



**PROMETHEAN**  
PLANNING

'The Slips',  
West End Lane,  
Henfield,  
West Sussex  
BN5 9RG

Use of land for the stationing of 4 static caravans for  
residential purposes and associated day rooms

Planning Statement

18<sup>th</sup> October 2025

## **Location**

The site amounts to approximately 0.58 hectares and is located on the western outskirts of Henfield and is situated on the southern side of West End Lane.

The site is currently used as a camp site and is a long narrow field with mature trees to both the west and east boundaries.

The surrounding area is predominantly characterised by a mix of residential development and agricultural and equestrian land.

The site has an established access from West End Lane.

## **The Proposal**

The proposal is for the use of land for the stationing of 4 static caravans for residential purposes and 5 associated day rooms.

The plans also include parking for 2 cars for each pitch, a touring caravan and a bike and bin store as well as a day room / utility building for each pitch.

## Relevant policies

Policy 26 of the HDPF seeks to protect the rural character and undeveloped nature of the countryside against inappropriate development, seeking to support certain forms of development related to the needs of rural enterprise and sustainable rural development, while seeking to prevent a significant intensification of use and retain important components of rural character.

Policy 23 of the HDPF sets out the criteria for assessment in the determination of planning applications for non-allocated gypsy and traveller development, seeking to ensure that sites are appropriate in terms of ground conditions, vulnerability to flood risk, served by safe and convenient vehicular/pedestrian access, appropriate to local character, appearance and neighbouring amenity.

Policy 23 of the HDPF seeks to support sites located in or near existing settlements, within reasonable distance of local services and community facilities, in particular to schools and essential health services.

Paragraph 22 of the Planning Policy for Traveller Sites (PPTS) (2015) confirms that applications for planning permission should be determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.

Paragraph 23 of the PPTS confirms that applications involving traveller sites must be assessed in accordance with the presumption in favour of sustainable development, and the application of specific policies contained within the PPTS and NPPF relating to traveller sites.

Paragraph 24 of the PPTS sets out that Local Planning Authorities must consider the following issues amongst other relevant matters, in the determination of applications for traveller sites:

- a.) The existing level of local provision and need for sites;
- b.) The availability (or lack) of alternative accommodation for the applicants;
- c.) Other personal circumstances of the applicant;
- d.) That the locally specific criteria used to guide the application of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites;
- e.) That they should determine applications for sites from any travellers and not just those with local connections.

Paragraph 25 to the PPTS sets out that LPAs should strictly limit new traveller site developments in the open countryside that are away from existing settlements or outside areas allocated in the development plan.

Paragraph 27 of the PPTS confirms that if an LPA cannot demonstrate an up-to-date 5 year supply of deliverable sites, this should be a significant material consideration in any subsequent determination when considering applications for the grant of temporary planning permission. An exception, however, exists for defined protected landscapes, Sites of Special Scientific Interest and/or areas protected under the Birds and Habitats Directive.

## Need

At this time, the district is subject to a substantial unmet need for gypsy and traveller pitches which has subsisted for a number of years, with no clear pathway for resolution through the adoption of a new local plan.

The Council has progressed work on an updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) in order to understand the latest position, and to develop an appropriate Gypsy and Traveller Policy as part of the Local Plan Review. In January 2020, the 'Gypsy and Traveller Accommodation Assessment (GTAA) – Final Report' was published.

This Report was part of the background evidence base that accompanied the Local Plan Review (Regulation 18) Consultation which ran from February to March 2020.

The GTAA Report provides an evidence base for the provision new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2019 to 2036. The GTAA identifies that there is a need for 93 pitches for Gypsy and Traveller households over the plan period (2019-2036).

The need of 93 pitches for Gypsy Traveller Households stated in the GTAA dated January 2020 has since been updated by Opinion Research Services for Horsham Council and published in December 2023.

The update indicates a need between 2023-2040 (the plan period) for 128 pitches. This follows the result of the Lisa Smith Judgement where the Planning Policy for Traveller Sites (PPTS) was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller by reintroducing those who have ceased to travel permanently due to education, ill health, or old age into the definition (now referred to as the 2023 PPTS).

The needs assessment produced to support the local plan review provides the most up to date evidence base.

This constitutes a major consideration weighing heavily in favour of the proposal provided that the development does not significantly depart from the criteria laid-out in Policy 23 of the HDPF and the PPTS

## Location

The application site lies outside of the built-up area and is therefore considered to be within the countryside in policy terms. The site lies approximately 0.8 miles from Henfield High Street which has a good range of services and facilities with some access to public transportation and 0.1 miles from the edge of the settlement boundary of Henfield.

Policy 3 of the HDPF classifies Henfield as a 'Larger Village' within the District which has a good range of services and facilities, strong community networks and employment provision together with reasonable train or bus links.

This situation, however, is not dissimilar to circumstances considered in the determination of appeal ref: APP/Z3825/W/20/3265226, (LPA ref: DC/20/1993), where the Inspector noted at paragraph 18 that future occupiers would prove highly dependent on the use of the private car, though, neither HDPF Policy 23 nor the provisions of the PPTS explicitly require gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village, or otherwise preclude a high degree of reliance on the private car at paragraph 17.

The Inspector considered at paragraph 19 that the likelihood of short car journeys to nearby settlements would constitute a factor weighing in favour of a gypsy or traveller proposal, noting that NPPF paragraph 105 recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural environments, and found the appeal proposal acceptably located at paragraph 20 such to comply with the requirements of HDPF Policy 23

Similar conclusions have been reached in appeals relating to more remote sites, including APP/Z3825/C/21/3271264

The location is also not dissimilar to the 3 pitches recently allowed at appeal under APP/Z3825/W/24/3345055 at Stonepit lane which is just 1 field to the north.

It is therefore considered that the site constitutes an acceptable location for the proposed development in relation to HDPF Policies 23 and 26

### Impact On trees

The site is bound by mature trees which screen it well from the surrounding area and contribute to the character of the site and the wider area.

The proposed development seeks to avoid incursion into the RPA of the trees proposed to be retained on site.

The application is accompanied by a detailed arboricultural report detailing the impact on the trees and ensuring the development will not lead to harm to any of the trees retained on site

The proposal is therefore considered to be compliant with policies 25 and 26 of the HDPF and policy 10 of the HNP which seeks to preserve features and characteristics of the landscape character, such as trees.

### Landscape impacts

The starting point must be that the likely location of any new Gypsy Traveller site in Horsham will be in the Countryside. The PPTS accepts that gypsy sites will be in the countryside.

Simply because a site is within the countryside is not an automatic assumption that it will be harmful to the character of the area. Each site must be assessed for landscape sensitivity and the impact of the proposal must be considered.

The application site has no statutory or local landscape designation, it is not within the Green Belt and is not a National Landscape or National Park. The application site is therefore exactly the type of area in which Gypsy Traveller sites are likely to be found

This part of West End Lane comprises a rural appearance which is characterised by trees and hedging and planting which line the lane with residential development scattered along the lane with open parcels of land between them.

The proposal seeks to retain the surrounding trees and boundary treatments. Thus the proposal would result in limited impact to the surrounding character, avoiding an urbanising impact on the rural character of this part of the lane.

The applicant is also willing to accept a condition removing any permitted development rights for further fencing installation of fences, recognising that tall solid fencing could result in a subdivision of the site which would have the potential to be harmful to the character of the site.

Whilst any form of development will result in some change to the character of a site, the changes here are not considered to be harmful.

Strategic Policy 23: Gypsy and Traveller Accommodation states that any planning applications for non-allocated sites must not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings. (our underlining added)

The resulting impact is limited and certainly could not be considered to meet the threshold of 'unacceptable harm' as set out in the policy

In the recent appeal on the site for 3 pitches at Stonepit Lane, just to the north (reference APP/Z3825/W/24/3345055) the Inspector commented:

*With regard to character and appearance, the proposal comprises three static caravans and three day room buildings with associated hardstanding. The combination of the apparent changes in ground levels, and the likely height of static caravans, and the height of the day rooms shown, suggest most if not all of the urbanising features would be screened; especially from views from the south towards the site from West End Lane.*

*Landscaping is proposed, which would further ameliorate the visual effects of the proposal when seen from further afield.*

*More immediately, the landscaping along Stonepit Lane would comprise native hedging, this would not be dissimilar to that found along Stonepit Lane, which I saw during my site inspection has been grown to a considerable height. This is further reinforced by the fact that the Council's Appeal statement indicates that 'this part of Stonepit Lane comprises a rural appearance which is characterised by trees, hedging and planting which predominantly lines the lane.' The proposal would reinforce such characteristics, which could be secured by planning condition.*

*Furthermore, I saw that isolated residential dwellings which are located adjacent or near to the highway are a typical feature of the area. The combination of the context of the appeal site; including its topography, the nature of the proposal being single storey in form, the potential for the sensitive use of landscaping to reinforce existing soft landscaping on the site, and the nature of the proposed development on this site which is on the edge of Henfield and not dissimilar in character to the sporadic residential development in the area lead me to the conclusion that the proposal would not have an adverse effect on the character and appearance of the area.*

*Accordingly, the proposal would not conflict with Policies 23, 25, 26 and 33 of the Horsham District Planning Framework 2015 (HDPF) and Policy 12 of the Henfield Neighbourhood Plan, which, amongst other aims, seek to ensure that development would not have an unacceptable impact on the character and appearance of the landscape.*

The application is similar in many respects to the Stonepit Lane scheme and includes similar appropriate landscape improvements.

For these reasons, the proposed development is considered to cause limited harm to the character and appearance of the area and so would not conflict with Policies 25, 26 and 33 of the HDPF and Policies 10 and 12 of the Henfield Neighbourhood Plan.

## Highways and Access

The proposed development would utilise the existing vehicular access from West End Lane to the north.

No road safety concerns in relation to the proposed access are apparent.

It is clear that the proposed development would be serviced by a safe and suitable means of access such as to satisfy the requirements of HDPF Policies 23 and 40

Policy 41 of the HDPF seeks to ensure that the proposed development is supported by adequate parking, including for vehicles, electric-vehicles and cyclists.

The proposed layout provides that each pitch would benefit from hardstand providing a space for 2x cars and a refuse store incorporating an EV charging point and storage for 2x cycles.

## Ecology

Protected species surveys have been carried out and are included with the submission.

The scheme provides for ecological enhancement, including the installation of bird boxes and additional native hedge planting.

The scheme provides for ecological enhancement, including the installation of bird boxes and additional native hedge planting. The net result will be a significant increase in native hedging on the site when compared to the pre development scenario and this will reinforce connectivity for wildlife to the boundaries.

The development does not result in an adverse impact on protected species and its habitat and so is in accordance with Policy 31 of the Horsham District Planning Framework (2015) and the NPPF.

A biodiversity net gain report is included demonstrating an enhancement in excess of 10% and a suitable condition can be applied

The effect of paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 is that planning permission granted for the development is deemed to have been granted subject to the condition ("the biodiversity condition") that development may not begin unless:

- i) A Biodiversity Gain Plan has been submitted to the planning authority, and
- ii) The planning authority has approved the plan

This is a deemed condition which would control the implementation of the BNG enhancements.

It is expected that the LPA would in any case add a further condition requiring that prior to the commencement of the development a Habitat Management and Monitoring Plan (HMMP) shall be submitted to and approved in writing by the Local Planning Authority.

## Water neutrality

On the 8th October 2025, the Government issued a press release setting out that ‘a landmark agreement’ has been reached between government, regulators and the water industry to resolve the water supply issues in the Arun Valley, enabling building work to ‘begin from 1 November’.

In essence this press release foresees that water neutrality will no longer be a material planning consideration from 1 November as a strategic-level solution has been agreed to ensure adverse impacts on the Arun Valley habitat sites, as identified in the Natural England Position Statement of September 2021, will be avoided.

The press release states that ‘Under the agreement by Defra, Natural England, the Environment Agency and Southern Water, the water company will change its water abstraction permits to limit the amount of water taken from local rivers and wetlands, as well as provide funding to restore habitats.’

The press release goes on to state that ‘New homes will also be built to higher water efficiency standards in line with the building regulation guidance for water scarce areas, reducing daily water use and easing pressure on local watercourses.’

As it stands, however at the time of submission, the Natural England Position Statement of September 2021 still officially remains in place.

It is considered that the Position Statement is likely to be withdrawn by the end of October, and this will likely mean that water neutrality is no longer a constraint on development.

In the event that this does not happen the Council have recently confirmed that they will now look to use Grampian conditions restricting the commencement of development until such time that the site has secured mitigation under the Councils’ own mitigation scheme SNWCS.

It is understood that development deemed compliant with a current or emerging (post-submission) local plan or neighbourhood plan would be deemed eligible for access to purchasing SNWCS water credits.

Gypsy and Traveller proposals are considered to be eligible to access SNWCS to offset the increased water demand associated with the proposal.

The applicant therefore proposes the use of a Grampian Condition that restricts the commencement of development until such time that the requisite number of credits have been secured through SNWCS.

### **Foul water and surface water Drainage**

The site is not within a flood zone as identified by the Environment Agency. A small area of land to the north west of the site is at future risk of surface water flooding but this area does not contain any of the proposed units.

A flood risk report is included with the application.

A detailed drainage report accompanies the application.

### **Sustainability statement**

The proposal seeks to utilise sustainable design and construction techniques, for example, energy conservation and efficiency, water efficiency, reducing waste, re-using materials and recycling materials to ensure the most efficient use of limited resources.

The application seeks to meet these aims in the following ways:

- Provision of an electric vehicle charging point for each plot
- Improvements to the biodiversity of the site through substantial additional planting to the boundaries including enhancing existing hedgerows.
- Provision of separate waste and recycling bins along with suitable covered storage.
- Water limiting measures will be provided to ensure the proposal will use no more than 85 litres/person/day

### Factors weighing in favour of the appeal.

The following factors weigh in favour of the application:

- i) The proposal complies with Policy 23 and the presumption in favour of the plan applies.

Strategic Policy 23: Gypsy and Traveller Accommodation states as follows (our comments in red):

*The following criteria will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople and any planning applications for non-allocated sites:*

- a. *There must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable;*

*The site is outside of a flood zone with no known drainage issues, no contamination issues or hazards such as overhead lines. The site is level and accessible.*

- b. *The site is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users;*

*The site has a safe established access*

- c. *The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas;*

*There is power and water on the site and drainage is possible. The site is located in a residential lane with other dwellings so waste collection services will be readily available. Sufficient parking and turning is available on site as well as sufficient amenity space for the families.*

- d. *The site is located in or near to existing settlements, or is part of an allocated strategic location, within reasonable distance of a range of local services and community facilities, in particular schools and essential health services;*

*The site is located 0.1 miles from the nearest built-up area boundary (Henfield)*

*Future occupiers would benefit from indirect access into the larger settlement, which provides services and facilities, with public transport access to larger settlements.*

- e. *The development will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.*

The application site is well screened on all boundaries. It would not impact the amenity of local properties, none of which are adjacent to the site.

The site is not a protected or sensitive landscape and whilst any development will result in some change to the character of a site, the changes are not considered to be harmful.

The resulting impact is limited and certainly could not be considered to meet the threshold of 'unacceptable harm' as set out in the policy.

- ii) The identified need for Gypsy Traveller pitches is not being met and issues with water neutrality make it even more difficult for the LPA to meet this need. Therefore, where a suitable site comes forward that meets the requirements of Policy 23 and can demonstrate water neutrality they should be granted.
- iii) The LPA cannot demonstrate a five-year supply.
- iv) There is a clear failure of Policy. The LPA have failed to deliver on their allocations so did not meet the identified need for 93 pitches (even though that was an underestimate.) From 2015 to date the Council has relied on a discriminatory definition that has tainted their entire approach. There has been a clear failure of policy.
- v) Public Sector Equality duty is relevant to the proposal. The effect of the discrimination is set out in the Lisa Smith judgement and the change of definition led to a reduction on need by some 2/3. The Council have been working on the wrong figures since at least 2020 and this engages the Public Sector Equality duty. There has been a clear breach and this is factor that must be taken into account.
- vi) The likely location of any new Gypsy Traveller site in Horsham will be in the Countryside. The PPTS accepts that gypsy sites will be in the countryside. Simply because a site is within the countryside is not an automatic assumption that it will be harmful to the character of the area. The application site has no statutory or local landscape designation, it is not within the Green Belt and is not a National landscape or National Park. The site is therefore exactly the type of area in which sites are likely to be found. The proposal results in limited impact on the landscape character of the area.

Overall, therefore, the limited impact considered to arise for the development proposals would be far outweighed by the significant benefits as identified above.

It is, therefore, considered that planning permission should be approved.