

PLANNING, DESIGN & ACCESS STATEMENT

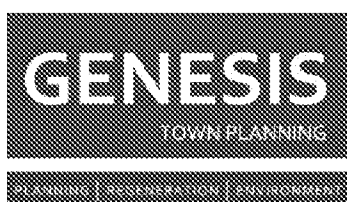
Retrospective application for the demolition of three existing buildings and erection of replacement workshop and machinery store building - amended design and siting to Planning Permission FG/37/17/PL

Onslow Caravan Park
Onslow Drive
Ferring
BN12 5RX

On behalf of

Mr P Pratt of Island Meadow Parks

Ref: 20032/PDAS01
October 2020



RTPI

Chartered Town Planners



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1.0 INTRODUCTION

- 1.1 This Planning, Design & Access Statement has been prepared on behalf of Mr Peter Pratt of Island Meadow Parks. Island Meadow Parks operates a number of successful caravan parks in East Anglia and the South of East of England.
- 1.2 This application seeks retrospective permission for the demolition of three existing storage/workshop buildings and erection of replacement workshop and machinery store building including amended design and siting to Planning Permission FG/37/17/PL.
- 1.3 The application documentation comprises this Planning, Design and Access Statement and the documents listed below:
- Covering Letter
 - Planning Application Form and Certificates
 - Community Infrastructure Levy (CIL) – Form 1: CIL Additional Information Form
 - Drawing No. 031 11 - Location Plan
 - Drawing No. 031 05 Rev A - Site Plan
 - Drawing No. 031 06 – Proposed/Constructed Floorplan, Roof Plan and Elevations
 - Drawing No. 031 07 - Permitted Floorplan, Roof Plan and Elevations
 - Drawing No. 031 08 - Constructed & Consented Comparison
 - Drawing No. 031 09 - Site Sections
 - Drawing No. 031 10 - Site Sections with figure dimensions
 - Drawing No. 20060 - Topographical Survey
 - Shadow Study by Bayside Architectural Design Limited
 - Flood Risk Assessment
 - Surface Water Drainage Statement
 - Biodiversity Survey and Report by the Ecology Co-op

2.0 THE SITE AND SURROUNDING AREA

The Application Site

- 2.1 The application site is about 0.138 hectares (0.34 acres) and comprises the south eastern part of the Onslow Caravan Park, Onslow Drive, Ferring. The caravan park is located in the north-western part of Ferring and is approximately 5.0 hectares (12.3 acres) in size and falls within the administrative area of Ferring Parish. It is a static caravan holiday park that has 90 static caravans, although there is an historic planning permission for 133 caravans. According to the Proposals Map of the Adopted Arun Local Plan 2018 the application site and the entire caravan park falls within the Settlement Gap between East Preston and Ferring.
- 2.2 The part of the caravan park that is pertinent to this application (i.e. the application site) is edged red on the google satellite image below.



- 2.3 This area contains a partially constructed barn and workshop, a small yard area, and three storage and workshop buildings which will be demolished upon the completion of the new barn/workshop building. These buildings and yard area are accessed directly off the main caravan park drive which links into Onslow Drive to the east. Appendix 1 of this statement contains photographs of the new barn/workshop and surrounding area. A high voltage (above ground) electricity cable

passes over the yard area and the older storage/workshop buildings. The southern boundary currently comprises a 1.8m high close boarded timber fence which runs parallel with a public footpath and dry ditch that feeds into the Ferring Rife located further to the west.

The Surrounding Area

- 2.4 The surrounding area is mixed in character with static caravans located immediately to the north and west. Existing residential properties all of which fall within the defined built up area boundary of Ferring are located to the north-east, east, and south. These mainly comprise bungalows (to the east) and two storey/two and a half storey houses (to the south). The nearest residential properties to the barn include a single storey bungalow 'Whispers' (No. 53 Onslow Drive) located to the east and Nos 2 to 16 Meadow Way which are two storey houses (some with large rear facing dormers) overlooking the new barn/workshop.
- 2.5 The village centre of Ferring is located approximately 300m to the east within which there is a good range of local shops and facilities including bus stops on the Stagecoach 700 route.

3.0 PLANINNG HISTORY

- 3.1 According to records displayed on the Arun District Council website a number of planning applications relating to the wider caravan park use have been submitted over the years. Applications of most relevance to the current proposal are summarised below:
- 3.2 ***FG/161/14/PL*** – Demolition of three buildings and erection of replacement workshop and machinery store. Approved 22nd January 2015.
- 3.3 This application included the proposed demolition of three dilapidated storage/workshop buildings near the main entrance to the caravan site from Onslow Drive. Owing to the presence of an overhead powerline the proposed new buildings could not be located in the same position as the buildings that were to be demolished. As a result, the new workshop and machinery store building was to be relocated to another part of caravan park close to the South Coast Railway line that runs parallel to its northern boundary.
- 3.4 This permission was not however implemented because the building would have been located over a culverted section of the Ferring Rife and the requirements of the drainage engineers would have resulted in too many caravan plot pitches being lost within the wider site. This necessitated a new application with a revised siting for the buildings.
- 3.5 ***FG/85/15/PL*** – Demolition of three buildings and erection of replacement workshop and machinery store (Amendment to FG/161/14/PL). Refused 29th July 2015.
- 3.6 This application sought the re-positioning of the buildings approved under DG/161/14/PL to a more central part of the caravan park away from the rife and closer to the site managers accommodation. Despite the case officer recommending that planning permission should be granted, Members of the Planning Committee decided to refuse permission on the grounds that it would harm the outlook of occupiers of the existing mobile homes and would be detrimental to the setting and character of the low rise caravan park. In addition, there were no compelling circumstances requiring its location which was considered to harm the objectives and integrity of the East Preston and Ferring Strategic Gap.
- 3.7 ***FG/37/17/PL*** - Demolition of three buildings and erection of replacement workshop and machinery store (Resubmission following FG/161/14/PL with amended design and siting). Approved 8th May 2017 subject to 8 No. planning conditions.
- 3.8 This granted permission for the re-siting (plus design changes) of the new workshop and machinery store approved under FG/161/PL to the south-east part of the caravan park close to its main entrance from Onslow Drive.

- 3.9 **FG/121/18/PL** – Variation of Condition 2 imposed under FG/37/17/PL relating to approved site plan. Approved 24th September 2018 subject to 4 no. planning conditions
- 3.10 This application arose because of an enforcement investigation which revealed that the positioning of the building under construction did not accord with the approved drawings. As a result, a retrospective application was submitted. This sought a slight modification to the positioning of the building by moving its south-western corner 0.93 metres further away from the southern boundary of the site.
- 3.11 **FG/29/20/PL** – Variation of Condition 2 imposed under FG/121/18/PL relating to proposed site plan, proposed floor plan, proposed elevations and roof plan. Withdrawn 15th April 2020.
- 3.12 This application arose because of a enforcement investigation concerning the method of surface water disposal which was not in accordance with the details set out in the approved drainage scheme discharged under FG/48/18/DOC in respect Condition No. 4 of FG/37/17/PL on 8th June 2018. There were also irregularities between the building under construction and as shown on the approved drawings for permissions FG/37/17/PL and FG/121/18/PL.
- 3.13 When the application was submitted on 2nd February 2020 it sought retrospective permission for the following changes to the approved drawings:
- The relocation of and increased width to the main door opening north elevation;
 - The deletion of the roller shutter door opening to the workshop area on the north elevation and the insertion of a standard single door;
 - The removal of two door openings in the east elevation to create a blank elevation;
 - The insertion of four additional roof lights (eight in total) in the north facing roof plane of the main roof;
 - The removal of a roof light in the northern roof plane above the workshop area;
 - The insertion of eight new roof lights on the south facing roof plane of the main roof; and
 - A 900mm set back to the workshop area along the southern elevation.
- 3.14 During the course of the application it became apparent that the ridge and eaves heights of the building as constructed were higher than as shown on the approved plans for FG/37/17/PL. The main reason for this was that the building as constructed used a standard portal frame instead of a bespoke frame which would have had a lower roof height.
- 3.15 On 7th April 2020 the case officer confirmed that if the application were not withdrawn it would be likely to be recommended for refusal. As a result, the application was withdrawn on 15th April 2020.

4.0 THE PROPOSED DEVELOPMENT

4.1 This application seeks retrospective permission for the demolition of three existing storage/workshop buildings and erection of replacement workshop and machinery store building including amended design and siting to Planning Permission FG/37/17/PL and FG/121/18 which were granted permission on 8th May 2017 and 24th September 2018, respectively.

4.2 The current application is submitted to reflect the footprint, height and elevational appearance of the building as currently constructed on site which differs from that approved under FG/37/17/PL and FG/121/18. The main changes to the building's footprint, length and height (as approved and as constructed) are shown on Drawing No. 031 08 - Constructed/Consented Comparison. These are summarised below:

- A revised building footprint that includes:
 - a reduction in the width of the building by 1060mm
 - setting back the rear building line of the south elevation (to the workshop area) by 900mm
- Increasing the ridge heights of the main building by 800mm and the workshop area by 298mm
- Increasing the eaves heights of the main building and the workshop area by 120mm

4.3 A number of changes have also been made to the north, east and south elevations. These can be seen by comparing Drawing No. 031 06 – Constructed Plan, Roof Plan and Elevations and Drawing No. 031 07 – Permitted Plan, Roof Plan and Elevations. The changes are summarised below:

- the repositioning and widening of the vehicular entrance on the northern elevation of the main building;
- the insertion of a new single width door to the workshop area on the northern elevation (which replaces the approved double width roller shutter door opening for this part of the building);
- the insertion of four additional roof lights (eight in total) in the northern roof plane of the main roof;
- the removal of the rooflight in the northern roof plane of the workshop area;
- the removal of two single width doors on the east elevation; and
- the insertion of eight new roof lights in the southern roof plane of the main roof.

5.0 PLANNING POLICY CONTEXT

- 5.1 This section assesses the planning policy context at the National level as set out in the National Planning Policy Framework (NPPF) and at the Local Level in the form of the Arun Local Plan and the Ferring Neighbourhood Plan.
- 5.2 The Development Plan for the area of the application site comprises the following documents:
- West Sussex Joint Minerals Plan (July 2018)
 - West Sussex Waste Local Plans (April 2014)
 - Arun Local Plan 2011-2031
 - Ferring Neighbourhood Plan 2014-2034

National Planning Policy Framework (NPPF)

- 5.3 The National Planning Policy Framework (NPPF) was revised in February 2019. Although the NPPF does not form part of the Development Plan it provides up to date planning policy that should be taken into consideration in determining planning applications and appeals. Section 2 of the NPPF provides for the achievement of sustainable development and paragraph 8 confirms that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of three different objectives). These are:
- a) ***an economic objective*** to build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) ***a social objective*** to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being; and
 - c) ***an environmental objective*** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.4 Paragraph 10 confirms that at the heart of the Framework there is a presumption in favour of sustainable development. This is reflected in Paragraph 11 which confirms that plans and decisions should apply a presumption in favour of sustainable development.

5.5 Section 4: Decision-making

This confirms in paragraph 47 that in determining applications for planning permission that they should be determined in accordance with the development plan, unless material considerations indicate otherwise.

5.6 Section 5: Building a strong, competitive economy

Paragraph 80 confirms that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 84 confirms that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. In these circumstances it will be important to ensure that development is sensitive to its surroundings.

5.7 Section 12: Achieving well designed places

Paragraph 127f) confirms that planning decisions should ensure that developments:

“..create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁶, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

5.8 Paragraph 130 confirms that permission should be refused for development of poor design that fails to take the opportunities for improving the character and quality of an area and the way it functions.

5.9 Section 14: Climate Change and Flooding

This section acknowledges the need for the planning system to support the transition to a low carbon future in a changing climate, taking account of flood risk and coastal change. Paragraph 155 confirms that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 158 confirms that development should not be allocated or permitted if there are reasonably available sites appropriate for development in areas with a lower risk of flooding.

5.10 Paragraph 163 confirms that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. It goes on to state that development should only be allowed in areas at risk of flooding where it can be demonstrated that:

- a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) The development is appropriately flood resistant and resilient;

- c) It incorporates sustainable drainage systems, unless there is clear evidence that it would be inappropriate;
- d) Any residual risk can be safely managed: and
- e) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

5.11 Section 15: Conserving and enhancing the natural environment

Paragraph 170 confirms that planning decisions should contribute and enhance the natural and local environment by having regard to various criteria including b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; and d) minimising impacts on and providing net gains for biodiversity.

5.12 The Development Plan documents of most relevance to this application include the following:

Arun Local Plan 2011-2031

5.13 The Arun Local Plan 2011-2031 was adopted in July 2018. Policy Map 2 (East) shows that the application site is in the countryside and within the East Preston to Ferring Settlement Gap. Its northern, eastern and southern boundaries are however adjacent to the defined Built-Up Area Boundary.

5.14 Local Plan policies of most relevance to this application are referred to below:

5.15 Policy SD SP1 (Sustainable Development)

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

5.16 Policy SD SP2 (Built-up Area Boundary)

Development should be focussed within the Built-up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.

5.17 Policy C SP1 (Countryside)

Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:

- a. for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation with West Sussex Waste Local Plan; or
- b. for quiet, informal recreation; or

- c. for green infrastructure; or
 - d. for the diversification of the rural economy; or
 - e. for road and/or cycle schemes; or
 - f. in accordance with other policies in the Plan which refer to a specific use or type of development.
- 5.18 Policy SD SP3 (Gaps Between Settlements) – this policy seeks to protect and retain the separate identity of gaps between settlements by preventing coalescence between settlements. It goes on to comment that development will only be permitted within gaps if:
- a. It would not undermine the physical and/or visual separation of settlements;
 - b. It would not compromise the integrity of the gap, either individually or cumulatively with existing or proposed development;
 - c. It cannot be located elsewhere; and
 - d. It maintains the character of the undeveloped coast;
 - e. Or, if a subsequent DPD or Neighbourhood Plan deems it appropriate, through allocation.
- 5.19 Policy TOU SP1 (Sustainable Tourism and the Visitor Economy) – encourages sustainable tourism where it protects as well as promotes the main tourism assets.
- 5.20 Policy TOU DM1 (Tourism Related Development) - confirms that when assessing proposals for visitor attractions, facilities or accommodation outside of the Built Up Area Boundary will generally be expected to be small scale and relate to quiet, informal recreation and enjoyment of Arun's countryside. In all cases, developments in the countryside are required to demonstrate that it is required and is compatible with its countryside location and is sensitively designed to minimise potential impact in the countryside.
- 5.21 Policy D SP1 (Design) - This confirms that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have derived from a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.
- 5.22 Paragraph 13.2.2 of the explanatory text confirms that ***“The successful introduction of new buildings into established townscapes and landscapes relies on the use of materials, high standards of workmanship, detailing and limits on scale and massing ensuring that ‘new’ buildings are harmonious with their surroundings”.***

- 5.23 Paragraphs 13.2.8 to 13.2.10 consider scale. Paragraph 13.2.9 comments that for development to be successfully integrated within the existing environment, scale is an important design element. When designing the local character of building forms, patterns of development and the natural environment, the scale of new development should:
- Avoid obscuring public views, vistas and skylines;
 - Ensure the height and massing does not interrupt or debase the rhythm of an existing building/ roof line and overall streetscape, or detract from the local and wider areas character;
 - Respect the existing scale in the detailing and composition of elements such as windows, doors etc;
 - Have regard to the principal users of development schemes – people; so that buildings and infrastructure are scaled for their maximum benefit and enhance their experience and space; and
 - Taller buildings are more suited to key locations such as on corners, along principal routes, the end of vistas or around parks but this would be more site specific.
- 5.24 Paragraph 13.2.10 recognises that the form, building details and massing of a development will have a great impact on a locality, and has the opportunity to enhance, add variety and local distinctiveness. It also confirms that development does not have to be restricted to exactly the same scale of the existing area, but should keep within the general confines of the overall character, unless it can be demonstrated that the contrary would bring a substantial visual improvement.
- 5.25 Policy D DM1 (Aspects of Form and Design Quality) - This is a complementary policy addressing aspects of form and design quality. It covers 15 items including character; appearance/attractiveness; impact; innovation; adaptability; crime prevention; trees and woodland; solar gain; public realm; layout–movement; layout-legibility; public art; density; scale; and aspects of form and design quality. For the purposes of the current application the following items are of particular relevance:
- ***Character*** - which confirms that developments should 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 scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.
 - ***Appearance/attractiveness*** - including demonstration of a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.
 - ***Impact*** - have minimal impact to users and occupiers of nearby property and land. For example by avoiding significant loss of sunlight, privacy and unacceptable noise and disturbance.

- **Crime Prevention** - provide security measures that make places feel safer which can be achieved through natural surveillance and human presence.
- **Trees and Woodland** - all new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.
- **Scale** - the scale of development should keep within general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring substantial visual improvement.

5.26 Policy D DM4 -- (Extensions and Alterations to Existing Buildings -- Residential and Non- Residential) -- When considering applications for extensions and alterations to existing buildings, the Council requires that:

- a) The extension or alteration sympathetically relates to and is visually integrated with, the existing building in siting, massing, design, form, scale and materials;
- b) The extension or alteration is visually subservient to the main building and provides a high standard of amenity;
- c) The extension or alteration does not have an adverse overshadowing, overlooking or overbearing effect on neighbouring properties;
- d) In streets characterised by relatively small gaps at first floor level between buildings, any extension or alteration at first floor level does not come to within a minimum of one metre of the side boundary;
- e) The extension or alteration does not compromise the established spatial character and pattern of the place but is instead a positive addition.

5.27 Policy ENV DM5 - (Development and Biodiversity) - This confirms that development schemes shall in the first instance seek to achieve a net gain in biodiversity and protect existing habitats on site. They should also incorporate elements of biodiversity including green walls, roofs, bats and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designed or not).

5.28 Policy W DM2 (Flood Risk) -- confirms that development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment will only be permitted where certain criteria have been satisfied.

5.29 Policy W DM3 -- (Sustainable Urban Drainage Systems) -- To increase the levels of water capture and storage and water quality all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development at an early stage of the design process.

- 5.30 Policy QE SP1 (Quality of the Environment)- This requires all development to contribute positively to the quality of the environment and ensure that development does not have a significant negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the district.
- 5.31 Policy QE DM1- (Noise Pollution)- seeks to safeguard the continued use of existing industrial and commercial uses and to protect amenity. Noise sensitive development should not normally be permitted where high levels of noise continue throughout the night, especially during the hours when people are normally sleeping; and, there is a likelihood of complaints about noise from industrial development.

Ferring Neighbourhood Plan 2014

- 5.32 The Ferring Neighbourhood Plan was made on 10th December 2014. Policies of most relevance to the proposed development include:
- 5.33 Policy 1A: (Spatial Plan for the Parish) - refers to the built-up area boundary of Ferring Village which is shown on the Proposals Map. It confirms that development proposals located within the built up area boundary will be supported; and, those that are located outside the built up area boundary that do not accord with development plan policies in respect of the control of development in the countryside will be resisted.
- 5.34 Policy 10: (Sustainable Drainage Systems and Water Management) – requires development proposals to demonstrate that they incorporate sustainable drainage design features that will be effective in managing the risk of surface water flooding within and beyond their boundary. One or more of the following solutions will be supported:
- Permeable driveways and parking areas
 - Water harvesting and storage features
 - Green roofs
 - Soakaways
 - Other suitable and effective technical solutions recommended by a flood risk assessment

6.0 PLANNING CONSIDERATIONS

- 6.1 The main planning considerations for the determination of this application are set out below and include the following:

Need for the Proposed Building

- 6.2 The limited size and poor condition of the three existing storage/workshop buildings (about 93 m² in total) which are proposed for demolition means that much of the machinery (including a Land Rover, two diggers, two trailers, a ride on mower, a grass roller, a chipper/shredder, a stump grinder, a cement mixer, a concrete breaker, and a machine to clear blocked drains) that is used on a regular basis for the maintenance of the caravan park has to be kept off-site or left in the open. This results in security problems with the potential risk of theft of these items. The new building is positioned opposite the site managers house which provides surveillance and improves security for the contents of building which is encouraged by paragraph 127f) of the NPPF and Local Plan Policies D SP1 and D DM1.
- 6.3 In addition to improving site security, the new building is required to meet the essential maintenance needs of the Caravan Park. To help the business run efficiently and effectively it is essential to have a suitable machinery/equipment store on-site combined with a workshop area to service and maintain the storage items in good order. It is evident that there is a clear need for the accommodation currently sought. This accords with Local Plan Policy TOU DM1 which supports tourist related facilities and accommodation.

Principle of Development

- 6.4 The principle of a new storage/workshop building in its current location within the Caravan Park is already accepted by virtue of planning permissions FG/37/17/PL and FG/121/18/PL which were granted on 8th May 2017 and 24th September 2018, respectively. As the new building is substantially complete with the footprint of the main part of the building (the four bay storage area) having been built in accordance with the amended siting approved under FG/121/18/PL and as all of the pre-commencement conditions (Nos 3, 4, 6 and 8) of permission FG/37/17/PL have been discharged, a 'material start' has been made. This means that these two permissions represent the 'fall-back' planning position subject to the buildings being completed in accordance with the approved drawings and discharged conditions.
- 6.5 As a consequence of the 'fall back' position, the main considerations for this application relate to the differences in the height and the elevational changes between the approved scheme and the current scheme; the effects that these changes would have on the amenity of the occupiers of nearby residential properties; and, other material considerations. These aspects are considered below.

Countryside and Settlement Gap Location

- 6.6 Since application FG/37/17/PL was approved in May 2017, the Arun Local Plan 2011-2031 was adopted in July 2018. As before the application site continues to be located just outside the built-up area boundary which lies immediately to the south and east. This means the application site is still defined as a countryside/rural location. As before, the new building is discretely located within the Caravan Park with static caravans located to the north and west; and a mix of bungalows and predominately two storey housing located to the east and south, respectively. As a result, the new building does not appear as an isolated feature in the landscape and fits in well with its urban fringe location. As set out in paragraph 6.2 and 6.3 above the new building is required to provide suitable storage and maintenance equipment to meet the day to day needs of the Caravan Park which justifies its countryside location. As such the development accords with Local Plan Policies C SP1 and TOU DM1 as it is required for tourism purposes and is compatible with its countryside location.
- 6.7 When application FG/37/17/PL was approved the application site fell within the East Preston to Ferring Strategic Gap. The current adopted Local Plan no longer has Strategic Gaps. These have been replaced by Settlement Gaps which are a slightly less onerous designation. Although the proposed building is located in the countryside and falls within the East Preston to Ferring Settlement Gap the above permissions indicate that it is an acceptable form of development in the settlement gap. As previously stated, the building is not located in the open countryside and on this basis it does not undermine the physical and/or visual separation of settlements, or contribute to the coalescence of settlements and it would not individually or cumulatively compromise the integrity of the settlement gap. Whilst it is acknowledged that the building as constructed is higher than the approved scheme, an increase in height of 800mm (at its highest) it would not make a significant material difference to the retention of the separate identity between East Preston and Ferring or result in any coalescence between these settlements. As such the current scheme accords with Local Plan Policy SD SP3.

Siting/Positioning

- 6.8 Owing to the close proximity of the overhead power cables the new building cannot be located in the same position as the three existing buildings to be demolished. The position of the main part of the building (comprising four bays to be used for vehicle and machinery storage) is in the same location as that approved under FG/121/18/PL. The workshop part of the building which is located at its eastern end has been reduced in width by 1060mm and is stepped back by 900mm from the main south facing elevation. These changes represent reduction in the approved footprint of the building, moving it further away from the nearest residential properties to south (Nos 4, 6 and 8 Meadow Way) and the detached bungalow (No. 53 Onslow Drive (to the north-east)). This results in an improved relationship with neighbouring properties by increasing the distance between these dwellings and the building. As such the current siting of the building amounts to an improvement over the approved scheme under FG/121/18/PL. The siting/positioning of the building therefore accords with Local Plan Policy D SP1.

Appearance

- 6.9 The appearance of the building being a portal frame structure partly constructed from brick/blockwork clad by external timber weatherboarding and set under a grey cement fibre corrugated sheet roof is similar in appearance to many agricultural buildings within the district. The building is split into two elements with the workshop being designed to be stepped back from the main rear building line (south elevation) representing a subordinate side extension reducing the overall bulk of the building. Overall, it has an acceptable appearance for its rural/countryside/urban fringe location and does not cause unacceptable harm to visual appearance of the area. The appearance of the building is not significantly different to that of the approved scheme FG/37/17/PL and would use the same palette of materials previously approved by the discharge of Condition No. 3 (cleared under FG/22/18/DOC). On this basis the appearance of the building accords with Local Plan Policy D SP1.

Scale and Massing

- 6.10 Drawing No. 031 08 compares the heights of the building as constructed and as approved under FG/37/17/PL. This shows the main increase in height being the ridge height of the main roof located above the vehicle and machinery storage area. This part of the building has increased by 800mm. The ridge height of the roof above the workshop area has also increased, but only by 298mm. The effects of these increases will however be negligible when the building is viewed from the rear garden areas of the nearest residential properties to the south (No's 6 to 12 Meadow Way) because of the shallow pitch of the roof which means that most of the increased height will be at an angle and moving away from these properties instead of being in a vertical plane.
- 6.11 The part of the new building nearest to these residential properties comprises the wall forming the south elevation. This has increased the height to the eaves by 120mm which is just over about half the standard height of one concrete block (215mm). The increase is slight and only has a moderate effect particularly as new landscape planting will be planted along the southern boundary as per discharged Condition No. 8 of FG/37/17/PL. This condition was discharged under FG/22/18/DOC on 1st May 2018 and included new tree and hedgerow planting along the southern boundary. Over time this planting will grow helping to screen and soften the appearance of parts of the southern elevation when viewed from the public footpath and residential properties to the south.
- 6.12 Drawing Nos 031 09 and 031 10 comprise Site Sections between the building as approved and as constructed and the neighbouring residential properties No. 53 Onslow Drive (a bungalow) and No. 8 Meadow Way (a two-storey semi-detached house). This shows that the increased height of the barn as constructed is only a marginal increase compared to the approved scheme and that its ridge height at 5736mm continues to be lower in height than No. 8 Meadow Way which has a ridge height of 8110mm. The back to back distance between the barn and the two nearest

residential properties to the south (Nos 6 and 8 Meadow Way) are 15m and 17m, respectively. The presence of the public footpath and dry ditch (which is about 5m wide) between the application site boundary and the rear garden boundaries to the south (as shown in Photographs 12, 13 & 14 of Appendix 1) also creates a sense of separation and distance between the buildings. The effects of the increased height of the building on the rear garden areas and from within the houses themselves would only be slight in terms of outlook and dominance and is not unacceptable.

- 6.13 Whilst the ridge height of the workshop is 298mm higher the approved scheme this part of the building is still 1475mm lower than the ridge height of the bungalow to the north-east ('Whispers' – No. 53 Onslow Drive). The workshop building has a scale and massing that is similar to that of the bungalow. This, combined with an 17m gap between the two buildings, creates a comfortable and acceptable relationship between the two buildings that would not harm the residential amenity of the occupiers of the bungalow.
- 6.14 Views of the new building from the southern side of Meadow Way and between the gaps of the existing residential properties on the northern side of the road (see Photographs 7, 8 & 9 in Appendix 1) indicate that the building has an acceptable scale and massing which does not interrupt or debase the rhythm of the overall streetscape. Although the building is about the same width as two pairs of semi-detached houses located to the south it is lower in height (by about 2374mm) and is only seen in glimpsed views in the gaps between the residential properties in Meadow Way. As set out in paragraph 13.2.10 of explanatory text to Local Policy DSP1 it is important to note ***"..... that development does not have to be restricted to exactly the same scale of the existing area, but should keep within the general confines of the overall character, ..."***. Whilst it is acknowledged that the new building can also be seen from the public footpath that is adjacent to the southern boundary (Views from this public viewpoint are shown in the Photographs 10 to 14 in Appendix 1) the building as constructed is not over dominant and will be less visible when the new boundary planting matures and becomes established.
- 6.15 Overall the scale and massing of the building as constructed is not out of keeping with character of the site (which is a caravan park) or the surrounding area (which is residential comprising a mix of two/two and half storey houses and single storey bungalows). Although the overall height of the building has increased compared to the approved scheme it does not have an over dominant or overbearing effect on neighbouring properties. As such it accords with the relevant explanatory text of Policy D SP1 (Design); criteria c) of Policy D DM4; and ***Criterion 1. Character*** and ***Criterion 14. Scale*** of Local Plan Policy D DM1.

Sunlight and Overshadowing

- 6.16 The applicant has commissioned Bayside Architectural Design Limited to prepare a Shadow Study that compares the extent of shadowing that the approved scheme and the building as constructed would create. A copy of this Shadow Study forms part of the application submission. The Shadow Study assesses the situation at the times of the Spring Equinox (21st March); Mid-Summer (21st June) and Mid-Winter (21st December). Owing to the orientation of the building which is generally

in a north-east to southern-west direction and the location of the nearest residential properties which are located to the east and south of the new building the proposed development does not result in any direct overshadowing of nearby residential properties or their garden areas. Indeed, it is very difficult to observe the differences between the approved scheme and the development as built. As such the proposed development will not result in the significant loss of sunlight or adverse overshadowing and accords with the sunlight aspect of **Criterion 3. Impact** of Local Plan Policy D DM1 and criteria c) of Policy D DM4.

Alterations to the Appearance of the Building

- 6.17 The alterations to the appearance of the building are described in Section 4 of this statement. Excluding the increased ridge and eaves height the main changes to its external appearance are limited to the north and east elevations. As these elevations face into the main area of the caravan park the alterations to door openings will not be seen from outside the caravan park. Notwithstanding this, the alterations are in keeping with the original design concept for the building and its scale. The changes maintain a high design standard for a building of this type and use.
- 6.18 As previously stated the building as constructed includes four additional roof lights in the northern roof plane and eight new roof lights on its southern roof plane. These have been incorporated to maximise the amount of natural light within the building during daylight hours reducing the need for artificial lighting. This embodies the principles of sustainable design and will assist in reducing energy use which is encouraged by paragraph 8 of the NPPF.

Access

- 6.19 Vehicular access to the new building is via the internal road layout serving the wider Caravan Park area. The internal roads are part tarmac and part concrete and link into Onslow Drive which abuts the north eastern boundary of the application site. This means of access was considered suitable for planning permission FG/37/17/PL. A new yard area would be provided between the building and the neighbouring bungalow 'Whispers' (No. 53 Onslow Drive) which will provide ample parking and manoeuvring space for staff and delivery vehicles.

Landscaping

- 6.20 For the purposes of this application it suggested that landscaping is dealt with by a suitably worded planning condition. Nevertheless it is envisaged that landscaping scheme will be the same as that detailed in application FG/22/18/DOC relating to the discharge of Condition No. 8 - (Landscaping Scheme) of FG/37/17/PL which was cleared on 1st May 2018. This involved the planting of new native species of trees and hedges along the southern boundary which is adjacent to the public footpath. This will help screen and soften the appearance when viewed from the

public footpath and residential properties to the south. New tree and shrub planting is also proposed in close proximity to the north, east and west elevations. These measures would soften the appearance of the building when viewed from within the caravan park.

Biodiversity

- 6.21 A Bat Scoping Report and Preliminary Ecological Appraisal has been prepared by the Ecology Co-op. This forms part of the application submission and confirms that as the application site comprises buildings surrounded by existing hardstanding/paved areas the risks of impacts on reptiles, amphibians, badgers and other protected species is considered negligible and no other surveys are necessary. Owing to the presence of the existing buildings they were all assessed for their potential to host roosting bats. The inspection of the buildings revealed few opportunities for roosting bats and overall this potential is rated as 'low negligible'.
- 6.22 The report acknowledges the potential for disturbance from artificial lighting and recommends the installation of an ecologically sensitive lighting scheme. Although the site is of inherently low ecological value there are opportunities to enhance the value of the site and the wider caravan park area. These opportunities include establishing a wildflower meadow habitat within the amenity grassland in the wider caravan park area and at least 10 metres of native hedgerow with some new tree planting. As referred to in paragraph 6.20 above, new landscape planting around the building and along the southern boundary will be provided as part of the development. The new tree and hedgerow planting will therefore provide additional new habitat on the application site which will achieve a net biodiversity gain in accordance with paragraph 170 d) of the NPPF and Local Plan Policy ENV DM5.

Flood Risk

- 6.23 The application is supported by an updated Flood Risk Assessment (FRA) which was submitted for application FG/161/14/PL. The updated FRA confirms that based upon the Environment Agency Flood Map for Planning that the wider caravan park falls within Flood Risk Zones 2 and 3 and that the majority of the application site itself falls within Flood Zone 1 (Low Probability of Flooding) with a small part of the western side being within Flood Zone 2 (Medium Probability of Flooding).
- 6.24 It is important to note that the new building relates to non-residential floorspace of 330m² (gross) and will be used for the storage of machinery and workshop uses related to the wider caravan park use. It will replace three existing storage/workshop buildings of about 83m² located in the north eastern corner of the application site. This results in a net floorspace increase of 247m² which means it falls within the definition of 'minor development'. It is material to note that the construction of the new building has resulted in the loss of one former holiday static caravan pitch which means there will be one less holiday caravan within the caravan park.

- 6.25 The workshop/storage uses within the new building are considered to be 'less vulnerable' uses and the new building will not result in any additional people working at the site which is five persons (three full-time and two part-time).
- 6.26 The access route (both pedestrian and vehicular) to the new building is via a short section of the main access road serving the caravan park which links into Onslow Drive. Both of these access routes (or part thereof) are within Flood Zone 1. This means that employees carrying out work in the new building, and the emergency services, could safely reach the development and evacuate it should the wider parts of the caravan park experience flooding. This accords with guidance set out in paragraph 163 e) of the NPPF and Local Plan Policy W DM2 b).
- 6.27 The finished building will also incorporate various flood resistant and resilient construction measures which are specified in paragraph 2.10 of the FRA. In this respect the proposed development accords with paragraph 163 b) of the NPPF and Local Plan Policy W DM2.

Surface Water Drainage

- 6.28 The application is supported by a Surface Water Drainage Statement which is similar to the details that formed the discharge of Condition No. 4 of planning permission FG/37/17/PL. These details were discharged under FG/48/18/DOC on 8th June 2018. In summary infiltration testing was carried out in September 2017 and this demonstrated that a blanket soakaway is not a viable option. Taking various matters into consideration the most appropriate surface water drainage solution for rainwater collected from the roof of the building involves the installation of two 8.5 cubic metre circular tanks located above ground at the eastern end of the workshop building. These storage tanks are sized to store a 100 year plus 30% extra rainfall allowance for climate change and would be linked at low level. The stored water would be then be filtered and discharged into the off-site water course (owned by the applicant) that runs along the southern boundary of the caravan park. Both storage tanks would be screened to soften their appearance. Details of the screening could be made the subject of a planning condition.
- 6.29 Drainage for the existing hardstanding area around the building would be the same as at present which currently drains to the existing grass areas within the wider site.
- 6.30 The proposed surface water drainage strategy accords with Policy W DM3 of the adopted Local Plan and similar proposals have been approved under FG/48/18/DOC on 8th June 2018.

Noise and Light Pollution

- 6.31 Condition No. 5 of FG/37/37 limits the use of the building to a workshop and the storage of vehicles and machinery (i.e. tractors, trailers and grass cutting machinery etc) associated with the caravan park. Condition No. 4 of FG/121/18/PL limits operations within the building to ***".. 0700 hours to 1800 hours Monday to Friday inclusive, 0700 hours to 1300 hours on Saturday nor at any time on Sundays, Bank or Public Holidays"***.

- 6.32 It is envisaged that the approval of the current application would be subject to similar use and hours of use conditions. As such these uses and activities are not considered to generate unacceptable levels of noise. As the use of the building is likely to be limited to the hours set out above the use of internal lighting outside of these hours will not be necessary. As such there will be minimal light pollution escaping from inside building during the hours of darkness outside of normal working hours. Owing to the height of the roof above the internal floor levels in the building and the obscure finish to the rooflights it will not be possible to look into or out of the building through these features. As a result, there will be no direct overlooking between the building as constructed and the surrounding residential properties.
- 6.33 Overall, the proposed uses and the design changes to the building as constructed will not result in any unacceptable design, pollution or privacy issues, or have a significant negative impact upon residential amenity of the occupiers of nearby residential properties. As such it accords with Local Plan Policies D SP1 ; D DM1 and Policy QE SP1 .

7.0 SUMMARY AND CONCLUSION

7.1 The foregoing sections of this Statement confirm the following:

- a) The need for and principle of a new building including the proposed uses within the building in its current location are acceptable by virtue of planning permissions FG/37/17/PL and FG/112/18/PL.
- b) The 800mm increase in height of the main part of the building and the 298mm height increase to the workshop will not make any discernible difference to the separate identity or coalescence in the East Preston to Ferring Settlement Gap.
- c) The main material considerations for this application relate to the differences in height and the elevational changes between the approved scheme and the application proposal and their effects on the amenity of the occupiers of nearby residential properties.
- d) The current siting and reduced footprint results in an improved relationship with neighbouring properties.
- e) The increase in height of the building as constructed does not result in a significant change to its scale or massing and it is still consistent with the scale and massing of nearby buildings and the overall character of the surrounding area.
- f) The proposed development would not result in any significant or unacceptable loss of sunlight or overshadowing.
- g) The external changes to the appearance of the building including revised door openings/ positions and additional rooflights maintain a good standard of design for a building of this type and use; and would not result in any adverse privacy issues arising.
- h) No significant harm would be caused to the existing negligible biodiversity of the application site. There would be a net biodiversity gain in the form of new tree and hedgerow planting along the southern boundary around the building. In addition, there scope to provide an area of wildflower meadow in part of the wider caravan park.
- i) Most of the application site is in Flood Zone 1 and proposed commercial use of the building is a 'less vulnerable' use. Safe access and egress to/from building can be achieved should flooding occur and the development incorporates suitable flood resistant and resilient construction measures
- j) An acceptable method of surface water drainage disposal will be incorporated in the development.
- k) The proposed use would not result in unacceptable levels of noise or light pollution.

- 7.2 Overall, the proposed scheme amounts to sustainable development for which there is a presumption in favour of granting planning permission.
- 7.3 We therefore trust that your Council will be able to approve this application within the eight week determination period.

Appendix 1 – Photographs of Barn and Surrounding Area



1. View of North Elevation – Vehicle and Machinery Store



2. View of East Elevation - Workshop



3. View of south-west corner and rear of Nos 6, 8 and 10 Meadow Way



4. View of South Elevation – Vehicle and Machinery Store



5. View along Southern Boundary looking South West



6. View along Southern Boundary looking East



7. View through Gap between Nos 8 and 10 Meadow Way



8. View through Gap between Nos 4 and 6 Meadow Way



9. Gap between Nos 4 & 6 Meadow Way



10. View between No. 53 Onslow Drive and No. 2 Meadow Way



11. Entrance to public footpath from Meadow Way



12. View to west along public footpath



13. View along public footpath looking east



14. View along public footpath looking east