



APPLICATIONS & APPEALS SERVICES

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

**Change of use of land for Class B8 (storage)
for caravans as an extension to an existing
storage site in conjunction with a revision to the
site layout approved under Planning Permission
referenced CM/14/22/PL**

**PLANNING, DESIGN
& ACCESS STATEMENT**

ENF/249/25

March 2026



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1.0 INTRODUCTION

1.1 Planning permission is sought to address an existing caravan storage site previously granted under the Planning Permission referenced CM/14/22/PL to first, regularise the layout for the site which has been laid out differently to the approved plan. Secondly permission is also requested to address an extension to the site. The extension covers approximately 500sqm and in conjunction with the revised layout is providing for an additional 41 caravans than previously approved. The works have already been undertaken therefore the application is retrospective.

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 storage;

- **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 following the grant of planning permission in 2022 for caravan storage, has been laid to hardstanding and enclosed with metal palisade fencing. The site has a frontage to Church Lane to the east although is screened from view by hedgerow and a tree lined boundary to the highway. To the south, the site is set back from Horsemere Green Lane behind an intervening parcel of land which is subject to permission for a residential dwelling. Two further residential properties sit to the east and a horse manage sits to the northwest.
- 2.3 Access to the site is taken from the southwest 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 appropriate

visibility 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 are no single form of site boundary, 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 entrance from public domain



Views through the site



Views through 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.
- CM/14/22/PL - Use of land for Class B8 (Storage) for caravan storage (resubmission of CM/64/21/PL). This application may affect the setting of a listed building and is in CIL Zone 3 (Zero Rated) as other development. Granted 22 June 2022.

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF) (2024)

- 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 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 In pursuing sustainable development, the NPPF sets out that ***“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 is of paramount importance which identifies that the objectives of sustainable development outlined in 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 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. The NPPF 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 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 is 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, 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”***. The NPPF requires that a positive approach is taken to applications for alternative uses.
- 4.9 The NPPF also 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, 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. 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 with reference 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 has been granted for a change of use of land from a grass paddock to provide for the storage of caravans with this permission having been implemented on site. This permission provided for 47 caravan parking spaces and 4 staff parking spaces (including one disabled space). The number of caravans on site was not previously restricted by any planning condition, with the only mechanism to secure the parking being the conditioned site layout.
- 5.2 Given the demand for secure caravan storage, the site was also extended north to provide for an additional row of caravan parking spaces with this simply formed from a continuation of the hardstanding. The reorganisation of the site in conjunction with the extension across approximately 500sqm enables the provision of an additional 41 caravan parking spaces. This takes the total number of spaces to 88.
- 5.3 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 when implementing

the planning permission granted in 2022, there was already a waiting list for caravan storage in the area. The need for such sites has been exacerbated through the high demand for land to meet the housing crisis with a greater land value attributed to sites located as to have residential development potential.

- 5.4 The application therefore sought to meet existing need for secure storage, but through its enlargement has provided for the growing need coupled with rising numbers of households in the area. 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.
- 5.5 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.

- 5.6 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. The membership of CaSSOA and the success of the applicant in providing for caravan storage was recognised by the Local Planning Authority when granting the previous permission.
- 5.7 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

- 5.8 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.
- 5.9 The extension to the approved scheme has continued to utilise paddock land which was similar divided from the site by fencing therefore ensuring that there was no loss of hedgerow. The expanded area continues to support this farm diversification activity which, due to the established boundaries ensures that the site is limited and does not encroach into the surrounding countryside. The scale of the development also makes efficient use of the land which is too small to be of value for agricultural activities 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.

5.10 Given the location of the site, the alternative layout for the site from that approved and the extension to the storage area ensures that there is 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 extension to the storage area requires no further operational development (e.g. new buildings) and can provide the appropriate level of security with the applicant residing at an adjacent property.

5.11 In previously granting permission for the caravan storage, the Local Planning Authority acknowledged that the site is:

'positioned close to the Rudford Industrial Estate and there are no sites available for the proposed use with external storage yards all linked to the buildings and ancillary to the extant uses. The proposed caravan storage does not require a building to support the use therefore making plots within existing storage sites uneconomical should any site become vacant'.

5.12 The Local Planning Authority in considering the proposal against Policy EMP DM1 accepted the demand for storage space outside of allocated industrial sites, acknowledging that:

'It would also be inappropriate to remove any existing commercial buildings to provide the required storage space as this would prejudice other more intensive employment uses from taking place in the future. In addition, it is not economically viable for the applicant to purchase alternative land when the application site is already in the applicant's ownership and sits in very close proximity to the Rudford Industrial Estate'.

5.13 It was also accepted that the development met the remaining criteria of Policy EMP DM1 that considers the impacts of this form of development in this location, for instance upon highway safety, public routes and residential amenity. Matters relating to design, layout and landscaping were also considered acceptable.

5.14 The differing layout and extension to the site creates no new impacts that would now result in this development being unacceptable. The development therefore continues to accord with Policy EMP DM1 of the Local Plan.

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 extension of the approved storage site continues to not require any new buildings. The additional land was paddock and divided by the original site by a field boundary (fence). This land has simply received an extension of the hardstanding 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 The extension of the site northwards has enabled the site to be arranged in a more accessible manner for the users which in turn has provided for additional spaces. Access into the site is also provided at a different angle to enable ease of manoeuvrability. As such, the original 47 spaces can be increased to 88 with only minimum additional land take. Space continues also to be provided for four car parking spaces for users of the site visiting to maintain and prepare caravans for travel.

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 development continues to make efficient use of an area of land 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. This was acknowledged within the previous Officer report.

6.6 The site itself is not prominent to the public domain being screened from public vantage points by virtue of its backland position and boundary planting. The additional land used for storage sits to the rear of the approved site and is therefore seen in context. There is no significant change to the character of the surrounding area where the use is low level in terms of activity. The layout is practical for the type of storage and enables caravans to be individually maneuvered on site.

Figure 1: Site Layout (as approved)

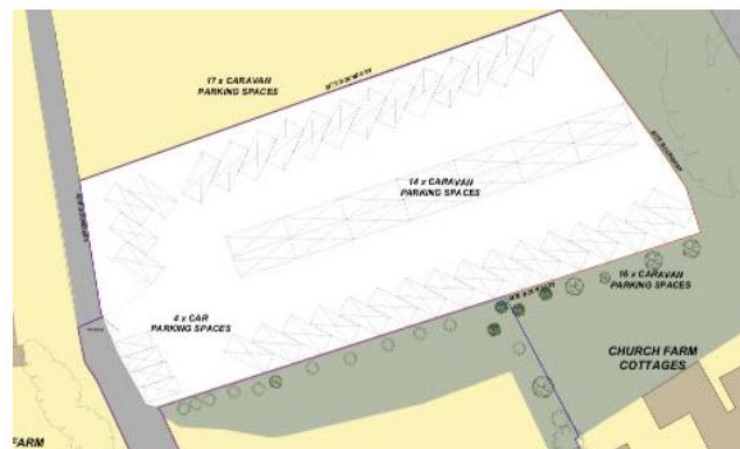


Figure 2: Site Layout (proposed)



6.7 In addressing the impact, the previous approval was accepted as being 'relatively simple and low key both in terms of appearance and activity. It will not be viewed as an isolated feature in the countryside as it is relatively close to other buildings.' It was additionally acknowledged to not give rise to 'any significant change to the character of the surrounding area where the use would be of a low level in terms of activity'. 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.

6.8 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 layout is functional with no new buildings required to facilitate the use. As such there is no requirement to consider architectural principles.

6.9 The site already has landscaping to the public domain where the site abuts Church Road to the east and this would remain to ensure screening is provided to assist with site security. As such the development does 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.

6.10 The extended caravan storage site 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.

6.11 The caravan site continues to 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 sufficient distance from the properties to ensure that appropriate levels of amenity remain and therefore the

development would not be adversely prominent or overbearing.

- 6.12 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.

- 6.13 The extended use and reorganization of the site 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.

- 6.14 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'.

- 6.15 The development continues to 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.

- 6.16 The development requires no new landscaping in order to mitigate the impact because no trees are affected either from the original permission or from the extended area which simply extended into the adjacent land. The previous permission included a landscaping condition which has been complied with and the existing tree lined hedgerow to the west and south of the site remains. 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.

- 6.17 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.

- 6.18 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.

- 6.19 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. The application has however been accompanied by a Transport Assessment to confirm how the site can be accessed by a variety of transport modes. 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).

- 6.20 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.

- 6.21 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.

- 6.22 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.

- 6.23 The storage use can be readily accommodated within the site leaving ample space for onsite parking and maneuvering. This was accepted through the original grant of planning permission and the extension to the site by approximately 500sqm does not result in any new harm. This additional area is positioned to the rear of the approved site and therefore has no new impact upon public vantage points. 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.

- 6.24 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.

- 6.25 In having regard to the siting, design, scale and external appearance of the development, it is considered that reorganised site with its extension remains in accordance with the criteria to the Arun Local Plan Policy D DM1 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 met.

Natural Environment

- 6.26 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.

6.27 The extension to the approved site did not require the demolition of any buildings likely to accommodate any protected species and the extended storage use has been 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.

6.28 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 ensures that no new impacts arise. This ensures 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

6.29 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.

6.30 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.

6.31 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.

6.32 The listing refers to the attributes of the building that give it its special historic interest. These attributes have not been 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.

6.33 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.

6.34 The position of having 'less than substantial harm' was also recognised by the Conservation Officer in considering the previous application who raised no objection. It was deemed that any harm was also '*outweighed when considered against public benefits which include efficient reuse of land that has*

no notable economic value to agriculture and would provide opportunity for rural diversification and support a rural business'.

6.35 The Officer report also indicates that the provision of the storage site ensure 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.*' The report concluded by stating that '*the proposal should be positively weighed in favour of the public benefits noting that the harm to the significance of the heritage asset is minimal*'.

6.36 The extension to the parking area would not give rise to any new 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 where the locality has been targeted for additional housing. In determining the application, it is considered that proposal should continue to be positively weighed in favour of the public benefits noting that the harm to the significance of the heritage asset is minimal.

6.37 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. The level of vehicular movements from the site have been assessed as remaining low, stating that 'the 41 additional caravan spaces would produce, on average over the year, approximately 2 additional arrivals per month' 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 onsite parking for 88 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 as set out in the Transport Assessment.
- 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 has been granted for a caravan storage site to accommodate up to 47 caravans. This site has however been laid out to accommodate an additional area of land of approximately 500sqm which, in conjunction with a reorganisation of the layout can provide for up to 88 caravans with four parking spaces. The use for caravan storage continues to meet a growing demand for safe and secure storage and the location remains ideal to meet insurance standards for sites of this nature, being safe, secure and within close presence to nearby properties.
- 8.2 The development can be contained within the extended area having again been derived from paddock. 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 minimal noise and disturbance, the extended area does 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 weigh in favour of the development, and the character and appearance of the setting would be preserved as already confirmed.
- 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 Clymington Neighbourhood Plan. It is requested that planning permission be granted.