

**From:** Planning@horsham.gov.uk  
**Sent:** 09 February 2026 15:59  
**To:** Planning  
**Subject:** Comments for Planning Application DC/25/2079

**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 09/02/2026 3:58 PM.

### Application Summary

**Address:** Cotlands Paddock Horsham Road Cowfold West Sussex RH13 8AH

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**Proposal:** Use of land for the stationing of 4no. static caravans for (Gypsy and Traveller) residential purposes and associated day rooms.

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**Case Officer:** Shazia Penne

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[Click for further information](#)

### Customer Details

[REDACTED]

### Comments Details

**Commenter Type:** Neighbour

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**Stance:** Customer objects to the Planning Application

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**Reasons for comment:**

- Highway Access and Parking
- Loss of General Amenity
- Other
- Privacy Light and Noise

**Comments:** [REDACTED]

Objection to Planning Application DC/25/2079  
Use of land for the stationing of 4 static caravans for Gypsy and Traveller residential purposes and associated day rooms and room for 4 touring caravans  
Cotlands Paddock, Horsham Road / Brighton Road, Cowfold, West Sussex RH13 8AH  
Date 3 February 2026  
To Development Management, Horsham District Council  
Parkside, Chart Way, Horsham, West Sussex RH12  
I object to planning application DC/25/2079 and request that planning permission is refused.  
Having reviewed the submitted material, the Horsham District Planning Framework (HDPF), the Cowfold

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Neighbourhood Plan (CNP), and consultee responses visible at the time of writing, I consider that the application does not provide a coherent, proportionate evidence base to demonstrate compliance with key policy tests.

Primary reasons refusal is justified on the current information:

- Safe and suitable access onto the A281 is not demonstrated; the only county response seen relates to

Public Rights of Way and does not constitute a highway safety assessment.

- Foul drainage feasibility and pollution risk are not evidenced; Environmental Health note the absence

of a drainage strategy and question whether a compliant drainage field can fit within the red line.

- Countryside and landscape impacts are not robustly assessed for a new permanent residential use

outside the built-up area boundary.

- Heritage setting impacts for nearby listed buildings are not supported by a proportionate setting

assessment with verified viewpoints/visuals, and lighting/amenity controls are not detailed.

In the absence of the evidence listed in this representation, the Local Planning Authority (LPA) cannot

robustly conclude that the proposal is acceptable. I therefore request refusal.

Policy / duty Core issue Why refusal is appropriate

HDPF Policy 26

(Countryside protection)

Countryside harm /

unjustified intensification

Landscape/visual evidence and mitigation are not robustly demonstrated for a new permanent residential use outside the BUAB.

Summary and decision sought

Reasons for Refusal

HDPF Policy 23(b)

Safe access not demonstrated

No formal highways safety assessment addressing access

+ NPPF (safe access)

demonstrated

geometry, visibility, speed evidence, servicing/emergency access, and pedestrian safety.

HDPF Policy 38 + CNP

Drainage and foul

No detailed drainage strategy or testing; consultee concerns

Policy 1

drainage feasibility not

indicate uncertainty that sufficient land exists within the red

(drainage/flood risk)

demonstrated

line for a compliant drainage field; pollution and flood

+ Policy 23(c)

interaction not addressed.

HDPF Policy 34

Heritage setting and

Nearby listed buildings require a proportionate setting

+ statutory heritage duty

verified visuals

assessment with verified viewpoints/visualisations; this is not provided.

HDPF Policy 33 + Policy

Amenity impacts (noise,

No detailed lighting plan/specification; noise evidence is

23(e)

lighting, activity)  
screening-level; mitigation via layout/boundary treatments is not secured.  
HDPF Policy 31  
Ecology / lighting spill Survey coverage and lighting impacts on habitats/commuting + biodiversity duties  
corridors are not demonstrated to be acceptable or mitigated.  
Statutory Biodiversity Net  
BNG submission  
BNG inputs appear inconsistent (including site-area Gain (BNG) reliability assumptions) and validity/timing statements appear inconsistent with a 2026 determination.  
Material consideration Enforcement / baseline  
Enforcement context suggests site conditions and baseline uncertainty  
may not be stable/verified for residential use, affecting assessment of impacts (drainage, pollution, ecology, character).  
Policy framework and decision basis  
The application must be assessed against the adopted development plan and other material considerations.  
Principal policies and duties relevant to this objection (non-exhaustive) include:  
- Horsham District Planning Framework (HDPF): Policy 23 (Gypsy and Traveller accommodation), Policy 24 (Environmental protection), Policy 25 (Landscape character), Policy 26 (Countryside protection), Policy 31 (Biodiversity), Policy 33 (Amenity), Policy 34 (Heritage), Policy 38 (Water resources / flooding), Policy 40 (Highways).  
- Cowfold Neighbourhood Plan (made 8 October 2025): including Policy 1 (Groundwater and surface-water flood risk).  
- National Planning Policy Framework (NPPF, December 2024): requirement for safe and suitable access for all users (para 115).  
- Planning (Listed Buildings and Conservation Areas) Act 1990: statutory duty to have special regard to preserving listed buildings and their settings.  
1. Highways safety and safe/suitable access  
The proposed vehicular access is onto the A281, a derestricted 60 mph road. The access is described locally as being on/near a bend and gradient, with limited forward visibility.

The intensification to four residential pitches, four touring caravans. and associated day rooms is likely to increase turning movements and may introduce slow-moving vehicles (including towing), servicing and refuse operations at the access. This is opposite Homelands Nursing Home where there are frequent elderly visitors whose reaction times may be slower than average. This turning is also used by slow moving agricultural machinery going to Trenchmore Farm  
On the information available, safe and suitable access for all users is not demonstrated. The current county response visible relates to Public Rights of Way and should not be treated as a full highway safety assessment.  
- Policy tests include HDPF Policy 40 and Policy 23(b), and NPPF para 115 (safe and suitable access).  
- Pedestrian safety is also relevant: the absence of footways, lighting and safe crossing opportunities increases car dependency and undermines sustainability objectives.

Missing evidence:

- Measured access drawings showing proposed widths, radii and swept paths for emergency, refuse and towing vehicles.

- Visibility splay drawings to appropriate standards, informed by measured vehicle speeds (or a speed survey where necessary).

- A formal response from West Sussex County Council Highways Development Management confirming

whether the access is acceptable and identifying any required mitigation.

- A pedestrian safety assessment covering route practicality to key services, lighting, crossing points and interaction with the A281.

2 . Drainage, foul drainage feasibility and flood/pollution risk

Environmental Health note the absence of a drainage strategy and raise concerns that there may be

insufficient space within the application red line for a compliant drainage field.

Without a detailed drainage strategy, percolation testing and a properly sized drainage field design, the LPA

cannot be satisfied that the development can be safely and lawfully serviced without unacceptable risk of

pollution to land or watercourses.

The recent dumping and burning of possibly hazardous waste may have led to ground contamination.

The site is reported to be adjacent to a Flood Zone 3 area, and site topography may cause drainage flows to interact with low-lying areas; exceedance routing and maintenance must therefore be evidenced.

- This goes directly to HDPF Policy 23(c) (sites must be properly serviced), Policy 24 (avoid unacceptable pollution) and Policy 38 (water resources / flooding).

- CNP Policy 1 emphasises managing groundwater and surface-water flood risk.

Missing evidence:

- A full drainage strategy for foul and surface water, including SuDS approach, exceedance routing and maintenance responsibilities.

- Percolation testing and ground conditions evidence; a drainage field design sized to occupancy and compliant with relevant standards/Building Regulations.

- A plan demonstrating all drainage infrastructure and required offsets/constraints can be accommodated wholly within the red line.

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- Construction and operational pollution prevention measures, particularly given proximity to watercourses and the site's slope/soil conditions.

3 . Location, settlement hierarchy and countryside protection

The site lies outside the Cowfold built-up area boundary (BUAB). HDPF Policy 26 states that development

outside BUABs will be strictly controlled to protect countryside character.

The Cowfold Neighbourhood Plan carries full weight in decision-making. In that context, the proposal

represents new residential development in the countryside and must be justified against the spatial strategy

and the specific criteria in HDPF Policy 23.

- New permanent residential use introduces urbanising effects (domestic activity, paraphernalia,

lighting, hardstanding and servicing).

- Accessibility to services appears limited without safe pedestrian infrastructure, increasing reliance on private vehicles.

Missing evidence:

- A proportionate landscape and visual appraisal, with viewpoints from the A281 and nearby receptors (including leaf-on and leaf-off where relevant).

- Details of boundary treatments, lighting and site management to demonstrate countryside effects can be mitigated.

#### 4 . Landscape character and heritage setting

The proposal introduces four static caravans, four touring caravans, day rooms and associated domestic infrastructure in an open paddock. This can create a notable urbanising effect if not carefully designed and screened. Nearby heritage assets (reported locally as Cotlands, West Cotlands and Brook Place, including Grade II\*

Brook Place) require careful assessment of setting impacts. On the current submission, a proportionate setting assessment with verified visuals is not provided.

- Relevant policy includes HDPF Policy 25 (landscape character) and Policy 34 (heritage), alongside

the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Missing evidence:

- A heritage statement assessing the effect on the setting of nearby listed buildings and identifying

whether any harm would be less than substantial or substantial (as applicable).

- Verified viewpoints/visualisations demonstrating how the proposal appears from the A281 and key

heritage receptors.

- A lighting plan (locations, heights, luminance, shielding and hours of use) demonstrating avoidance of

adverse impacts and light spill.

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#### 5 . Residential amenity, lighting and operational practicality

The intensification from paddock use to four residential pitches plus day rooms is likely to increase activity,

vehicle movements, external lighting and noise, including during evening hours.

Operational arrangements (servicing, refuse storage/collection, turning) should be evidenced in plan form to

demonstrate the site can function without causing nuisance or safety issues.

- HDPF Policy 33 requires development to avoid unacceptable harm to the amenity of nearby occupiers

and land.

- HDPF Policy 23(c) expects sites to be properly serviced and practically operable.

Missing evidence:

- Servicing/refuse and turning arrangements evidenced in plan form (including swept paths where

needed).

- A detailed lighting plan and specification with enforceable parameters.

- Proportionate noise evidence and mitigation measures secured by condition where necessary.

- A site management approach (e.g., boundary treatments, storage areas, hours of operation for

external lighting) if the LPA were minded to approve.

#### 6 . Ecology and biodiversity, including BNG

Local reports suggest protected species may be present in the wider area (e.g., bats and other receptors).

Development should be supported by surveys and ecological assessment proportionate to risk, including the

effects of lighting, habitat disturbance and cumulative impacts.

The BNG submission should be internally consistent and valid at the point of determination.

Where inputs

(including site area) appear inconsistent, the reliability of claimed outcomes is reduced.

- HDPF Policy 31 expects biodiversity to be protected and enhanced, and relevant legislation requires

the LPA to be satisfied that impacts are understood and mitigated.

Missing evidence:

- Up-to-date ecology survey evidence, with survey effort/seasonality appropriate to likely receptors.

- An external lighting plan demonstrating avoidance of harmful light spill to habitats and potential bat commuting/foraging corridors.  
- A corrected and clearly evidenced BNG calculation, consistent with the red line boundary and baseline habitat condition, with stated validity at determination.  
Conclusion and requested action

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For the reasons set out above, the proposal conflicts with key criteria of the development plan, particularly in relation to foul drainage feasibility and highway safety, and it is not supported by an adequate evidence base on heritage setting and countryside impact.

Given the consultee concerns on drainage and the absence of a formal highways safety assessment of the access, the LPA does not currently have an adequate evidential basis to conclude that the development would be safe, acceptable and properly serviced.  
I therefore request that planning permission is refused.

Yours faithfully,

[Name]

[Address]

References

- Horsham District Council: Cowfold Neighbourhood Plan (made 8 October 2025).
- National Planning Policy Framework (December 2024), paragraph 115 (safe and suitable access).
- Horsham District Planning Framework (relevant policies as cited above).
- HDC Environmental Health and Licensing consultation response on DC/25/2079 dated 30 January 2026 (as shown on the planning file at time of writing).
- Planning (Listed Buildings and Conservation Areas) Act 1990.

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Kind regards

**Telephone:**

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