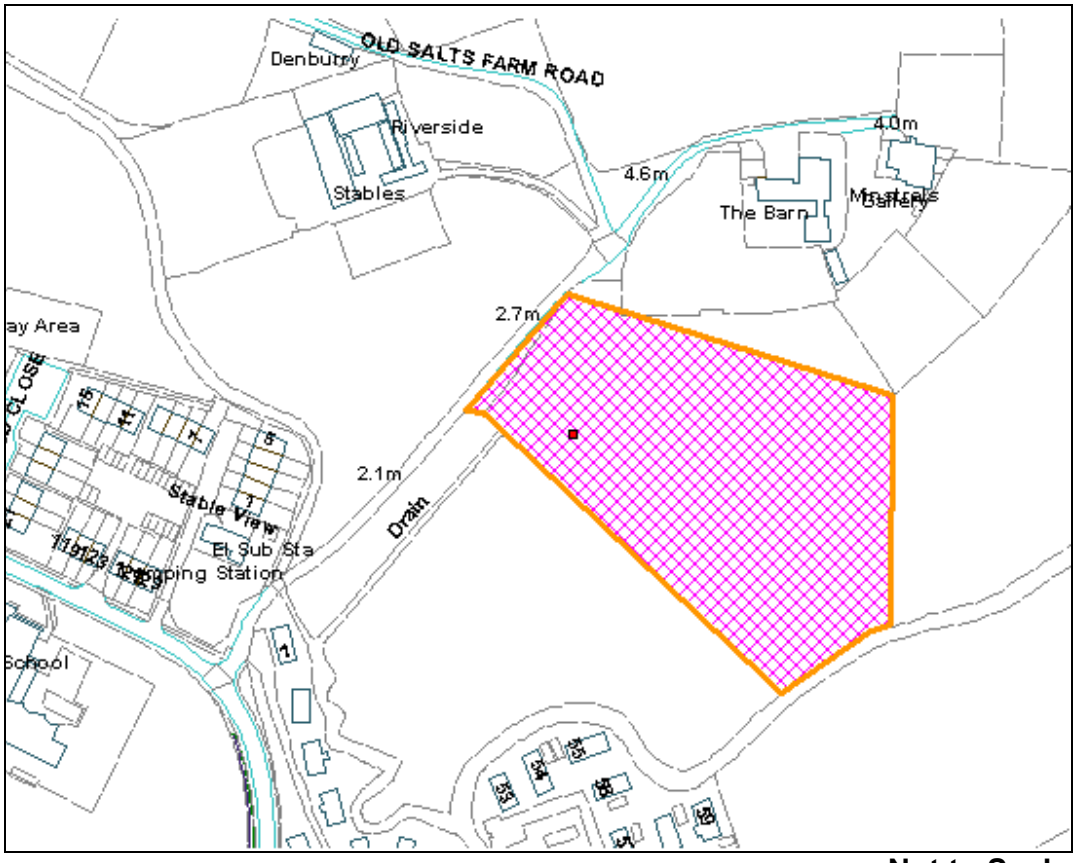
Application Number: AWDM/0116/15 **Recommendation – REFUSE**

Site: **The Barn Caravan Park, Old Salts Farm Road Lancing, West Sussex, BN15 8JG**

Proposal: **Permanent mobile home for use of the camp site owner and new vehicle and pedestrian entrance gates**

Applicant: Mr Joby Pannell Ward: Widewater
Case Officer: Peter Barnett



Not to Scale

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Proposal, Site and Surroundings

This touring caravan and camping site is located to the east of the built-up area of Lancing, within the remaining open area of flat coastal plain. It lies on the south-east side of a narrow private lane (which has a tarmac surface in poor condition). It is

situated 100m along the lane, before reaching the dwellinghouse ‘Beechlands’ (formerly ‘The Barn’) and the listed ‘Minstrels Gallery’ (formerly Old Salts Farmhouse) beyond. On the opposite side of the lane are paddocks and livery stables. To the south, beyond a watercourse and within the built up area, is a large residential mobile home site (Willowbrook Park).

The application site consists of a field, the north-west part of was formerly certificated by the Camping and Caravanning Club for its use as a touring caravan and camping site by Club members for no more than 5 touring caravans at any one time. Planning permission was granted in 2013 to increase the number of caravan pitches from 5 to 25 over the whole field, including that part which was outside the certificated area. Since then, the site is no longer certificated with the Camping and Caravanning Club due to its increased size.

Permission is sought to site a 3-bed mobile home measuring 12.5m long, 6.7m wide and 4.3m high to ridge on an existing area of hardstanding at the entrance to the site. The application is supported by a Design and Access Statement which states that the owners have run the camp site for over 12 years and would like to have a permanent resident on the site for the purposes of safety and security and to support the growing business and its contribution to the local economy. It is also proposed to erect new gates and fencing at the entrance for security and to prevent illegal entry or exit of campers without payment.

The Statement explains that there are an increasing number of local events that bring significant demand for camping, such as the Air Show and the forthcoming Wild Life music event at Shoreham Airport. An on-site management presence would enable campers to be properly looked after with any incidents dealt with swiftly. A permanent residence would also improve security, preventing illegal occupation of the land by the travelling community, and providing security for campers leaving their tents or caravans unattended during the day. The caravan park is a growing business and an on-site presence would enable better day-to-day management.

In further support of the application, the applicant’s agent has highlighted that the site is 4 times busier than in 2009, following the subsequent grant of permission for the shower block and the increase in caravan pitches.

Relevant Planning History

L/13/01 – siting of residential mobile home – refused
L/119/04 - siting of residential mobile home – refused
ADC/0360/06 - Temporary siting of mobile home (to provide 24 hour on site security/management of licensed touring caravan site) (retrospective) – refused and appeal dismissed
ADC/0173/08- Locate mobile home on land in the sole ownership of a member of the 'gypsy' community – refused and appeal dismissed

AWDM/1089/11 - Shower, toilet and washing-up building for The Barn certified touring caravan site – approved
AWDM/0722/13 - Change of use of rear part of field to enable its inclusion within certified camping and caravan park with associated increase in the number of caravan pitches from 5 to 25 – approved

Consultations

West Sussex County Council: No objection from a transport/highways aspect. Comments that the addition of a permanent caravan on the site in itself would not materially increase the number of movements to and from the site.

Adur & Worthing Councils: The ***Environmental Health*** officer has no adverse comment.

Environment Agency: Object. The proposed development falls into a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. Flood Zone 3a is defined by the Planning Practice Guide to the NPPF as having a high probability of flooding. The development type in the proposed application is classified as 'highly vulnerable' in accordance with table 2 of the Planning Practice Guide to the NPPF. Tables 1 and 3 of the Technical Guide to the NPPF make clear that this type of development is not compatible with this Flood Zone and should not therefore be permitted.

Lancing Parish Council: Committee was concerned with the permanency of the dwelling and the possible further erosion of the Lancing Gap via development 'creep'. Committee voted narrowly to object to this application but might be more inclined to possibly support a new application if this was a temporary and time limited arrangement.

Representations

4 letters received in support of the application:-

- The site has recently been allowed to increase the number of caravans
- The Council has approved a large music festival at Shoreham Airport which will attract a huge number of visitors to the area
- There is very little control over the site in the evening and at night
- Allowing the application will greatly improve the effective management of the site in terms of noise and the overall conduct of people using the site
- At present there is no one who is instantly available on the site should there be an incident
- There is a need for an on-site manager for supervision and security reasons

Relevant Planning Policies and Guidance

Adur District Local Plan 1993-2006 (ADC 1996) (saved policies): AG1, AC1, AC4, AH11
Proposed Submission Adur Local Plan (2014) Policy 14
National Planning Policy Framework (March 2012)

Relevant Legislation

The Committee should consider the planning application in accordance with:
Section 70 of the Town and Country Planning Act 1990 (as amended) that provides the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations; and
Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

Principle

The site lies outside the built-up area and in the 'strategic gap' of countryside separating Lancing from Shoreham. Saved policy AC4, relating specifically to the strategic gaps, is intended to prevent further development in such areas in order to prevent the coalescence of settlements and to ensure that any development maintains and enhances their predominantly open and undeveloped character. Policy AC4 states that development will only be permitted in "compelling circumstances" and that need for development essential for agriculture, horticulture, forestry or the diversification of the rural economy or to take advantage of a valuable opportunity to meet demand for quiet informal recreation may exceptionally be regarded as compelling.

This policy will be replaced with Draft Policy 14 of the Adur Local Plan which relates to Local Green Gaps, the aims of which are the same as policy AC4.

Saved Policy AH11 of the Local Plan states that the land use policy considerations for mobile homes are the same as for permanent housing.

The NPPF supports the sustainable growth and expansion of all types of businesses and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings (para 28). It also supports sustainable rural tourism that benefit local businesses in rural areas, communities and visitors and which respect the character of the countryside (para 28).

The NPPF also states that "Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances" (para 55).

Visual amenity

The mobile home would be sited on an area of hardstanding at the entrance to the site. At the time of your Officer's site inspection there were a number of caravans being stored in this area, together with several cars and vans. It is understood that the area was being used for parking/storage temporarily during the winter to prevent damage to the grass field of the main campsite. There is a block built 'shed' at the entrance plus a smaller timber shed. There is no record of planning permission having been granted for either structure.

The site is screened to some extent by a hedge along the frontage and the proposed mobile home would be within an area enclosed by hedging to the south and west. The mobile home would have a pitched roof and would have a more permanent appearance than the mobile home which was formerly on the site.

This issue has been considered previously at 2 appeals. In 2007, the first Inspector took the view that "*the mobile home, by reason of its colour, presence and height, fails to maintain the local open character although there is some planting that breaks up views of the mobile home from Old Salts Farm Road to a limited extent*."

More recently, in 2009, the Inspector stated that "*Unlike a touring caravan, the mobile home has a year-round presence and has the appearance of residential development, complete with domestic paraphernalia including a wooden shed and a larger "shed" with block walls and a pitched roof*."

He went on to state that "*The mobile home is near the edge of the built-up area and represents an intrusion of development into a gap where the aim is to avoid the coalescence of settlements. In addition, its permanent residential appearance detracts from the rural character of its surroundings, which survives despite a scatter of development, including nearby stables and dwellings*." He concluded that the appearance of the mobile home "*would only be softened, not overcome, by existing and additional planting and, while it should be seen in the context of caravans and tents on the certificated site, these are just short term, changing features on a grassy field*."

If permitted, the mobile home would constitute a sporadic form of development, detrimental to the appearance and character of the area. It is accepted that the surrounding landscape is not of a particularly high quality, having typical "urban fringe" characteristics associated with land fragmentation into small plots. However, it still possesses some rural quality and, most importantly, needs stringent control over new development to retain a rural character. The cumulative effect of incremental development as in this case would be to eradicate the remaining semblances of rurality. The Willowbrook Park Residential Mobile Home Park, sited some 100m to the south-west of the application site, and the 4 houses adjoining the pumping station 70m to the west, are located within the 'built-up' area as identified in the Local Plan and therefore not comparable with the application site.

The applicant considers that are material considerations which outweigh the policy objections and has referred specifically to the need to improve safety and security on the site, particularly since permission was granted to increase the number of caravans that can use the site from 5 to 25. The increased number and scale of local events, and the subsequent increase in visitor numbers (including campers) to the area, is also given as a reason to support the proposal, as is the need to support a local business.

The need to control use of the touring caravan and camping site

The use of the site as a touring caravan and camping site at the time of the previous application and appeal was small scale, limited solely to members of the Camping and Caravanning Club and the number of touring caravans on the site not exceeding 5 at any time, with no individual caravan present for more than 28 days.

Since then, permission has been granted to increase the number of caravans to 25. There is also no limitation on the number of tents present. This has enabled the site to be more intensively used and the applicant has stated that there is a need for better management and security of the site, which would be more effective with a permanent on-site presence.

In the previous appeal decision concerning this matter in 2009, the Planning Inspector stated "*I am not convinced that the siting of a mobile home is the only means of controlling usage and security of the site*." He went on to state that "*the site is close to dwellings and mobile homes within the built-up area which could, in principle, go some way towards enabling the certificated site's needs to be met*."

It is acknowledged that the site is likely to be more intensively occupied now, but the arguments against a permanent on-site management presence are still considered to be valid. The Inspector's view that "*alternative means of controlling usage and security of the site have not been explored*" remains relevant to the consideration of this application. It is understood that the applicant lives within 0.5 miles of the site which is considered to be close enough to be able to deal with any safety or security matters which may arise.

Consequently, the security case currently put forward by the applicant is not considered strong enough to outweigh the policy objection to new residential development in the strategic gap.

Flood risk

The site lies within an area at risk of flooding (zone 3a) and, as a result of the Environment Agency's (EA) objection, this was a reason for the previous appeals being dismissed.

The applicant's agent has included a Flood Risk Assessment in the Design & Access Statement accompanying the present application. He states that the ground floor of the

mobile home would be 300mm above ground level. The risk of flooding is 1 in 1000 and the EA will issue a warning via the media if there is a risk of a flood event. He also states that the site has not flooded in the past 12 years.

However, the Environment Agency has objected, as before, commenting that the proposed development type is classified as 'highly vulnerable' in accordance with table 2 of the Planning Practice Guide to the NPPF. Tables 1 and 3 of the Technical Guide to the NPPF make clear that this type of development is not compatible with this Flood Zone and should not therefore be permitted.

The applicant's agent is exploring means of overcoming the EA objection but as it stands the objection remains and, as the proposal would result in an unacceptable risk to people and property from flooding, it would not be appropriate for the mobile home to be located on the site.

Recommendation

REFUSE for the reasons:-

1. The site is located within a flood risk area and the application involves a highly vulnerable form of development which would be at unacceptable risk of flooding, contrary to the Technical Guidance to the National Planning Policy Framework

2. The site lies within the 'Strategic Gap' of open land between the built-up areas of Shoreham and Lancing and the development conflicts with saved policies AC1, AC4 and AH11 of the Adur District Local Plan and policy 14 of the Proposed Submission Adur Local Plan which seek to prevent development in strategic gaps/Local Green Gaps between built-up areas in order to prevent the coalescence of the settlements and to retain their separate identities.

3. The proposed permanent siting of a mobile home constitutes undesirable sporadic development which would be detrimental to and out of keeping with the rural character and appearance of the locality, contrary to paragraphs 28 and 55 of the National Planning Policy Framework

Informatives:

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

This refusal relates to the following drawing:-

Drawing No. 307 110 received 30 January 2015

13th April 2015