

**From:** Planning@horsham.gov.uk <Planning@horsham.gov.uk>  
**Sent:** 27 September 2025 11:28:49 UTC+01:00  
**To:** "Planning" <planning@horsham.gov.uk>  
**Subject:** Comments for Planning Application DC/25/1395  
**Categories:** Comments Received

## Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 27/09/2025 11:28 AM.

### Application Summary

|               |   |
|---------------|---|
| Address:      | Limeburners Caravan Site Lordings Road Newbridge West<br>Sussex RH14 9JA                            |
| Proposal:     | Siting of 24No. single-storey static homes for permanent year-round residential use (Use Class C3). |
| Case Officer: | Hannah Darley   |

[Click for further information](#)

### Customer Details

|          |  |
|----------|--|
| Address: | Garden House Lordings Road Billingshurst |
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### Comments Details

|                      |  |
|----------------------|--|
| Commenter Type:      | Neighbour  |
| Stance:              | Customer objects to the Planning Application   |
| Reasons for comment: | <ul style="list-style-type: none"><li>- Highway Access and Parking</li><li>- Loss of General Amenity</li><li>- Overdevelopment</li><li>- Privacy Light and Noise</li><li>- Trees and Landscaping</li></ul>   |
| Comments:            | I am writing on to register our strong objection to the proposed change of use of the Limeburners to accommodate 24 permanent residential static caravans. We urge the Council to refuse this application on the grounds that it is fundamentally incompatible with local and national planning policy, the rural character of the |

area, existing infrastructure capacity, and environmental constraints.

This would amount to allowing change of use for 24 permanent residences, a substantial departure from the site's original use as a touring campsite, precisely the kind of change the initial restriction was designed to avoid.

Conflict with Development Hierarchy and Settlement Expansion, HDPF Policy 3, 4 and 26 sets out that development will be permitted within towns and villages which have defined built-up area boundaries. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement.

The expansion of settlements will be supported only where allocated in the Local Plan or Neighbourhood Plan and are appropriate in scale and character,

Development outside built-up area boundaries will be permitted only where it is essential to its countryside location, supports the needs of rural enterprise, and maintains its scale, character, and the landscape.

HDPF Policy 1 states The Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.

The site lies outside any defined built-up area boundary, is not allocated for development or included in the Local plan or Neighbourhood plan and is not essential to a countryside location. The proposal represents unjustified countryside residential development, harmful in scale, density, and character, and sets a precedent for further rural encroachment. It directly conflicts with the settlement hierarchy and strategic countryside protection policies.

Allowing permanent residential development here would set a dangerous precedent for further piecemeal residential schemes in open countryside, weakening the integrity of settlement boundaries and weaken confidence in a plan-led system, Local plan or Neighbourhood plan. This would damage the ability to resist future, unplanned development beyond settlement limits, contrary to HDPF Policies 1, 3 and 26 and Paragraphs 11 and 130 of the NPPF. Approval of this application would lead to cumulative urbanisation pressures on the rural area, wholly at odds with Policy 26.

The Natural Environment and Landscape Character, HDPF Policy 25 and The Impact on Landscape and Rural Character. HDPF Policy 24, Environmental Protection sets out that a development will be required to minimise its impact on the landscape and natural environment, be appropriate in their location, protect air, soil and water quality, ensure surface water is managed, prevent noise pollution and contribute to climate change mitigation and adaptation.

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In HDPF Policy 25, The Natural Environment and Landscape Character it sets out The natural environment and landscape character will be protected against inappropriate development. The individual character of settlements and settlement separation will be maintained.

Paragraph 187 sets out planning policies should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, minimising impacts on biodiversity, and preventing development from contributing to unacceptable levels of pollution and recognising the intrinsic character and beauty of the countryside.

The proposal introduces a change of use for 24 permanent dwellings, parking areas, lighting, and domestic paraphernalia into an undeveloped rural site. In an area surrounded by open countryside and loose knit housing not defined as a hamlet or a village, this would urbanise the landscape, erode tranquillity, and permanently alter the countryside character. The development is not of a scale or form appropriate to its setting.

Quality of Development and Impact on Amenity, HDPF Policies 32 & 33, Quality of New Development / Development Principles sets out that

Development will be required to enhance and protect the locally distinctive characters. High-quality design is required to ensure that development is of a scale, massing and character appropriate to its setting, and respects the amenities of nearby occupiers.

NPPF Paragraph 130, planning decisions should ensure that developments create places with a high standard of amenity for existing and future users.

The proposal fails to respect local character. Static caravans lack architectural quality and do not reflect rural Sussex design. The development introduces year-round noise, traffic, and light pollution, harming the amenity of existing residents. This is wholly inconsistent with Policies 32 and 33.

The campsite use was seasonal, low-intensity, and limited to short-term stays. It maintained the rural tranquillity and ensured the site was not overcrowded year-round. In contrast, the proposed permanent dwellings would introduce continuous daily traffic, refuse collections, deliveries, and lighting, eroding the amenity of neighbours and the rural community.

Heritage Impact. HDPF Policy 34, Cultural and Heritage Assets & NPPF Paragraphs 214-218 states the Council recognises that heritage assets are an irreplaceable resource, and as such positive management of heritage assets will be required to sustain and enhance the historic environment. The historic environment of the district forms the core of this district's historic development and character.

Development should retain and improve the setting of heritage assets, including views, public rights of way, trees and landscape

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features, including historic public realm features. Where a proposed development will lead to substantial harm a designated heritage asset, local planning authorities should refuse consent.

HDPF Policy 32 states a new development should Complement locally distinctive characters and heritage of the district. The site lies close to Grade II listed buildings including The Limeburners, 1 Dingles Cottages, Newbridge Cottage, and Newbridge House. The proposed 24 static homes, associated infrastructure, and lighting would fundamentally alter the character and significance. The application offers no binding mechanism for sensitive restoration of the Limeburner's pub. The harm is not outweighed by guaranteed public benefits, and the proposal therefore conflicts with both local and national heritage policy. As referenced in the application, repurposing the Limeburners pub to form an office or management site, and use of the Limeburner's car park for overflow parking, is not in keeping and fails to respect the heritage of the two adjacent listed buildings. This approach also demonstrates a lack of intent to retain the pub as a valuable community asset. The Limeburners is a small, listed building, historically and structurally suited for use as a pub, but it does not have the space or capacity to accommodate additional functions such as office use or large-scale parking. The existing parking provision is insufficient for the scale of development proposed, and the building itself cannot support multiple competing uses without significant harm to its character, heritage value, and function as a community asset. NPPF para 93: Planning policies and decisions should guard against the unnecessary loss of valued facilities and services.

Environmental and Flood Risk Concerns. HDPF Policy 38, Flooding and NPPF Paragraphs 174-181 state Development will be required to avoid areas at risk of flooding and provide mitigation measures to ensure flood risk is not increased elsewhere.

The site suffers from surface water flooding and heavy clay soils. The land falls in an area of Medium risk of surface water flooding (ref Environment Agency Data). No robust Flood Risk Assessment or drainage strategy has been provided. The intensification of impermeable surfaces would worsen runoff and flood risk. Additionally, recent tree removal undermines biodiversity claims, and no ecological assessment has been submitted. This is contrary to both HDPF Policy 38 and NPPF requirements.

Highways and Traffic Safety. HDPF Policy 40, Sustainable Transport sets out that development will be permitted where it provides safe and suitable access for all, minimises the need to travel, and reduces reliance on private cars. Developments should be appropriate and in scale to the

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existing transport infrastructure, including public transport, located in areas where there is a choice in the modes of transport available, Minimises the distance people need to travel, and is accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development on the wider area or as a result of needing to address an existing local traffic problem.

It is recognised in policy 24 that the most common source of air pollution in Horsham District is from vehicle emissions and the district declared an 'Emission Reduction Area'.

The site is in a remote rural location, over 2.5 km from Billingshurst, with no access to public transport, services, or facilities. Future residents would be entirely reliant on private vehicles, in direct contradiction to the principles of sustainable development in both local and national policy.

The development would generate significant year-round traffic movements, unlike the seasonal, temporary activity of the former campsite. With limited and unsuitable parking provision, overspill onto rural lanes is inevitable. Increased traffic on a 60mph rural road raises safety concerns, and the single access point is inadequate for the scale of development. There is no access to public transport and residents would rely on solely private cars. There is already daily congestion at both ends of Lordings Road, at Newbridge, and Adversane.

There is substandard access for walking, wheeling and cycling, and the suitability of local footpaths which are historically waterlogged, and the lack of transport links, fails to accord with policy 40 of the Horsham District Planning Framework (2015), policy Bill 12 of the Billingshurst Neighbourhood Plan, and paragraphs 110, 115a and 135a of the NPPF (2024).

NPPF Paragraph 110 sets out that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

And Paragraph 117 that developments need to facilitate access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use.

The site's isolated nature will force all residents to rely on private cars for daily commuting, shopping, and daily life. This directly increases carbon emissions and undermines the Council's climate change objectives. The development does not promote sustainable transport or provide alternatives and is therefore contrary to NPPF paragraph 110 and the sustainability objectives of Policy 1.

Lack of Local Need or Strategic Justification. HDPF Policy 19,

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Park Homes and Residential Caravan Sites states, proposals for park homes or residential caravan sites will only be permitted where there is an identified local need, the site is in a sustainable location, and there is no unacceptable harm to character or amenities.

No evidence of local need has been demonstrated. Many existing static home sites in the district already provide capacity with homes available. The location is unsustainable, remote from services, and harmful to both landscape and amenity. The proposal fails all criteria under Policy 19.

The site lies outside any defined built-up area boundary, is not allocated for development in the Local Plan or a Neighbourhood Plan and is not essential to a countryside location (contrary to HDPF Policy 26, NPPF Paragraph 84). Development here would be overdevelopment and urbanisation of a rural site and set an undesirable precedent and lead to pressure for further development well outside the nearest settlement.

Loss of Community Asset. HDPF Policy 43, Community Facilities, Leisure and Recreation states the Council will resist the loss of sites and premises currently or last used for community facilities and services.

The Limeburner's pub and touring campsite is a valued community asset. Its loss as a public house and conversion into offices/management accommodation undermines the potential for its future as a viable pub or community facility. The applicant has not demonstrated that the pub is unviable, nor offered suitable alternative provision. This is contrary to Policy 43, which seeks to retain such facilities for community benefit.

The site has historically been used as a touring campsite, a low-impact use which supported the local visitor economy and provided seasonal accommodation. Its loss to permanent residential dwellings removes a community and leisure facility, contrary to Policies 9 and 43. No evidence has been presented to demonstrate that the campsite is unviable or that its loss is justified.

Failure to replace like for like or provide alternative provision. NPPF Paragraph 98 states

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities, and other local services to enhance the sustainability of communities and residential environments and guard against the unnecessary loss of valued facilities and services.

The replacement of a community-serving tourism facility with permanent private dwellings does not benefit the wider public or

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enhance community sustainability. No alternative provision for visitors has been proposed, and the change of use narrows rather than broadens local choice. This weakens the visitor economy.

Environmental Protection, HDPF Policy 24, Environmental Protection states the Council will ensure that the district's environment is protected from unacceptable levels of pollution including air, soil, water, noise, light and odour.

NPPF Paragraph 198, Planning policies and decisions should ensure that new development is appropriate for its location by mitigating and reducing to a minimum potential adverse impact resulting from noise, light pollution and impacts on health and quality of life.

Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

The proposal introduces dense permanent year-round lighting, vehicle movements, and activity into a tranquil rural setting. This will generate unacceptable levels of light spill, noise, and air pollution from increased traffic. The quiet enjoyment of the countryside and the health and quality of life of existing residents would be harmed. This conflicts directly with HDPF Policy 24 and NPPF paragraph 198.

In conclusion, The proposal conflicts with multiple policies of the Horsham District Planning Framework (Policies 1, 3, 4, 11, 19, 24, 25, 26, 32, 33, 34, 38, 40, 43) and the National Planning Policy Framework (paras 84, 98, 110, 1167, 130, 174-181, 187, 198, 214-218).

Represents a detrimental change in land use that undermines community sustainability, tourism, and amenity.

Introduces unjustified, unsustainable, and harmful development into a sensitive rural setting, causing significant adverse impacts on landscape, heritage, biodiversity, flood risk, highway safety, and neighbour amenity. It would create pressure for further piecemeal residential developments in the countryside.

The application fails to comply with the development plan when read as a whole, and no material considerations exist to justify, and the proposal should be refused.

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Kind regards

**Telephone:**

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