



APPLICATIONS & APPEALS SERVICES

**CHURCH FARM
HORESEMERE GREEN LANE
CLYMPING
BN17 5QX**

**Change of use of land for Class B8 (storage)
for caravans**

**PLANNING, DESIGN
& ACCESS STATEMENT**

NJA/18/257

October 2021



CONTENTS

1.0	INTRODUCTION	3
2.0	PHYSICAL CONTEXT	4
3.0	PLANNING HISTORY	6
4.0	PLANNING POLICY CONTEXT	7
5.0	DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT	13
6.0	LAYOUT, DESIGN & APPEARANCE	15
7.0	ACCESS & PARKING	24
8.0	CONCLUSION	25

1.0 INTRODUCTION

1.1 Planning permission is sought for the change of use of a parcel of agricultural land to create a site for the storage of caravans.

1.2 This Supporting Statement addresses the design and access issues as well as relevant planning policy, having regard to the requirements of Article 8 of the Town and Country Planning (Development Management Procedure) Order 2015. The details of the proposals will be described and appraised having regard to the following aspects:

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – the planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed additional accommodation;
- **Amount** – the extent of development on the site;
- **Scale** – the physical size of the development;
- **Layout** – the relationship of the proposed extension and alterations to neighbouring properties;

- **Appearance** – details of materials, style and impact upon the visual amenities of the area;
- **Landscape** – impact of the proposal on the existing landscape;
- **Access** – access to the development and parking provision
- **Flood Risk** – impact of the development on fluvial and pluvial flood risk.

1.3 The Council is requested to consider this Statement alongside the submitted plans and this demonstration that the proposed development accords with the relevant planning policies and is acceptable in all respects. It is hoped that the Council will support the proposal and grant Planning Permission.

2.0 PHYSICAL CONTEXT

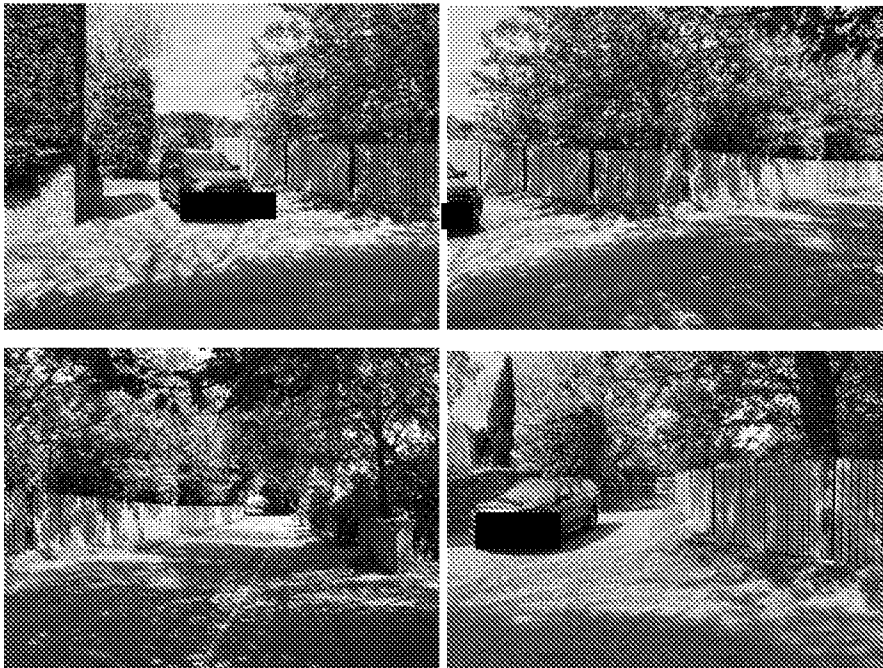
- 2.1 The site comprises a broadly rectangular parcel of land positioned to the east of Church Farm Barn, Horsemere Green Lane, Clymping. Church Farm Barn itself is a detached residential dwelling formed from a former flint barn set under a grey pitched roof with hipped ends which is afforded screening from the highway by high conifer hedging set behind a brick wall.
- 2.2 Within the site itself, the land is broadly level and laid to scrub grassland with a hedge and tree lined boundary to Church Lane to the east and hedgerow to the south. Remaining boundaries are demarcated by post and rail fencing creating a modest sized paddock with a gated access. The site is set back from the highway behind an intervening parcel of land subject to permission for a dwelling with construction soon to start. Two further residential properties sit to the east and a horse manage sits to the north west.
- 2.3 Access to the site is taken from the south west corner via a bell mouth junction to Horsemere Green Lane with gates set back from the highway to allow for long vehicles to fully exit the highway. In return, the access provides for appropriate for accessing Horsemere Green Lane. Beyond the access

point, a metaled track extends north past the western boundary of the site to serve outbuildings to the rear of Church farm Barn.

- 2.4 The wider street scene along this section of Horsemere Green Lane has a domestic appearance with well-maintained front gardens and boundary treatments, which includes a mix of timber fencing, soft landscaping and brick walling. Whilst the majority of frontages are softened by landscaping, there is no overriding materials used for site boundaries, giving a varied appearance to the street scene.
- 2.5 The site is located within a countryside location characterised primarily by detached residential properties of individual design and materials commensurate with the period of build and giving no overriding architectural character. The properties are set within good sized mature curtilages which front onto the highway giving a strong relationship to the public domain. The planting to the site boundaries and to the adjacent agricultural land provides a low density and bucolic appearance to the area.
- 2.6 Set out below are some photographs of the site which provides further context.



Application site



View of site from public domain



Views into and across the site

3.0 PLANNING HISTORY

3.1 The application site lies within the administrative area of Arun District Council. An inspection of the West Sussex County planning register reveals no planning history for this particular parcel of land. There is history for adjoining land which comprises:

- CM/32/20/PL - Change of use of land (B8 Storage) & erection of 1 No. detached single storey, two bedroom dwelling. Approved 16th October 2020.
- CM/11/20/CLE - Certificate of Lawfulness for use of land for Class B8 (Storage). Approved 1st July 2020.
- CM/36/19/PL – Retention of replacement fencing & proposed replacement entrance gates. Permission granted 30th September 2019.
- CM/21/03 – Single dwelling. Refused 26th August 2003. Appeal dismissed 29th April 2004.

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF) (2021)

- 4.1 The NPPF sets its status within the planning process at paragraph 2 where it states: ***“The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions”***. The NPPF is therefore afforded weight in the decision-taking process whereby it sits as more up to date than the adopted development plan.
- 4.2 The NPPF reinforces the drive for sustainable development within paragraph 7 stating that ***‘the purpose of the planning system is to contribute to the achievement of sustainable development.’*** The pursuit of sustainable development continues to have three dimensions, now expressed as objectives, comprising an economic objective, a social objective and an environmental objective.
- 4.3 Paragraph 9 states that in pursuing sustainable development ***“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local***

circumstances into account, to reflect the character, needs and opportunities of each area.” This paragraph is of paramount importance which identifies that the objectives of sustainable development outlined in paragraph 8 of the NPPF should be taken as a guide when determining what is sustainable, reinforcing that each planning decision has to be made on its own merits having regard to local circumstances.

- 4.4 The principle of proactively accepting new development is continued within paragraphs 10 and 11 of the NPPF. It is stated that where there are no relevant development plan policies or the relevant policies are out of date, planning permission should be granted unless the policies of the Framework indicate otherwise or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework considered as a whole. For decision taking, the NPPF states that this means approving development that accords with the development plan without delay.
- 4.5 Chapter 4 of the NPPF addresses decision-taking. Paragraph 38 states that ***‘Local planning authorities should approach decisions on proposed development in a positive and creative way.’***

- 4.6 The drive to support rural areas is additionally reinforced in Chapter 6 which confirms in paragraph 85 that ‘to meet local business and community needs in rural areas’, sites may have to be found that are ‘adjacent to or beyond existing settlements, and in locations that are not well served by public transport’. The key to acceptability being that the development is sensitive to the surroundings and has no unacceptable highways impact. Encouragement is given to **‘sites that are physically well-related to existing settlements’**.
- 4.7 In respect of car parking provision, Chapter 9 of the Framework states that if setting local parking standards, Local Planning Authorities should take into account the accessibility of the development, its type, mix or use, the availability of and opportunities for public transport, local car ownership levels and an overall need to reduce the use of high emission vehicles.
- 4.8 Chapter 11 of the NPPF requires that development makes effective use of land with Paragraph 120 advocating that **“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the**

environment and ensuring safe and healthy living conditions”. Paragraph 123 requires that a positive approach is taken to applications for alternative uses.

- 4.9 The NPPF places great emphasis upon the creation of high quality buildings and places within Chapter 12. A number of tests for achieving high quality development are set out within paragraph 130, which includes ensuring that developments (in summary):
- a) function well and add to the overall quality of an area, not just for the short term but over the lifetime of the development;
 - b) are sympathetic to local character, including the surrounding landscape setting.
- 4.10 Chapter 15 of the NPPF gives consideration to the natural environment. Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils, by recognising the wider benefits of eco system services and by minimising impacts on biodiversity. This is continued within paragraph 179 which refers to biodiversity and states that local planning authorities should preserve and enhance biodiversity. It is

also required that new development should adequately mitigate against any potential harm, with encouragement given to incorporating biodiversity enhancements in and around new development.

4.11 Section 16 of the NPPF gives regard to the historic environment and requires a positive strategy to be given to the desirability of preserving and enhancing the significance of heritage assets. This states that in determining applications account should be taken of the desirability of sustaining and enhancing the significance of assets and putting them to viable uses consistent with their conservation. This includes also having regard to the potential impacts of development upon the significance of a heritage asset and its setting.

4.12 The NPPF states that any development likely to lead to substantial harm or loss of a heritage asset is likely to be refused consent unless this harm is outweighed by matters of public benefit. The consideration of the impact upon the significance of a designated heritage asset requires great weight to be given to the asset's conservation.

Local Planning Policy

4.13 The local Development Plan comprises the Arun Local Plan 2011 – 2031 which took effect in July 2018 and the Bersted Neighbourhood Plan 2014-2029 which was made in November 2014.

Arun Local Plan 2011 – 2031 (July 2018)

4.14 The local Development Plan comprises the Arun Local Plan 2011 – 2031 which took effect in July 2018.

4.15 The relevant Local Plan policies to this development proposal comprise:

- Policy SD SP1 – Sustainable development
- Policy SD SP2 – Built-up Area Boundary
- Policy C SP1 – Countryside
- Policy D SP1 - Design
- Policy D DM1 - Aspects of form and design quality
- Policy T SP1 - Transport and Development
- Policy W DM2 – Flood Risk
- Policy QE SP1 – Quality of the Environment
- Policy QE DM1 – Noise Pollution
- Policy QE DM2 – Light Pollution

- Policy HER SP1 – The Historic Environment
- Policy LAN DM1 – Protection of Landscape Character
- Policy EMP SP1 - Strategic Economic Growth
- Policy EMP DM1 - Employment Land: Development Management.

- 4.16 Policy SD SP1 (Sustainable development) states that a positive approach will be taken to development proposals that reflect the presumption in favour of sustainable development and will work proactively to find solutions to secure development.
- 4.17 Policy SD SP2 (Built-up Area Boundary) requires the development within the boundary will be permitted subject to other policies of the Local Plan.
- 4.18 Policy C SP1 (Countryside) recognises areas defined as the countryside will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside which meets stated criteria, such as being for agriculture, recreation, the rural economy and which otherwise accords with other policies in the Plan.
- 4.19 Policy D SP1 (Design) requires that new development makes efficient use of land whilst reflecting the characteristics of the local area in all aspects of design.
- 4.20 Policy D DM1 (Aspects of form and design quality) sets required criteria for the assessment of new development, having regard to character, appearance/attractiveness, impact, innovation, adaptability, crime prevention, trees and woodland, solar gain, public realm, layout, public art, density, scale and form.
- 4.21 Policy T SP1 (Transport and Development) requires development to minimise the use of the car, to provide for appropriate parking, and encourages healthy lifestyles.
- 4.22 Policy W DM2 (Flood Risk) ensures that development in areas at risk of flooding will only be permitted when certain criteria have been met. This should also take account of climate change.
- 4.23 Policy QE SP1 (Quality of the Environment) seeks to ensure that development does not have a significantly negative effect upon residential amenity, the natural environment or upon activities enjoyed by residents and visitors to the

District. Where industrial development is proposed, this should be directed to land allocated for these uses.

4.24 Policy QE DM1 (Noise Pollution) ensures that noise generating development should be located in appropriate locations.

4.25 Policy QE DM2 (Light Pollution) requires that any outdoor lighting shall minimise the impact upon the landscape, be the minimum required for security and working purposes, minimises potential glare and spillage with consideration to be given to powering such lighting by on-site renewable sources.

4.26 Policy HER SP1 (The Historic Environment) affords the highest level of protection to designated heritage assets and requires that they are conserved and enhanced in a manner appropriate to their significance.

4.27 Policy LAN DM1 (Protection of Landscape Character) requires all development to respect the particular characteristics and natural features of a landscape character area.

4.28 Policy EMP SP1 (Strategic Economic Growth) provides for sustainable growth of differing economic sectors whilst also securing for the integration of other uses and forms of development where it fosters growth and provides for appropriately scaled development.

4.29 Policy EMP DM1 (Employment Land: Development Management) provide for sites outside of the built-up areas that would not result in detriment to public access routes and highways and is of a high standard of design, layout and landscaping appropriate to the context. Criteria also require development to have a sympathetic relationship to the surrounding characteristics of the landscape.

Clymping Neighbourhood Plan 2015-30

4.30 The application site lies within the Neighbourhood Plan Designation Area for the 'Clymping Neighbourhood Plan'. The Neighbourhood Plan was made in January 2016. Relevant policies to the consideration of the proposal comprise:

- Policy CPN 8 - Protection of Trees and Hedgerows
- Policy CPN 9 - Protection of Natural Habitats
- Policy CPN 11 - Quality of Design

- Policy CPN 12 - Reducing the risk of flooding
- Policy CPN 14 - Traffic and the Environment

- 4.31 Policy CPN 8 (Protection of Trees and Hedgerows) ensures that development that will damage or result in the loss of trees or hedgerows of arboricultural and amenity value will not be permitted. Encouragement is given to the retention of trees or hedgerows of good arboricultural and amenity value.
- 4.32 Policy CPN 9 (Protection of Natural Habitats) avoids harm to existing nationally and locally protected habitats unless the harm can be mitigated or equivalent alternative habitats are provided.
- 4.33 Policy CPN 11 (Quality of Design) requires new development must be of a high quality of design and protect and enhance local character having regard also to the local environment, boundary treatments, materials, amenity, parking, detailing and low carbon usage.
- 4.34 Policy CPN 12 (Reducing the risk of flooding) sets out that new development must be designed and constructed to reduce the level of flood risk.

- 4.35 Policy CPN 14 (Traffic and the Environment) ensures that development does not have a detrimental impact on highway safety and the living conditions of residents, with provision for pedestrian and cycle networks.

5.0 DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT

- 5.1 Planning permission is sought to convert a grass paddock into a small site for the storage of caravans to meet a growing demand in such storage facilities. It is intended for the site to provide a maximum of 46 caravan storage spaces, to include a space with disabled accessibility, along with four parking spaces for owners to use when tending to their caravans.
- 5.2 The applicant has considerable (30+ years) experience of running such storage and has witnessed a significant increase in the ownership of caravans, with this continuing to rise as a result of the pandemic. As such the applicant already has a waiting list for caravan storage in the area and frequently has to turn away potential customers. Storage sites have also been lost through the high demand for land to meet the housing crisis with a greater value attributed to land with residential development potential.
- 5.3 The application therefore seeks to meet existing need for secure storage, but also anticipates a growing need coupled with rising numbers of households. The immediate area to the site has been particularly targeted for new housing, with

for instance, permission granted for 300 new homes in Horsemere Green Lane alone. It is therefore desirable to have caravans stored close to residential areas to enable clients to easily tend to their caravans to prepare these for travel.

- 5.4 The need for sites is also pertinent where storage of caravans within the curtilage of properties on residential estates does tend to be restricted, particularly on newer builds through covenants on the land that prohibits parking on driveways. Such covenants ensure that parking is retained for vehicles where estates are at higher densities and parking spaces are in high demand. In addition, it is common for newer estates to also have parking restricted by planning condition to restrict curtilage parking to only cars, motorcycles and cycles.
- 5.5 Coupled with the need for appropriate storage and the increasing value of caravans, caravan insurance companies are requiring that off site storage occurs on well-managed sites with a residential presence. The applicant is therefore a member of CaSSOA (Caravan Storage Site Owners Association) which was formed in 1999 by insurer, Amtrust Europe Ltd. This is a now a nationally recognised Association setting appropriate standards for caravan storage

to combat theft, to which caravan insurance companies will direct customers to for their storage needs. CaSSOA requires sites to have a high level of security such as fencing, lockable gates, CCTV and monitored entry and exit points.

- 5.6 From the experience of the applicant, the movement of each caravan is rarely more than twice a year, and in many cases only once a year, and indeed often not at all. Movements generally take place during daylight hours. With the advent of motorised “movers”, caravan parking has become quieter and easier and no engine noise is therefore to be heard.

Amount and scale of development

- 5.7 Local Plan EMP SP1 (Strategic Economic Growth) recognises the range of economic sectors that will arise within the District and fosters growth of appropriately scaled development. This proposal would contribute towards a local business, which whilst located within the countryside is in an area which is experiencing targeted growth, but importantly remains appropriately scaled for the locality.
- 5.8 The proposed development would utilise an existing small paddock as a farm diversification activity which due to the established boundaries would ensure that the site is limited

and not encroach into the surrounding countryside. The scale of the development would make efficient use of the land which is too small to be of value for agricultural activity in a position that has good access to the highway and minimal visual impacts. Furthermore the site is also within proximity to the Rudford Industrial Estate confirming that the area already has a mixed character and appearance and land uses such that this site is not located within wholly rural countryside.

- 5.9 Given the location of the site, there would be no new adverse harm upon the character of the area nor any adverse harm to any residential properties which are sited at a distance from the site. The creation of the site would not require operational development such as the erection of new buildings and can provide the appropriate level of security on site with the applicant residing at an adjacent property.

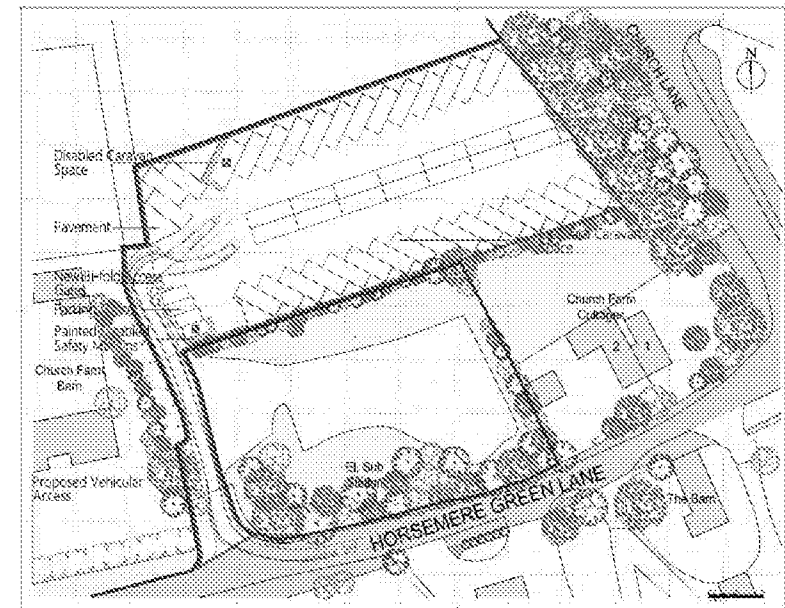
6.0 LAYOUT, DESIGN & APPEARANCE

6.1 The NPPF attaches great importance to the design of the built environment with the Local Plan Policies D SP1, D DM1 and EMP DM1 as well as the Clymping Neighbourhood Plan Policy CPN 11 – Quality of Design considering matters of design. These policies place weight upon the effect of new development upon its surroundings having regard to matters of design, scale, materials, siting and layout as well as the relationship to neighbouring development and the setting in the landscape. Consideration is additionally given to the impact of new development on the character of the area within Policy EMP DM1 for employment land.

6.2 In having regard to the development plan policies, the creation of the storage site would not require any new buildings, but simply the laying out of the land with enclosure by a 2m palisade fence to provide the required level of security. The fence itself is not included within the development proposal because this can be erected under permitted development rights afforded by the Town and Country Planning (General Permitted Development)(England) Order 2015 Schedule 2, Part 2, Class A.

6.3 Within the site the storage facility would be laid out to provide for access to each caravan with the 46 spaces also allowing for manoeuvrability. Space is also to be provided for four car parking spaces to allow caravans to be tended to and prepared for travel.

Figure 1: Site Layout



Design and appearance

- 6.4 The Arun Local Plan and the Clymping Neighbourhood Plan all contain criteria based policies for addressing the design and appearance of new development as well as the impact of development upon the character and appearance of the local area. Many of these design criteria overlap. Given the detailed criteria, consideration is primarily given to Arun Local Plan Policy D DM1 (Aspects of form and design quality) with the criteria individually addressed below.

Aspects of form and design quality

When considering any application for development the Council will have regard to the following aspects:

- 1. Character - Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.***
- 6.5 The proposed development would make efficient use of an area of land which is sited in a locality characterised by a mix of residential properties, community facilities and industrial sites. The character is not wholly rural but sits within the settlement of Clymping, which is also close to Burndell to the
- north-west. Clymping is also a settlement that is to receive an additional 300 dwellings on land to the south of Church Farm and to the south of Horsemere Green Lane. The character of the area will therefore receive further change in its appearance.
- 6.6 The use of the site for a storage purpose would be screened from public vantage points by virtue of its backland position and boundary planting. As a consequence, there would not be any significant change to the character of the surrounding area where the use would be of a low level in terms of activity. The layout also proposes a spacious layout that would not result in a cramped form of storage with space to individually manoeuvre caravans on site. The proposal accords with criteria 1.
- 2. Appearance/attractiveness - Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.***
- 6.7 Criteria 2 overlaps with Criteria 1, both referring to design matters having regard to design, materials and landscaping. It is reiterated that the resultant storage use would be functional in its layout with no new buildings required to facilitate the use. As such there is no requirement to

consider architectural principles. The site already has landscaping to the public domain where the site abuts Fort Road to the east and this would remain to ensure screening is provided to assist with site security. As such the development would not have any adverse prominent to the public domain as to impact upon the character and appearance of the area. The proposal accords with criteria 2.

3. Impact

Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

- 6.8 The development has minimal impact upon neighbouring properties. To provide for secure storage a relationship to a residential presence is seen as essential by caravan insurance companies to assist with security. In this regard, the site would be in proximity to Church Farm Barn to the southwest and to a new dwelling to be constructed to the immediate south of this application site (to be occupied by the applicant). The only other dwellings within the immediate vicinity of the site comprise Church Farm Cottages which front Horsemere Green Lane to the southeast.

- 6.9 The caravan site would be visible in outlooks from the nearest properties such as in longer views gained at a first-floor level and may also be glimpsed at ground level in winter when there is less vegetation. However, the proposal would retain a sufficient distance from the properties as to ensure that appropriate levels of amenity remain and therefore the development would not be adversely prominent or overbearing.

- 6.10 The nature of the development for storage purposes would not give rise to adverse levels of harm in terms of loss of privacy or sunlight or daylight. Furthermore, the use would be low level and being for storage, would not generate notable levels of noise or disturbance. The use is therefore appropriate for positioning in relation to residential properties. The proposal would therefore accord with criteria 3.

4. Innovation

Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

- 6.11 The proposed use would not need to embrace new technologies and it is not considered necessary to embed

innovative design and construction techniques into development which is simply for caravan storage. This criterion is therefore not relevant.

5. Adaptability

Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

- 6.12 The development is specifically designed to meet the needs of the business comprising caravan storage therefore does not require any new buildings. The space would adapt as necessary but would also not provide for any public space therefore this aspect of the criteria is not relevant.

6. Crime prevention

Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the

'Safer Places - The Planning System and Crime Prevention'.

- 6.13 The development would provide for a secure caravan storage within an enclosed site. The positioning of the site away from immediate public view or from direct access to the highway (i.e. through two gated entrances) the location is inherently appropriate to meet security requirements. The proposal accords with criteria 6.

7. Trees and woodland

All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

- 6.14 The development requires no new landscaping in order to mitigate the impact because no trees are affected. The existing tree lined hedgerow to the west and south of the site would remain. Criteria 7 is not relevant to the proposal.

8. Solar gain

Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

6.15 The orientation of the site is prefixed and the development comprises the provision of external storage only with no buildings required. The functional use of the land is not reliant upon sunlight or passive solar energy. Criteria 8 is therefore not relevant.

9. Public Realm

Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

6.16 Criteria 9 is not considered to be relevant to the proposal where streets and public spaces are not required. In any event the proposal is intended to provide a safe and secure space with provision for retaining existing planting.

10. Layout – movement

Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

6.17 The development would not impact upon the existing highway network where access to the site would remain from Horsemere Green Road. Within the site, vehicles would access the storage site via the existing route that extends northwards parallel to Church Farm Barn. The site is additionally within the settlement therefore enables access by walking and cycling. Criteria 10 would therefore be met.

11. Layout – legibility

Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

6.18 The development is not positioned or required to provide a focal point to the public realm. The site itself is purposely located to avoid having a public relationship in order to meet security requirements. The development has no need to provide public realm features such as sculptures or street furniture. The requirements of criteria 11 would be met.

12. Public art

Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures.

- 6.19 The provision of public art is not relevant to the proposed development.

13. Density

The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

- 6.20 The development is not for a residential use and has no impact upon the density of development in this location.

14. Scale

The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

- 6.21 The storage use can be readily accommodated within the site leaving ample space for onsite parking and maneuvering. Being screened from the public domain, the site would remain within the confines of the character of the locality. The proposal would therefore accord with criteria 14.

15. Aspects of form and design quality

Development should also comply with the Arun District Council Design Guide.

- 6.22 Matters regarding scale and massing have been addressed in relation to criteria 1. Whilst the Arun District Design Guide advocates particular aspects of design, this guidance only draws reference to the design of caravan parks as opposed to caravan storage where there distinct differences. No guidance is provided for Class B8 storage uses in terms of design requirements. Criteria 15 is therefore not considered to be relevant.
- 6.23 In having regard to the siting, design, scale and external appearance of the development, it is considered that the criteria to the Arun Local Plan Policy D DM1 are met and therefore in turn, overlapping criteria also contained within

Policies S SP1, LAN DM1 and EMP DM1 as well as Policy CPN 11 of the Clymping Neighbourhood Plan are all met.

Natural Environment

- 6.24 The NPPF requires that local planning authorities should preserve and enhance biodiversity and that new development should adequately mitigate against any potential harm. The site is not located within any area designated for its ecological interest and does not contain any trees subject of a Tree Preservation Order nor protected by virtue of any Conservation Area designation. The site does not have any vegetation on site and therefore the development would have no impact upon biodiversity interests.
- 6.25 The proposed development would not result in the demolition of any buildings that are likely to accommodate any protected species and the proposed storage use can be achieved whilst being sensitive to the natural environment. As such, there is no conflict with the relevant development plan policies or advice set out in the NPPF addressing biodiversity, with the proposal also ensuring that the characteristic landscape of the locality would be safeguarded.

- 6.26 The site sits within an area that is not at risk from fluvial or pluvial flooding therefore is appropriate for the proposed use and any drainage can be addressed on site to ensure that no new impacts arise. This will ensure that the development accords with Policy W DM3 (Sustainable Urban Drainage Systems) of the Arun Local Plan and Policy CPN 12 (Reducing the risk of flooding) of the Clymping Neighbourhood Plan.

Historic Environment

- 6.27 The application site is located within proximity to Church Farm Barn, a Grade II listed building, therefore consideration needs to be given to the impact of development within the setting of this heritage asset. The Planning (Listed Buildings and Conservation and Conservation Areas) Act 1990 states that, in considering applications which affect the setting of listed buildings and conservation areas, the Local Planning Authority must have special regard to the desirability of preserving or enhancing its setting or any features of special architectural or historic interest which it possesses.
- 6.28 The NPPF additionally requires a Local Planning Authority to 'identify and assess the significance of a heritage asset that may be affected by a proposal (including development

affecting the setting of a heritage asset)...'. This assessment should consider the direct and indirect impacts with weight given to the asset's significance and conservation. These requirements are reflected locally within Policy HER SP1 (The Historic Environment) of the Local Plan and Policy CPN 13 (Retain buildings or structures of character) of the Clymping Neighbourhood Plan.

- 6.29 Church Farm Barn was first listed in 1976 within the listing entry stating:

**TQ 00 SW CLIMPING HORSEMERE GREEN LANE
16/354 15.11.76 Barn to the west of Nos 1 & 2 Church
Farm Cottages (formerly listed as barn to the north
east of Church Farm Cottages) II C18. Faced with flints
with red brick quoins. Hipped roof of corrugated iron,
painted green. Ventilation holes edged with red brick.
Central wagon entrance on south side.**

- 6.30 The listing refers to the attributes of the building that give it its special historic interest. These attributes would not be physically impacted from the nearby positioning of the caravan storage area which is to remain detached from the curtilage of the listed building by an intervening track. As such, it is considered that the proposal would have less than

substantial harm to the significance of the architectural and historic character of Church Farm Barn.

- 6.31 The NPPF requires that 'where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'. This balance is required irrespective of whether the harm arising is substantial or less than substantial harm to its significance.

- 6.32 In considering the harm arising, the proposal would provide for efficient reuse of land that has no notable economic value to agriculture and would provide opportunity for rural diversification and support to a rural business. By providing a site also meets a local need ensuring that the site in turn can support other businesses involved in the sale and maintenance of caravans having a positive 'knock-on' effect. This constitutes a positive benefit in the public interest.

- 6.33 The proposed use would not give rise to adverse environmental harm given the screening from the surrounding character of the area and the detachment from the setting of the listed building. Furthermore by providing a small site locally would reduce the need for travel further afield, again

having a positive benefit in the public interest. In determining the application, it is considered that proposal should be positively weighed in favour of the public benefits noting that the harm to the significance of the heritage asset is minimal.

- 6.34 In considering the statutory duties of the Planning (Listed Building and Conservation Areas) Act 1990, the NPPF and the Policies of the Development Plan, the character and appearance of the setting of this heritage asset would be preserved and the development also accords with the respective policies of the Arun Local Plan and the Clymping Neighbourhood Plan.

7.0 ACCESS AND PARKING

- 7.1 Arun Local Plan Policy T SP1 (Transport and Development) and Neighbourhood Plan Policy CNP14 (Traffic and the Environment) ensures that development meets its transport demands and is designed to minimise additional traffic generation, provides for safe and easy movement and meets parking requirements.
- 7.2 The proposed development is a traffic generating use therefore the application is accompanied by a full Transport Statement. Based on experience gained by other caravan storage sites, it is estimated that movements would equate to approximately three arrivals and three departures per day when averaged across an entire year. The Statement concludes that this level of movement can be adequately accommodated on the highway network.
- 7.3 The site will be accessed from Horsemere Green Lane utilising an existing access point which is already used for larger vehicles such as horseboxes. The access provides for appropriate visibility for the public highway which is subject to a 30mph speed limit and has sufficient radii to accommodate cars towing caravans. Equally when off the highway, the access to the site itself from the private track can also

accommodate the vehicles, again with sufficient space for turning into the site.

- 7.4 The site proposes on site parking for 46 caravans and four cars ensuring that the needs of the development can be met. The site is also within an accessible location enabling the site to be reached by alternative modes of transport such as walking and cycling should owners wish to tend to their caravans.
- 7.5 With no new harm would occur to the local highway network and with the site able to accommodate its transport requirements on site, the development is considered to accord with the relevant policies pertaining to highway and transport matters.

8.0 CONCLUSION

- 8.1 Planning permission is sought for the change of use of an agricultural paddock to a Class B8 use specifically for caravan storage to meet a growing demand for safe and secure storage. The location of the site is ideal to meet insurance standards for sites of this nature, that is safe, secure and within close presence to nearby properties.
- 8.2 The development can be contained within the site area and following the erection of security fencing under permitted development rights, ensures no encroachment into the wider countryside. Furthermore existing planting would be retained to the site boundaries to protect the site for security and in turn ensure that there is no harm to the landscape character.
- 8.3 It is acknowledged that the site is within proximity to neighbouring residential properties however given the low level storage use with minimal noise and disturbance, the proposal would not have any overriding demonstrable harm upon privacy or amenity. There would additionally be no adverse harm to natural features derived from the trees and hedgerows which provide screening to the site and the site is

notably not in an area liable to flood from fluvial or pluvial sources.

- 8.4 The site is located within proximity to Church Farm Barn, a Grade II listed building and would give rise to less than substantial harm to the significance of this heritage asset. However the public benefits of the proposal would weigh in favour of the development and the character and appearance of the setting would be preserved.
- 8.5 The development would make efficient use of the land with space retained on site to accommodate the manoeuvring and parking requirements with no change necessary to the existing vehicular access which already serves larger vehicles. The development would therefore generate no harm to highway safety.
- 8.6 The proposal complies with the NPPF and the relevant policies contained within the Arun Local Plan and the Clymping Neighbourhood Plan. It is requested that planning permission be granted.