Supplementary Planning Guidance

ACCOMMODATION FOR TEMPORARY AGRICULTURAL WORKERS

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Executive Manager Planning/Development Services
SUPPLEMENTARY PLANNING GUIDANCE - ACCOMMODATION FOR TEMPORARY AGRICULTURAL WORKERS

1.0 INTRODUCTION

1.1 This Supplementary Planning Guidance sets out how the Council will deal with accommodation for temporary agricultural and horticultural workers. It expands upon Policy DE8 of the West Lancashire Replacement Local Plan, which was adopted in July 2006.

1.2 Temporary agricultural workers, including ones from overseas, have been employed on farms in West Lancashire for many years. However, it appears that in the last few years the number of foreign workers has increased substantially. An idea of the number involved is given by the Government’s Seasonal Agricultural Workers Scheme annual quota, which in 2003 was 25,000 compared to 10,000 in 2000 for the country as a whole. Whereas in the past the caravans housing these workers may have been placed within and/or between the farm buildings some of the new sites are often highly visible and some are near residential properties. This can have an adverse impact on the landscape and local residents.

1.3 In recent years agricultural and horticultural employers have found it increasingly difficult to recruit sufficient numbers of temporary workers, especially at periods of peak activity. This is for several reasons:

- the labour market has become increasingly competitive and unemployment rates have fallen;
- temporary and weather dependent work discourages people, especially having to move on and off benefits;
- the decline in supply of traditional sources of such labour (UK and EU students) due to other and better paid work opportunities. Agricultural work is seen as being both hard and offering less remuneration and having few future employment prospects;
- working holidaymakers tend to take up urban work.

The farmers argue that this constrains their ability to meet domestic demand and some export markets, so opening up the UK to imports.

1.4 The majority of seasonal and casual workers are from one or more of the following:

- Recruited direct by the farmers;
- Workers supplied by gangmasters;
- Students seeking part-time or vacation work;
- The Seasonal Agricultural Workers Scheme (SAWS); and;
- The Working Holiday arrangements.
1.5 The Government SAW scheme was reviewed and changed in January 2004. It permits full-time students aged over 18 years to be employed for any seasonal or agricultural tasks and there is now no upper age limit. The SAW scheme recommends that participants should be resident on the farm holding where they are working or in other suitable accommodation close by. Under the terms of their contract the farmers must demonstrate that, for the number of workers they wish to employ they can provide suitable accommodation on-site or nearby.

How do I know if planning permission is required for accommodating workers in caravans?

1.6 Subject to three criteria planning permission is not required for temporary seasonal accommodation for farm workers. The Town and Country Planning (General Permitted Development) Order 1995 (GPDO) allows the use of agricultural land as a caravan site for the accommodation during a particular season of a person or persons employed in farm operations on land in the same occupation. This use of land is subject to a condition that the use is discontinued when the above circumstances cease to exist and requires all the caravans on the site to be removed. The important points are that the accommodation must be seasonal, and involve persons employed on land in the same occupation. It must be emphasised that the exemption from the need for planning permission only relates to a short-term solution to provide adequate labour to meet the demands during peak periods of activity.

1.7 A Planning Inspectors decision in December 2002 about a site in West Lancashire clarified that caravans can only be kept on the site for one particular season, that is, during the planting, growing or harvesting of a single crop, but not the whole crop cycle, if the development is to avoid the need for planning permission (for example, picking apples or lifting potatoes). The nature of the horticultural business in this part of the country, with multi-cropping and rolling planting programmes resulting in overlapping crop cycles, means that most farmers would find it difficult to claim the GPDO exemption rights.

1.8 Operators should always check with the Council’s Planning Department, but planning permission will be required in the following cases:

- If the workers will be housed for longer than a normal planting, growing, or picking season;
- If caravans and other related buildings (e.g. canteens and toilets) are to be kept on site permanently;
- If a change of use to an existing building is involved;
- If hardstandings and permanent services (e.g. water supply or septic tank) need to be provided; or
- If a new building is required.
2.0 THE COUNCIL’S APPROACH

2.1 The Council wishes to assist in supporting a healthy rural economy within the context of national and local planning policies. Depending on their location, permanent buildings or caravans can reduce the open character of the Green Belt and have an adverse impact on the landscape and the amenity of local residents.

2.2 Farmers wishing to provide accommodation for their workers are advised to take the following sequential approach to meet the Council’s planning policy:

- Firstly check if planning permission is required (see paragraph’s 1.6 to 1.8.
- Look to see if you can find accommodation in an existing house (this includes agricultural workers and other rural dwellings), hotel, other types of residential building (such as a care home) or an established caravan park.
- If none are available, check if you can convert any existing buildings either on or off-site.
- If that is not possible try to find a site for your accommodation that is not in the Green belt. Look in the local village or town or on the edge of the village or town.
- If there are no sites available in or on the edge of a village or town, then the chances are that the site will be in the Green Belt where Government and local policies do not allow caravan sites or residential buildings. You will need to convince the Council that there are very special circumstances and that you have looked at all other alternatives before we can even consider granting permission for any accommodation in the Green Belt. You will also need to show that your proposed site is the most suitable within your own land holding.
- Whatever site is identified the operator must consult local residents prior to submitting a planning application and amend the proposed scheme to take account of their views. This could involve, for example, changing the location or orientation of the development, amending the means of access or improving screening etc.
- The operator must ensure compliance with all other regulations, such as the caravan sites standards and the drainage requirements of the Environment Agency, Building Regulations etc. If an Environment Agency licence is required, this shall be included with the application for planning permission.
- Adequate arrangements must be made for the disposal of refuse and sewage from the site in order to avoid causing pollution to the environment and nuisance to neighbours.
3.0 PLANNING POLICY

3.1 The following policy is included in the West Lancashire Replacement Local Plan and it should therefore be treated as a material consideration when planning applications for this type of development are considered.

Policy DE8
Accommodation for Temporary Agricultural/Horticultural Workers

The reuse of existing buildings within village settlements and the Green Belt for accommodation for temporary agricultural and/or horticultural workers will be permitted provided that it complies with criterion (i) below and, if in the Green Belt, it also complies with Policy DS2.

The provision of suitable non-permanent accommodation, appropriate to both the identified need and the location, will be permitted where it can be demonstrated that:

a) There is a requirement to provide accommodation to satisfy a clearly identified need for temporary agricultural/horticultural workers;

b) There are no existing buildings in the locality, which are suitable, or capable of being made suitable, for accommodating temporary workers;

c) The site chosen is the most suitable in the locality, taking into account other policies in the Local Plan; and

d) It complies with the following:

i. Any impact on visual amenity, residential amenity, highway safety, landscape, wildlife and countryside character is minimised to an acceptable level. Any such impacts will need to be outweighed by clear benefits in helping to meet the local employment problem that exists;

ii. Proposals include measures to protect the character of the local area including: retention of existing trees and hedges, implementation of landscape planting and improvement of any damaged or derelict land involved and improvement of boundary treatments;

iii. The siting, location, scale and external appearance of the accommodation, hardstanding and associated facilities are designed to minimise the impact on the wider area to an acceptable level; and

iv. The amount of accommodation, hardstanding and associated facilities to be provided is justified in relation to the agricultural land holding of the applicant to ensure that it is the minimum required.
In all cases of new accommodation in the Green Belt permission will be subject to a time-limiting condition of five years from the date of the accommodation being sited on the site or the date of the planning permission, whichever is earlier, unless the evidence of need demonstrates that a shorter time-limited condition is warranted.

3.2 Where caravans have already been granted planning permission until November 2007 they will be dealt with at this time as new accommodation and a new application will be required which clearly shows that the applicant has followed the search sequence set out in the policy.

4.0 DESIGN GUIDANCE

4.1 If it is necessary to provide new accommodation it is important that it is designed in accordance with Policy GD1 of the Replacement Local Plan and, if the site is in the Green Belt, such accommodation needs to be carefully sited and should be limited in scale in order to limit any impact on the openness of the Green Belt. In all cases, you should try to find a site which:
- Is close to the village so that your workers will be able to have access to local health care and other facilities
- Ensures that the accommodation is sited where it will have the least impact on local residents
- Is hidden or screened from views so that the accommodation does not spoil the visual amenity of the countryside, for example, by being sited in between existing buildings
- Is in a location where a safe access to the road can be created which will not adversely affect the highway safety or lead to vehicles passing close to neighbouring residences.

4.2 Accommodation should be of a size, height and design appropriate to their setting and be in character with the rural area. Ideally, it should be single storey only in order to reduce the potential impact on the visual amenity and character of the open countryside. External materials and appearance should be in keeping with their surroundings.

4.3 New accommodation should avoid the need for areas of new hardstanding or parking areas and ideally any private amenity or garden space should be enclosed by other buildings or be of a limited size. Any new garden areas should be defined by hedge and tree planting appropriate to their location and setting. The erection of new boundary walls or fences will generally not be permitted.
### Summary of Comments Received and Recommended Response

**Accommodation for Seasonal Agricultural Workers**

**Supplementary Planning Guidance**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Comment on Guidance</th>
<th>WLDC Response</th>
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<tbody>
<tr>
<td>C Andrews</td>
<td>Comments centre around an objection to the work that has occurred on the caravan site at Long Croft. No specific comments have been made regarding the content of the SPG.</td>
<td>No change to the SPG is required in response to this comment.</td>
</tr>
<tr>
<td>Mr Thomas Bell</td>
<td>It is important that the statement 'caravans on the sites to be removed' is adhered to.</td>
<td>This paragraph refers to what needs to happen under permitted development rights, i.e. when planning permission is not required. <strong>No change to the SPG is required.</strong></td>
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<td>2.2</td>
<td>Support process whereby an operator must consult local residents prior to submitting a planning application and amend the scheme to take account of their views. The three-year rule for allowing existing caravans should be adhered to.</td>
<td>Support noted</td>
</tr>
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<td>3.1</td>
<td>Any development of hostels should not be located in proximity to existing domestic properties to reduce the impact of noise from the workers.</td>
<td>The policy does require any impact on visual and residential amenity to be minimised to an acceptable level. <strong>No change is required.</strong></td>
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<tr>
<td>S &amp; E Banister</td>
<td>First line should be corrected to read 'seasonal agricultural workers, including those from overseas, have been employed on farms etc'. As it stands, it gives the impression that overseas farms are the concern of the Council. A phrase should be included to make it plain that in the past, caravans housing seasonal workers which 'may have been placed within/between the farm buildings' resulted in them being unseen, but still in contravention of planning regulations. 'This can have an adverse impact' should be 'this does have an adverse impact'</td>
<td>Agree. <strong>Change first line of paragraph 1.2 as suggested to improve clarity.</strong></td>
</tr>
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<td>1.3</td>
<td>The list should be a list of examples. Therefore it should read, 'for several reasons, for example'.</td>
<td>This wording is taken from the Home Office Review of Seasonal Agricultural Worker's Scheme published in May 2002.</td>
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<td>1.5</td>
<td>Will farmers check whether the worker is indeed a student? What is the definition of student in the SAW, and who decides on the suitability of the residence?</td>
<td>The SAWS scheme is run by the Home Office.</td>
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<td>1.6</td>
<td>The word 'should' in line ten should be removed and the word 'shall' be inserted. In the last two lines, peak periods should read in the singular – peak period.</td>
<td>Agree that the word should can be deleted but suggest it is replaced with &quot;must&quot;. Disagree with the second point as permission may not be required during peak periods. Agree to delete the word &quot;should&quot; from line 10 of para 1.6. and replace with &quot;must&quot;.</td>
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<td>1.7</td>
<td>Last two lines, take out the word 'would' and insert 'might'.</td>
<td>Disagree. The sentence is clear.</td>
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<td>1.8</td>
<td>Why is the word 'normally present'? This should read 'Operators etc…. but planning permission 'will' be required'.</td>
<td>Agree. Delete &quot;normally&quot; and add &quot;will be&quot; in para 1.8.</td>
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<td>2.2</td>
<td>Take out the words 'to meet the Councils planning policy' from the first two lines and insert a full stop after 'approach'. In the bullet points, replace the word 'should' with 'shall'. In the last bullet point, it should be plain that the maximum three years shall begin from the date of the siting of the first caravan, subsequent sitings on the same holding will not mean a further three years will begin. There should also be a complete audit undertaken by the Council to look at the number and locations of the caravans and other accommodation before the formal implementation of these guidelines.</td>
<td>Agree Delete the words “to meet the Councils planning policy” from second line of Paragraph 2.2. Agree. Replace “should” with shall in bullet points of paragraph 2.2. It is accepted that existing sites should not be granted permission for caravans to be used beyond November 2007. Any additional caravans proposed on existing sites should also be limited to November 2007. It is only in the case of new sites that caravans may be permitted for three years in order to show that the accommodation is needed in the longer term. Add new para 3.2 stating “Where caravans have already been granted planning permission for a temporary period these will not be extended beyond November 2007. For new sites the Council will only approve caravans if applicants have used the sequential approach set out in paragraph 2.2 and have been unable to find more suitable accommodation. In these cases caravans will only be permitted for a maximum of three years to allow the applicant to find more suitable accommodation. If this is not possible then the Council will require that the caravans are replaced with the type of semi-permanent accommodation set out in the above policy.”</td>
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<td>3.1</td>
<td>In the policy statement DE8, insert the words &quot;or could be made suitable&quot; in between the words suitable and for in the last two lines. A worry is that stating a maximum in this way will mean that farmers will do nothing until the end of the three-year period. There must be a continual review and farmers must be placed under pressure to begin the process of compliance straight away, rather than at the last moment.</td>
<td>Agree. In the policy statement DE8, insert the words &quot;or could be made suitable&quot; in between the words suitable and for in the last two lines. It will be made clear that renewals for longer than three years will not be permitted. See response to para 2.2 above.</td>
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<td>2.2</td>
<td>Amount of time available for use of caravans should be increased to five years to allow time for financial planning, consideration of design issues and the granting of planning permission, in addition to the time required to build these new style dormitories.</td>
<td>Three years is sufficient time for this. Many of the existing sites have already benefited from having caravans on site since 2002 and these should not be extended beyond November 2007. No change is required.</td>
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<tr>
<td>4.0</td>
<td>Must confirm whether permanent planning permission would be granted for the new style dormitories or permission would remain temporary, as is the case for caravans. If growers are to invest in building new dormitories then planning permission must be permanent. We view the new guidance as a positive step in resolving the problems associated with accommodating seasonal agricultural workers on the understanding that the following conditions are met: 1) Caravans are allowed to be used for up to five years rather then three. 2) No unnecessary conditions are imposed which make costs prohibitive or use impractical 3) Permanent planning permission is granted for the new accommodation</td>
<td>The policy and guidance do not suggest a time limit but it is likely that conditions will be imposed requiring removal if the buildings are in the Green Belt once they are no longer required to accommodate temporary workers. Disagree. See above. No change required, as there is no mention of unnecessary conditions. By their very nature all conditions must be necessary Full planning permission can be granted subject to a condition to require removal of buildings once they are no longer needed to accommodate temporary workers if they are in the Green Belt No change is required.</td>
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<td>Joyce Brookfield</td>
<td>4.0</td>
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<td>Concerned that in the long-term, the proposed structures may be less serviceable and attractive than the caravans. Worried that the policy may promote the construction of 'sheds'. Growers face financial pressures, thought must be given to the issue of what action would be taken at the end of the three year caravan period if an alternative structure could not be afforded.</td>
<td>More detailed guidance has been prepared for the design of the accommodation. The Council is aware of the financial pressures but it needs to ensure that any development is properly planned and that good quality accommodation is provided. Three years is a reasonable maximum period. <strong>Add design guidance to the SPG.</strong></td>
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<tr>
<th>Mr Geoff Buffey</th>
<th>2.2</th>
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<td>It is proven that management and control of workers is best undertaken on the farm. Local resistance and refusal of planning permissions would suggest that accommodation in house, care home, caravan sites and residential areas are unrealistic. Edge of town sites are also areas of potential conflict. It should be sufficient for growers to justify a need for the workers to be able to accommodate these on the farm. Caravans may be the most suitable accommodation as these can be painted to assimilate into the locality.</td>
<td>Research shows that approximately two-thirds of seasonal workers do not live on the farm. No change is required as the policy does require any impact on visual and residential amenity to be minimised. The Council must take national government guidance regarding Green Belt into account. It would lead to large scale encroachment into the Green Belt if all workers lived on the farm. Painting caravans would not give the quality of accommodation being sought by the Council. Further guidance on design has been produced to show how buildings can be designed to be in keeping with their surroundings. <strong>No change is required.</strong></td>
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<td>The policy is unduly restrictive in stipulating the type of accommodation. The restriction which permits caravans for a maximum of three years is unreasonable. The requirements of growers change year by year and the ability to invest in semi-permanent accommodation is only available to the largest growers.</td>
<td>The policy still allows some flexibility but is required to take other planning considerations into account. The three year maximum is required to show that there is a need for accommodation and to allow the policy to be determined through the Local Plan process. It also gives employers time to find an alternative form of accommodation. This type of accommodation is seen as a last resort and the emphasis is on finding other solutions. This seems to be happening as only one-third of seasonal workers live on the farm. <strong>No change is required.</strong></td>
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| 4.0 | There appears to be a conflict in that the Council require semi-permanent buildings but are not in favour of permanent materials.  

If growers are to invest in accommodation it needs to be durable, long term and constructed from materials most suited to adjacent living conditions, fire regulations etc.  

Design limitations are unduly restrictive since single storey accommodation will occupy larger ground areas.  

It should be recognised that residential caravans, correctly sited, screened and painted as necessary, do provide adequate living standards. They provide appropriate facilities on a semi-permanent basis with far less of a long-term impact than the development proposed in the policy.  

Semi-permanent buildings could be modular or timber clad buildings. Further design guidance has been prepared to reflect the fact that the buildings are not expected to last forever but takes into account the need to comply with the Building Regulations and Housing Acts.

This would not necessarily be the case. Further design guidance has been prepared.

Disagree that caravans have less of an impact. For the same number of workers, caravans are likely to occupy a greater area of land.

Add design guidance to the SPG. |

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<th>Mr David Edge</th>
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| 4.2 | A need for overseas workers has been identified. In order to ensure a steady flow of such workers into the West Lancashire area, accommodation must be of a high quality to encourage workers to return for a second season.  

Accommodation will be inspected by Concordia and supermarket inspectors, a timber battery house construction would therefore not be acceptable. A brick construction with proper foundations and damp course would seem to be a minimum requirement for 2005 accommodation standards.  

Consideration must be given to potential fire hazards associated with housing a number of people in a small area. Buildings must conform with ‘accommodation in multiple occupation standards’ as set out by the Environmental Protection Department.  

The most appropriate type of accommodation would be individual units, housing four workers per unit, consisting of internal brick walls and appropriate fire precautions.  

Noted.  

Further design guidance has been prepared. Any buildings would need to comply with Building regulations and the Housing Acts.  

Agreed. The guidance already points out that any buildings would need to comply with all other regulations such as Building Regulations and HMO Standards. Further design guidance has been prepared.  

Further design guidance has been prepared to show the options available.  

Add design guidance to the SPG. |
| Increasing media coverage of issues such as poor living standards, fire hazards, overcrowding and social problems associated with seasonal workers will inevitably point blame at the employer and not the planning department. As a result, I propose an amendment to paragraph 4.2 to take into account comments made regarding suitable materials to be used in the construction of accommodation for overseas workers. I propose a brick construction with tiled roof, proper insulation and internal fire precautions. |
| Brick and tiles may not always be appropriate, particularly in rural Green Belt locations. Other systems of building have proven popular in other countries. |

| Flavourfresh Salads Ltd | Add design guidance to the SPG. |
| Flavourfresh Salads Ltd | |
| Gore Hall Farm | |

The SPG fails to give due consideration to the difficulties in providing accommodation for seasonal agricultural workers. It has been shown at appeal that there is an overriding need for such workers to maintain the local economy. Without them the local agricultural industry could not operate. There is no available accommodation in existing buildings or on sites outside of the Green Belt. The policy must accept that in such circumstances, where an operator can demonstrate a need and a lack of alternative sites, the need for provision of accommodation within the Green Belt must constitute the special circumstances required to allow development within the Green Belt.

In such cases, it is unreasonable for the SPG to specify the form of accommodation that is acceptable. By definition, such accommodation is only acceptable in special circumstances and in light of this the SPG should not specify which form of accommodation is acceptable.

In the appeal decision referred to, the Inspector accepted caravans as being an appropriate form of accommodation and that, in the particular instance for that appeal, the most appropriate and least intrusive site had been selected.

The Council has never disputed the fact that there is a need for seasonal and temporary workers to maintain the local economy. The policy and the SPG have been prepared because the Council recognises the need for a solution to this problem. The policy and the SPG take all these points into account but require some form of evidence that there are no suitable alternatives.

The SPG covers all cases and not just Green Belt locations. However, it does point out that all other forms of accommodation and non-Green Belt sites should be considered first.

The appeal referred to only allowed caravans for a temporary period of three years to enable the Council to address the issue via the development plan process. He stated that the acceptability of caravans as a long term solution must remain in doubt.
The SPG should not therefore seek to predetermine the form of accommodation deemed acceptable, nor state that caravans will not be permitted after three years.

The SPG should acknowledge the issue and accept that there may be circumstances where operators can demonstrate very special circumstances to allow accommodation to be located within the Green Belt.

Government Guidance does not permit this. The Government Office for the North West objected to the previous Policy and SPG because they referred to the Green Belt. These objections have now been withdrawn which indicates that the Council is in line with government policy.

The policy in the SPG should be amended to read:

The provision of semi-permanent single-storey accommodation for seasonal agricultural workers in the Green Belt in the form of dormitories will be permitted where very special circumstances it can be demonstrated that there is a need to provide accommodation to satisfy a clearly identified need for seasonal agricultural or horticultural workers provided and that there are no existing buildings or alternative sites which are suitable for accommodating such seasonal workers and that:

(i) any impact on visual amenity and/or residential amenity and/or highway safety and/or landscape, wildlife and countryside character is minimised to an acceptable level. Any such impacts will need to be outweighed by clear benefits in helping to meet the local employment problem that exists;

(ii) proposals include measures to protect the character of the local area including: retention of existing trees and hedges; implementation of landscape planting

It is agreed that the policy needs to be clear in order to provide certainty. Government guidance does not permit any reference to permitting inappropriate development in the Green Belt in policy or SPG. However, the policy wording could be improved to emphasise that the Council favours other solutions and that semi-permanent buildings would only be considered as a last resort. It is recommended that the policy be amended to read as follows:-

Policy DE8 Accommodation for Temporary Agricultural/Horticultural Workers

1. The reuse of existing buildings within settlements and the Green Belt for accommodation for temporary agricultural and/or horticultural workers will be permitted provided that it complies with criteria (i) below and if in the Green Belt it also complies with Policy DS2

2. The provision of semi permanent single-storey accommodation in the form of dormitories will be permitted where it can be demonstrated that:-

(a) there is a requirement to provide accommodation to satisfy a clearly identified need for temporary agricultural/horticultural workers;

(b) there are no existing buildings in the locality which are suitable, or capable of being made suitable for accommodating temporary workers;

(c) the site chosen is the most suitable in the locality taking into account other policies in this Local Plan and

(d) it complies with the following:-

(i) any impact on visual amenity; residential amenity; highway safety; landscape, wildlife and countryside character is minimised to an acceptable level. Any such impacts will need to be outweighed by clear
and improvement of any damaged or derelict land involved; and improvement of boundary treatments;

(iii) the siting, location, scale and external appearance of the accommodation, hardstanding and associated facilities are designed to minimise the impact on the wider area to an acceptable level; and

(iv) the amount of accommodation, hardstanding and associated facilities to be provided is justified in relation to the agricultural land holding of the applicant to ensure that it is the minimum required.

In justifying that there is a long-term need for such accommodation, the use of caravans will only be permitted for a maximum of three years.

Where the development includes the re-use of a building in the Green Belt, it should also comply with policy DS2.

The applicant will be required to keep a record of residents.

The Council will introduce a monitoring system.

The Council would seek the advice of the County Land Agent in assessing planning applications for agricultural workers accommodation. There is no set formula as each case will be different. However the County Land Surveyor has experience of assessing such
| 1.6 | What checks will be made to enforce removal of caravans after a ‘season’ and to track the whereabouts of the workers brought into the country? There must be a clear definition of what a season is as presently caravans are not moved after a season. |
|     | The Council will monitor compliance with conditions attached to any planning permission. A definition of ‘seasonal’ is included in paragraph 1.7 of SPG. The Council has successfully prosecuted for a breach of permitted development rights resulting in a £2,000 fine. **No change is required.** |

| 3.1 | Do the sites in Tarleton, Hesketh Bank and Banks qualify under the permitted long-term need for caravan accommodation for a maximum of three years? Is the prime motivation for some employers of a financial nature and not, as some may claim, a solution to a shortage of affordable accommodation? |
|     | Each case will be judged on its merits. A different approach will be taken in non-Green Belt locations where caravans are acceptable in principle. Employers are claiming that there is a shortage of affordable accommodation and this can affect the profitability of their business. Both of these factors are a material consideration in the applicant being required to demonstrate that there is a clearly identified need that cannot be met elsewhere. **No change is required.** |

| Mr Gilbert Johnson | 2.2 | Bullet point 9 states that the Council does not favour the use of caravans, as they do not provide quality accommodation, are visually intrusive and occupy large areas of land due to spacing requirements. However, caravans are often the only cost effective means for providing agricultural workers and it is unlikely that there will be sufficient opportunities to convert existing buildings etc. to provide for such accommodation. Appropriate static caravans, which meet all the licensing requirements, which includes the provision of water and sewage, do provide a satisfactory quality of accommodation for workers given the seasonal nature of their occupation. Furthermore, not all sites suitable for providing for such accommodation are located within the Green Belt or locations where the caravans would be prominent. Accordingly, it is contended that the proposed restrictions on the use of caravans as permanent solutions for providing for such accommodation, on all sites, is overly restrictive. |
|                 |     | As explained in the SPG caravans are felt to be more harmful to the openness of Green Belt and the visual quality of the countryside. It is clear that other solutions are feasible as the majority of workers live off-site. It is not accepted that the guidance is overly prescriptive. Caravans may be acceptable outside the Green Belt. **No change is required.** |

<p>| DE8 | Criterion (iv) of the policy appears to require seasonal agricultural workers accommodation to be on the agricultural land holdings where the workers will be employed. This fails to acknowledge suitable sites |
|     | The proposed change to the Policy will make it clearer that development in the Green Belt is seen as the last resort and would only be permitted if all other options have been ruled out for valid reasons. |</p>
<table>
<thead>
<tr>
<th><strong>Mr S Johnson</strong></th>
<th>Provision of accommodation for seasonal workers benefits tenants as they are able to access local amenities. The village also benefits from their trade as they shop locally. More accommodation is required in Tarenton to meet the demands of the increasing number of Portuguese workers.</th>
<th>Noted. No change is required.</th>
</tr>
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<tbody>
<tr>
<td><strong>Lancashire County Council</strong></td>
<td>It appears that the SPG is in line with the replacement JLSP 2001-2016.</td>
<td>Noted No change is required.</td>
</tr>
<tr>
<td><strong>Mr Robert Andrew Smith</strong></td>
<td>1.2 Seasonal workers have historically been used by farmers, but in the past were only used for one period of the year (such as at the planting or harvesting stage) and not all year round. Workers must not be on sites all year.</td>
<td>This is covered in paragraphs 1.6 and 1.7 of the SPG which explain the circumstances in which planning permission is required. In many cases the accommodation is required from March to November. Each case will be judged on the evidence of need and appropriate conditions will be imposed where necessary to ensure that the accommodation is not occupied from December – February. No change is required.</td>
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<td>1.3 Foreign workers provide some farmers with cheap alternative labour. They accept less pay than local employees and farmers can also charge them for making use of sub-standard accommodation that British workers would not accept. Young school leavers are now reluctant to work on the land, as they cannot compete with ultra cheap foreign labour.</td>
<td>No change is required.</td>
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<td>1.5 Who will police what constitutes a season? How will this be enforced, will the caravans be moved away out of season?</td>
<td>The Council will introduce a monitoring system to ensure that the accommodation is not occupied in the winter. No change is required.</td>
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<td>2.1 Workers could be housed in caravan parks like the Riverside, Leisure Lakes or Brooklyn Park, all of which are within cycling distance of most growers in the area. If</td>
<td>This would be acceptable under the policy and is referred to in para 2.2 bullet point 5. No change is required.</td>
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<td>2.2</td>
<td>Concerned about manpower sources to police this. Measures need to be in place so that farmers have to supply firm evidence of the need for the number of workers they employ. Residents should have a say in where such sites will be created in order to avoid problems associated with anti-social behaviour. Workers should be housed, where possible, on the farms property to reduce social problems and noise pollution/disruption.</td>
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<td>Applicants will be required to produce evidence of need and the employers will be required to keep a record of residents and this will be monitored. Consultation will take place when applications are considered and the Council will take into account the impact on local amenity as set out in the Policy. The issue of seasonal working has resulted in local tensions. The Council has set up a Commission of Councillors to investigate the problem and a Partnership Group has been set up to address these issues. The SPG will assist with this. <strong>No change is required.</strong></td>
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