the seafront and with appropriate investment it is considered that it could be attractive to a holiday park operator. This is against a backdrop of holiday parks generally throughout the UK experiencing a resurgence in popularity as the pound has fallen against the euro, making it more cost effective for many families to remain in the UK for their holidays. So longer term there is an expectation from officers that the site will remain in holiday park / tourism use. In the interim period whilst the site is not occupied by a holiday park operator, and to support the continued viability of the District's agricultural/horticultural businesses which rely on migrant labour, a short term approval for 1 year with a review thereafter is considered acceptable. The application is therefore recommended for approval.

Human Rights

8.16 In reaching this conclusion the Human Rights of the applicants and nearby occupiers have been taken into account when reaching this recommendation and it is concluded that the recommendation to permit is justified and proportionate.

RECOMMENDATION

PERMIT subject to the following conditions and informatives:-

1) The use of the site shall be for the accommodation of agricultural workers only and shall be for a limited period of 1 year from the date of this permission, at the end of which time the site shall be restored to its original condition or to a condition to be approved in writing by the Local Planning Authority.

Reason: Permission would not normally be granted for such development in this location but in granting permission exceptionally for a temporary period the Local Planning Authority have had regard to the particular circumstances relating to the proposal.

Note: For the purposes of this condition agricultural workers are defined as those persons employed solely in agriculture as defined in Section 336 of the Town and Country Planning Act 1990.

2) The development hereby permitted shall not be carried out other than in accordance with the approved plans: 006; 051-001; 051-002REVQ; 051-003REVP; 051-006REVB; 051-007REVC; 051-009REVA; 051-011REVA; 051-012REVB; 051-014REVB; 051-015REVB; 051-017REVA; 051-018REVA; 051-020REVA; 051-021REVA; 051-023REVB

Reason: To ensure the development complies with the planning permission.

3) At no time shall the maximum number of agricultural workers accommodated at the site exceed 300.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity.

4) Within 1 month of the date of this permission the applicant shall provide a designated refuse bin collection point on the site adjacent to the site entrance on Bracklesham Lane in accordance with details to be first submitted to and approved in writing by the Local Planning Authority.

Reason: To facilitate the efficient weekly collection of refuse from the site.

5) Within 1 month of the date of this permission plans shall be submitted to and be approved in writing by the Local Planning Authority showing the allocation of 24 car parking spaces for staff and visitors to the site. Once approved the spaces shall be provided and maintained for car parking purposes only until the use hereby permitted ceases to continue.

Reason: To ensure adequate car parking is provided for the use within the site.

6) Within 1 month of the date of this permission a site specific Travel Plan shall be submitted to and be approved in writing by the Local Planning Authority detailing measures to transport workers between the accommodation and the employment locations.

Reason: To ensure the effective operation of the site and the maximising of sustainable means of transport to reduce traffic generation on the highway.

INFORMATIVES

1) The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

2) This permission authorises a Change of Use only and does not authorise any other development that may require planning permission.

For further information on this application please contact Jeremy Bushell on 01243 534734