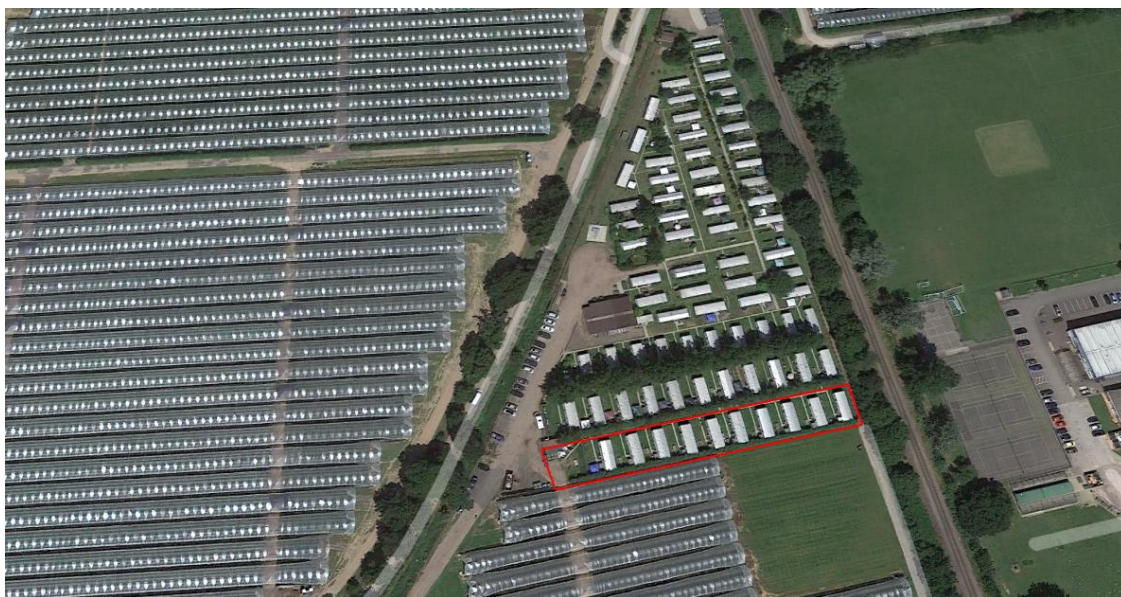




de Courcy
town planning consultants

**Continued use of land for
the siting of mobile
homes for agricultural
workers**

**Sheeplands Farm, Goffs
Barn, Wargrave Road,
Wargrave RG10 8DJ**

Prepared For
Hall Hunter Partnership

1265
May 2025

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1 INTRODUCTION

- 1.1 This planning application seeks retrospective planning permission for the continued use of land for the siting of 10 mobile homes to accommodate seasonal staff employed at Sheeplands Farm. The application is submitted on behalf of Hall Hunter Partnership who have a 10 year Farm Business Tenancy agreement relating to 82 ha and a 20 year agreement relating to 21 ha with W R Bennett (Berkshire) Ltd who own the land.
- 1.2 This application is made following pre-application discussion with Helen Maynard of Wokingham Council and the issuing of a lawful development certificate on 30th April 2025 confirming the lawfulness of the staff mobile homes and associated buildings to the north of the application site.

2 DESCRIPTION OF SITE

- 2.1 The application site is located to the west side of Wargrave Road, which runs north-south through the centre of Sheeplands farm. The eastern boundary of the site adjoins a railway line which also traverses north-south through the farm. Beyond this is the Piggott School campus.



Photo.1 – Location of the mobile homes (outlined in red) in relation to the wider Sheeplands Farm

- 2.2 Access to the site is from Wargrave Road and also provides access to the adjoining water treatment plant. There are no public rights of way in the vicinity of the site and the mobile homes are not seen from any public vantage point.
- 2.3 The applicant's Farm Tenancy Agreement covers 103 hectares of which 21 hectares are covered by heated polytunnels and with the remainder unheated polytunnels or planted for outdoor berry production. In total 75 ha on the farm is in berry production at Sheeplands Farm.
- 2.4 There are 74 mobile homes on the land, including the 10 mobile homes which are subject to this application. Within the mobile home area, to the north of the application site, is a

staff recreation building, laundrette, staff shop and Hall Hunter farm office. Adjacent to the office and to the west of the area is parking for occupiers of the mobile homes.

3 RELEVANT PLANNING HISTORY

- 3.1 An application for a lawful development certificate was issued by the Council on 30th April 2025 confirming the lawfulness of 64 mobile homes for use as habitable accommodation by farm staff, a staff shop, staff launderette portacabin and staff parking, plus operational development comprised of 2 of the remainder of the mobile homes, the staff amenity building, launderette, staff shop and a gazebo (LPA ref 250374). The plan showing the area subject to the certificate can be seen in Figure.1 below.



Figure.1 – Plan showing the land subject to the lawful development certificate

- 3.2 The 10 mobile homes which are the subject of this planning application have not been on site for the required 10 years and therefore were not part of the lawful development certificate application.

4 RELEVANT POLICY CONSIDERATIONS

- 4.1 Section 38(6) of the Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In this case the development plan comprises the Wokingham Borough Core Strategy (CS), adopted in January 2010 and the Managing Development Delivery Local Plan (MDD) (2014)
- 4.2 Policy CP1 of the CS promotes sustainable development and requires that new development, inter alia, maintains or enhances the high quality of the environment and demonstrates how schemes help reduce the need to travel, particularly by car. In addition, the policy seeks to encourage development which will contribute to reaching zero carbon.
- 4.3 The proposed mobile homes are required to accommodate staff employed in the growing of berries at Sheeplands Farm. The provision of good quality staff accommodation on the site is essential to attract and retain skilled staff required for the production of berries on the site. For the reasons set out in the following section of this report, the availability of one site staff is essential for the continued sustainability of the business and its continued contribution to the rural economy in the light of stiff competition from overseas producers. The production of berries for UK consumption is far more sustainable than importing berries from as far afield as South America. Clearly, providing accommodation for staff on site would reduce the need for travel. The proposed development would therefore contribute to the policy objective of reaching zero carbon.
- 4.4 Policy CP11 – Proposals outside Development Limits (including countryside) states:

“In order to protect the separate identity of settlements and maintain the quality of the environment, proposals outside of development limits will not normally be permitted except where:

1. It contributes to diverse and sustainable rural enterprises within the borough, or in the case of other countryside based enterprises and activities, it contributes and/or promotes recreation in, and enjoyment of, the countryside; and

2. It does not lead to excessive encroachment or expansion of development away from the original buildings; and ..."

- 4.5 The provision of the proposed mobile homes contributes to the continued success of the farming operations at Sheeplands Farm and makes an important contribution to the local economy of the Borough.
- 4.6 The proposed mobile homes would be sandwiched between the existing mobile homes and buildings to the north and the polytunnels to the south and would therefore have very limited impact on the character of the area. The development would not result in excessive encroachment or expansion away from the existing structures which enclose the site.
- 4.7 Policies CP12 of the CS and TB01 of the Managing Development Delivery Local Plan (MDD) (2014) seek to protect the Green Belt from inappropriate development. Compliance with these policies is considered in section 6 of this Statement.
- 4.8 The site lies within the 400m to 5 km buffer zone to the Thames Basin Heaths Special Protection Area (SPA) and therefore policy CP8 of the Local Plan is relevant. This policy requires that development which, alone or in combination, is likely to have a significant effect on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered. The mobile homes are about 2.5 km from the closest part of the SPA.
- 4.9 In this case seasonal staff would only reside on the site for part of the year. Occupants of the mobile homes are not permitted to have dogs and most do not have access to a car and would be unlikely to walk to the SPA for recreation given the distance.
- 4.10 The National Planning Policy Framework (NPPF) is a material consideration. Paragraph 85 of the NPPF advises that:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."

- 4.11 Paragraph 88 of the NPPF seeks to support a prosperous rural economy' and 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 businesses"*

4.12 The proposed development is supported in principle by these paragraphs due to the growth and productivity that the additional accommodation facilitates.

4.13 Paragraphs 83 of the NPPF notes:

"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"*

4.14 The following section considers whether there is an essential need for the proposed staff accommodation on the farm.

5 ESSENTIAL NEED

5.1 HHP employed a total of 451 people at Sheeplands Farm, both permanent and temporary staff over the 2024 season, with the seasonal staff employed mainly between April to October. The heated tunnels on the farm extend to the growing season in the spring and the autumn. The farm produced 2400 tonnes of strawberries, 665 tonnes of raspberries and 150 tonnes of blueberries in the 2024 season. The berries picked at Sheeplands Farm are transferred to Heathlands farm for packing and distribution. Most of the crop is supplied to the large supermarket chains.

5.2 Hall Hunter operate the following sites:

- Heathlands and Birchin Inghams Farm, Wokingham - 82 hectares (205 acres)
- Sheeplands Farm, Wargrave - 85 hectares (210 acres)
- Tuesley Farm, Godalming - 178 hectares (463 acres)
- Eashing Farm, Godalming – 26 Hectares (65 acres)

5.3 In total HHP employ about 300 permanent staff and 1000 seasonal workers. Hall Hunter are one of the largest soft fruit producers in the UK, producing about 7000 tonnes of berries annually and one of the largest employers in the Wokingham area. During the peak season in 2024 the number of permanent and seasonal staff living on the site reached at 451.

5.4 Berry yields at Sheeplands Farm have increased significantly since 2021 demonstrated by the figures in Table.1 below.

Sheeplands	2021	2022	2023	2024	2025
Annual Harvest Tonnage	2,429	2,863	3,325	3,548	3,688
YoY Change Tonnes		434	462	223	140

Table.1 – Increase in berry yields year on year at Sheeplands Farm

- 5.5 In 2025 HHP expect to grow 686 tonnes of raspberries at Heathlands and Sheeplands with 685 tonnes of these coming from Sheeplands. Since the 10 mobile homes subject to this application were brought onto the site the annual berry yields at Sheeplands have increased by 1,125 tonnes (64%).
- 5.6 The harvest period is from May to October when seasonal staff are required to maintain and pick the fruit. For the remainder of the year full time labour is required for the preparation and management of the plants and maintenance of the equipment and polytunnels.
- 5.7 Soft fruit production is labour intensive and relies on experienced staff to run the farming operations, maintain and pick the fruit. Raspberry harvesting is particularly labour intensive. Raspberries must be picked every 2–3 days during the season to avoid spoilage and overripe fruit, unlike strawberries, raspberries ripen gradually, meaning repeated passes are required throughout the harvest period. Raspberry harvesting is slower and more physically demanding due to plant layout and reach requirements. Raspberry pickers typically pick 5.5 kg per hour compared to strawberries at 25 kg per hour. Raspberries therefore have a higher staff ratio requirement than other berries.
- 5.8 Raspberries also require skilled staff because pickers must accurately judge ripeness, as underripe berries do not ripen post-harvest, and overripe ones collapse. Raspberries are also graded by colour – light, medium, and dark – requiring pickers to sort while harvesting. In contrast strawberry picking requires less precision and minimal grading. Raspberry picking is therefore a more specialist task demanding trained, consistent workers.
- 5.9 The majority of the workforce are Eastern European. Skilled labour is in short supply post Brexit and there is intense competition amongst growers in the UK and overseas for experienced staff. It is therefore essential to provide good quality accommodation on site and good pay to attract the quantity and calibre of workers required. If the business is unable to attract experienced workers, the business would fail. HHP have a seasonal return of 80% of seasonal workers attracted largely by the quality of accommodation on offer on site, which, in addition to the mobile homes includes an on-site shop, leisure and sports facilities and a staff canteen providing hot food. Hall Hunter replace their mobile homes on a 5 year rotation to ensure the accommodation they can offer is of a high quality.

- 5.10 Guidance on the provision of caravan accommodation for temporary workers in the UK is set out by The Fresh Produce Consortium (FPC).¹ A copy of this guidance is submitted with the application. This guidance seeks to ensure that benchmark standards of accommodation are provided to ensure that the welfare standards and legal responsibilities of employers are met. This guidance has been adopted by HHP who have a responsibility to ensure that its workers are housed in suitable accommodation which is safe and comfortable and meets best practice. This includes minimum spacing between caravans to meet safety requirements. The guidance also sets out the standards in relation to space to allow workers to properly rest and ensure good standards of hygiene.
- 5.11 The FSC guidance advises that twin room sizes may not be suitable for two adults and sets out a minimum bed size for each worker (see para 2.3.2). In addition, the guidance requires that each caravan has sufficient furniture for the number of occupants and that 'hot bedding' is not permitted and therefore each worker must have their own beds. Bunkbeds are not advised to avoid overcrowding, hygiene and safety reasons and separate male and female accommodation is required unless for a family. Each caravan must also provide storage for personal belongings in an accessible location.
- 5.12 Table 2 below shows the staff numbers employed by HHP at Sheeplands Farm. This shows that a significant proportion of staff are employed on a permanent basis with employment at Sheeplands rising to 451 in last year's peak season. The number of permanent staff has remained largely static over the last 5 years whilst the number of seasonal workers has steadily increased over this period by about 10%.

¹ FPC Guidance on provision of caravan accommodation for temporary workers in the UK 5th Edition 2024

	Permanent Staff	Seasonal Staff
2020	56	351
2021	63	315
2022	61	385
2023	60	390
2024	60	391

Table. 2 – Staff numbers at Heathlands Farm

- 5.13 All of the existing accommodation on the site, including all mobile homes on site are fully occupied during the season. Attached as **Appendix.1** to this Statement is a list of the occupancy of each of the 74 mobile homes at Sheeplands Farm on 24th April 2025 . Each mobile home has a maximum occupancy of 6 members of staff. The list shows that a majority mobile homes are fully occupied. Key members of staff who live on site all year round occupy mobile homes at a slightly reduced density of 5 persons with the key member of staff having their own bedroom. These figures demonstrate that there is no available capacity to accommodate the 59 members of staff workers who currently occupy the 10 mobile homes which are subject to this application.
- 5.14 HHP also rent four properties on Sheeplands Farm from W R Bennett (Berkshire) Ltd, the owner of Sheeplands Farm. These are 1 and 2 Sheeplands Cottages and 1a and 1b Yarrow Cottages. These are occupied by permanent staff working for HHP at Sheeplands Farm. HHP also rent a flat at 7 Royal Station Court in Twyford which is occupied by a senior member of permanent staff. These properties are fully occupied.
- 5.15 HPP have a total of 67 mobile homes at Heathlands Farm. These mobile homes are also fully occupied by HHP staff and therefore are unable to accommodate workers from Sheeplands Farm.
- 5.16 The majority of the mobile homes at both Sheeplands and Heathlands farm are occupied by 6 members of staff. Each mobile home has three double rooms, so the rooms are shared. Ideally each of the mobile homes should have occupancy of less than 6 however

that would require a significant increase in the number of mobile homes required. It is clear that it would not be appropriate to increase occupancy above 6.

5.17 In terms of functional need, fruit growing is a 24/7 operation requiring workers to be on site to respond to emergencies that can occur at any time to address issues as they arise. Particular issues include:

- Irrigating stock by drip irrigation and partly by hand, with the latter carried out early in the morning or later in the evening during hot sunny periods to prevent burning or scorching of the plants
- Provision of mobile heaters to protect less hardy plants via mobile heaters from autumn to spring particularly.
- Covering plants with fleeces to protect stock in the evening and uncovering during the day to give plants as much daylight/growing time as possible
- Checking automated systems are set up and running correctly, responding to any breakdowns or emergencies.
- Spraying, which generally needs to be undertaken early in the morning or evening, for example vine weevils have to be sprayed at night
- Applying fertilisers and compost/manure etc, including liquids which cannot be applied in sunlight
- Ventilation of plants particularly in the summer and during periods of rapid temperature changes
- Removal of snow from polytunnels to avoid collapse sometimes during periods of persistently heavy snow. This can involve work through the night
- During windy periods small gaps/flapping plastic needs to be addressed quickly to prevent greater damage

5.18 The scale of loss to the business resulting from unexpected weather events could be considerable, resulting in a significant negative impact on the business.

- 5.19 The average wage for seasonal staff is relatively low (about £500 per week) and they pay a weekly rental of £75 for the mobile home accommodation. It is not feasible for seasonal workers to rent locally given the lack of supply, the cost and the relatively short period for which the accommodation is required in the season.
- 5.20 It may be feasible for some staff to live within a short distance of the site and fulfil the needs of the business. The site however lies in an area of high property prices and the business cannot afford to purchase additional housing in vicinity of the site to accommodate its staff and it would be unreasonable to require the business to do so.
- 5.21 The supply of rental properties in the area is limited and rentals are high. Properties within 3 miles of the RG10 8DJ postcode range from about £900 per month for a single room studio to about £2,500 per month for a four bedroom property². These rental properties are normally let on a full time basis, and it would not be affordable for staff or HHP to rent.
- 5.22 In summary, it is considered that there is an essential need for seasonal worker accommodation on site.

² Source – Rightmove web site

6 GREEN BELT CONSIDERATIONS

- 6.1 Policies CP12 of the Core Strategy Development Plan Document (CS) (2010) and TB01 of the Managing Development Delivery Local Plan (MDD) (2014) seek to protect the Green Belt from inappropriate development.
- 6.2 Paragraph 142 of the National Planning Policy Framework (the Framework) makes it clear that the Government attaches great importance to the Green Belt and the protection of its essential characteristics, those being openness and permanence. Paragraph 153 of the NPPF advises that when considering any planning application in Green Belt, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness.
- 6.3 The proposed development would not fall within one of the exceptions in paragraph 154 of the NPPF and therefore is considered inappropriate development which, by definition, would be harmful to the Green Belt and should not be approved except in very special circumstances (VSC). VSC must therefore be demonstrated in this case which outweigh the harm caused by allowing inappropriate development within the Green Belt.
- 6.4 Harm by reason of inappropriateness and harm caused to the openness and purpose of the Green Belt, would therefore need to be clearly outweighed by the benefit to the agricultural enterprise so as to amount to very special circumstances justifying an exception to Green Belt policy
- 6.5 Planning Practice Guidance³ advises that openness is capable of having both spatial and visual aspects. The visual impact of the proposal may therefore be relevant, as could its volume. The duration of the development, and its remediability, taking into account any provisions to return land to its original state, may also be relevant to the consideration of openness as can the degree of activity generated, such as traffic generation.
- 6.6 As stated in the preceding section, the proposed development is visually contained by the surrounding mobile homes and polytunnels. As such it is considered that the development would have a limited impact visually on the openness of this part of the Green Belt.

³ Paragraph: 013 Reference ID: 64-013-20250225

- 6.7 Should the need for the accommodation fall away in the future the mobile homes can be removed from the land and the land remediated.
- 6.8 There are clear benefits in siting the staff accommodation centrally within the farm which significantly reduces the activity associated with vehicle movements compared to the alternative of staff driving to the site from elsewhere.
- 6.9 In view the essential need for the staff accommodation at Sheeplands Farm and the absence of alternatives, it is considered that this essential need representing VSC in this case sufficient to outweigh the limited harm to the openness of the Green Belt.

7 CONCLUSIONS

- 7.1 HHP are one of the largest producers of berries in the UK and a major employer in Wokingham District. Berry production, and in particular raspberry production requires skilled labour, particularly during peak months.
- 7.2 The labour force is largely eastern European and employed on a seasonal basis. The 10 mobile homes proposed accommodates up to 60 workers. There is no capacity on the other mobile homes on the site or at Heathlands Farm and the costs of rental properties in the area are high and would not be affordable even and would be unlikely to be let for a short period over the berry season (May to October).
- 7.3 There is a demonstrated need to retain the accommodation on the site to meet the needs of farming business and the welfare requirements of the workers. It is considered that this represents VSC sufficient to outweigh the limited harm to the openness of the Green Belt and character and appearance of the countryside.
- 7.4 For the above reasons it is considered that the proposals accord with the development.

APPENDIX 1 – SHEEPLANDS STAFF MOBILE HOMES SURVEY 24TH APRIL 2025

Site	MH number	Beds	Number of occupants	
SHE	SHE1	6	6	
	SHE2	6	6	
	SHE3	6	6	
	SHE4	6	6	
	SHE5	6	6	
	SHE6	6	6	
	SHE7	6	4	Key Staff
	SHE8	6	6	
	SHE9	6	6	
	SHE10	6	5	Key Staff
	SHE11	5	4	
	SHE12	6	6	
	SHE13	6	6	
	SHE14	5	5	
	SHE15	6	6	
	SHE16	6	6	
	SHE17	6	5	Key Staff
	SHE18	6	5	Key Staff
	SHE19	6	6	
	SHE20	6	6	
	SHE21	6	6	
	SHE22	5	5	
	SHE23	6	6	
	SHE24	6	6	
	SHE25	6	5	Key Staff
	SHE26	6	6	
	SHE27	6	5	Key Staff
	SHE28	6	6	
	SHE29	6	6	
	SHE30	6	6	
	SHE31	6	6	
	SHE32	6	6	

SHE33	6	6	
SHE34	6	6	
SHE35	6	5	Key Staff
SHE36	6	6	
SHE37	6	6	
SHE38	6	5	Key Staff
SHE39	6	6	
SHE40	6	5	Key Staff
SHE41	6	6	
SHE42	6	5	Key Staff
SHE43	6	6	
SHE44	6	5	Key Staff
SHE45	6	5	Key Staff
SHE46	6	6	
SHE47	6	5	Key Staff
SHE48	6	6	
SHE49	6	6	
SHE50	6	6	
SHE51	6	6	
SHE52	6	4	Key Staff
SHE53	6	6	
SHE54	6	6	
SHE55	6	6	
SHE56	6	6	
SHE57	6	6	
SHE58	6	6	
SHE59	6	6	
SHE60	6	4	key staff
SHE61	6	6	
SHE62	6	6	
SHE63	6	6	
SHE64	6	6	
SHE65	6	6	

SHE66	6	6	
SHE67	6	6	
SHE68	6	6	
SHE69	6	6	
SHE70	6	6	
SHE71	6	6	
SHE72	6	6	
SHE73	6	6	
SHE74	6	5	key staff