

Horsham District Council

Ref: 164/2025
Date: 30 September 2025

Dear Sir or Madam,

Horsham District Council Reference: DC/25/1395

Site Address: Limeburners Camp Site, Lordings Road, Billingshurst

We have been instructed by residents of Lordings Road to make representation in objection to the above planning application.

The Resident's grounds for objection are set out below:

Policy background

The Development Plan for Horsham District Council is the Horsham District Planning Framework (2015) (HDPF). The following policies are relevant for the proposed development:

- Policy 1 - Sustainable Development
- Policy 3 – Development Hierarchy
- Policy 4 – Settlement Expansion
- Policy 10 - Rural Economic Development
- Policy 11 - Tourism & Cultural Facilities
- Policy 26 – Countryside Protection
- Policy 32 – The Quality of New Development
- Policy 33 – Development Principles

- Policy 34 - Heritage Assets and Managing Change within the Historic Environment
- Policy 40 – Sustainable Transport
- Policy 41 – Parking
- Policy 43 – Community Facilities, Leisure and Recreation

- Billingshurst Neighbourhood Plan
 - Policy BILL 1 – Billingshurst Built-Up Area Boundary
 - Policy BILL 2 – Housing Design and Character
 - Policy BILL 11 – Tourism
 - Policy BILL 14 - Parking

- Horsham District Local Plan (2023-40) (Regulation 19):
 - Policy 1 - Sustainable Development
 - Policy 2 - Development Hierarchy
 - Policy 11 - Environmental Protection
 - Policy 13 - The Natural Environment and Landscape Character
 - Policy 14 - Countryside Protection
 - Policy 19 - Development Quality
 - Policy 20 - Development Principles
 - Policy 21 - Heritage Assets and Managing Change within the Historic Environment
 - Policy 24 - Sustainable Transport
 - Policy 25 - Parking
 - Policy 28 - Community Facilities, Leisure and Recreation

The following Policies of the HDPF are the most pertinent:

Policy 3 (Settlement Hierarchy) in the HDPF states *“Development will be permitted within towns and villages which have defined built up areas.”*

Policy 26 (Countryside Protection) states *“Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:*

1. *Support the needs of agriculture or forestry;*
2. *Enable the extraction of minerals or the disposal of waste;*
3. *Provide for quiet informal recreational use; or*
4. *Enable the sustainable development of rural areas.*

In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside”

Policy 33 (Development Principles) states *“In order to conserve and enhance the natural and built environment developments shall be required to Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings”*

Policy 34 (Heritage Assets and Managing Change within the Historic Environment) states *“the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets”*

Planning History

Planning permission (BL/97/97) was approved in 1997 for the use of the land as a caravan and campsite.

A recent application (DC/25/0700) was submitted for the removal of condition of the original application for the use of the land for caravans and camping. The application was withdrawn.

Principle of Development

Planning application DC/25/1395 seeks permission for the siting of 24no. single-storey static homes for permanent year-round occupation (Use Class C3).

The proposal would effectively create a new residential development in a countryside location, outside any defined Built-Up Area Boundary, and unrelated to an existing settlement. Policy 3 (Development Hierarchy) of the Horsham District Planning Framework (HDPF) sets out a clear strategy for directing housing growth to sustainable locations with established infrastructure, services, and facilities. Residential development of this scale in a rural, isolated location is inconsistent with this spatial strategy and would amount to unsustainable development, contrary to the objectives of NPPF paragraphs 7, 8 and 11, which require development to contribute to the three dimensions of sustainable development (economic, social and environmental).

Policy 4 (Settlement Expansion) of the HDPF permits the expansion of settlements only where properly planned, well integrated, and supported by the local community. The application does not represent a logical extension to a settlement, nor does it demonstrate local need or community support. Instead, it represents speculative development in the open countryside, contrary to the Council's plan-led approach to growth and to NPPF paragraph 15, which requires planning decisions to reflect an up-to-date plan-led strategy.

The site's rural location is remote from day-to-day facilities and services, resulting in a heavy reliance on private vehicles. This runs counter to NPPF paragraph 110, which seeks to reduce the need to travel and promote sustainable transport.

The proposal would also result in the loss of an existing tourism use, which was originally approved to support rural diversification and local businesses. The approved use as a caravan and camping site (for short-term stays) contributed positively to the local visitor economy and complemented the Limeburners Pub. Permanent residential use would remove this tourism function, contrary to Policy 11 (Tourism and Cultural Facilities) and Policy 43 (Community Facilities) of the HDPF, as well as NPPF paragraph 88, which seeks to support a prosperous rural economy through tourism and diversification.

Impact upon the Listed Building

Policy 34 of the Horsham District Planning Framework states *“the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets”*

The Limeburners Pub, a Grade II Listed Building, lies immediately adjacent to the application site. The Council’s Conservation Officer has raised concerns that the permanent siting of 24no. static homes would have a harmful impact on the building’s setting, due to the density of development, associated domestic activity, and visual intrusion.

Unlike seasonal touring caravans, a permanent residential park of this scale would introduce year-round domestic paraphernalia, hardstanding, and lighting, fundamentally altering the rural character of the site and undermining the special setting of the heritage asset.

This is contrary to NPPF paragraphs 212–215, which state that great weight should be given to the conservation of heritage assets and that any harm to their setting should require clear and convincing justification. No such justification has been provided.

Accordingly, the scheme is contrary to Policy 34 of the HDPF and the NPPF's requirement to give great weight to the conservation of heritage assets.

Impact upon neighbour amenity

Other than the Limeburners Pub, there are no immediate neighbours to the application site. The nearest neighbouring dwellings are located on the opposite side of Lordings Road, whilst other nearby dwellings are sporadically located along Lordings Road to the north and south of the application site.

The use of the pub along with the camp site, brings a certain level of noise and traffic, though reasonable within a rural location. The nature of camp sites and their use, it is reasonable to assume that outside of the months of April to September, the camp site would have seen little or no activity. Whilst traffic movements for a single caravan or tent would be minimal, as they would one vehicle.

By contrast, the introduction of 24no. permanent residential units would significantly intensify activity on the site throughout the year. This would result in additional vehicle movements, greater levels of noise, and increased domestic activity, which would impact the tranquillity and character of the area.

Therefore, whilst there is an existing use of the site, the intensification of the use of the site would bring additional impact upon the surrounding area, which would impact the residential dwellings along Lordings Road. The proposal is therefore contrary to Policy 33 of the HDPF and the NPPF.

Parking and Transport

The camp site is served by a single access entrance off Lordings Road, which is separate to the Limeburners Pub car park, whilst the camp site has no formal parking arrangement.

The original planning permission allows up to 30 no. caravans on the site and this would include a single vehicle for each caravan and/or tent.

The site is accessed via a single entrance off Lordings Road, a narrow rural lane. The approved campsite did not have formal parking arrangements but generally accommodated one vehicle per unit on a short-term basis.

A permanent residential scheme of 24 no. homes would create a materially higher level of traffic, with each household likely to generate multiple vehicles. This would lead to a significant intensification of use of the access, resulting in highway safety concerns on a constrained rural lane.

Furthermore, additional hardstanding would inevitably be required to provide parking and turning space for the occupiers, eroding the rural character of the site and landscape setting.

The proposal is therefore contrary to Policies 40 and 41 of the HDPF, as well as NPPF paragraphs 110 and 111, which require development to ensure safe and suitable access for all and to avoid severe residual impacts on the road network.

Conclusion

The proposal for the siting of 24 no. static homes for permanent residential use (Class C3) represents an unsustainable form of development, wholly inconsistent with the spatial strategy set out in the HDPF. It would result in:

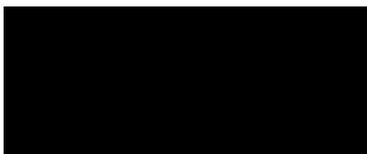
- unjustified new housing in an isolated countryside location, contrary to Policies 3 and 4 of the HDPF and NPPF paragraphs 7, 8, 11, 15 and 110

- the loss of a tourism facility, undermining rural diversification and community benefit, contrary to Policies 11 and 43 of the HDPF and NPPF paragraph 88
- harm to the setting of a Grade II Listed Building, contrary to Policy 34 of the HDPF and NPPF paragraphs 212–215
- adverse amenity impacts through intensification of use, contrary to Policy 33 of the HDPF and
- unacceptable highway and parking impacts, contrary to Policies 40 and 41 of the HDPF and NPPF paragraph 110.

Therefore, it is clear the proposal would not result in a sustainable form of development and lead to an intensification of the site, which would have a detrimental impact upon the surrounding countryside, as well as the Listed Building of the Limeburners Pub.

For these reasons, the proposal conflicts with both the HDPF and the NPPF, and it is respectfully requested that planning application DC/25/1395 is refused.

Your faithfully



Doug Wright

WPS Planning