

Recommendation Report for Planning Permission

REF NO: LU/173/25/PL

LOCATION: Arun Self Storage
Littlehampton Marina
Ferry Road
Littlehampton
BN17 5DS

PROPOSAL: Change of use from caravan storage to the storage of caravans, large vehicles such as heavy goods vehicles and trailers. This application is a departure from the Development Plan, is in CIL Zone 1 and is Zero Rated.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	Change of Use of caravan storage to the storage of caravans and large vehicles such as heavy goods vehicles and trailers. Both of these uses would fall under Use Class B8; Storage and Distribution.
SITE AREA	0.87 hectares.
BOUNDARY TREATMENT	Fencing and hedgerow.
SITE CHARACTERISTICS	The site is used for the storage of up to 174 caravans.
CHARACTER OF LOCALITY	Littlehampton Marina, comprising a mix of uses including residential, storage, commercial, retail, leisure / recreation and education.

RELEVANT SITE HISTORY

LU/333/20/CLE Lawful development certificate for the existing use as B1 Approve (a), (b) & (c) & B8 without compliance with condition 2 of 28-01-21 LU/455/07.

REPRESENTATIONS

Littlehampton Town Council - No objection.

1 letter of objection.

- Good idea in principle, but access to the site is limited due to parking along Ferry Road. HGVs will not be able to get into site.

COMMENTS ON REPRESENTATIONS RECEIVED:

Noted.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

WSSC Highways (28/9/25) - Further information required.

- Detailed information of the current/pervious use i.e. nature of operation, traffic generation levels.
- Detailed information of the proposed use i.e. nature of operation, traffic generation levels.
- A site plan showing parking and turning spaces (including track plots).
- An access plan including track plots.
- In the event traffic levels (especially of HGV type vehicles) are significantly greater than existing we may request additional junction analysis or more detailed transport modelling.

WSSC Highways (20/11/25) - Further information required.

- The site is to have a mixed use; 80 spaces to be retained for caravan/motorhome use, 42 spaces for 12m long rigid vehicles (ie removal vans).
- The tracking plots show that it is possible to enter and exit the site, however the line of parked cars, which appear to be a permanent occurrence, makes these manoeuvres very difficult. In addition, there do not appear to be any plans on the webpage relating to the widening of the access as a result of the drainage works.
- WSSC are unlikely to raise any objection to the additional movements providing this level/use can be conditioned. By permitting this change in operational use there is the possibility of a significant increase in vehicle movements, especially during peak times, which could have a detrimental impact on the junction with the A259.
- The access onto Ferry Road needs addressing. In order for safe ingress and egress the parking on the opposite side of the road will need addressing by the application and approval of a Traffic Regulation Order (TRO).

WSSC Highways (17/12/25) - No objection.

- . It is understood that Arun District Council as Local Planning Authority is not prepared to include a condition limiting vehicle movements. Some control is built in to the proposal as the number of spaces will be allocated to the HGV storage is restricted and the remaining spaces will be used as existing i.e. storage of caravans.
- The application is for storage and not for an operation use so naturally limits movements.
- If the TRO application is successful, the applicant will need to undertake the highway works - i.e. install the markings on the carriageway themselves.

WSSC Minerals and Waste (MWPA) - No objection.

- The site is approximately 200m to the south of Littlehampton Wharf, which is safeguarded as per policy M10 of the WSSC Joint Minerals Local Plan
- Given the scale of the development the MWPA are of the opinion that the proposal would be unlikely to have any significant impact upon the safeguarded minerals infrastructure.
- No objection to the proposal, subject to the Local Planning Authority being satisfied that it would not prevent or prejudice the continued operation of the safeguarded minerals infrastructure

Environmental Health - No objection.

South Downs NP - No comments to make.

COMMENTS ON CONSULTATION RESPONSES:

The applicant has submitted details regarding the widening of the access and the parking layout. They have agreed to enter into a Traffic Regulation Order (TRO) with WSCC. A suitably worded condition can be imposed to limit the number of HGV parking spaces (thereby naturally restricting daily movements) and to ensure that the TRO is entered into and all associated works are completed prior to the first use of the HGV spaces.

POLICY CONTEXT

Designation applicable to site:

Built-up Area Boundary

Article 4 Land

Economic Growth Area

WSCC Mineral Consultation Area

Adjacent to West Bank Strategic Site

2km Buffer Zone SSSI

Arun Valley IRZ

Flood Zone 3

Surface Water Flooding (High)

DEVELOPMENT PLAN POLICIES

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

DDM1	D DM1 Aspects of form and design quality
QEDM1	QE DM1 Noise Pollution
QESP1	QE SP1 Quality of the Environment
TSP1	T SP1 Transport and Development

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

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

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

The proposal is considered to comply with relevant Development Plan policies in that it will not harm the character and appearance of the area, or residential amenities of neighbours. Nor is there any additional flood risk on site or elsewhere.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

- (2) in dealing with an application for planning permission the authority shall have regard to -
- (a) the provisions of the development plan, so far as material to the application,
 - (aza) a post examination draft neighbourhood development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.

OTHER MATERIAL CONSIDERATIONS

There are other material considerations to be weighed in the balance with the Development Plan.

BIODIVERSITY NET GAIN

This application is no liable for Biodiversity Net Gain (BNG) as the site is 100% hard surface.

CONCLUSIONS

PRINCIPLE

The site is in the Built-up Area Boundary in a sustainable location where development is acceptable in principle in accordance with policy SD SP2 of the Arun Local Plan (ALP), provided it accords with other policies.

Littlehampton has a 'made' Neighbourhood Development Plan (LNDP), of which Policy 1 is relevant. This policy concerns the presumption in favour of sustainable development; in which planning applications which accord with the policies in the Neighbourhood Plan will be approved.

The Arun Design Guide (ADG) is relevant to this application.

The NPPF gives a presumption in favour of sustainable development unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (para 11(d) ii.). Paragraph 11(c) states that development proposals that accord with an up-to-date development plan should be approved without delay. 11(c) is relevant in this case as the proposal is in the Built Up Area Boundary and will be determined under an adopted local plan.

DESIGN AND VISUAL AMENITY

The site comprises a large area of hardstanding used for the storage of caravans, with plans indicating that up to 174 caravans can be stored at any one time. Access to the site is taken from Ferry Road. Following recent flooding (the site lies within Flood Zone 3) and the consequential damage to caravans on site, it has been decided that it would be more appropriate to store larger vehicles, such as 12m rigid lorries (HGVs), as their higher ground clearance makes them less prone to damage should further flooding occur.

The current mix of spaces comprises 33 bays at 11m, 111 bays at 7.4m, and 30 bays at 5.6m. A typical caravan (7.4m) towed by a car would be approximately 12m in overall length. It is proposed to retain some caravan/motorhome storage (80 spaces) but convert the remaining area for the storage of larger vehicles (36 rigid vehicles). Other than the setting out of the spaces, no physical alterations will be made to the appearance of the site.

As the character of the development is very similar to the existing use (the storage and parking of vehicles), no harm to the visual qualities of the area will occur.

The proposal accords with ALP policy D DM1, as the character and appearance of the development make the best possible use of the land while maintaining the site's visual qualities.

RESIDENTIAL AMENITY

ALP policy D DM1(3) requires consideration of the impacts on neighbouring amenity, such as loss of sunlight, privacy, outlook, and unacceptable noise or disturbance.

Policy QE SP1 of the ALP requires that all development contributes positively to the quality of the environment and does not have a significantly negative impact on residential amenity.

The site is self-contained, with a small rife separating it from the rest of the marina. There is a small caravan site to the west, which is well screened by a small area of woodland. The proposed works will have no physical impact in terms of overbearing, overshadowing, or overlooking.

Policy QE DM1 states that new noise-generating development should be supported by an appropriate noise assessment detailing the existing noise environment, the likely impact of the development, and evidence to show that it will not negatively affect noise-sensitive environments.

The submitted documentation indicates there will be an increase in vehicle movements from the site, particularly during the winter months when existing caravan storage would generate fewer daily movements compared to the daily operations of local businesses using the site to store commercial vehicles. It is acknowledged that any noise would be intermittent. However, the use of larger (and generally noisier) vehicles may result in some negative impacts on local residents. There is an approximate 30m separation between the nearest caravans and the site boundary, along with mature screening. The immediate area comprises an eclectic mix of uses and businesses, including marine workshops, light industrial uses, container storage, boat moorings, and community amenities cafe, gym, swimming pools). Therefore, existing background ambient noise levels are expected to be higher than in a purely residential area. On balance, the additional vehicle movements will not give rise to a significant impact on neighbours residing in the nearby caravan park.

The proposal will not significantly harm the residential amenity of neighbours and accords with ALP policies D DM1, QE SP1, and QE DM1.

FLOODING AND DRAINAGE

The site is subject to a high level of tidal flood risk as it is in Flood Zone 3 (FZ3) Para 170 of the NPPF states 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.

Policy W DM2 of the Council's Local Plan states that development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the SFRA, will only be permitted where all of the following criteria have been satisfied:

- a. The sequential test in accordance with the National Planning Policy Guidance has been met.
- b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.
- c. The sustainability benefits to the wider community are clearly identified.
- d. The scheme identifies adaptation and mitigation measures.
- e. Appropriate flood warning and evacuation plans are in place; and
- f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e., consideration of flood flow routing and utilising temporary storage areas

Due to the location of the site, a Flood Risk Assessment (FRA) has been submitted. The FRA indicates that, as the vulnerability of the site is not changing, storage falls into the 'less vulnerable' category; a sequential test is not required. It further states that the continued use of the site for storage is appropriate. Not only will the vulnerability of the use remain unchanged, but no built development is proposed; therefore, the proposal does not require a sequential test in accordance with paragraph 175 of the NPPF.

The development will remain safe, primarily because it will only be accessed by visiting persons, and it therefore does not require any mitigation measures or emergency evacuation plans.

Given that the NPPG defines flood risk as 'a combination of the probability and the potential consequences of flooding,' in this instance the probability of flooding is high, as previously experienced on site; however, the risk to life is extremely low. The application is in accordance with the NPPF and ALP policy W DM2.

There will be no alteration to the amount of hardstanding on site, and the site will continue to drain surface water in the existing way. The proposal accords with ALP policy W DM3.

HIGHWAYS

Policy T SP1 of the ALP seeks to ensure development provides safe access onto the highways network and (c) protects committed lines of road schemes from development.

It is proposed to reconfigure the parking arrangements on the site, retaining spaces in the south-west for caravan storage (totalling 80 spaces) and converting the north-eastern portion of the site for the storage of HGVs.

Concerns have been raised by an objector and WSCC Highways regarding access and egress to the site and the potential impact of additional movements on the junction of Ferry Road with the A259, particularly during peak times. WSCC has noted that, although the widened access is acceptable, a line of cars regularly parked on the southern side of Ferry Road, opposite the site, could make access arrangements difficult.

The applicant has confirmed that, until the flooding in 2024, the site operated at capacity for the storage of 174 caravans and was open 24 hours a day, with the Marina also manned 24 hours a day. Average daily movements were six each way, although this figure could peak during late summer at up to 18 daily movements. The proposal is anticipated to increase daily movements to between 24 and 30, depending on the time of year. There is currently no control over traffic movements for the existing site, and it is not considered possible to restrict the proposed number of daily movements, as such a limitation would be difficult to enforce and unreasonable given the existing unrestricted operation. In accordance with WSCC advice, limiting the number of HGV spaces would naturally restrict daily movements, and the number of HGVs on site could be controlled via condition. The agent has confirmed that despite earlier indications, only 36 HGV storage spaces would be provided.

The applicant has committed to entering into a Traffic Regulation Order to ensure that the highway can be marked to keep the access clear of parked vehicles. To ensure road safety, it would be appropriate to control via condition compliance with a TRO prior to first use of the HGV storage.

The proposed use would generate additional vehicle movements on a daily basis; however, the requirements to access vehicles parked on site are likely to vary. HGVs are most likely to move during peak rush hour, whereas caravan movements are expected to be more spread out over days and times. Although different in character, the additional movements are unlikely to cause significant harm. WSCC

has raised no objection, and the proposal complies with ALP Policy T SP1.

WASTE

The site is approximately 200m south of Littlehampton Wharf, which is safeguarded for the purposes of mineral transportation. Policy M10 of the West Sussex Joint Minerals Local Plan (WSJMLP) seeks to ensure that development near such sites does not prevent or prejudice their ongoing operations.

The use of the application site for parking and storage of vehicles remains consistent with its existing use. The two sites do not physically interact, and there will be no cumulative impact on the Wharf.

The proposal accords with Policy M10 of the WSJMLP.

SUMMARY

Subject to condition the proposal accords with the Plan, it is therefore recommended for approval.

HUMAN RIGHTS ACT

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

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

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

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

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

CIL DETAILS

This application is not CIL liable as other development.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

1. Site and Location Plan 131087/14
2. Proposed Parking Plan - Caravan and Motorhome Site Plan
3. Access Design General Arrangement - 6230 / 1001

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Arun Local Plan policies D DM1 and T SP1.

- 3 The use of the site is for the storage of Heavy Goods Vehicles (HGVs) and towed caravans/motorhomes only and shall be limited to a maximum of 36 HGVs spaces and 80 caravan/motorhome spaces only.

Reason: To maintain safe access to the highway in accordance with Arun Local Plan policy T SP1.

- 4 Use of the site to accommodate the parking of Heavy Goods Vehicles, shall not commence until a Traffic Regulation Order (TRO) is entered into and agreed with the Highways Authority and works required by the TRO have been undertaken in accordance with the agreed details.

The applicant is advised of the requirement to enter into early discussions with and obtain the necessary licenses from the Highway Authority. The applicant is reminded to also consider any temporary construction related works that will obstruct or affect the normal operation of the public highway prior to any works commencing and during construction of the new access.

Reason: To maintain safe access to the highway in accordance with Arun Local Plan policy T SP1.

- 5 First use of the site for the storage of Heavy Goods Vehicles (HGVs) shall not occur until such time as the vehicular access serving the development has been constructed in accordance with the details shown on drawing Access Design General Arrangement - 6230 / 1001.

Reason: In the interests of road safety and in accordance with policy T SP1 of the Arun Local Plan.

- 6 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the NPPF.