Retrospective planning application

DC/26/0185 | Supplementary evidence and final supporting statement

Land off Rowhook Road, Rowhook Hill, West Sussex • November 2026

1. Introduction and purpose of submission

This statement responds to Horsham District Council's outstanding concerns regarding the operational necessity, scale, finished levels and landscape effects of the existing agricultural hardstanding and associated earthworks. It should be read alongside the previously submitted agricultural assessment, topographical survey and application drawings, together with the supplementary technical evidence identified below.

The applicant seeks to demonstrate that the hardstanding is reasonably necessary and proportionate to the requirements of the Christmas tree farm and that the identified landscape effects can be appropriately addressed through a secured mitigation scheme.

Supporting evidence

Landscape and Visual Appraisal (LVA), November 2026, and Appendix A: Landscape Perspective Ltd, Ann Rowland, Chartered Landscape Architect, with over 30 years' professional experience. Contact: a.rowland@lperspective.co.uk.

Vehicle tracking base drawing 26.91–001: Highway Planning Ltd, Dermot McCaffery MIHE MIRSO, with over 29 years' highway and transport experience. Contact: dermot@highwayplanning.co.uk. Supplementary calculated vehicle manoeuvring and illustrative loading-area sheets based on this drawing are reproduced in Appendices B and C; their stated assumptions and verification requirements are retained.

2. Agricultural operational necessity

The site is an established Christmas tree farm. The hardstanding provides a consolidated operational area for the movement and parking of agricultural vehicles, handling and dispatch of harvested trees, equipment storage, irrigation equipment and access to the existing workshop for maintenance and repair. These activities directly support cultivation, harvesting and distribution of the crop.

The hardstanding is located adjacent to the pre-existing workshop, concentrating operational activity rather than dispersing machinery and storage across the cultivation areas. The wider site is intended to return substantially to Christmas tree production.

3. Justification of size and proportionality

The operational layout shown at Figure 13 of the LVA Appendix A illustrates the allocation of space for machinery, ancillary storage, parking, workshop access and central manoeuvring. The vehicle tracking and loading-area drawings explain why apparently open parts of the hardstanding must remain available for working movements rather than being occupied by static equipment.

The larger tractor and trailer combination is approximately 17.40 m long. The calculated workshop-forecourt route sweeps approximately 446 m², compared with an original Land Rover allowance of approximately 298 m²; approximately 264 m² of the tractor sweep lies beyond that original allowance (Appendix B, sheet 1). The illustrative stationary loading activity allocation is approximately 282 m² (Appendix C, sheet 1). These are overlapping operational phases, not additive areas or prescribed minimums.

Taken together, the drawings and machinery schedule support the applicant's assessment that the existing footprint is operationally constrained. A material reduction risks restricting manoeuvring, loading or access. The actual footprint and clearances should be confirmed against a dimensioned layout; no claim is made that every square metre has been independently established as the absolute minimum.

4. Vehicle swept path analyses

Land Rover and trailer

The smaller vehicle combination is used to distribute Christmas trees to retail outlets where the larger tractor and trailer cannot readily gain access. The Highway Planning Ltd drawing (Appendix A to this statement) shows the original vehicle tracking and yard arrangement.

Agricultural tractor and larger trailer

The New Holland T5.120 tractor with loader and Marshall BC-32 trailer is required for larger crop movements. The supplementary comparison (Appendix B) identifies two routes requiring a reverse of 14.0 m or 20.4 m respectively. The latter uses the workshop forecourt to simplify departure. Parking, storage and other movable obstructions must be cleared temporarily during these operations.

The calculated minimum clearances are approximately 0.107 m and 0.114 m, without an additional operating margin. These demonstrate the spatial constraint with the presumption that the manoeuvre is safe in practice. Site geometry, machine capabilities, visibility and a suitable operating margin must be confirmed before relying on either arrangement.

5. Consideration of alternative arrangements

A smaller hardstanding would restrict the working area available for larger vehicle movements, tree staging and loading, particularly where other essential machinery and ancillary equipment must also be accommodated. The applicant considers that a material reduction would compromise these functions. The swept path comparison and loading-area arrangement provide supporting evidence, subject to their stated assumptions.

Relocating the operational area elsewhere on the site would separate it from the existing workshop, where machinery and vehicles require direct access for maintenance and repair. A sloping or uneven loading area would introduce avoidable risks during telehandler operations and load handling. A substantially level platform, with an appropriate drainage fall, is therefore the preferred operational arrangement.

6. Workplace health and safety considerations

The Workplace (Health, Safety and Welfare) Regulations 1992 (SI 1992/3004), where applicable, provide relevant principles. Regulation 12 concerns suitable floors and traffic routes, including avoidance of hazardous slopes and unevenness; Regulation 17 concerns safe circulation of pedestrians and vehicles, including loading bays.

HSE guidance HSG136, A Guide to Workplace Transport Safety, supports the provision of firm, suitable working surfaces, sufficient manoeuvring space and separation of pedestrians from vehicle activity. The illustrative layout in Appendix C identifies a stationary loading position, telehandler working zone, tree staging, pedestrian route and controlled access for securing loads.

The working platform assists safe handling but does not itself establish compliance. Ground bearing capacity, machinery limits, actual exclusion areas, supervision and traffic management must be appropriate to the operations.

7. Agricultural machinery and equipment schedule

Appendix D reproduces the applicant’s machinery and equipment schedule, including tractors, trailers, cultivation and maintenance implements, irrigation equipment, telehandler, polytunnel and secure storage container. The equipment serves identified agricultural functions. Its allocation should be read with Figure 13 of the LVA Appendix A and the working-area drawings, allowing for the need to clear movable equipment during larger vehicle operations.

8. Justification of finished levels and associated earthworks

The finished level of the agricultural hardstanding was selected to relate to the established floor level of the pre-existing agricultural workshop, providing a continuous working interface for machinery access, loading, unloading and maintenance. The natural gradient of the site necessitated regrading to achieve this relationship. The earthworks are therefore associated with an identified operational requirement, rather than levelling undertaken for convenience or appearance alone.

Reference is made to the topographical survey previously submitted to the Council, reproduced at Figure 10 of the LVA Appendix A. The survey should be read alongside the existing workshop and proposed operational layout. The precise original and finished levels, extent of cut and fill, drainage falls and bank profiles should be confirmed through appropriate survey and engineering information.

9. Independent Landscape and Visual Appraisal findings

The November 2026 LVA identifies a minor adverse local landscape effect in the observed condition (paragraph 9.1). It nevertheless concludes that the development can be accommodated without material harm to the wider rural character in landscape terms (paragraphs 9.15 and 9.25), subject to mitigation. No views of the hardstanding were identified from the surveyed stretches of Rowhook Road or public rights of way in October (paragraph 9.31).

Current and temporary appearance of the site

The previous Christmas tree crop was removed in November 2024 in response to Forestry Commission plant-health requirements concerning the eight-toothed spruce bark beetle (LVA paragraphs 1.6–1.8 and Appendix A, Figure 02). This resulted in a more open and exposed appearance across the wider farm. The current condition is therefore not solely attributable to the hardstanding and earthworks.

The hardstanding and regraded platform are permanent operational features. Removal of temporary spoil and clutter, reinstatement of disturbed ground, crop replanting and reinforcement of boundary vegetation will progressively improve integration. Rotational crop cover will vary and is not relied upon as permanent screening.

10. Commitment to landscape mitigation and enhancement

As landowner and operator, I formally commit to implementing the landscape mitigation and enhancement measures recommended in Section 8 of the LVA, through a scheme agreed with the Local Planning Authority. In particular, I will:

- Soften the gradient of the upper part of the bank to create a softer appearance
- Plant on the slope of the bank to soften the appearance and create a stable root bound surface
- Remove and redistribute the bund of soil on the eastern boundary to the north-east of the workshop
- Remove redundant materials
- Infill gaps in the hedging to the southwest boundary
- Plant 140 broad leaf trees to the southern-most area of the plot creating a new woodland screen

- Agree to comply with Policy 33-Development principles & ILP Guidance Note GN01 – The Reduction of Obtrusive Light, which provides the technical lighting design criteria if external lighting is required.

11. Assessment against relevant planning policies

HDPF Policy 25 (District Character and the Natural Environment): the LVA's findings, retention of woodland and boundary structure, and mitigation support the policy's landscape conservation objectives, while acknowledging the residual local change.

HDPF Policy 26 (Countryside Protection): the hardstanding supports an established land-based agricultural enterprise and its siting alongside the existing workshop is directly related to the site's operational needs. The swept path, loading arrangements and equipment schedule substantiate the need for working space. The LVA supports the conclusion that wider landscape character can be conserved, subject to mitigation. The applicant submits that the development is of an appropriate scale and essential to its countryside location, subject to the Council's assessment of the whole evidence and other policy requirements.

The proposal also supports the Slinfold Neighbourhood Plan's rural character and rural business objectives, as identified in the LVA. National planning policy objectives supporting rural enterprise, context-sensitive design and landscape protection are relevant to the balancing of operational need and landscape effects. The LVA's policy discussion should be read subject to confirmation of the applicable national framework at determination.

12. Conclusion and request for approval

The supplementary evidence provides a coordinated response to the Council's outstanding concerns. The operational case identifies the need for a substantially level working platform alongside the existing workshop, the demands of agricultural vehicle manoeuvring and loading, and the space required for essential equipment. The independent landscape appraisal identifies local adverse effects but supports the potential for integration within the wider rural landscape through secured mitigation.

The applicant respectfully requests that the Council considers the combined evidence, the previously submitted agricultural assessment and topographical survey, and the formal mitigation commitments in determining application DC/26/0185. It is submitted that retention of the hardstanding and associated earthworks can be justified, subject to appropriate technical confirmation and reasonable planning conditions securing the agreed mitigation and operational arrangements.

James Lord
Applicant and landowner

Supporting document register

- Previously submitted agricultural assessment and topographical survey.
- Landscape and Visual Appraisal, Landscape Perspective Ltd, November 2026, with separate Appendix A (Figures and Photographs).
- Appendix A to this statement: Highway Planning Ltd drawing 26.91–001, 12 November 2026 (Land Rover tracking).
- Appendix B: tractor / Marshall BC-32 workshop forecourt comparison, both sheets.
- Appendix C: yard working areas and level working platform justification, both sheets.
- Appendix D: applicant's machinery and equipment schedule.

Appendix A | Land Rover and trailer swept paths





Land Rover 130 (HCPU) + Ifor Williams HB510XL Horsebox

Overall Length	10.930m
Overall Width	2.300m
Overall Body Height	2.820m
Min Body Ground Clearance	0.164m
Max Track Width	2.298m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	7.500m

Highway Planning Ltd
3 Jubilee Cottages,
Cox Green Lane,
Maidenhead
SL6 3EX

REV	AMENDMENTS	DRAWN	CHKD	DATE

Job Title: LAND ON SW SIDE OF ROWBROOK HILL, HORSHAM

Client:

Drawing Title: PROPOSED FIELD ACCESS

Scale	Date	Designed	Drawn	Drawing No	Rev
1:500 @ A3	12 NOV 26	DFM	DFM	26.91 – 001	

Appendix B | Tractor manoeuvring comparison — sheet 1

TRACTOR / MARSHALL BC-32 - WORKSHOP FORECOURT OPTION

Comparison with previous 14 m reverse | Same vehicle geometry and working boundary | A3 landscape | Plan panels 1:500 at A3

1 PREVIOUS ROUTE - 14 m REVERSE



Reference: the previously issued route.

One reverse: 14.0 m.
Forward departure: about 42.2 m.
Five reverse curvature sections.
Nineteen departure curvature sections.

This remains the shorter reversing option.

Magenta: working boundary.
C: 4.0 m A: 4.5 m B: 6.0 m
Owner-supplied widths; west edge adjusted.

Workshop and polytunnel retained.
Parking, storage and movable items clear.

2 WORKSHOP FORECOURT - 20.4 m REVERSE



Blue: forward. Orange: reverse.
Blue tractor / red trailer positions.
Circles: direction changes.

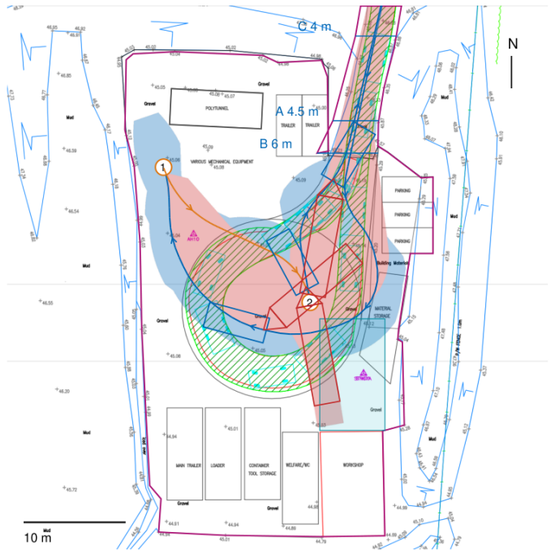
1. Same forward approach: about 67.7 m
2. One reverse: 20.4 m
3. Forward departure: about 43.6 m

Reverse sequence:
Curve 8.0 m; straight 6.0 m; curve 6.4 m.

Cyan: clear workshop forecourt used.
Trailer is almost straight at reverse end.

Longer reverse, with simpler alignment
for departure. Two direction changes
in both options; comparison on sheet 2.

3 WORKSHOP OPTION - FULL SWEPT ENVELOPE



Filled blue / red: calculated body sweep.

Peak articulation: 59.99 degrees
Smallest tractor rear-axle radius: 5.00 m
Closest calculated clearance:
0.114 m (about 11 cm)

Whole vehicle checked at 0.02 m steps.
No boundary or structure crossings
in the calculated route.

The workshop remains an obstacle;
the trailer stops outside its outline.
Clearance has no added operating margin.
Calculation assumptions are on sheet 2.

4 SPACE BEYOND THE ORIGINAL LAND ROVER ALLOWANCE



Green: original vehicle allowance.
Orange: workshop-option sweep beyond it.

Original allowance union: about 298 m²
Workshop-option sweep: about 446 m²
Additional ground swept: about 264 m²
Common swept area: about 182 m²

Areas stop at the mapped northern edge.
All three original manoeuvre envelopes
are combined for comparison.

Orange lies within the working outline.
It is newly swept ground, rather than
the difference between the two area totals.

ROWBROOK HILL | Source 26.91 - 001 | Workshop forecourt comparison | One reversing leg in each option | Sheet 1 of 2

Appendix B | Calculation basis — sheet 2

COMPARISON AND CALCULATION BASIS

New Holland T5.120 with loader + one Marshall BC-32 trailer | Workshop forecourt kept clear

CALCULATED TRADE-OFF

Using the workshop forecourt gives a more aligned trailer and a simpler departure, with 6.4 m more reversing travel.

Both routes use one reverse and two direction changes. The previous route remains preferable when reversing distance is the priority.

Measure	Previous route	Workshop forecourt option
Reverse distance	14.0 m	20.4 m
Reversing legs / direction changes	1 / 2	1 / 2
Reverse curvature sections	5	3
Departure curvature sections	19	7
Calculated minimum clearance	0.107 m	0.114 m

Section counts describe the constant-curvature pieces in the model; they are not counts of gear changes or required stops.

The workshop forecourt must remain clear for the full reversing and departure sequence shown.

VEHICLE AND SITE GEOMETRY

Tractor: wheelbase 2.49 m; maximum width 2.50 m; rear axle to loader front 5.19 m; rear axle to hitch 0.60 m.

Tyres: front 440/80R24; rear 480/80R38. Tractor rear bounding extent uses the nominal rear tyre radius.

Trailer: deck 9.75 m x 2.54 m; hitch to deck front 1.86 m; axle group to rear 1.60 m.

Hitch to axle group: 1.86 + 9.75 - 1.60 = 10.01 m. Hitch to trailer rear: 11.61 m. Straight combination: 17.40 m.

C = 4.0 m, A = 4.5 m, B = 6.0 m at the marked cross-sections; west edge linearly interpolated, existing east edge retained.

The width changes and working outline use the supplied site information; they are not a new boundary survey.

Workshop and polytunnel retained. Parking bays, material storage and other movable obstructions temporarily clear.

MODEL AND VERIFICATION

Low-speed planar offset-hitch model, rigid body envelopes, a virtual non-steering tandem axle and no lateral tyre slip.

Tractor/loader and trailer deck use full-width bounding rectangles; drawbar uses a conservative triangle.

Minimum tractor rear-axle radius 5.00 m and maximum articulation 60 degrees are assumptions, not verified limits for this vehicle.

The reverse uses radius 10.00 m for 8.0 m, a 6.0 m straight and radius 6.67 m for 6.4 m; steering changes at rest are permitted.

The full route is replayed at no more than 0.02 m travel increments; every body polygon is checked against the outline and structures.

The north portal is extended along its alignment solely for full arrival/departure; swept areas exclude everything outside the mapped panel.

Movement distances include that approach and departure. Minimum clearance is geometric and includes no added operating margin.

KINEMATIC EQUATIONS

$dx/ds = \cos(\theta)$; $dy/ds = \sin(\theta)$; $d\theta/ds = k$;

$d\beta/ds = k\,[1 + h\cos(\beta)/L] - \sin(\beta)/L$; $h = 0.60$ m, $L = 10.01$ m; trailer heading = $\theta - \beta$.

Negative travel s is used for reversing. Articulation is integrated by fourth-order Runge-Kutta with exact circular tractor steps.

Before relying on the tight clearance, confirm the supplied widths, outlined edges, steering capability and permissible articulation on site.

Keep the workshop forecourt and other affected areas clear throughout the manoeuvre; maintain visibility and control during the reverse.

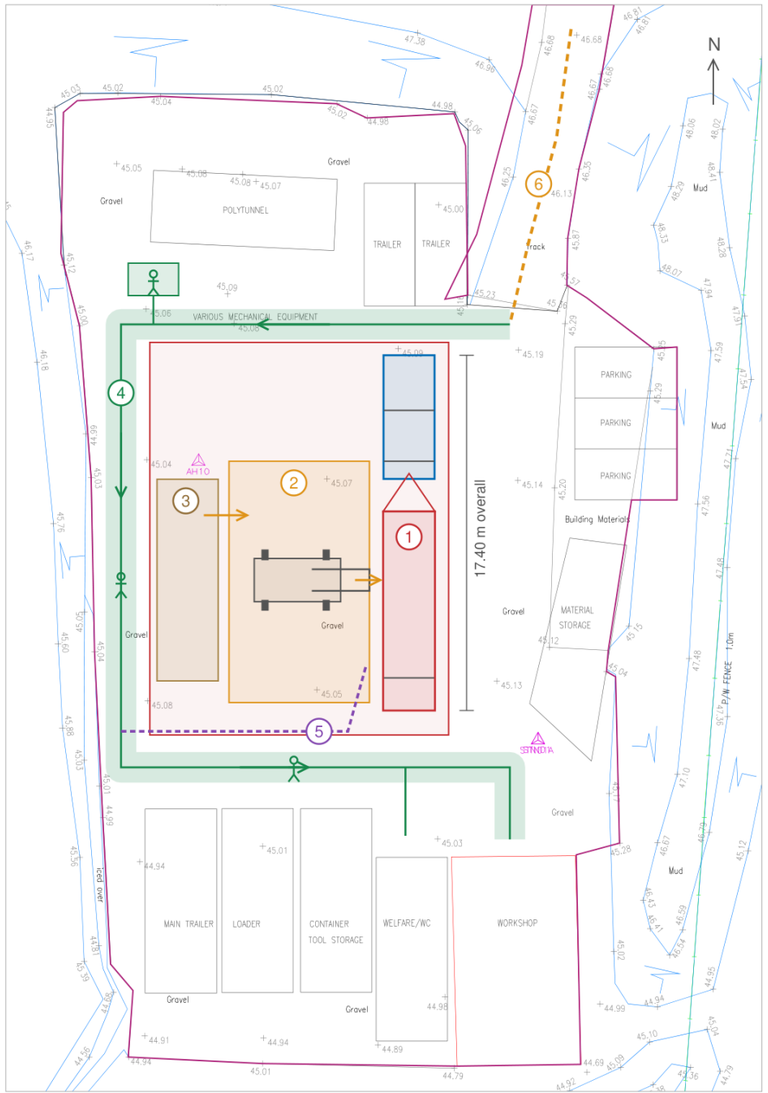
Calculated geometry assessment | Source: Highway Planning Ltd, 26.91 - 001 | Workshop forecourt option | Sheet 2 of 2

Appendix C | Operational working areas — sheet 1

YARD WORKING AREAS - LOADING, UNLOADING AND PEDESTRIAN ACCESS

Clean survey base with one stationary loading arrangement | Structures and source spot levels retained | Plan scale 1:250 when printed at A3

WORKING-AREA PLAN



0 10 m

Source spot levels are reference data.
No proposed grading levels assigned.

1 **STATIONARY LOADING / UNLOADING POSITION**

New Holland T5.120 with loader and one Marshall BC-32 trailer. Supplied geometry: 17.40 m overall, trailer deck 9.75 m x 2.54 m. Parking position is an illustrative operational choice, not an existing marked bay.

2 **TELEHANDLER WORKING AREA - PEOPLE EXCLUDED**

Amber allocation for approaching and placing trees on the trailer. Machine symbol and operating allowance are indicative; actual attachment, tree/load size, reach, capacity and turning space must determine the final exclusion area.

3 **TREE / LOAD STAGING**

Temporary position for trees awaiting loading or recently unloaded. Keep material within the allocated area and maintain the access and visibility needed by the operator. No new permanent storage building is proposed.

4 **PEDESTRIAN ROUTE AND WAITING POINT**

Green: proposed 1.50 m route allowance around the activity zone, with waiting point and approaches to welfare/workshop. Use suitable separation and keep the corridor clear. Route width and building entrance positions require on-site confirmation.

5 **CONTROLLED ACCESS FOR STRAPPING / INSPECTION**

Purple dashed access is used only after the telehandler is stopped and secured, attachments made safe and the tractor/trailer immobilised. Agree that the load is secure and everyone is clear before either machine moves again.

6 **SHARED ENTRANCE - TIME-SEPARATED ACCESS**

Orange dashed line is pedestrian access through the shared entrance, not a concurrent vehicle lane. Stop vehicle movements while pedestrians use this section; keep non-essential people outside active loading operations.

LEVEL AND PROPORTIONATE WORKING SPACE

The owner explains that the working level was selected to relate to the existing building level. A substantially level platform supports loading and stable footing while allowing a designed drainage fall. No threshold elevation or drainage design is assumed here.

The red activity allocation is about 282 m² in this illustrative arrangement. It is not a prescribed minimum. It partly overlaps the turning area used at other times: do not add loading and swept-path areas together as if they were separate requirements.

ROWBROOK HILL | Source: Highway Planning Ltd 26.91 - 001 | Operational working-area arrangement | Sheet 1 of 2

Appendix C | Level platform justification — sheet 2

WHY A LEVEL WORKING PLATFORM IS NECESSARY

Supporting points for the council response | Operational reasons linked to guidance and national planning policy

1. Stable trailer during loading and unloading

   A firm, substantially level standing position supports trailer stability while the weight and distribution of trees changes. This is a direct operational reason for levelling the loading position. [1]

2. Telehandler stability

   Sloping, uneven or unstable ground is a recognised telehandler hazard. A suitable working platform reduces this avoidable influence on stability; it does not replace the machine load chart, suitable ground bearing capacity or competent operation. [2]

3. Separation of people and machinery

   The yard needs space for loading activity and a route for people who are not involved. The plan identifies separate allocations and a waiting point rather than treating every square metre as vehicle parking. [3, 4]

4. Safe access when securing loads

   People may need to inspect or strap the load, but that access is a different operating phase from machine loading. The controlled access shown explains the need for clear space around the parked trailer. [1, 4]

5. Firm and even circulation surfaces

   Usable routes need a surface that remains firm and even, without ruts, obstructions or abrupt level changes that compromise movement and footing. Surface condition is relevant to people as well as vehicles. [5]

6. A working level related to the existing building

   The owner states that the yard level was chosen to suit the pre-existing building. Relating the platform to the building avoids introducing an unnecessary level discontinuity at the working interface. This is a site-specific operational explanation, not an HSE requirement that the whole plot share one elevation.

7. Space related to actual tasks

   The scaled stationary vehicle, tree staging, machine activity allocation and pedestrian access explain different demands on the yard. The loading arrangement and earlier turning arrangement are alternative operating phases and overlap; their areas should not be simply added together.

8. Goods handling and reduced pedestrian conflict

   National planning policy TR4(1)(c)(i) and (d) addresses reducing pedestrian/vehicle conflict and efficient goods delivery. The separated activity allocations and controlled access address those objectives. [6]

9. Supporting an existing land-based business

   National planning policy E4(1)(b) supports development and diversification of agricultural and other land-based businesses; E4(2) also addresses relationship to existing development and appropriate siting/design. The operational justification should be assessed alongside those wider considerations. [7]

10. Drainage and the extent of earthworks

    A substantially level working platform may still include a controlled drainage fall. The building datum explains the chosen working relationship; proposed levels, drainage details and existing/proposed sections are needed to substantiate the height and volume of earthworks.

CLICKABLE REFERENCES

[1] HSE: Loading

[2] HSE: Telescopic handlers

[3] HSE: Separating pedestrians and vehicles

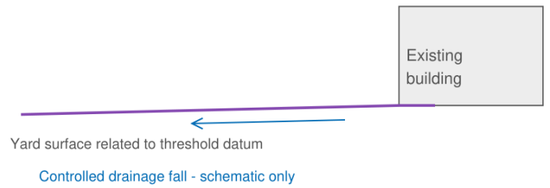
[4] HSE: Loading/unloading inspection checklist

[5] HSE: Workplace transport safety - introduction

[6] NPPF: TR4 - street design, access and parking

[7] NPPF: E4 - rural business development

BUILDING DATUM - DESIGN PRINCIPLE



Controlled drainage fall - schematic only

DRAWING BASIS AND CONFIRMATIONS

Existing structures and source spot levels are retained from the supplied drawing. Prior vehicle tracking and turning-layout graphics have been removed.

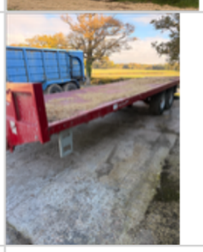
The stationary loading position, routes, waiting point and working allocations are proposed arrangements. No telehandler lifting capacity or operating envelope has been calculated.

Confirm door positions, physical separation, actual loading practice, machine/load requirements and ground conditions before adopting the arrangement.

The references support the reasons stated; they do not set the illustrated yard area or replace assessment of local planning policies, drainage, landscape effects and the earthworks proposed.

ROWBROOK HILL | Source: Highway Planning Ltd 26.91 - 001 | Operational working-area arrangement | Sheet 2 of 2

Appendix D | Machinery and equipment schedule

Vehicle / Trailer	Wheel base	Lengh	wheel siz	Distsnce from hitch point to axle	Picture	Extra info	
Tractor New holland T5. 120	2490mm		Front tyer 4490/80 R24 Rear480	600mm		Loader new holland 685LA front of loader to front wheel hub 2700mm	
Marshall BC -32 Trailer		32' x 8' 4" / 9.75m x 2.54m				Pivot from twin axle to rear of trailer 1600mm	
Marshall BC -32 Trailer		4.3meters from hitch to double axel & 1.3 from doube axle to rear				2nd trailer	
Topper		2 meters wide- 1.5 meters long				Use- weed and grass control between planting bays	t
Roller		2.7 m wide - 2.5 m long				Use- flattening of rotivated bays frior to replanting	
Chain harrow		3.6 meters wide- 2 meters long				Use- removal of small root balls in the planting bays	
Tree chipper		2.2meters - 2 meters				Use- Chipping of damaged or unsuitable crop	
Dumper		5.2 meters long- 2.6 meters wide				Use- Irigation fitted with 1000LTR water tank (to take from the well supply until a better metyhod is arranged	
Old digger		3 meters - 2.4 meters				Use- removal of stuborn stumps when trying to clear an old planting field, also ditch clearance	
Trailer Ifor williams		16'ft 6" by 6'ft 6"				Use- delivery of crop for longer delivery distances	
Irrigation tank		3.6 meters- 2.2 meters				Used to store water for storage and temperature control as well water is too cold to use directly	
Telehandler		Overall length of the 2019 JCB 535-95 is 4.99 m (16 ft 4 in / 4990 mm) to the front of the carriage.				Use- Loading/unloading and transporting the harvested trees.	
Hedge trimmer		3m - 2.4m				Use-maintaining hedgerows	
Polly Tunnel		16ft' wide by 30 ft" long				Used to grow our own sapling plants	
Dark green shipping container		8 ft" by 20ft" metal container				This is a secure storage for perishable items such as seed, & tools that can not be left in the open. It also offere a tidy storage solution.	