DRAFT STATEMENT of COMMON GROUND

DC/24/0298
Proposed settled gypsy accommodation site comprising 10no pitches and associated utility buildings.

Oakhurst Centre, West Chiltington Lane, Coneyhurst, West Sussex

Areas of agreement

1. The application site is found within a predominantly rural context ~1.2km east of the defined built-up area boundary of Billinghurst, accessed to the west of West Chiltington Lane by way of shared single-track private driveway. The site contains the definitive route of public footpath (PROW) No.1924, and modelled areas of surface water flood risk (low-high risk). The majority of the site is modelled as a 'red' impact risk zone for the potential presence of Great Crested Newt, as represented within the District-wide licencing scheme for GCN. The site is not contained within the designated Green Belt and does not contain any designated habitat.
2. The parties agree that the site is sufficiently sustainably located in relation to an appropriate range of local services and facilities, being found a short drive from Billingshurst. The parties agree that the proposal, therefore, is near to an existing settlement and within reasonable distance of a range of facilities such as to comply with the provisions of HDPF Policy 23 in this respect.
3. The parties agree that the scale of proposed development is proportionate to the scale of the nearest settled community (Coneyhurst), not resulting in a greater quantum of development to that present within the existing hamlet. The parties agree that the proposals would not result in the over-dominance of the nearest settled community pursuant to Paragraph 14 of the PPTS.
4. The site is bounded by treed-hedgerows to its southern, northern and eastern boundaries. The parties agree that this existing vegetation provides generally effective visual screening from nearby public vantages. The parties, further, agree that the proposals are capable of retaining existing boundary vegetation, would not result in the loss of features important to the character of this Landscape and that existing built facilities already result in harm to local visual and landscape character. The proposals, therefore, are considered compliant with the provisions of HDPF Policies 25, 32 and 33 in addition to BPNP Policy BILL 2.
5. The parties agree that the council is unable to demonstrate a deliverable 5-year supply of sites relative to its assessed need. The Council's latest published AMR

confirms at paragraphs 3.44 and 3.45 that a single pitch has been delivered in the previous monitoring period (2024-2025) and 9x pitches have been approved. In relation to the immediate need for pitches, comprising of at least 50x pitches to 2027, therefore, officers consider that there is a significant unmet need for pitches within the District, The benefits to be derived from the delivery of 10x pitches is a matter that carries significant weight in favour of a grant of planning permission, especially in the context of the Authority's immediate and historic unmet need for pitches.

6. The parties agree that the proposals would not result in unacceptable effects upon the living conditions of nearby occupants as a consequence of the absence of harmful overshadowing effects and/or an unacceptable loss of privacy resulting from the introduction of caravan pitches.

7. The parties agree that adequate vehicular turning space exists within the site to enable vehicle to manoeuvre and exit onto the public highway in a forward gear and that there are no publicly available records of injury accident within a period of 5-years preceding 24.07.2023. The parties agree that the proposals would not unacceptably impact upon highway safety or operation.

8. The parties agree that the proposals would not prove harmful to the setting and/or significance of any heritage assets such as to result in conflict with the provisions of HDPF Policy 34.

9. The parties agree that NatureSpace, operators of the District-wide licencing scheme for GCN, advise that 11x ponds are present within a 500m radius of the proposed development, consider there to be suitable habitat for GCN within the development site and wider connectivity between the site and surrounding habitat features in the landscape.

10. The parties agree that NatureSpace advised that a NatureSpace Certificate or Report must be submitted demonstrating that the impacts of the proposals are addressed through the District Council's Licence, or otherwise provide relevant surveys and site-specific mitigations in reflection of the reasonable likelihood of impact upon GCN in order to demonstrate no unacceptable harm to GCN. The Appellant has provided a District Licence Report and Impact Plans during the course of this appeal.

11. The parties agree that the appeal proposals, notwithstanding the absence of mitigation, would not contribute to the possible adverse effect upon the integrity of the Arun Valley SAC, SPA and Ramsar designations as addressed by the Natural England Position Statement of September 2021.

12. Extant permission exists under application DC/23/1854 for the demolition of the buildings.

    Prior Notification for demolition of existing equestrian and commercial/industrial buildings

    Oakhurst Centre West Chiltington Lane Coneyhurst West Sussex RH14 9DN - Validated: Fri 06 Oct 2023 | Status: PERMIT

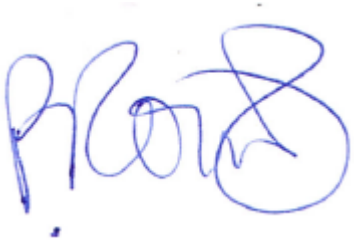
Areas of disagreement

1. Whether concerns in relation to flooding RFR 2 remain a strong reason for refusal; *i.e. whether in the light of the September 2025 ,"Government updates national flood risk planning guidance to clarify 'reasonably available' sites" which amended paragraph 175 of the framework to clarify that "the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood-risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future".*

2. Whether Flood-Resilient Design can be designed to ensure occupiers remain safe during a flood including:

- Setting floor levels above the estimated flood level.
- Using water-resistant materials to minimize damage.
- Incorporating sustainable drainage systems (SuDS) to capture, slow, and soak away rainwater, reducing flood risk.
- Emergency Access and Escape: A safe route of access and escape must be provided, connected to a higher flood risk area and above the estimated flood level.

Signed SW .....on behalf of Horsham District Council; Date 21/11/2025



Signed ……Phil Rowe……on behalf of appellant; Date 21.11.25