

**Land at former McIntyre Nursery
Littlehampton Road
Ferring
West Sussex BN12 6PG**

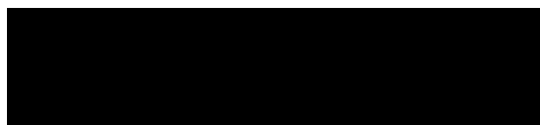
**Planning Statement
for
Standby Self-Storage**

Issue: #4
Date: 26th February 2018
Status: FINAL



John Collins Associates
Chartered Surveyors
Town Planners

127 Beulah Road
Thornton Heath
Surrey CR7 8JJ



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1. Description of the Development

- 1.1. Demolition of polytunnels, use of land for Class B8 container self-storage and the siting of 42 single-stacked storage containers, an office/toilet portacabin, new fencing, gates, CCTV, lighting and alterations to the entrance.

2. The Site and Surroundings

- 2.1. The site is in mixed use for which planning permission was granted at a recent appeal. This Enforcement Notice Appeal was allowed insofar it related to material change of use of land from horticulture to a mixed use comprising the storage of motor vehicles, the stationing of a portable office building used as an office, a scaffolders' yard and a firewood yard, including the stationing of storage containers and a portable office building.
- 2.2. The development proposal relates to part of the mixed use site, namely the three polytunnels used for the storage of motor vehicles and their associated fenced and gated compound with office portacabin and the open parking area adjacent to the access road.
- 2.3. The site area is 1,140m²
- 2.4. The site is located within a small enclave of built development in the countryside. It is lies outside the boundary of any defined built-up area and is now wholly in commercial use.



Photo 1: The site entrance



Photo 2: The site viewed looking east from the adjoining Scaffolders' Yard



Photo 3: The shared access drive

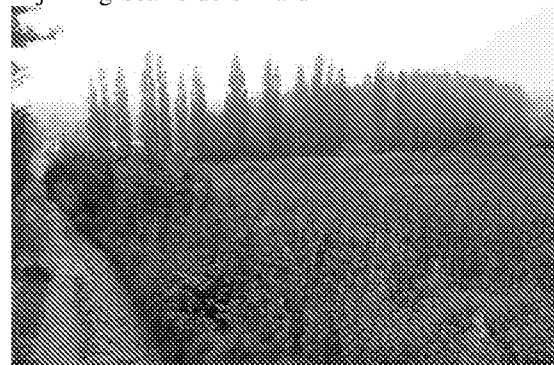


Photo 4: View looking south from the footpath to Highdown Hill

- 2.5. The site and its immediate surroundings are a former horticultural nursery, McIntyre Nursery, which has been subdivided into several commercial uses. None of these commercial activities are related to an agricultural use. The land to the north is a timber yard and is currently occupied by Bell Davis Fencing Supplies. A scaffolders' yard and firewood yard are located

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to the west and partly to the south of the development site. Along the southern site boundary there is a former horticultural pack-house which is in Class B8 storage/distribution use. It is occupied by PHS All Clear, who supply washroom products, water coolers and plant hire. Adjoining this warehouse unit is Highdown House, an authorised Class B1(a) office building with ancillary storage, occupied by the Highway Electrical Association.

- 2.6. Further to the south lies Chalet and Hillview Nursery. The use of this property was previously restricted to an agricultural tenancy, but it has now has been granted consent for unrestricted residential use. It is understood that the glasshouses of this former agricultural dwelling have been disused for the last 5 years.
- 2.7. The site is accessed via an existing access road located off the northern carriageway of the A259 Littlehampton Road.
- 2.8. The South Downs National Park lies to the north. The built-up residential area of Ferring is located on the southern side of Littlehampton Road.

3. Planning History

- 3.1. The relevant planning history of the site comprises:

<i>LA Ref</i>	<i>Decision</i>	<i>Date</i>	<i>Description</i>
FG/149/14/PL	Granted	17.12.14	New storage facilities for existing scaffold yard and firewood yard (related to landscaping contractors). Replace structures to be demolished.
FG/108/14/PL	Refused	07.10.14	Proposed new storage facilities for existing permitted scaffold yard and firewood yard (related to landscaping contractors) to replace structures demolished.
ENF/6/12 C/12/2184306	Appeal Allowed in Part	07.02.14	The material change of use of the land from horticultural use to a mixed use comprising the storage of motor vehicles, the stationing of a portable office building used as an office, a scaffolders' yard and a firewood yard, including the stationing of storage containers, together with facilitating operation development comprising the erection of concrete steps.
FG/42/12	Refused	26.07.12	Use of polytunnels for storage.

- 3.2. The relevant planning history of adjoining land include:

<i>LA Ref</i>	<i>Decision</i>	<i>Date</i>	<i>Description</i>
FG/190/16/PL	Granted	1.2.17	Highdown House: application for removal of condition 3 following grant of planning permission FG/129/00 relating to the restrictive use of the ancillary office accommodation to the needs of agriculture, horticulture, forestry and for no other purpose.

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LA Ref	Decision	Date	Description
FG/59/10	Granted	15.10.10	Land North of McIntyres Nursery: change of use from former agricultural nursery to B8 storage and wholesale supply of fencing and associated materials at (departure from the Development Plan).
FG/160/05	Granted	15.03.06	Highdown Farm: change of use of redundant horticultural pack house to B1/B8 use.
FG/129/00	Appeal Allowed	13.09.01	Demolish existing offices and provide replacement offices for McIntyres Nursery.

4. Planning Policy

- 4.1. The development plan includes:
1. The “Saved” policies of the Arun District Local Plan 2003 (LP)
 2. The Ferring Parish Neighbourhood Plan 2014-2029, November 2014
- 4.2. The policies of the development plan should be applied in the context National Planning Policy Framework, 2012 (NPPF).
- 4.3. There are also draft policies within the emerging Arun District Local Plan 2011-2029 (ELP), albeit of limited weight under para. 216 of the NPPF.

5. The Proposal

- 5.1. The development proposal has been largely informed by the Inspectors findings in a recent Enforcement Notice appeal (C/12/2184306). A pre-application enquiry was also submitted for an advanced version of a draft design, which is virtually identical to the full planning application proposal (PAA/204/17). The advice received was: “*were an application for planning permission to be submitted, it would be likely to be recommended for approval.*”
- 5.2. Standby Self Storage offer affordable self-storage facilities on secure and accessible sites, typically to local businesses with long-term storage requirements. They wish to open a branch in the Worthing area and offer employment to at least one local person.
- 5.3. Storage would be enclosed within standard shipping containers and not in the open. The containers would be green in colour and of limited height: a single stack is proposed.
- 5.4. It is proposed to alter the access point to improve visibility to the right sightline and access the site more efficiently in a central position. New sliding gates are proposed, set back from the access drive to accommodate a car or light commercial vehicle before the gates are remotely operated.

6. Economic Growth and Sustainable Development

- 6.1. The development proposal receives support under paragraph 17 of the NPPF by reusing previously developed land which is not of high environment value. Paragraph 28 supports growth and expansion of all types of business and enterprise in rural areas in order to create

jobs and prosperity by taking a positive approach to sustainable new development through the development plan process.

- 6.2. It is understood that the site was on the market for 4 years as a horticultural nursery prior to 2012 and that no enquiry was received. The selling agent reported the small size of the site and its commercial surroundings were a significant impediment in its marketability. However, the question of redundancy and marketing of the land proved to be of little relevance to the Inspector's decision for the 2012 appeal. The Inspector was mindful that the development plan policies seek to protect the countryside for its own sake, rather than to safeguard the availability of sites for horticultural businesses. The Inspector considered all 3 elements of the mixed use were "*small and relatively low key*" and "*all provide employment, albeit limited, and provide services to those living in the area.*" The Inspector found "*there is nothing before me to the effect that a small horticultural business, inevitably restricted in size and scope by the limited size of the site, would be likely to make a greater economic contribution. I conclude that all 3 components of the mixed use of the appeal site contribute positively to the local economy and, if allowed to remain insitu, would continue to do so. This being so, I find no serious conflict with the objective of the NPPF or draft ELP Policy SP4 insofar they are relevant to this issue.*" The proposed development involves no significant change to these material considerations.
- 6.3. The new development would be sustainable and provide a positive economic benefit, including local employment, albeit limited in extent.
- 6.4. With regard to the environment, both a car storage and self-storage use are low-key in nature. The volume of traffic generated for each storage use is not likely to reach a level to detract from the character of the established commercial area. Moreover, the Inspector noted that, in terms of energy conservation and climate change "*all 3 business on the appeal site is such that distances likely to be travelled by vehicles associated with them could be considerable, irrespective of where they are based.*" He stated that "*the scaffolders and landscape/arboricultural contractors will travel from their respective yards to wherever they are working, which could be anywhere within a considerable radius. Similarly, stored motor vehicles associated with the internet sales business are likely to be driven over distance to wherever the viewing or purchasing customer happens to be. It therefore matters little in terms of locational sustainability whether such business are located in town or countryside. No matter where they are, their activity will involve driving vehicles considerable distances into the countryside*". By contrast, the users of the self-storage facility are more likely to be local. The Inspector, who was clearly mindful of the fall-back position, concluded "*in any event, the lawful horticultural use would, in all likelihood, attract vehicle movements over distance and between town and countryside on a similar or greater scale.*"

7. Visual Impact

- 7.1. The development site is surrounded on all sides by built form or developed land. Moreover, there are mature trees to the north, east and west that screen the established commercial enclave from all but very limited and restricted views from the surrounding countryside.
- 7.2. When the Council granted consent for the storage use of the adjoining land to the north (a timber yard), the Committee Report noted "*only glimpses of the site can be seen*" from the footpath which continues up to Highdown Hill (FG/59/10). The timber yard is screened by a line of poplars. By contrast the development site, which lies further to the south, has a further screening line of conifer trees that border the timber yard. There is therefore even less potential for views into the site. Moreover, the proposed green coloured containers would help to blend in the development from any glimpsed views of the development site.

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- 7.3. The Inspector for the recent appeal agreed. He found: *“that the boundary screening helps to hide all the uses on the site from walkers”*. He attached *“little significance to the presence of parked vehicles adjacent to the road frontage, which would in all likelihood be a feature of the site for its lawful use”*. He stated that: *“Moreover, I am mindful that open storage and display and the parking of sizeable vehicles would be part and parcel of a horticultural use and that, in views of the site in all directions, such activity is likely to be subsumed by similar uses on the surrounding commercial sites provided that is limited in height. This includes the stationing of storage containers, as long as they are not stacked. I therefore find that the mixed use, in itself, has no significant adverse implications for long distance views from Highdown Hill or the setting of the National Park”*.
- 7.4. The appeal decision set a height limitation of 3m on new structures and storage containers. The proposed single stack of 2.6m high containers would therefore conform to this restriction.
- 7.5. External lighting is proposed using bulkhead fittings mounted at a relatively low height on the tops of the storage containers. The selected light fittings would have an eye-brow feature in order to direct light downward and thus help to avoid spillage of light outside the site. Low level lighting bollards have been additionally selected adjacent to the access point. The road and walkways would also be paved in dark, rather than light, surfacing materials. Consequently, there should be little or no reflection from these surfaces.

8. Traffic Generation

- 8.1. The Inspector stated that the access road is of *“good quality”* and noted *“that business within the same commercial enclave.... already generate substantial traffic including heavy vehicles”*. He noted that traffic generation for vehicle storage would be limited to initial delivery, dispatch for sale and staff trips from and to the site to accommodate customer viewings elsewhere. He stated that *“drawing on my own judgment and experience and in the absence of survey data I find that, overall, traffic generated by the mixed use of the site as a whole, even allowing for potential intensification, would in all likelihood be no greater in volume than that which would arise from a reinstated horticultural enterprise and, given the likelihood of customer visits associated with the latter, little different in terms of its vehicular composition. Moreover, it would add little to what is already generated by neighbouring uses such that this aspect would be subsumed by its context.”* The Inspector concluded: *“I find no harm to arise in terms of highway safety”*.
- 8.2. The authorised storage facility provides an internal floor space of 905m². This would potentially provide space to store at least 100 cars. The Planning Inspector envisaged a notable amount of daily comings and goings of cars with initial delivery and then dispatch for both customer viewing or sale, as well as staff trips to and from the site.
- 8.3. The proposed container self-storage facility would be a low trip generator. Automated entry/exit gate records from another of the applicant's storage sites are available to demonstrate a low number of daily vehicle movements of cars or small commercial vehicles. Customers typically use the facilities for long-term storage.
- 8.4. Standby Self Storage in Croydon, Surrey, comprises a mixture of standard 20' storage containers and smaller storage units, providing a total floor area of 520m². This site is essentially fully let (96% occupied). The average number of visits is 9.4 trips per day based on a monthly record. This equates to 1 trip for each 55.3m² of lettable floor area. The proposed lettable floor area for the development site is slightly larger. A standard 20' container has an internal area of 13.85m². The development proposes 42 containers with a gross internal floor area of 582m². The anticipated daily trip generation for customers is therefore 11 (582m² divided by 55.3m²).

- 8.5. The proposed traffic flows should therefore be less than the existing authorised storage use of the site and the former horticultural use, especially if a ‘farm shop’ element was included as mentioned by the Planning Inspector.

9. Protection of the Countryside

- 9.1. The Ferring Parish Neighbourhood Plan, 2014-2029 shows the site to be at the eastern end of an area hatched as “*Land north of the Littlehampton Road*”. The Plan describes this land as “*primary open countryside*”. Policy 7 states that “*the Neighbourhood Plan will resist any proposals for a change of use from an established agricultural, horticultural or equine use or any other unrelated uses*”. The significance of the last four words is not explained in the supportive text.
- 9.2. At a recent appeal, an Inspector reviewed this ‘made’ Neighbourhood Plan in the context of the core principles of the NPPF as well as both current and emerging Local Plan policy. The appeal decision allowed a change of use of land from agricultural to B8 Storage at Hangleton Nursery (W/15/313071). This former horticultural nursery is located nearby off Hangleton Lane, which lies north of the A259 Littlehampton Road. The site is situated in another enclave of developed land in an area designated as countryside. The Inspector considered the main issue for the appeal was “*the effect of the proposal on the character and appearance of the Ferring area and the aims of policies on the protection of the countryside and a defined gap between settlements*”.
- 9.3. The Inspector stated that “*the area covered by the Plan is a relatively narrow part of the land lying north of the A259 with the appeal site at the western edge and consideration must be given to the situation beyond that Plan’s boundary. Looking further along the land north of the A259, taken between the two roundabouts, there is more evidence of open countryside and views of the downs, and it is clear from visiting the site that reverse views from the downs would be available over the coastal plain and include (sic) the appeal site. The emerging ‘gap’ policy SD SP3 seeks to protect gaps in order to maintain a ‘sense of place’ for settlements, as countryside and landscape considerations have their own policies, as they do in the adopted, but dated Local Plan. Outside the Neighbourhood Plan Policy 7 area and the suggested ‘gap’, there is on the south side of the A259 the sizeable parking and buildings of a supermarket and a site for housing presently being developed. As a result, the truly open countryside land in both the wider ‘gap’ and the Policy 7 area does not visually include the appeal site, but it is clear to the east and west beyond the farm buildings and garden-centre respectively and to the north within the South Downs National Park area the swathe of open countryside is more coherent and is safeguarded separately by the National Park designation.*”
- 9.4. The Inspector noted that the appeal site was bounded by built form and developed land. He found the open land, hardstanding and disused horticultural buildings “*unattractive and neglected*” and considered the “*open nature of which does little to enhance the character or appearance of the area, the value of either the ‘gap’ or the aims of Policy 7*”.
- 9.5. The development proposal was to store up to 100 cars prior to transfer elsewhere for sale. The Inspector allowed the appeal “*on the basis the storage of vehicles would be a low-level use, not able to be readily seen from the main road ...and would be hardly perceptible from viewpoints on Hangleton Lane or other ground level places nearby. The vehicles would be seen from the elevated viewpoints on the downs, but then in the context of the other development in the vicinity and more particularly the large area of car parking presently associated with the car dealership*” (namely, Yeomans-Peugeot fronting the A259). He stated “*whilst the unattractive and unproductive nature of the existing land would appear vacant or*

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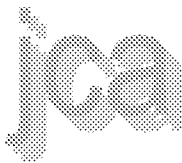
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open in those elevated views, the almost surrounding development would not allow it to contribute significantly to the setting of the downs or the designated Highdown Hill heritage asset, as sought in the Neighbourhood Plan. Use as proposed would not therefore undermine the reasons for the designation of either the National Park or the heritage asset and would not cause harm to either. Similarly, the effect on the 'gap' designation would be limited due to the limited contribution that the site's almost vacant state makes to the perception of there being a gap at or near the site. The settlements Angmering and Worthing are kept apart by other land, and the use of the Appeal site as proposed would not be seen as an encroachment of either vehicles or activity or a consolidation of sporadic environment". The Inspector concluded there were only "limited effects and conflict with the countryside policies of the 2003 Local Plan".

- 9.6. There are direct and comparable locational circumstances with the Hangleton Nursery site and the application site. Both involve low-key development in established commercial enclaves which create no significant visual harm to the character and appearance of the countryside or the 'gap' designation. However, there is one notable difference in that there are elevated views from the downs of the open car storage at Hangleton Nursery. In comparison, the elevated views of the application site from the downs are screened by mature trees to the north, east and west. In this regard, there is even less conflict with the countryside policies for the development proposal. Furthermore, there are prominent views from the downs of the open storage and parking of caravans, trailers, boats, motor homes and vehicles, as well as storage containers (including double-stack containers) on adjoining land off Hangleton Lane. To the south, the application site is set back from the A259 Little Hampton Road by a considerable distance and is screened by adjoining commercial buildings and uses.

10. Conclusion

- 10.1. The Inspector for the 2012 appeal on the application site clearly considered that a relaxation of restrictive locational policies of the development plan was justified. He concluded "*in this particular case, the location of the appeal site with an established commercial enclave where authorised uses already generate considerable activity, the brownfield nature of the site and the pre-existence of a horticultural enterprise which would itself be commercial in character all combine to create a set of circumstances in which there is no significant additional harm to interest of acknowledge importance.*"
- 10.2. The development proposal shares the above characteristics and there is already an established B1 use on the application site.



JOHN COLLINS ASSOCIATES

Chartered Surveyors Town Planners

127 Beulah Road, Thornton Heath, Surrey CR7 8JJ

