Naylor Flowers Limited

Planning Statement

Use of land for the stationing of agricultural workers' accommodation
Land at Vickers Park, Washway Road, Moulton Marsh, Spalding, PE12 6LP

Document Reference: 1246 1 /PS/ LMS

Date: April 2017

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1. EXECUTIVE SUMMARY

1.1. This is a Full Planning Application is for the change of use of land for the siting of 13 mobile homes and 10 'log cabins' for occupation by agricultural workers in connection with the applicant's current horticultural business.

1.2. The application includes internal gravelled access to each unit of accommodation, a package treatment plant for foul water disposal and the use of an existing hard surfaced area for the picking-up and dropping-off of staff when they are transported to and from the fields. A space has been reserved on the site where it is planned to construct a farm office using sustainable construction methods. This proposed office will be the subject of a future application.

1.3. Naylor Flowers Limited is a privately-owned business run by Matthew Naylor and Christopher Edgeley. Before it was incorporated, the business was a family farming partnership based in Mouton Seas End since the 1940s.

1.4. The business grows cut flowers and potatoes on approximately 202 hectares of land in a 16 km radius of Moulton Seas End. The products are all grown for supermarkets, including Aldi, the Co-operative Group and Waitrose, on a contracted basis through partners and agents including JZ Flowers, Nene Potatoes and the Butters Group. The business produces over 50 million stems of flowers each year and is a leading producer in the British flower industry.

1.5. Cut flower production is a major industry in South Holland and the exit of the UK from the EU will have a significant impact on this sector. The UK imports 85% of the cut flowers that consumers buy and the demand for home-grown production is likely to increase now that the value of sterling has weakened.

1.6. Having workers based on the farm represents an established method of providing a well-managed, cost effective and sustainable work force enabling the farming business to operate and plan effectively.

2. APPLICATION SITE AND SURROUNDINGS

2.1. Vickers Park is an established part of the Naylor Flowers Limited's holding, comprising a large general purpose agricultural building, parking and turning, polytunnels for flower production and the surrounding fields, where many of the workers who will be housed in the temporary accommodation will work.

2.2. There is an existing access to Washway Road and a pair of semi-detached dwellings, one of which is occupied by the applicant company.

2.3. There is a variety of landscaping around the periphery of the site, none of which is impacted upon by the proposal and a field drain to the north.

2.4. The site is generally flat with no other features of note.

3. PLANNING POLICY

The Development Plan

3.1. The development plan consists of the South Holland Local Plan 2006 (saved policies 2009) (LP).

3.2. LP policy SG1 states that all proposals for development will be permitted where that development follows the principles of sustainable development.

3.3. LP policy SG14 considers the design and layout of new development.

3.4. LP policy SG15 considers the impact on the local highway network, pedestrians and cyclists.

3.5. LP policy SG17 requires new proposals to consider the impact on residential amenity.

South East Lincolnshire Local Plan

3.6. The Publication Version of the new local plan that will replace the 2006 plan commenced a six week consultation exercise on the 10 April 2017. Policy 2 Spatial Strategy states at D that; "In the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits."

National Planning Policy

3.7. The National Planning Policy Framework (the "NPPF") sets out Central Government's planning policies for England and how these are expected to be applied.

3.8. 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."

3.9. 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."

3.10. Paragraphs 196 and 197 confirm that applications should be determined in accordance with the Development Plan and that, in such cases, Local Authorities should apply the presumption in favour of development.

3.11. The NPPF asserts a presumption in favour of sustainable development.

4. DESIGN

Use

4.1. Historically, Naylor Flowers has used licenced gang masters to provide its flower harvest workers. Traditionally this worked well; those agencies would move their staff between different flower growers, vegetable businesses and pack houses according to seasonal peaks. In recent years, most of these workers would have been economic migrants who moved to the UK from Eastern Europe.

4.2. These workers mostly live in rented accommodation in Boston. Recently, the shortage of affordable housing has been cited as a problem by workers and there have been noticeably fewer people available for farm work, as individuals sought less physical work in factories.

4.3. In addition, Naylor Flowers is concerned about the way that staff are treated by private landlords and is unable to audit this to their satisfaction.

4.4. In the last 12 months, Naylor Flowers has increased production by 50%, and is finding it harder to obtain the right calibre of labour at the right time to service the essential needs of the business. The business has found it increasingly difficult to find an agency who can meet their requirements in a way that is fair to the workers while remaining effective.

4.5. It is now increasingly the case that there is significant turnover of staff being supplied to the business, which is very difficult to manage effectively. It is very expensive and has safety implications to constantly train new staff on a daily basis to carry out the core activities of the business. There is also the question of where this ever changing pool of people is coming from or going to.

4.6. Naylor Flowers feel that the tried and tested method of accommodating a well-managed workforce on site would stop exploitation of workers in a way that could not be guaranteed under the current arrangement. It would give the workers the security of employment and affordable, well maintained accommodation. It would also stop workers migrating to other agencies at the promise of higher wages only to find that the work

has dried up two weeks later at which point they may enter the benefit system.

4.7. The UK's exit from the EU may further reduce the availability of workers for the horticultural jobs at Naylor Flowers, while increasing demand for the goods which they produce. The labour requirements of the business has never been, and will never be met, by the indigenous population. The provision of this accommodation would also allow a flexible approach in uncertain times if Naylor Flowers was required to use UK-born students in the future. In the first instance, the accommodation would be offered to agency workers, who would be put on the Naylor Flowers payroll and would work in the business.

4.8. Staff will be working in the fields surrounding the accommodation but, when travelling further, there will be nominated drivers among the workers to transport them between fields. These nominated drivers will also transport the workers to shops in Holbeach, Spalding or Boston for groceries and for recreational activities.

4.9. The nature of the seasonal work means that staff levels will be low in the winter and high in the summer. This seasonal variation in labour demand will mean that the accommodation will not be required during the time of year when a flooding incident is most likely. Accordingly, the requirement by the Environment Agency for this type of accommodation to be vacant during winter months can be complied with.

Amount

4.10. It is proposed to site 23 temporary mobile homes comprising 10 'log cabins' and 13 static mobile homes. The log cabins are essentially static caravans with a wood effect cladding and the 13 static mobile homes have a more standard appearance.

4.11. Each unit will accommodate up to 6 employees with a maximum of up to 120 employees on site at any one time.

4.12. Employees work in the fields, weeding and picking flowers, maintaining polytunnels and packing the product ready for dispatch to the customer.

Layout

4.13. The layout of the site has been designed to take advantage of the area of the field not currently used for cultivation with easy access to the

parking and turning area, where the employees will gather before being assigned work in the fields.

4.14. The units of accommodation have been orientated to take advantage of the natural sunlight and each is more than the minimum recommended distance away from its neighbour.

4.15. To the north of the site there will be a package treatment plant as there is no access to mains sewage.

4.16. It is proposed that an area within the existing polytunnels on site will be made available for the employees in the event that they wish to grow their own fruit and vegetables.

4.17. Gravel (or similar) access tracks will be constructed around the site to allow for reasonable access for maintenance and emergency vehicle access.

4.18. In the event that planning permission is granted, an area has been set aside (shown on the submitted plan) where it is proposed to construct a farm office using sustainable methods of construction and materials. This will be the subject of a separate planning application.

Scale

4.19. The level of accommodation is commensurate with the size of the farming operation and no more than is needed for the horticultural operations which, be their very nature, are labour intensive.

Landscaping

4.20. There is some roadside planting and field hedging to the north of the site which, together with the existing buildings on site, will assist in assimilating the proposal into the landscape. It is also proposed to introduce some planting within the site, but this will be more for the site environment rather than impacting on views from outside the site.

4.21. There are no public footpaths around the site and public views from the A17/Washway Road are fleeting.

Appearance

4.22. The 'log cabins' have a dark stained wood appearance and these have been placed closest to the road and will assist in shielding the traditional static homes behind. The traditional statics will be light in colour and each will vary subtly.

Other Material Considerations

4.23. A Flood Risk Assessment and Flood Warning and Evacuation Plan accompanies the planning application and this demonstrates that the site is safe from flooding and that the finished floor levels of the caravans can be elevated above the predicted flood levels in the event of a flooding incident. The site will not be used for permanent occupation.

4.24. The site is open agricultural land and there is no indication that the site has any ecological value. The sparse tree and hedge planting on the boundaries of the site will be retained.

5. CONCLUSIONS

5.1. Naylor Flowers Limited has been in operation since the 1940s and is a well-established local horticultural and agricultural business with major national food retailers amongst its clients.

5.2. In order to maintain the consistency of labour in the light of a rapidly expanding business and following the aftermath of the decision to leave the EU, the business has decided to organise and manage its own labour needs by providing well-managed and well-organised accommodation on its own land.

5.3. Vickers Park is surrounded by land under cultivation by the applicant company and provides an ideal location to locate the accommodation for workers employed in those fields.

5.4. The site will only be occupied for nine months of the year; with the winter months avoided as this is the most likely time of the year when a flooding event may occur.

5.5. There will be no detrimental impact arising from the occupation of the site and the two nearest dwellings are under the control of the applicant company.

5.6. The proposal represents a sustainable form of development, one that is essential for the applicant company and that demands a rural location adjacent to where the workers will be employed.

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