

Recommendation Report for Planning Permission

REF NO: CM/20/20/PL

LOCATION: Woodpecker Camping Field
Crookthorne Lane
Climping
BN17 5RG

PROPOSAL: Use of site approved for tent pitches (CM/7/18/PL) to be used for caravan/motor home camping and tent pitches and associated changes to approved layout.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION

The proposal relates to a change of part of the approved seasonal camping site for 60 tent pitches to use 20 pitches for camping use by caravans and motor homes and 12 for tents.

The application includes retention of hedging to the site boundaries.

4 chemical toilets and other structures located adjacent to The Piggeries building comprising 2 toilets and 2 showers have previously been approved. This proposal includes a new foul disposal point.

The defined holiday season would run from 1st April to 31st October in any one year.

The reason for the application is that due to the Covid - 19 Pandemic in line with Government guidance, the applicant has only recently been permitted to open the Tented Camping facility. The approved Woodpecker Camping Field has permission and is Licensed to only allow Campers to stay in tents therefore, the premises operate with communal toilet and washing facilities. This works very well in a normal season. However, this is not a normal season and there could be a risk to Campers/cleaning staff of contracting the virus by using shared/communal toilet and washing facilities.

Campers in caravans and motor homes bring their own toilets and washing facilities with them, so there is no risk to the other campers or staff. The normal spacing between the pitches has been doubled to 6 metres. A foul water disposal point for Campers is proposed to facilitate disposal of waste from toilets and washing facilities and fresh running water taps at each pitch will be introduced to further reduce any risk of contact between Campers. There will be a strict "one way" path around the field for vehicles to access their pitches.

SITE AREA	0.95 hectares
TOPOGRAPHY	Predominantly flat.
TREES	None of any significance affected by the proposed development.
BOUNDARY TREATMENT	Hedging to south north and west to approximately 2m.
SITE CHARACTERISTICS	Open field with Old Piggeries building in southern part of site used for tent camping. Farm shop to west, residential dwellings to south.
CHARACTER OF LOCALITY	Predominantly rural.

RELEVANT SITE HISTORY

CM/7/18/PL	Change of use of land from agricultural field to 60 No. tent pitches operating from April to October to include 2 No. plumbed screened portable showers, 2 No. plumbed portable toilets, 2 No. screened changing cubicles, 2 No. 2 screened portable chemical toilets with hand wash facilities & washing up/drying area within existing building.	ApproveConditionally 12-07-18
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REPRESENTATIONS

Parish Council

Objection

- This application should not be considered by Arun District Council whilst it is unclear whether the new site layout will meet the new licence requirements.
- The business owner's concern about the Covid 19 restrictions could be achieved within the existing site arrangements even if pitch numbers are reduced.
- The proposal will more significantly compromise the agricultural land usage and gap policy
- Suitability of access on to A259 is questionable.

5 Objections.

- There are alternative sites in the area
- Increased volume in traffic would be unwelcome. The road is obviously not suitable for large vehicles, has no walk way and is in constant use by many pedestrians and cyclists.
- The site currently has no amenities to cater for this application.
- It would be difficult for mobile homes/caravans to camp there without a hard standing and a tarmacked track from the entrance to the pitch.
- There are other already established sites in the area for caravaners so there is not the demand for another one.
- When the dementia care home is built, there will be 3 businesses requiring access off the main road (Maidenhead Aquatics, the care home and the campsite/ holiday lets). The entrance off Clymping street is already being used by the building contractors, the established holiday let / permanent dwelling. How soon before the campsite visitors also use this point of entry?
- It is the concreting over of land south of the A259 by stealth.
- In the future it will be easier to obtain planning permission for business buildings or housing.
- We will continue to ensure that surreptitious destruction of the countryside in the Clymping gap, south

of the A259 is officially recorded.

- Mobile homes will mean these increases will be almost permanent. When the original campsite application was approved, we were assured that traffic on the main road would not increase significantly because site users would be able to buy food from the nearby farmshop, and walk to the nearby Black horse pub which both now gone.
- The site simply isn't suitable for this new use. It is currently a "wild" site meaning it has no hard standings, no electrical feeds to the pitches, no access roads on the site and whilst most Caravans and mobile homes need an Approved disposal facility that does not exist.
- Approving this application would essentially change the whole area from a holiday campsite into a year round housing estate.
- This application is turning the Woodpecker campsite into a permanent caravan/mobile home park which is not needed. It will change the nature of Climping Village, will increase traffic, increase population without improving facilities.
- How long will caravans be occupied? They are more resilient than tents.
- This agricultural field was to be used for wild camping purposes only. The Woodpecker Camp was only open for a few weekends last year. There is another wild camping field (The Cuckoo Camp) within walking distance that is open and has adapted to the Government guidelines to be Covid safe. The Climping beach cafe, car park and WC's are all open.

COMMENTS ON REPRESENTATIONS RECEIVED:

The application does not need to be considered by the Development Control Committee as it falls to be determined under delegated officer powers since it is categorised as 'other' and is for a change of use with no operational development.

Site licence is controlled by other legislation. If it cannot operate in accordance with the layout indicated on this application the permission cannot be implemented and a new application would be required. It would not be reasonable to refuse the application for a reason not related to planning legislation which is outside of planning control.

Reducing pitch numbers is not an issue for the applicant with regard to addressing Covid 19. The main justification for caravans and motor homes is that they have their own toilet/changing/bathroom facilities reducing the need for contact via cleaning and cross over between campers.

The proposal would not significantly alter the impact of camping on the gap or the agricultural use. The use would still be temporary and does not include hard surfacing. Any caravans/motor homes would be viewed against a backdrop of field boundaries and tents. The proposal does not include mobile homes or hard standings and represents a reduction in the number of pitches.

County Highways have no objection to access to site from a highway safety aspect.

It is proposed to limit the number of pitches and months of occupation by condition as per the previous permission.

CONSULTATIONS

WSCC Strategic Planning

Ecology Advisor

Engineering Services Manager

Engineers (Drainage)

Environmental Health

CONSULTATION RESPONSES RECEIVED:

County Highways - No Objection.

Southern Water - No Objection. Informative relating to foul drainage requested.

Drainage Engineer - No Objection.

Environmental Health - No Objection.

The applicant should note that the proposals will require a new licence to be issued under the Caravan Sites and Control of Development Act, 1960. The existing camping licence will not be valid for the proposed use and the new licence will require the proposed pitches to comply with spacing standards.

Ecology Officer - No Objection. Condition requested.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted

POLICY CONTEXT

Designation applicable to site:
Outside Built Up Area Boundary
Within Settlement Gap

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

TOUDM1	TOU DM1 Tourism related development
TOUSP1	TOU SP1 Sustainable tourism and the visitor economy
DSP1	D SP1 Design
SDSP1	SD SP1 Sustainable Development
SDSP2	SD SP2 Built-up Area Boundary
SDSP3	SD SP3 Gaps Between Settlements
CSP1	C SP1 Countryside
LANDM1	LAN DM1 Protection of landscape character
TSP1	T SP1 Transport and Development
TDM1	T DM1 Sustainable Travel and Public Rights of Way
ENVDM5	ENV DM5 Development and biodiversity
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QESP1	QE SP1 Quality of the Environment
SODM1	SO DM1 Soils

Clymping Neighbourhood Plan 2015 Policy CPN10	Protection of high grade Agricultural Land
Clymping Neighbourhood Plan 2015 Policy CPN5	Support and promote recreation and tourism
Clymping Neighbourhood Plan 2015 Policy CPN7	Protection of open views
Clymping Neighbourhood Plan 2015 Policy CPN8	Protection of Trees and Hedgerows

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Policies CPN 5, CPN7, CPN8, CPN9 and CPN 10 of Clymping Neighbourhood Plan are considered relevant to consideration of this proposal.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to comply with relevant Development Plan policies in that it would comply with countryside policy to support the economic diversification of farm land whilst not having an unacceptable effect on the character and appearance of the area or the residential amenities of neighbouring occupiers.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are/are no other material considerations to be weighed in the balance with the Development Plan.

CONCLUSIONS**BACKGROUND**

The site is currently used for seasonal tent camping and is located outside the built-up area boundary within the Middleton and Littlehampton Settlement Gap. The site was previously used for tent camping with the benefit of permitted development under Schedule 2, Part 4 the Town and Country Planning (General Permitted Development) Order 1995.

SETTLEMENT GAP

The site lies within the Settlement Gap where Policy SD SP3 of Arun Local Plan states that development will only be permitted if (a) it would not undermine the visual separation of settlements. (b) it would not compromise the integrity of the Gap. The seasonal nature of the use and limited associated structures would ensure that the integrity of the Gap is maintained. The area would revert to farmland in the winter months and the proposal does not result in additional permanent structures. The limited sizes and design means that the proposed structures will be absorbed visually in the wider landscape. (c) The proposal

cannot reasonably be located elsewhere since it is amending an existing camping site permission.(d) Attention has been paid to the long term enhancement of the landscape, amenity and conservation value. The site is well screened and landscaped and the total number of overall pitches has reduced. Existing hedges with additional species are retained and retention of rough grass margins will be maintained on the western and southern perimeter of the field. The provision of more species rich hedging and enhanced field margins through the provision of wild flower seed planting has improved biodiversity in the area. This will provide a wildlife corridor around the site for amphibians, reptiles and hedgehogs, improving connectivity between suitable habitats and enhancing biodiversity in the area. With these proposed enhancement opportunities included within the site design, the residual impacts will be beneficial to biodiversity and permanent. Given that the field would revert to agricultural use in the winter periods the opportunity for further planting is limited. The proposal would maintain the character of the undeveloped coast.

The proposal complies with Policies D DM1 and TOU DM1 of the Local Plan in that noise/activity levels would not cause material harm to residential amenities given the distance to nearest residential properties and the seasonal nature of the proposal. It therefore does not undermine the physical and/or visual separation of Settlement Gap and retains the separate identity in accordance with policy SD SP3 of the Local Plan.

The land is capable of agricultural use and the change from tent to caravan camping does not alter this. The land is categorised as high quality agricultural land. The NPPF and Policy SO DM1 of the emerging plan seek retention of the best agricultural land Grades 1 - 3a for agricultural production.

Development would not be allowed unless the benefits outweigh the need to protect the land in the long term. This proposal does not represent long term and continuous loss of productive agricultural land and is therefore compliant with this policy.

NEIGHBOURHOOD PLAN

Policy CPN 5 of the Climping Neighbourhood Plan refers to small scale tourist facilities and requires compliance with certain criteria. The proposal is small in scale and meets the criteria in that it has a strong regard to the local character, historic and natural assets. The traffic impact is reduced since the number of pitches is reduced from 60 as approved to 32 and is acceptable in terms of highway safety.

It utilises an existing access which County Highways have no objection to. The access is located off the A259 and is not adjacent to neighbouring residential dwellings. The proposal preserves the open character of the area by utilising fields which would revert to agricultural use in the winter months and limiting the scale and amount of associated structures. Condition 4 requires all non permanent structures to be removed from the site over winter.

The proposal would also accord with policy CPN7 in that it would not erode the open landscape character of the countryside. It would not adversely impact on long distance views across the landscape given the limited height and size of associated facility structures and tents. Condition 4 requires all non permanent structures to be removed from the site over winter. The applicant currently removes cubicles once the temporary permitted use ceases.

The proposal is compliant with policies CPN8 and CPN 9 in that it retains existing hedgerows and habitats. The original application was supported by Ecology Reports and condition 7 ensures development accords with the Method Statement for nesting birds, reptiles and amphibians. The landscaping condition would provide for planting of additional hedgerow species and wildflower planting which would enhance the appearance and biodiversity of the area.

Policy CPN10 is complied with since the proposal does not result in the long term loss of high grade

agricultural land. The field would revert to farmland in the winter months. Condition 4 requires all non permanent structures to be removed from the site over winter.

TOURISM AND PROVISION OF CAMPING SITES IN THE AREA

The Council's Tourism Officer has previously suggested there is need for this type of seasonal accommodation. It is centrally located to all three towns (and villages) for overnighers. It is fairly close to the Public Houses Ship and Anchor at Ford, the Oyster Catcher and the Black Horse at Climping and has the benefit of being close to the coast and town of Littlehampton.

The application is for 32 pitches. Policy TOU DM1 of the Local Plan requires tourism development outside the built-up area to be small scale and compatible with its countryside location. The proposal would not be unduly prominent or adversely affect the rural character of the area given its temporary nature and the size and extent of the camp site. The previous application included a Preliminary Ecology Appraisal and Method Statement to demonstrate that the proposal is acceptable from an environmental perspective.

The National Planning Policy Framework paragraph 28 'Supporting a Prosperous Rural Economy' refers to promotion of development and the diversification of agriculture and other land-based rural businesses and support for sustainable rural tourism that benefit businesses in rural areas and respect the character of the area. This proposal would accord with these requirements.

CHARACTER AND APPEARANCE

The site lies in a flat open rural area within the Settlement Gap. The proposal includes retention of hedging and it is also proposed to impose a landscaping condition to bolster native species in this coastal location which will be expected to be replaced if lost within the first five years of operation. The planting has helped to assimilate the development into the wider landscape. No hardstandings or surfaced internal access roads are proposed.

Although the site is open, views into the site are already partially screened by trees/hedges around the field perimeters. The development of the touring park would be seasonal and therefore any perceived impacts will be limited to April - October when vegetation is in leaf.

Condition 4 requires all non permanent structures to be removed from the site over winter.

RESIDENTIAL AMENITY

The nearest residential properties to the proposed site are Hobbs Cottages to the west and Langmeads Close to the south. These are separated from the site boundary by approx. 10m and the nearest dwellings are approx. 35m and 18m from the camp site boundary. The current camping facilities operate with a quiet time and it is proposed to impose a condition to similarly limit the hours of the proposed camp site. There have been no complaints in the last 2 years from the camp site which currently operates with a larger number of pitches.

SUSTAINABILITY

Footpaths 169 and 171 are located to the south of the site and link to the wider footpath network providing access to the beach, public house and hotel. To the north there is direct access to the cycle lane under construction and bus stops. The Town centre of Littlehampton, with its services and train station, can be accessed via the foot bridge and is approx. 1 mile away with a bus service in close proximity to the proposed site. This all makes the site a sustainable location.

BIODIVERSITY

The majority of the site, approximately 1.1 ha, was an arable field recently reseeded with fescue grass. The field has been regularly mown and will continue to be maintained in this manner. The field is

considered to be of negligible ecological value to wildlife although vegetation bordering the site was suitable for foraging bats, nesting birds, reptiles and common amphibians. The proposal enhances biodiversity opportunities by retaining and providing an additional wildlife corridor along the field boundaries in the form of hedging and providing rough margins with wild flower seed sowing. This will provide a wildlife corridor around the site for amphibians, reptiles and hedgehogs, improving connectivity between suitable habitats and enhancing biodiversity in the area. With these proposed enhancement opportunities included within the site design, the residual impacts will be beneficial to biodiversity and permanent

CONCLUSION

The proposal is a low density with few structures and no hard surfaced road or parking area. Hedging would be retained and additional planting is to be conditioned. In addition the use is only seasonal and the use as an agricultural field would take place in the winter months.

The proposal would support and promote the local economy and recreation and tourism. The proposal preserves the open character of the Gap Between Settlements and contributes to the Green Infrastructure Network. It therefore accords with policy CPN 5 of Climping Neighbourhood Plan. The proposal also retains hedges, open views and natural habitats in accordance with policies CPN7, CPN8 and CPN9 of Climping Neighbourhood Plan.

The application is therefore recommended for approval subject to the following conditions.

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
- Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).
- 2 The development hereby approved shall be carried out in accordance with the following approved plans:
Location Plan
Block Plan submitted on 17-07-2020
- Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy D DM1 of the Arun Local Plan.
- 3 The number of tents pitched on the site shall at no time exceed 12 and the number of motor homes/caravans shall not exceed 20.
- Reason: To avoid an overcrowded appearance and to secure satisfactory standards of space and amenity in accordance with Arun Local Plan policies DDM1 and DEV39.
- 4 The use of the site for seasonal tent/motor home/caravan pitches shall only take place between the 1st April and 30th October in any one year. Between 1st November and 31st March in any one year all the non permanent structures must be removed from the site and the site returned to its former condition.
- Reason: In the interests of amenity, to prevent the establishment of permanent structures within the site and also in the interest of flood risk to the occupants of the site in accordance with policies DDM1, SDSP3, W DM2 and TOU DM1 of Arun Local Plan and the National Planning Policy Framework.
- 5 Details of any external lighting shall be submitted to and approved in writing by the Local Planning Authority before the use of caravans/motor homes hereby permitted commences. Development shall be carried out in accordance with the approved details.
- Reason: to safeguard the amenities of nearby residents in accordance with policy D DM1 of Arun Local Plan.
- 6 The development shall proceed in accordance with the submitted Method Statement for Nesting Birds, Reptiles and Amphibians dated May 2018 by RSK ADAS Ltd which formed part of planning permission CM/7/18/PL.
- Reason: To ensure the retention of vegetation important to the visual amenity, the ecological quality and for the environment of the area in accordance with policy ENV DM5 of Arun Local Plan.
- 7 The use of open fires shall be excluded and only raised barbecues shall be operated in accordance with the applicant's e-mail dated 09-05-2018 which formed part of planning permission CM/7/18/PL.
- Reason: To safeguard the amenities of nearby residential properties in accordance with policy D DM1 of Arun Local Plan.
- 8 The camp site shall operate quiet hours between 10pm and 6am daily as per the applicant's e-mail dated 18-06-2018 which formed part of planning permission CM/7/18/PL.
- Reason: To safeguard the amenities of nearby residential properties in accordance with policy D DM1 of Arun Local Plan.

- 9 INFORMATIVE: The applicant should note that under Part 1 of the Wildlife and Countryside Act 1981, with only a few exceptions, it is an offence for any person to intentionally take, damage or destroy the nest of any wild birds while the nest is in use or being built. Birds nest between March and September and therefore removal of dense bushes, ivy or trees or parts of trees etc. during this period could lead to an offence under the act.
- 10 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.
- 11 INFORMATIVE:A formal application for connection to the public sewerage system is required in order to service this development. Please read Southern Water's New Connections Services Charging Arrangements documents which has been published and is available to read on their website via the following link:
southernwater.co.uk/developing-building/connection-charging-arrangements