

Ray Turner Labour



Planning Statement
Retention of Migrant Workers' Accommodation
Barr Farm, Deeping St Nicholas, Spalding

Document Reference: 739 20/PS/LMS

September 2017

32 High Street
Helpringham
Sleaford
Lincolnshire
NG34 0RA

Tel: 01529 421646
Fax: 01529 421358
Email: admin@rdc-landplan.co.uk
Web: www.rdc-landplan.co.uk

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1. EXECUTIVE SUMMARY

- 1.1. The Robert Doughty Consultancy Limited has been instructed to submit a full planning application for the continued retention of 42 mobile homes together with welfare and administrative facilities to house eastern European migrant workers employed in the Spalding and Pinchbeck area.
- 1.2. Following the grant of a five year temporary permission in 2011, a further three year temporary consent was granted in 2014.
- 1.3. The applicant company has provided accommodation in the form of mobile homes for in excess of 14 years and throughout the intervening period there has been an ongoing sustained requirement for HGV drivers employed in the logistics companies based in and around the Spalding and Pinchbeck area.
- 1.4. The number of migrant workers living in Spalding has resulted in an increase in the use of houses in multiple occupation (HMO). The increase in the number of HMOs and planning applications to subdivide family accommodation into smaller units represents a significant drain on the District's stock of affordable family housing and reduces the opportunity for those wishing to settle in the town from getting on the first rung of the property ladder.
- 1.5. Planning permission for the use of Barr Farm as a caravan site was first submitted in 2005 and subsequently refused when it was advised that a more permanent site inside Spalding town's limits would be more appropriate.
- 1.6. Accordingly, a search begun to find a suitable site and two planning applications were submitted in 2007 for a hostel development. The first application was recommended for refusal on the basis of scale and was subsequently withdrawn. Following detailed discussions with officers from the Council, a second scaled-down application was submitted and recommended for approval, but was refused by the Planning Committee.

- 1.7. Members of the Committee suggested that they might support a number of smaller sites, however, disaggregation of the site and indeed the business is not feasible. The current arrangement at Barr Farm continues to work well because there are all the necessary elements on one site namely: transportation, translation, office administration and coordination of day-to-day activities.
- 1.8. Having a number of smaller units of accommodation spread across the town would generate their own difficulties of remote coordination, together with the social cohesion issues of trying to integrate a transient foreign population into established residential areas.
- 1.9. A planning application was, therefore, submitted in 2011 to retain the accommodation and ancillary facilities on site on the basis that it would enable the search for permanent accommodation within the settlement limits of Spalding to continue. The application was subsequently approved with a 5 year temporary consent followed by the granting of a Caravan Site Licence issued by the District Council.
- 1.10. Subsequent discussions with the Local Planning Authority established parameters for the search, however, that search proved fruitless and the application to renew the 2011 permission was approved for a further three years. This latest application seeks to retain the accommodation; however, it is requested that the consent be a permanent one to enable investment in the facilities on site. In the absence of a permanent consent, there is no possibility of attracting investment because of a lack of certainty in the ability to retain the business on site going forward. The existing accommodation is in a location that suits the company well, is well related to Spalding where the workers are employed, and has limited impact on adjacent land uses or users.
- 1.11. The proposal represents a sustainable form of development and the accompanying Flood Risk Assessment demonstrates that the site is safe from flooding and that adjoining land uses and users are not impacted upon by surface water from the site.

2. LOCATION AND SITE CHARACTERISTICS

- 2.1. The application site is located on the A1175 between Spalding and Deeping St Nicholas, which is also the administrative base for the applicant company. The applicant company also operates a waste wood storage facility for fuel for biomass boilers that is burned to provide heat in several local plant nurseries in the area.
- 2.2. There is a footway on the application site side of the A1175 that links both Deeping St Nicholas and Spalding.
- 2.3. There is good access to Spalding along the A1175 and A16 where all of the occupants of the caravans are employed as HGV drivers in the Wardentree Lane industrial area of Pinchbeck and Marsh Road, Spalding.
- 2.4. From the A1175, the application site has the appearance of a farmstead with a large at-cost former agricultural building dominating views from beyond the landscaped earth bunds that surround the site.
- 2.5. The caravan site is largely located in one discrete area surrounded by an earth bund and is screened from the A1175 by a small mixed species mature woodland that also surrounds a man-made lake.
- 2.6. The caravans are not visible from the beyond the site boundaries other than for a fleeting glimpsed view through the access road when passing the site on the A1175.

3. AMOUNT

- 3.1. Full Planning permission is sought for the retention of 42 mobile homes to accommodate HGV drivers from eastern European countries employed in logistics companies in Pinchbeck and Spalding.
- 3.2. Each mobile home is self-contained with its own cooking and washing facilities and there is a separate laundry building with washing machines and dryers available.
- 3.3. The caravan site is now well established with roads and footways, fire extinguisher points, lighting and access to a landscaped fishing lake. The site is licensed under the Caravan Sites & Control of Development Act 1960 and is regularly inspected by the South Holland District Council as the licensing authority.
- 3.4. The main office building on the other side of the site has all the necessary administrative support for the effective deployment of the workforce (12 in total), including a full-time translation service for the employees, and this deals with the day to day welfare of what is a transient foreign workforce, which includes 6 members of staff who originate from eastern Europe. The office is manned 24 hours a day in response to the nature of the logistics industry.
- 3.5. Many of those companies that the applicant provides drivers for now employ their own eastern European office staff in response to the increased number of foreign staff employed both directly and indirectly.
- 3.6. The applicant company has an average of 80 drivers on its books with the majority working in the Wardentree Lane area of Pinchbeck and the West Marsh Road area of Spalding. There are numerous companies who rely heavily on agency drivers to fulfil their staffing needs.
- 3.7. The applicant company continues to service two of the three main logistics companies in the Wardentree Lane and Marsh Road area and these include Garns Transport and Fowler Welch Coolchain.

- 3.8. Presently, the demand for these two main companies is as follows:-
- Garns Transport 10-15 drivers per day
- Fowler Welch Coolchain 25-40 drivers per day.
- 3.9. On any given day there will be up to 50 drivers on the road, with a further 12 on their weekly rest period and a further 10-18 on annual leave.
- 3.10. There are several factors that have led to the dependence on migrant workers in Lincolnshire and South Holland in particular. These are:-
- Rise of the 24hr supermarket culture with the accompanying need to operate and distribute round the clock.
 - Low unemployment rates in the county.
 - Increasing indigenous population in the 45-59 and 75+ age groups and a fall in the 25-39 age group.
- 3.11. The high use of HMOs to provide cheap accommodation in the district has meant that there is a significant burden on the more affordable end of the housing market in the district. This, in turn, means that the ability for people to get on the first rung of the property ladder is made more difficult. The length of stay of many workers varies widely depending on their circumstances, but many cite the lack of suitable accommodation as being uppermost in their decision to move on.
- 3.12. The lack of suitable accommodation does, therefore, have a knock on effect on the ability of local businesses to react to the seasonal fluctuations that make a fluid workforce so vital to the area's economy.

4. DESIGN AND ACCESS

- 4.1. The mobile homes are of a typical construction in a variety of colours and are generally 10m long and 3m wide. The site conforms to the 2008 model standards and there is a roadway and footway together with lighting, to ensure safe navigation around the site.
- 4.2. Caravans are replaced from time to time as they reach the end of their lifespan.
- 4.3. There is ample space between the mobile homes and, other than for the roads and footways, the site is laid to grass.
- 4.4. Access to the caravan site is shared with the main access into the overall site and there is good visibility in both directions at the junction with the A1175.

5. NATURE OF OCCUPANTS AND SITE MANAGEMENT

- 5.1. All those who currently work for the applicant company are male and do not have their families with them. In the main, the workers are in the country to earn enough money to send home, they return regularly to their home country and move on within a short space of time.
- 5.2. No family accommodation is being provided on the site as the intention is that the proposal provides a stepping stone to either employment elsewhere or to a place on the property ladder, should they wish to settle in the area with their family.
- 5.3. The nature of the business operated by the applicant company requires drivers to be provided at a moment's notice and this demands proper supervision of the site.
- 5.4. The layout of the site means that there is close supervision and assistance not only when entering and leaving the site, but also around the mobile homes and buildings.
- 5.5. The 24 hour nature of the site means that careful management ensures that the development continues to operate in a satisfactory way.
- 5.6. The translation staff are located inside the office buildings where the wood chip business also operates from. The employees have their own cars or arrange lifts to and from work, which is often at unsocial hours. A previous 24 hour-a-day taxi service paid for by the applicant company lost its appeal for the drivers and eventually the service had to be suspended for economic reasons.
- 5.7. Refuse is collected from the site by a private contractor on a weekly basis and there is a treatment plant serving the site.

6. PLANNING POLICY AND GUIDANCE

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".
- 6.2. The National Planning Policy Framework (NPPF) sets out the Government's requirements as to how the planning system can assist in achieving sustainable development and that the framework is a material consideration in the decision making process. The framework should also be read in conjunction with the recently released National Planning Practice Guidance which contains guidance on a specific range of topics.
- 6.3. Paragraphs 6 and 7 of the NPPF confirm the commitment to sustainable development based on three dimensions:

"an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

- 6.4. This is followed by a commitment to a presumption in favour of sustainable development and at paragraph 14, "For decision-taking this means:
- 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 permission unless:

- 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; or
 - specific policies in this Framework indicate development should be restricted."
- 6.5. Paragraph 215 of the NPPF states that "...due weight should be given to relevant policies in existing plans according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)".
- 6.6. The adopted South Holland District Local Plan (Local Plan) does not hold any specific policies that relate to the provision of migrant workers' accommodation within, or adjacent to, settlement boundaries. Policy HS14 relates to the provision of small scale accommodation for those involved in the agricultural/horticultural industry outside development areas.
- 6.7. The site is located in open countryside and, as such, must be considered against policies in the Local Plan that seek to restrict development for which a rural location is essential unless material considerations indicate otherwise.
- 6.8. Following the approval of the 2011 application, a meeting was held with the local planning authority to establish the principles that would govern the area of search for a permanent site within the settlement limits of Spalding in accordance with member's wishes.

It was agreed that:-

- Due to the location of the employment, the area of search should be the Spalding and Pinchbeck area.
- Due to the transient nature of the workforce it would not be appropriate to split it up and house it in multiple locations around the town as this would simply add to the propensity for smaller cheaper dwellings to be used in multiple occupation and represent a management issue for the applicant company.

- Building on land either with planning permission or allocated for residential development would not be financially viable.
- Locating the drivers in a settled residential area would not be appropriate.
- Hostel type accommodation but in a different location to that previously refused may be a solution.

6.9. The broad terms of reference for the site search were agreed informally by letter on the 29 November 2012.

6.10. As might be expected, the majority of land on the immediate edge of Spalding town and Pinchbeck village is largely either under option for long term residential development potential or lies adjacent to large scale industrial development where possible hostel accommodation would be inappropriate.

6.11. The area to the north of Spalding adjacent to Pinchbeck is dominated by industrial development where a hostel type development has already been ruled out once before.

6.12. The west of Spalding is dominated by the Holland Park expansion and the south and west is dominated by large scale industrial premises and all of the Spalding settlement edge lies within Flood Zone 3a.

6.13. An edge of settlement location is, in reality, little different from the location of the existing site at Barr Farm in that there would be reliance on the use of the private car to enable employees to get to work often at unsociable hours of the night. The only obvious difference would be that a new hostel would in effect be permanent accommodation, but having regard to the relatively short length of stay for most employees, mobile homes represent the most appropriate form of accommodation, much in the same way as they are used in the agricultural sector.

6.14. Notwithstanding the lack of suitable alternative sites that also do not fall within Flood Zone 3a, there are sound planning reasons for the continued use of the current site at Barr Farm.

6.15. In economic terms, the proposal continues to provide a valuable service for the existing logistics companies in the Spalding and Pinchbeck industrial areas, which, in turn, underpin the food production

and agriculture sectors that our region depends upon. These logistics companies depend so heavily on migrant labour that they in turn now employ their own Eastern European office staff to deal more effectively with foreign staff employed both directly and indirectly.

- 6.16. The applicant company employs 7 staff in the office, some of whom would be lost in the event that the site closed and there is a network of trades and services ranging from gas fitters to electricians and maintenance staff who benefit directly and indirectly from the ongoing operation of the site.
- 6.17. The applicant company has existing contracts with several companies in the area and, in the event that mobile homes were not permitted to stay whilst the demand remains, it would be fatal to the company as it would not be able to offer cost effective short-term accommodation for its employees.
- 6.18. In the event that the accommodation was not permitted to stay, there may well be the knock on impact of employees finding substandard accommodation in the form of HMOs in the town. Fuelling a demand for the multiple occupancy of dwellings at the lower end of the housing market has the impact of reducing dwellings for sale and rent for those wishing to get on the first rung of the property ladder.
- 6.19. In economic terms, therefore, the proposal contributes towards building a strong and competitive economy through the provision of appropriate accommodation in an innovative way to meet the short term needs of its employees.
- 6.20. In social terms, previous attempts to create permanent hostel type accommodation for employees adjacent to their places of work has not been considered favourably by the local planning authority despite officer support. There are undoubted social cohesion issues surrounding the introduction of a transient foreign workforce within or close to settled indigenous communities and accordingly, the site at Barr Farm provides for a well managed environment geared towards meeting the needs of a transient workforce whilst supporting the needs of settled community.
- 6.21. In environmental terms, the proposal has little, if any, impact on the existing character and biodiversity of the area and has no impact on

any other neighbouring land uses or users. There have been no complaints received by the applicant company regarding the site during the 14 years it has been in operation.

- 6.22. In reality, therefore, the operation at Barr Farm represents a sustainable form of development that responds in an innovative way to the needs of a transient yet valuable foreign workforce on a site that has little or no impact on the wider character and appearance of the area.

7. CONCLUSION

- 7.1. The applicant company currently 'houses' lorry drivers from eastern Europe in static caravan accommodation at Barr Farm, Deeping St Nicholas.
- 7.2. The increased reliance of local businesses on migrant workers has led to a significant number of workers requiring suitable accommodation for temporary periods.
- 7.3. A high concentration of businesses in the Wardentree Lane area of Spalding has meant that a location close to Spalding for such accommodation is the most logical in sustainability terms.
- 7.4. Housing land within the town would render the scheme financially unviable. The applicant company has already explored the possibility of purpose made accommodation within the Wardentree Lane area, but this application was refused by the Planning Committee.
- 7.5. The welfare of the residents is well catered for with on-site laundry, translation, administration and recreation facilities.
- 7.6. Spalding is a short drive away and there are no near residents that have been affected by the operation of the site thus far.
- 7.7. A rolling three-year cycle of permissions is, however, having an impact on the ability of the applicant company to attract investment to invest in more welfare facilities on site such as a brick built laundry building etc. It is therefore requested that consideration be given towards a permanent consent linked to the use of the site for accommodation by HGV drivers. We accept that there would need to be control of the accommodation in the event that the existing business no longer operated from the site.
- 7.8. The proposal represents sustainable development and is acceptable in all other respects.