

Planning Statement

Land at Littlehampton Marina Ferry Road, Littlehampton, West Sussex BN17 5DS

Application by Broomer Farm Trading Ltd., formerly named Littlehampton Marina Ltd., for a Certificate of Lawful Use in respect of two parcels of land at Littlehampton Marina for the stationing of Caravans which may be occupied Residentially throughout the year i.e. the Lawful Use of the Land is a Residential Caravan Site

1. This Application relates to two parcels of land at Littlehampton Marina which form part of a Residential Caravan Park. They are both edged red on Plan No.LMRCS/1 (Appendix A). This Plan also shows, edged blue, the boundaries of Littlehampton Marina in which the Applicant has owned a long Leasehold interest and has operated since 1971.
2. The parcels of land form part of a Residential Caravan Site which was initially established prior to 1997 when the current owners acquired the Applicant Company and which now accommodates 51 Caravans all of which are used residentially. The layout of the Caravan Park, as it exists at the present time, is shown on Plan No.LMRCS/2 (Appendix B). The parcels of land to which the application relates are again shown edged red and the date which the Caravans thereon were first occupied are colour coded.
3. The Caravan Site is also shown on the aerial photographs, obtained from Google earth, taken in 2007, 2010 and 2018, which comprise Appendix C. These photographs show the manner in which the Caravan Site has developed during the last 12 years. The two Sections of the Caravan Site to which the Application relates are shown highlighted yellow in the photographs.
4. Parcel A has an area of 0.05 ha. There are 5 Caravans sited on this parcel of land and these can be seen in all of the aerial photographs comprising Appendix C. All of these Caravans have been let and occupied residentially for more than 10 years and on account of this their use for this purpose is now lawful.

We would also mention that Planning Permission was granted in 2002 (LU/320/00) for the siting of 4 Static Holiday Caravans on this land and a copy of this Permission is reproduced in Appendix D. This Permission contains no Condition restricting either the period or mode of occupation of the Caravans. It follows that the 4 Caravans permitted by this Permission may be occupied Residentially throughout the year. The 5th Caravan has been sited in its present position for more than 10 years as evidence by the aerial photograph taken in 2007 and confirmed in the Statutory Declaration of Mr. David Finnamore the Managing Director and Principal Owner of the Applicant Company to which we will refer to later in this Statement.

Parcel B has an area of 0.5 ha. It was developed as a Residential Caravan Site over a period of time with the aerial photographs showing 17 Caravans sited in 2007, 28 Caravans sited in 2010 and 32 Caravans sited at the present time. The Applicant's records confirmed by Mr. Finnamore in his Sworn Affidavit show that 21 Caravans were sited in April 2009 increasing to 26 in October 2009 and that the development of this section of the Site was completed and fully occupied in September 2010. We would submit that the small undeveloped part of this parcel was in practice part of the Caravan Site in July 2009 (10 years prior to the preparation of this Statement) and that a Certificate of Lawful Use as a Residential Caravan Site should be issued in respect of the whole of this parcel of Land. The ground for the issue of this Certificate is that the Land has been used as a Residential Caravan Site for 10 years prior to the date of Application.

We have already referred to the Statutory Declaration of Mr. David Finnamore the original of which is being sent with the Application and a copy of which comprises Appendix E. Mr. Finnamore's evidence provided in this Declaration confirms that both parcels of land have been used for the siting of Caravans, which are used residentially throughout the year, for more than the 10 years required to establish that the Lawful Use of these parcels of land is as a Residential Caravan Site.

5. We would ask you, therefore, to issue a Certificate of Lawful Use to this effect.

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