Naylor Flowers Limited

Planning Statement
Use of Land for the Stationing of Agricultural Workers' Accommodation
Vickers Park, Washway Road, Moulton Marsh,
Spalding, PE12 6LP

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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 6 mobile homes and 2 'log cabins' for occupation by agricultural workers in connection with the applicant's current horticultural and agricultural business.

1.2. 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. It is member of the Linking Environment and Farming (LEAF) Marque, which is a leading global assurance system recognising more environmentally sustainably farmed products. It is held by farm businesses which meet LEAF's rigorous standards of sustainable farming practice.

1.3. 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 applicant company is profiled in the Growers Section of the Co-operative Group's website, which can be found via the following link https://www.coop.co.uk/our-suppliers/farmers/growers. The business produces over 50 million stems of flowers each year and is a leading producer in the British flower industry.

1.4. 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.

1.5. 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, a recently erected agricultural store, parking and turning, polytunnels and the surrounding fields for flower production, where many of the workers who will be housed in the proposed accommodation will work. There is also a pair of semi-detached three-bedroom dwellings on site also owned by the applicant that will be used to house workers and which will be occupied as 'small homes in multiple occupation'. The use of a dwelling house (Use Class C3) as a small house in multiple occupation (3-6 occupants)(Use Class C4) does not require planning permission unless there is an Article 4 Direction in place and, as far as we are aware, this is not the case.

2.2. There is an existing access to Washway Road which serves the farming operation and the existing pair of semi-detached properties.

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 East Lincolnshire Local Plan (LP), which was adopted in March this year.

3.2. LP Policy 2: Development Management, states that all proposals for development will be permitted where that development follows the principles of sustainable development, which includes the layout of development, design and orientation, access, impact on neighbouring land uses and in respect of Flood Risk, amongst other issues.

3.3. LP Policy 4: Approach to Flood Risk considers the location of new development in relation to the Flood Zones and the risk-based approach.

3.4. LP Policy 1 Spatial Strategy states at 1D, Countryside:

> 'The rest of the Local Plan area outside the defined settlement boundaries of the Sub-Regional Centres, Main Service Centres, Minor Service Centre and Other Service Centres and Settlements is designated as Countryside.
>
> 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

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

3.6. Paragraphs 7 and 8 of the NPPF confirm the commitment to sustainable development based on three dimensions:

> "**an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
>
> **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

3.7. This is followed by a commitment to a presumption in favour of sustainable development at paragraph 11,

"For decision-taking this means:

c) approving development proposals that accord with the development plan without delay; and

d) where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

i). 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

ii). specific policies in this Framework indicate development should be restricted."

3.8. Paragraph 38 puts the emphasis on the Local Authority 'to approach decisions on proposed development in a positive and creative way' and to work proactively will applicants to secure developments 'that will improve the economic, social and environmental conditions of the area.'

3.9. Paragraph 77 states that, **'**In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs…..'

3.10. At paragraph 79, the NPPF is supportive of development in the countryside where there is an essential need for a rural worker to live permanently at or near their place of work:

'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. DESIGN

Use

4.1. The South East Lincolnshire Local Plan 2011-2036 at paragraph 2.4.5 identifies agriculture as a key employment sector in the Region and its horticultural business as the second most important in the UK.

4.2. The horticultural industry in Lincolnshire has traditionally relied on seasonal workers. It is extremely labour intensive and historically, Naylor Flowers has used licensed gang masters to provide its flower harvest workers. These workers are bussed in from elsewhere, often over significant distances resulting in increased vehicle movements. In addition, providing the accommodation on the farm reduces the pressure on the limited supply of housing at the lower end of the housing market. The benefits of temporary on-farm accommodation was the subject of a recovered appeal for Staples Vegetables Ltd reference APP/Z2505/V/09/2119176 decided in 2011.

4.3. The nearest settlements to the farm are Moulton Seas End and Fosdyke, neither of which has a housing stock capable of providing the necessary amount of accommodation. Neither settlement has any reasonable level of services and, accordingly, locating the accommodation nearer to these settlements only serves to create greater distance between the accommodation and the place of work in the fields.

4.4. In the event that the horticultural business did not have the benefit of transient labour, it would fail.

4.5. Accommodation for workers on the farm results in a sustainable form of development in accordance with the provisions of the NPPF and on the basis that the business would fail without the labour, the proposal is essential to the horticultural business.

4.6. In the last 12 months, Naylor Flowers has increased production by 50%. The low level of unemployment in the South Holland area means that Naylor Flowers has to bring in seasonal workers from other areas. Despite significant efforts, Naylor Flowers has found it impossible to find a labour agency which can meet this requirement in a way which is legal and which treats workers fairly. Recruiting and accommodating their own seasonal staff is an essential step for the business.

4.7. It is proposed to site 8 temporary mobile units comprising 2 lodges and 6 static mobile homes. The lodges are essentially static caravans with a wood effect cladding and the 6 static mobile homes have a more standard appearance.

4.8. It is proposed to accommodate between 24 and 30 employees in the 8 units of accommodation.

4.9. Employees work in the fields, weeding, planting and picking flowers, maintaining polytunnels and packing the product ready for dispatch to the customer. The work programme is as follows:

Month	**Activity**
Jan-April	Daffodil flower harvesting
April- May	Flower planting
May- October	Harvesting summer flowers (including sunflowers, gladioli, Sweet Williams)
October-November	Potato harvesting

4.10. 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.

4.11. The existing main Sycamore Farm complex lies on Common Road some 850m north of the village of Moulton Seas End. Were workers to be accommodated there, they would have to be taken by minibus or car to the fields, the majority of which are located at the application site. This would result in additional vehicular movements. In addition, the site at Sycamore Farm houses a busy packhouse facility with vehicles, including HGVs coming and going at all hours. Accordingly, the accommodation would have to be a reasonable distance from the farm complex to afford some reasonable level of amenity and this would result in a far more visually prominent site than the current application site.

4.12. 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 recreational activities.

4.13. The growing of cut flowers is seasonal and the application proposes that with the drop-off in the need for workers in the winter months, the caravans and lodges will only be in use for 9 months in the year (the HMOs will be used for the remaining time). Accordingly, the use is temporary in the accommodation is of temporary construction and will not be occupied year-round. However, and somewhat obviously, the need for the workers and, therefore, the accommodation remains each year. Those workers needed outside of this period will be housed in the existing dwellings.

4.14. Having regard to the location of the site, which is largely screened from fleeting public views of those travelling along the A17, the need for additional landscaping is not necessary.

4.15. 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.

4.16. The proposal to use caravans and lodges is a well-tested form of accommodation and subject to suitable management, which the applicant company is committed to doing, will provide a good standard for the workers while at the farm.

4.17. A selection of photographs below shows the proposed lodges.







4.18. The nearest settlement to the site with a reasonable level of services and infrastructure is Holbeach. Some workers will have their own transport and there will be an element of car-sharing to access various destinations in the area. In the event that workers do not have their own transport, the applicant company will ensure that there is suitable coordination between staff or that a minibus service will be laid on. There is a bus stop at the northern end of Common Road and, whilst it would not be appropriate to encourage people to walk along the A17 to reach it, the large lay-by adjacent to the stop would enable workers to be dropped off and picked up to use public transport and go further afield.

4.19. There are neither existing dwellings nor suitable buildings capable of being used for accommodation on the scale proposed.

4.20. The layout of the proposal ensures that the proposed accommodation lies as close to the existing agricultural building and polytunnels and makes best use of the existing access and parking area. Were the proposal located next to Sycamore Farm, it would have to be located away from the busy farm complex and be visually intrusive.

Layout

4.21. The layout of the site has been designed to take advantage of the garden area of the pair of dwellings that will be used as small homes in multiple

occupation (up to 6 people in each). An area of existing polytunnels will be removed to make way for the caravans and lodges.

4.22. To the south of the site, there will be a package treatment plant as there is no access to mains sewage.

4.23. 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.

4.24. Having regard to the relatively small number of caravans/lodges proposed, there are no proposals to provide roads around the units and, accordingly, they will have a light touch on the landscape other than for concrete pads at specific points and the laying out of services.

Scale

4.25. 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

4.26. There is some roadside planting and field hedging around the site which, together with the existing buildings on site, will assist in assimilating the proposal into the landscape.

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

4.28. In the event that the local planning authority consider that additional planting is necessary, this can be secured via a suitably worded condition.

Appearance

4.29. The 'log cabins' have a dark stained wood appearance, and traditional statics will be light in colour, each will vary subtly.

Other Material Considerations

4.30. A Flood Risk Assessment accompanies the planning application. 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.

4.31. 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 in advance of the UK leaving 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 9 months of the year; with the winter months avoided as this is the most likely time of the year when a flood 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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