




bloomfields
CHARTERED TOWN PLANNERS

IN ASSOCIATION WITH

**Lambert
& Foster**



CHANDLER & DUNN
FARMING FOR THE FUTURE



SUPPORTING PLANNING STATEMENT

Perry Farm, Perry Lane, Wingham

December 2023

SUPPORTING PLANNING STATEMENT

In support of an application for the

Part retrospective change in siting of three existing mobile homes and the change of use of land for the siting and storage of three additional mobile homes for seasonal agricultural workers accommodation

at

**Perry Farm, Perry Lane, Wingham,
Kent, CT3 1ER**

On behalf of

Chandler & Dunn Ltd

Bloomfields is the trading name of Lambert & Foster (Bloomfields) Ltd (company no. 08278915) an owned subsidiary of Lambert & Foster Ltd a Limited Company registered in England and Wales, No 10574225. Registered office 77 Commercial Road, Paddock Wood, Kent TN12 6DS.

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1. Introduction

- 1.1. This statement has been prepared on behalf of our client Chandler& Dunn Ltd to submit a full planning application to amend the location of three existing mobile homes allowed by application 19/00603 (this part is retrospective) and seeks approval for the siting and storage in situ of three further mobile homes for seasonal agricultural workers at Perry Farm, Perry Lane, Wingham, Kent, CT3 1ER.
- 1.2. In 2022 prior approval was granted for the erection of an agricultural cold store at Perry Farm with reference 22/01461. The position of this cold store impacted the location of the existing mobile homes that were provided at the site in connection with 19/00603 which allowed for the use of land for the siting of 3 caravans and installation of waste treatment plant. This crossover of mobile home position and the new cold store is indicated below in Figure 1.



Figure 1 Location of approved cold store 22/01461

1.3. This application seeks to regularise the new position of the mobile homes for their siting and storage, as a consequence of the construction of the new cold store. This application therefore requests that the area of land that is used for the siting and over winter storage of the seasonal agricultural workers mobile homes is altered to accommodate the new position of the three existing mobile homes and extended to allow for a further three mobile homes to be sited and stored. This area is shown in Figure 2.

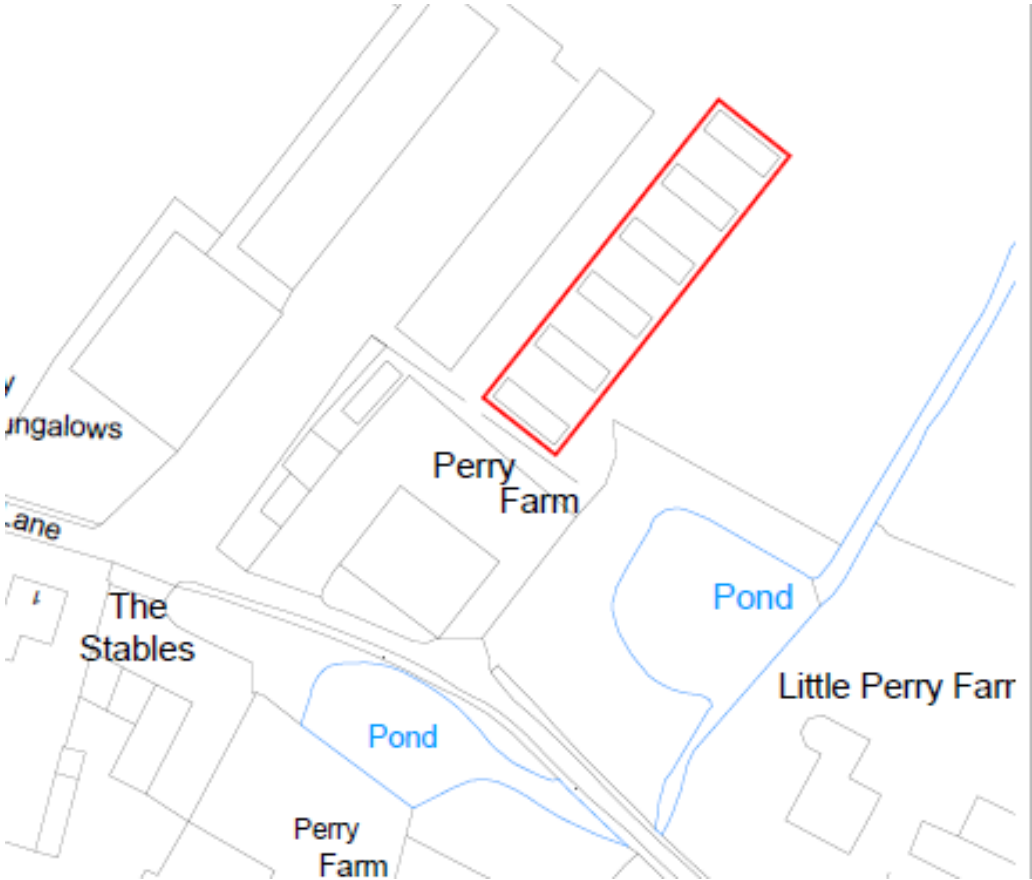


Figure 2 Proposed site location plan extract

1.4. Perry Farm extends to 100 hectares and is mainly used to grow top fruit. Perry Farm is located to the north of Perry Lane, with the main farmyard area being directly accessed off Perry Lane. The farmyard contains a number of agricultural buildings, a cold store, a farm office and staff room, in addition to the three seasonal agricultural workers mobile homes.

1.5. Perry Farm solely grows apples, with the following varieties, Jazz, and Pink Lady Apple varieties. Perry Farm supports the Chandler and Dunn Ltd wider mixed farming enterprise at Goldstone, which includes fruit, arable and livestock.

- 1.6. The proposal site is situated to the east of the farmyard and is immediately adjacent to the area approved for mobile home siting and storage. The proposal site is surrounded by agricultural buildings, the cold store and an orchard.
- 1.7. The site is not subject to any landscape constraints in terms of being designated as an Area of Outstanding Natural Beauty or Green Belt and it is not situated within an area that is at risk from flooding being located within Flood Zone 1.

2. Company Background

- 2.1. Chandler & Dunn Ltd is a family farming business with roots dating back to 1809, when farming began at Lower Goldstone in Ash. The business has 610 hectares of farmland covering two farms at Goldstone Farm at Ash and Perry Farm at Wingham.
- 2.2. In 1809 Peter Chandler purchased 26 acres of land at Goldstone and over several generations, the farm was expanded by his family. In 1922 Mr G S Dunn joined Mr A S Chandler as a partner in the farm, who then went on to first purchase cattle in 1939.
- 2.3. In 1942 the farm first registered with the Sussex Cattle Society and a pedigree Sussex herd was established at Goldstone Farm. This herd is the origin of all cattle bred and grown on today.
- 2.4. In 1952 Chandler and Dunn Ltd was formed as a family company under the leadership of the next generation; Robert, Philip and David Chandler and John Dunn.
- 2.5. Perry Farm was purchased in ...
- 2.6. In 2007 Chandler and Dunn Ltd won Fruit Grower and Edible Crop Grower of the Year and in 2014 the business was a finalist of the Farming of the Future Marks & Spencer awards.
- 2.7. Today the business spans three generations with ten family members actively farming. This not only gives Chandler & Dunn over 213 years of farming knowledge and hands-on experience, the continuity of generational farming gives the farm a powerful springboard into farming for the future.

- 2.8. The business has three farming main enterprises being livestock, fruit and arable. Complementary businesses Goldstone Butchers and the Sandwich Sausage Company are also run by the business.
- 2.9. The farms are run with modern techniques and technology with traditional and environmentally friendly values.
- 2.10. The fruit enterprise is led by Charlie Dunn and Richard Chandler and supported by Peter Chandler. Fruit is grown on two sites, Goldstone and Perry farms.
- 2.11. The farm cultivates around 200 Hectares of apple orchards and has around 3000 tonnes of mainly atmosphere controlled storage on site, and store and pre size the fruit on the farm before sending on to packers and supermarkets.
- 2.12. Chandler and Dunn are long standing and leading growers within Fruition Producer Organisation who use Worldwide Fruit as their marketing agent. They run extensive trial plots for WFL, and can have up to 60 new variety trials taking place at any one time.
- 2.13. Chandler and Dunn were one of the first UK farms to grow the popular variety of Jazz commercially, following our trials for WFL. They are active in Technology Strategy Board (TSB) projects with WFL - ranging from earwig population research to work on light levels in tree canopies.
- 2.14. Chandler and Dunn also work with the University of Worcester to plant wild flower strips and have a 'no mow' policy between the rows of trees in our trial orchards to research the effect on predator numbers. They recently planted 60,000 stinging nettle seeds in our pear orchards to encourage anthocorids which eat the notorious pear sucker insect.
- 2.15. Chandler and Dunn have trickle irrigation systems in most new orchards planted within the last 5 years. They grow the apple varieties Cox, Gala, Jazz, Egremont Russett, Dalicclass, Early Windsor, Braeburn, Cameo, Smitten, Ladina and Kissabel. All fruit is grown to a grade 1 supermarket quality with any apples below that standard are sold for juicing.

3. Proposal

- 3.1. This application seeks full planning permission to amend the location of three mobile homes approved by 19/00603 following the construction of the cold store approved by prior approval 22/01461 which is partially situated on the site of the mobile homes. The mobile homes have been moved to accommodate the cold store construction, so this aspect of the proposal is retrospective.
- 3.2. Alongside this, planning permission is sought for a further three seasonal agricultural worker mobile homes to be sited and stored in situ. This application therefore seeks permission to change the use of land for the siting and storage of six seasonal agricultural workers mobile homes (three being existing and three being proposed).

4. Planning History

- 4.1. In 2022 prior approval was granted for the erection of an agricultural cold store with reference 22/01461. The approved position of this cold store building has meant that the mobile homes need to be repositioned.
- 4.2. In 2019 planning permission was granted for the use of the land for the siting of 3 caravans and the installation of a waste treatment plant with reference 19/00603. A non-material amendment application was refused with reference 19/00603/A to change the orientation of these three caravans and to amend the site boundary.
- 4.3. In 2017 planning permission was granted for the erection of an agricultural building with reference 17/01537.
- 4.4. In 2012 prior approval was granted for the erection of a fruit storage building with reference 12/00213.

5. Design and Access Statement

Use

- 5.1. The proposal site is currently partly in agricultural use and partly in use for a mixture of agriculture and mobile home storage. It is proposed that the area will be used for the siting and over winter storage of seasonal workers mobile homes in conjunction with its agricultural use.

Amount, Layout & Scale

- 5.2. The proposal site extends to 695 square metres and proposes to extend the existing area that is approved for the siting and storage of seasonal workers mobile homes to the north. The position of three mobile homes will be amended and a further three mobile homes are proposed. The area of land will be situated to the east of the recently constructed cold store.
- 5.3. Each mobile home will measure approximately 10.8 metres long by 3.69 metres wide. The mobile homes are proposed in an east to west orientation and will have a 6 metre separation distance between each.

Appearance

- 5.4. The mobile homes proposed will match the existing mobile homes that have been approved and provided at the site.

Landscaping

- 5.5. The proposal site is well screened from the surrounding landscape by the existing orchard, mature trees and agricultural buildings. Additional screening in the form of trees were provided to the south east as part of application 19/00603. If the Council consider that additional screening is necessary, it is put forward that a hedge could be planted to the east of the mobile homes and this could be controlled by way of a suitably worded condition.

Access

- 5.6. The proposal site is accessed from Perry Lane, which is suitable in terms of visibility; there are no proposed changes to this.

6. Permitted development

- 6.1. Class A of Part 5 of Schedule 2 of The Town and Country Planning (GPDO) Order 2015 and paragraph 7 of the First Schedule to the 1960 Caravan Act sets out criteria to consider under the GPDO. Paragraph 7 grants permission for the seasonal use of agricultural land as a caravan site for agricultural workers.
- 6.2. The GPDO Part 5 Caravan Site Class A states at 'A' that, permitted development is "*The use of the land, other than a building, as a caravan site in the circumstances referred in paragraph A.2.*"
- 6.3. At point A.1 it identifies that this is subject to the condition that the use shall be discontinued when the circumstances specified in paragraph A.2 cease to exist, and all caravans on the site shall be removed as soon as reasonably practicable.
- 6.4. The circumstances mentioned in Class A are those specified in paragraphs 2 to 10 of Schedule 10 to the 1960 Act (cases where a caravan site license is not required). Paragraph 7 of the First Schedule is of note, "*Subject to the provisions of paragraph 13 of the schedule, a site license shall not be required for the use as a caravan site of agricultural land for the accommodation during a particular season of a person or persons employed in farming operations on land in the same occupation*".
- 6.5. Therefore, Class A of Part 5 of Schedule 2 of the GPDO and paragraph 7 of the First Schedule to the 1960 Act would allow for the applicant to station the six mobile homes for the season to be used in conjunction with the land at Perry Farm if they were then removed. Neither the GPDO nor the 1960 Act defines a season; therefore, it is open to interpretation and could comprise spring, summer, autumn and winter or refer to a particular period of the calendar year.
- 6.6. It is important to consider that Permitted Development rights under Schedule 2 Part 5:
- Are irrespective of landscape designations
 - Do not limit the number of caravans allowed to be sited on land
 - Do not restrict the caravans to be occupied by workers farming the land on which they are sited

- Do not preclude “off-lying land” forming part of the agricultural unit.
- 6.7. During the top fruit cycle there are many different operations undertaken during different seasons throughout the year. Primarily Chandler and Dunn require seasonal agricultural workers to reside at Perry Farm during harvest and thinning, which covers the season of mid June through to early November. This application therefore sets out that the mobile homes could be provided on site for seasonal workers during this timeframe, without the need for planning permission.
- 6.8. In order to avoid the expense, upheaval and logistical impacts this application therefore seeks planning permission for these seasonal agricultural workers mobile homes in situ when they are unoccupied.
- 6.9. The removal and storage of the mobile homes elsewhere is not only a financial burden on the business, it is an inconvenience to the running of the holding, would have a negative impact upon residential amenity and would potentially have a detrimental impact upon the local road network.
- 6.10. There are cost implications of having to remove the mobile homes from site to store elsewhere when they are not occupied. These costs cover the rental of a storage shed or area, the transport of the mobile homes to and from site, as well as the work required to connect/disconnect and position/remove the mobiles at the site.
- 6.11. The removal and transportation of the mobile homes from and to site would introduce large vehicular movements twice a year for each individual mobile home down the local small road network. These would then run past neighbouring properties, which has the potential to impact upon neighbouring amenity.
- 6.12. The three additional mobile homes are required at the site in order to provide accommodation for the additional workforce that is needed to tend, thin and harvest the higher yielding variety of apples that are now being grown at Perry Farm. The ability to house the workers on site to complete these tasks means that additional labour does not need to be brought in by minibus from the other accommodation at Goldstone Farm. This means that workers do not have to start their day earlier and finish later to accommodate a commute which in turn improves welfare and also reduces overheads and improves efficiency.

- 6.13. By offering accommodation on site Chandler & Dunn can ensure the accommodation is the correct quality, meeting industry standards and therefore allows the company to obtain and most importantly retain the number of workers it requires in this very competitive market. At present there is a shortage of seasonal workers, so farms need to offer good quality accommodation at their place of work in order to remain attractive to the workforce.

7. Need for workers mobile homes

- 7.1. The workers mobile homes are required at Perry Farm to provide accommodation for the workers which thin, pick, store and then load up for packing top fruit at Perry Farm. Three additional mobile homes are required to house the seasonal agricultural workers due to the loss of accommodation off site and the requirement to streamline and improve efficiency by housing the workers where they are needed rather than transporting workers to site.
- 7.2. The area that has been chosen for the mobile home storage is in close proximity to the main farmyard area with easy access to all of the top fruit orchards at the holding. It is situated adjacent to the cold stores which exist at the site for ease of monitoring and reasons of security. The proposal site is in very close proximity to the existing area which has been approved for the use of mobile home storage.
- 7.3. The occupants of the proposed mobile homes will be undertaking general horticultural operations including; pruning, thinning, cold store monitoring as well as the harvest and loading of fruit for onward transport..
- 7.4. Transporting labour in from rented off site accommodation, although not a considerably long journey adds additional travelling time for the workers and expense for the business. Having people reside at their place of work is not only more cost effective it also improves efficiency.

- 7.5. The mobile homes can hold up to six people, but for workers welfare, attractive accommodation and to align with the ever increasing industry norm, Chandler & Dunn normally only allow four people to reside in the mobile homes. This means that the additional seasonal workers mobile homes at Perry Farm that this application proposes will allow 12 more workers to reside on site for harvest, in addition to the 12 already accommodated.

8. Planning Policy & Analysis

- 8.1. Paragraph 10 of the National Planning Policy Framework says that, at the heart of the Framework is a presumption in favour of sustainable development. This is echoed earlier by Paragraph 7 which states: *“The purpose of the planning system is to contribute to the achievement of sustainable development.”* This proposal comprises sustainable development which is essential to Chandler and Dunn being able to carry out their business and in a viable manner.
- 8.2. It is recognised that when considering what constitutes sustainable development in accordance with paragraph 11 of the National Planning Policy Framework, the policies in the Framework need to be taken into consideration as a whole, with development that accords with an up to date development plan being approved without delay. It is submitted that the proposed development at the proposal site constitutes a sustainable development and one which is of benefit to the agricultural enterprise and wider economy, that complies with Dover District Council’s development plan.
- 8.3. Paragraph 38 of the National Planning Policy Framework requires that local planning authorities approach decisions on proposed development in a positive and creative way. The Paragraph states that local planning authorities should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*
- 8.4. Paragraph 84 of the National Planning Policy Framework refers to supporting a prosperous rural economy. Paragraph 84 states *“Planning policies and decisions should enable:*

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;”

- 8.5. The proposed development will meet the requirements of the applicant’s agricultural enterprise and the aim of Perry Farm to provide top fruit to the British consumer. It therefore supports the local and British economy. The development proposal aims to aid the provision of seasonal accommodation for the farms workers and allow the overall farm to be run more efficiently. These aims are supported by Paragraph 84 as they would allow the sustainable growth and development of Chandler and Dunn Ltd at Perry Farm.
- 8.6. It is quite clear that the National Planning Policy Framework places great importance on the contribution that agriculture makes to the rural economy and correspondingly provides support for its growth and expansion. The proposed development will support the ongoing expansion and improved efficiency of a business which plays a significant role in the rural economy in Kent, the south east and nationally having regard to the top fruit, arable and beef industries.
- 8.7. This proposal aims to ensure that sufficient workers can be accommodated on site for the top fruit harvest and is therefore hugely pivotal in ensuring efficiency of the business as well as the ability to continue to provide top fruit to the British consumer.
- 8.8. The ability to store the mobile homes in situ will negate any costs or time associated with their removal, external storage and transportation. Not only does their removal come at a cost, there is also the increased risk of damage to the mobile homes as well as the potential negative impacts upon the local road network. This proposal therefore supports the development and efficiency of a rural business, which should be supported in line with the Framework.
- 8.9. At paragraph 92(c) it is acknowledged that decisions should aim to achieve healthy, inclusive and safe places which support access to healthy food. The provision of the facilities to support the sustainable growth of top fruit would duly support such.

- 8.10. Paragraph 159 of the Framework advises that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at high risk. Flood risk is not a concern in this case, as the development site is not located within an area that is within a flood risk zone.
- 8.11. Recognition of the wider benefits of trees in the form of “natural capital”, “ecosystem service”, beauty, character and economic benefit is acknowledged at paragraph 174 of the Framework. The proposal enables such due to the provision of effective orchard management.

Dover District Council Development Plan

- 8.12. The development plan for the Dover District comprises of a number of saved policies from the old Local Plan, the Core Strategy and the Land Allocations Local Plan. The NPPF considers that where Local Plan policies are out of date, or this case, absent, development should be approved unless any perceived negative impacts would significantly and demonstrably outweigh the benefits of approving the development. This tilted balance concept is considered to be engaged in this applications circumstances, as there are no up to date policies which directly consider mobile home storage or farm workers accommodation.
- 8.13. With this in mind, consideration is given to the other policies which are pertinent material considerations as well as the overall drive to support rural communities and businesses.
- 8.14. The policies that are considered to be relevant include:
- Policy DM3 Commercial Buildings in the Rural Area
 - Policy DM15 Protection of the Countryside
- 8.15. Paragraph 3.79 of the Core Strategy sets out that *“The Strategy also promotes rural based jobs, the maintenance and strengthening of services and affordable housing by: The creation of rural based businesses through the reuse of buildings and new build of an appropriate scale and location”* Although the proposed development at Perry Farm will not create a new business, it will serve to support a well established and rurally important business to run more efficiently.

- 8.16. The importance to provide British produce to the British consumer is becoming even more profound, with consumers being encouraged and indeed actively seeking to 'buy their own'. The ability to ensure this need is met is provided by the growers in terms of the workforce to support this overall network. In order to manage and produce the yields, support the new varieties, sort for long term storage as well as manage all holdings effectively, a solid and reliable supply of labour is required for the business. The ability to recruit and retain this labour, across all levels (seasonal workers through to farm managers) means that the job security needs to be accompanied by appropriate accommodation.
- 8.17. The industry is also facing challenges in terms of food transparency, cheaper imports, changing legislation and a general decline in pollinators. In order to ensure that the production of top fruit remains profitable and competitive, growers have to produce high yields, with little waste on as cheaper margin as possible as well as keeping up with demand. To achieve this, alongside the new high yielding strains of fruit, efficient machinery and technological advancements there has to be backbone of reliable labour. This proposal would facilitate the ability to house and attract this labour, whilst remaining competitive and not require the movement of mobile homes through the year.
- 8.18. This application seeks to provide rural workers accommodation, as well as amenity facilities, within existing buildings alongside the provision of mobile homes. In line with the aims of The Strategy, it is considered that support should be given to this proposal as it will promote and support rural based jobs.
- 8.19. Policy DM3 of the Core Strategy is shown in Figure 3 and considers commercial buildings in rural areas. Although the mobile home siting and retention are not directly 'commercial buildings' their provision supports a commercial agricultural enterprise that makes a tangible contribution to the local and national economy.
- 8.20. This policy states that support will be given to the expansion of an existing business in the rural area. The location of the development is within the farm yard, exactly where the accommodation is needed to provide labour and easily accessible labour for the whole farm.

8.21. The proposal is considered to be appropriate to the wider areas scale and setting and would result in the provision of significantly less traffic, as the farm workers would not need to be brought to site and the mobile homes would not need to be removed from site. It is therefore considered that permission should be granted in line with this policy.

Policy DM 3

Commercial Buildings in the Rural Area

Permission for new commercial development or the expansion of an existing business in the rural area will be given provided that:

- i. It is located at a Rural Service Centre or a Local Centre as designated in the Settlement Hierarchy;
- ii. It is consistent with the scale and setting of the settlement, or
- iii. It is at a Village as designated in the Settlement Hierarchy provided that it would not generate significant travel demand and is in other respects consistent with the scale and setting of the settlement.

In all cases development should be within rural settlement confines unless it can be demonstrated that no suitable site exists, in which event it should be located adjacent to the settlement unless there is a functional requirement for it to be located elsewhere.

Figure 3 Policy DM 3

8.22. Policy DM15, which states the policy requirements for the protection of the countryside is shown in Figure 4.

Policy DM 15

Protection of the Countryside

Development which would result in the loss of, or adversely affect the character or appearance, of the countryside will only be permitted if it is:

- i. In accordance with allocations made in Development Plan Documents, or
- ii. justified by the needs of agriculture; or
- iii. justified by a need to sustain the rural economy or a rural community;
- iv. it cannot be accommodated elsewhere; and
- v. it does not result in the loss of ecological habitats.

Provided that measures are incorporated to reduce, as far as practicable, any harmful effects on countryside character.

Figure 4 Policy DM 15

- 8.23. It is considered that the proposed mobile homes and the re-siting of the existing mobile homes is required and justified by the needs of agriculture which in turn supports the rural economy, in accordance with points ii and iii.
- 8.24. The mobile homes that are proposed to be re-sited and added to are appropriately sited within the main farmyard area, in close proximity to the area (immediately adjacent to) the area which has previously been approved for the storage and siting of seasonal workers mobile homes. It is not therefore considered appropriate for them to be provided elsewhere.
- 8.25. Given that the proposed area is currently in use with the farmyard, it would not result in the loss of any ecological habitats.

9. Other material considerations

Fallback position

- 9.1. With regard to the siting and storage of the mobile homes, it is important to note that the permitted development rights which exist for seasonal workers caravans could be utilised to provide accommodation during the various different seasons.

- 9.2. When considering fallback position, regard should be had to the case law surrounding this concept. In 2013 a High Court challenge to the grant of planning permission for a new out-of-town retail development offered some judicial explanation of when a planning authority can take a fallback position into account when deciding to grant planning permission for a new development.
- 9.3. In the Case of *Zurich v North Lincolnshire Council* one of the grounds of Zurich’s challenge was that the Council had wrongly taken into account the potential for a fallback open retail scheme. While Zurich argued that the committee should only have been advised that they could only take a fallback into account if it was a realistic prospect, the Court rejected this. The Court held that in order for a fall back to be a material consideration, it has to have a “*more than a theoretical prospect*”. Therefore, while the weight that is to be attached to the fallback may be decided by the likelihood of its occurrence, the Court did not feel that it affected its status as a material planning consideration.
- 9.4. The strength of the fallback position has been acknowledged at various similar appeals. Whilst each case is considered on its merits, it is worth noting that, under appeal reference APP/B4215/W/15/3135001 for example, in granting the change of use of three office units to six self-contained flats, the Inspector stated that “*there is a strong likelihood that, even if the appeal was to be dismissed, a change to residential use and the resultant loss of employment space would occur in any event. The fallback position is, therefore, a material consideration of very considerable weight.*”
- 9.5. In 2016, a High Court judgement was made between Mansell and Tonbridge and Malling Borough Council regarding a residential development on the outskirts of East Malling, for four, five-bedroom houses. Within this judgement, the Honorable Mr Justice Garnham considered the fallback position of a Class Q permission for the site and the weight that should be attributed to it. Judge Garnham considered that “*In my judgement therefore, it would have been unrealistic to have concluded that, were the present application for permission to be rejected, the interested party would do nothing to develop this site. On the contrary it was plain that development was contemplated and that some development could have taken place pursuant to class Q. The Council was entitled to have regard to the fact that there might be separate applications for permission in respect of some elements of the scheme and to advise that appropriate regard must be had to material planning considerations including the permitted development fallback position.*”

- 9.6. It is therefore submitted that it is quite clear that should this application be refused the seasonal workers accommodation could be provided here in mobile homes, for various seasons and then be removed from site. The fallback position remains a material planning consideration that therefore must be given appropriate regard.

10. Conclusion

- 10.1. The mobile homes are required for the housing of seasonal agricultural workers, in conjunction with the agricultural requirements of the business and their continuous siting and storage in situ is sought. The mobile homes will provide much needed accommodation for seasonal workers.
- 10.2. The purpose of this application is to apply to re-site three existing mobile homes and provide an additional three mobile homes for seasonal workers and store them all year round so that they do not have to be removed in between seasons. This negates their removal, transport and re-siting which would be timely and costly to the applicant, as well as introducing the likelihood of damage and potential disruption to the local road network. A strong fallback position exists for the siting of mobile homes, which should be given material weight during the decision-making process.
- 10.3. Regardless of this fallback position, the proposal is considered to accord with all national planning policy and with the relevant up to date local policies. With respect it is therefore considered that this application should be approved under delegated powers