



PLANNING COMMITTEE REPORT

TO: Planning Committee

BY: Head of Development and Building Control

DATE: 21st July 2026

DEVELOPMENT: Erection of a six-pitch settled gypsy accommodation site

SITE: Long Wells Vineyard, Marches Road, Warnham, West Sussex, RH12 3SL

WARD: Itchingfield, Slinfold and Warnham

APPLICATION: DC/25/1727

APPLICANT: **Name:** James Robb **Address:** Care of Agent, Melton Lodge, Rusper Road, Newdigate RH5 5BX

REASON FOR INCLUSION ON THE AGENDA: More than eight persons in different households have made written representations within the consultation period raising material planning considerations that are inconsistent with the recommendation of the Head of Development and Building Control.

By request of Councillor Youtan

RECOMMENDATION: To approve planning permission subject to appropriate conditions

1. THE PURPOSE OF THIS REPORT

To consider the planning application.

DESCRIPTION OF THE APPLICATION

- 1.1 The application seeks to erect a six-pitch settled gypsy accommodation site. No other works to commence development has been undertaken. The six pitches would be positioned along the access road to the existing dwelling in Long Well Vineyard. Each pitch includes an amenity area and permeable hardstanding for parking. The remainder of the area will be used for grazing horses.

DESCRIPTION OF THE SITE

- 1.2 The site is located to the south of Marches Road, outside of any Built-Up Area Boundary (BUAB) in a countryside location. Access is to the north of the site directly off Marches Road. The site is not in a Conservation Area and does not contain any Listed Buildings.
- 1.3 The site is bounded in part on the western and northern sides by Marches Road. To the south of the site lies 13 residential properties (known as 1 to 6 The Woodford, 1 to 6 Northlands Cottages and Autumn Leaves) with long back gardens backing onto the site. To

the east of the site lies an existing established vineyard (Hoopers Vineyard) at The Old Barn, Northlands Road.

2. INTRODUCTION

STATUTORY BACKGROUND

2.1 The Town and Country Planning Act 1990.

RELEVANT PLANNING POLICIES

The following Policies are considered to be relevant to the assessment of this application:

National Planning Policy Framework

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 – Strategic Policy: Settlement Expansion
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 19 - Park Homes and Residential Caravan Sites
Policy 21 - Strategic Policy: Gypsy and Traveller Sites Allocations
Policy 22 - Gypsy and Traveller Sites
Policy 23 - Strategic Policy: Gypsy and Traveller Accommodation
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Warnham Neighbourhood Development Plan (2017-2031):

Policy W1: Built-Up Area Boundary
Policy W5: Design of residential development
Policy W9: Parking standards for new residential development

Horsham District Local Plan (2023-40) (Regulation 19):

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Strategic Policy 43: Gypsies and Travellers

Supplementary Planning Guidance:

Planning Obligations and Affordable Housing SPD (2017)

Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes:

Shaping Development in Horsham (2025- SDPAN)

Biodiversity and Green Infrastructure

PLANNING HISTORY AND RELEVANT APPLICATIONS

DC/21/0269	Install 1 x 8m wooden pole (6.2m above ground)	NO OBJECTION to Notification on 25.02.2021
DC/22/1432	Erection of single storey rear extension (Retrospective).	Application Permitted on 10.10.2022
DC/23/1269	Removal of Condition 2 of previously approved application DC/18/1748 (Permanent siting of agricultural workers dwelling) Relating to the agricultural occupancy condition.	Application Permitted on 10.11.2023
PE/24/0098	Extensions and alterations to existing dwelling and to establish curtilage.	Pre-Application Advice Given on 24.05.2024
DC/24/1551	Change of use of land for the siting of 2no. static caravans, 2no. touring caravans for habitation to be occupied by Gypsies and Travellers with associated parking and relocation of existing access. (Retrospective).	Application Refused on 21.03.2025
DC/25/0982	Change of use of land for the siting of 2 static caravans, 2 touring caravans for human habitation to be occupied Gypsy's and Travellers, with associated parking, relocation of existing access erection of day room (Retrospective)	Application Permitted on 18.11.2025
DC/25/1724	Erection of a replacement new two storey dwelling.	Application Refused on 19.12.2025

3. OUTCOME OF CONSULTATIONS

- 3.1 Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk.

INTERNAL CONSULTATIONS

- 3.2 **HDC Arboricultural Officer:** (13.11.2025) Comment: -

The trees team have been consulted on the above application for development which states there are no trees present at the site. There are some bounding trees in the roadside hedgerow, and the existing hardstanding is shown extended towards the belt of trees to the East of the site. The change of use and development process has the potential to impact upon the mature features that contribute positively to the current landscape setting.

If the application is acceptable in other planning terms, from my observations it may be viable to build out without significant impact on these features however, to make a fair assessment, a tree survey, AIA and TPP should be requested. It is up to the applicant to make clear how these features will be safeguarded and protected from the development process.

Second Response: (03.02.2026) Comment: -

The tree survey and associated AIA/TPP does not off-set the root protection area (RPA's) of the A grade roadside trees (T5-T7). These should be off-set into the site due to the constraints to rooting posed by the nature of the engineering/construction of Marches Road. This means their RPA's should be illustrated much closer to the siting of the nearest mobile homes than as shown plotted on the scaled Tree Protection Plan. As the trees are to the NE of the proposed dwellings, pressures to lop/fell will likely be confined to nuisance issues associated with proximity of change of use.

It is unclear why the belt of trees to the West (G3) has been grouped without individual plotting. The proximity of the change of use and siting of car parking and dwellings will require early removal of the diseased ash trees. Regardless of the intention to remove the nearest/largest ash stem (T2), future pressures to lop/fell the remaining tree belt will be dependent on where the individual trees are and what their future growth potential is. The relationship of the nearest proposed mobile home to the tree belt is poor and foreseeably likely to see a change to the future management/retention of some of the trees.

- 3.4 **HDC Drainage:** Request more Information to determine that the site drainage meets the requirements of the NPPF and PPG, National standards for sustainable drainage systems (June 2025), and the Horsham District Planning Framework (2015) – Policy 38.

- 3.5 **HDC Environmental Health:** Object, until further drainage details are provided and due to the distance of the caravans to the boundary and each other, parking and noise and nuisance.

If the development goes ahead then the site will require a caravan site licence, which specifies the distances from caravans to boundaries as well as the distances between caravans, including touring caravans, and other structures on the site.

- 3.6 **HDC Landscape Architect:** No Objection, subject to conditions: -

It is considered that the proposed development could be accommodated within the site in landscape terms, subject to addressing recommendations, which include softer boundary treatment, natural materials for proposed permeable surfacing, infilling gaps with existing hedgerows and the submission of a comprehensive hard and soft landscaping plan, to ensure that landscape change is managed appropriately.

To manage landscape change and avoid introducing urbanising elements, careful consideration should be given to the use of materials that are sympathetic to the rural character. The existing surfacing material on site should be replaced with a softer, more appropriate alternative that complements the rural setting.

OUTSIDE AGENCIES

- 3.7 **Ecology Consultant:** No Objection, conditions recommended.

Understand that existing boundary trees and hedgerows will be retained. The applicant's intention to plant additional native hedging and understorey planting (comprising Hawthorn and Blackthorn) around the site boundaries as specified in the Landscaping section of the Planning, Design and Access Statement (PROwe Planning Solutions, submitted October 2025) is supported and should be secured by condition.

The reasonable biodiversity enhancement measures need to be outlined within a separate Biodiversity Enhancement Strategy and secured by a condition of any consent.

- 3.8 **NatureSpace:** Comment: -

There are 5 ponds within 500m of the development proposal, the closest of which is located 75m south-east. There is connectivity between the development and surrounding features in the landscape. There is a reasonable likelihood that great crested newts will be impacted by the development proposals. The applicant has received NatureSpace documentation, conditions recommended.

3.8 **WSCC Highways:** Comment: -

The site is served by an existing established vehicle access point on Marches Road, and no alterations are proposed to this existing vehicle access arrangement. From inspection of WSCC mapping, there are no apparent visibility concerns with the existing point of access on Marches Road. In addition, the LHA is satisfied that the anticipated number of vehicle movements this site could generate can be accommodated into the local highway network without adverse safety impact.

Regarding car parking, the applicant proposes two car parking spaces per plot. Whilst technically a withdrawn document, the Good Practice Guide on Designing Gypsy and Traveller Sites (2008) recommended a provision of two car parking spaces per pitch. From inspection of the submitted plans, there appears to be suitable space within the proposed parking areas for this to be accommodated, with space for on-site turning to be achievable.

The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal.

PUBLIC CONSULTATIONS

3.9 Representations:

30 letters of Objection have been received from 19 addresses, objecting to the application on the following grounds:

- Unsuitable location and siting – outside built-up area, visible from Marches Road, inappropriate in principle
- Amenity and privacy impacts – loss of privacy, increased noise, harm to rural character
- Environmental harm – loss of trees/open land, damage to landscape character and ecology
- Inadequate infrastructure – no mains drainage, inadequate sewerage/waste disposal, lack of amenities
- Transport and safety issues – increased traffic, unsafe access, no public transport links
- Policy conflict – contrary to local plan aims, no identified need for traveller site

3.11 Parish Comments:

Warnham Parish Council: Objection: -

In addition to planning application DC/25/1724, Planning Application DC/25/1727 has been submitted for a proposed 6 pitch settled gypsy accommodation site together with allowance for a touring caravan suggesting a transient community on site which constitutes a change in use of the land area and is giving concern to neighbouring residents, with the recent Consent to the adjacent site DC/25/0982, where existing hedges and trees were removed prior to receiving consent to do so.

The potential for the arrival and departure of temporary caravans adds to road safety issues to a dangerous section of Marches Road with all the bends that exist in that area. Marches

Road is a designated route from the A29 to the A24 for all traffic including HGV vehicles where currently and as proposed insufficient set back of the entrance from the site to provide proper visibility splays as the site entrance is currently screened with hedgerows. This road has high traffic levels as indicated by the parish council traffic monitoring as well as witnessing a number of serious accidents due to speed and junction blindness.

The existing entrance with small pickups, van to the vineyard site had limited impact whereas the proposal for the movement of caravans, the potential of over 18 vehicles associated with the site will only add further road safety issues to a dangerous section of Marches Road.

Any development proposed to this site, requires a highway design to take into account the movement of vehicles (some of them with trailers or caravans) into and out of the proposed site.

The issue of providing traveller sites is recognised by the Parish but needs to be undertaken in a more controlled manner with a recognised parish need (no such need having been identified in the award-winning parish neighbourhood plan) and design not to the detriment of the rural landscape together with the existing flora and fauna.

With the long history of Long Wells Vineyard the site has been identified by the Parish Council as a location better suited to provide rural affordable housing through a Rural Exception Site being well designed to meet a need identified in the parish plan for homes for local residents within the Parish.

- 3.12 Member Comments:
None received

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

- 4.1 The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.
- 4.2 The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

- 5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

Policy Background and the Principle of the Development

- 6.1 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).

- 6.2 To inform the development of Strategic Policy 43 of the submitted Local Plan the Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA, November 2023) and a Targeted Update (September 2024) was also produced in response to changes regarding the PPTS's definition of who is a member of the G&T community for the purposes of planning policy. Collectively, 50 pitches are identified as being needed for the first five years of the submitted Local Plan (2023-2028) for those who meet the definition and also suggested a further need of 11 pitches for members of the community who it could not be determined whether they met the definition or not. At the time of writing 42 pitches have been approved / allowed during the relevant period.
- 6.3 In terms of the Council's current policy position, Policy 22 and 23 of the HDPF are considered to hold great weight, allowing speculative gypsy and traveller sites to come forward in principle. Paragraph 28 of the PPTS (updated December 2024) outlines that if a local planning authority cannot demonstrate an up-to-date five-year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.
- 6.4 Paragraph 11 of the NPPF states that the presumption in favour of sustainable development should apply where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and provision affordable homes, individually or in combination. This presumption is disengaged where footnote 7 exceptions provide a strong reason to refuse. Such exceptions include impacts on ecology or designated heritage assets. These matters are discussed further below.
- 6.5 Policy C of the PPTS relates to sites in rural areas and the countryside, with paragraph 14 stating that *"when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community"*. Paragraph 26 of the PPTS continues that local planning authorities *"should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure"*.
- 6.6 Policy 23 (Gypsy and Traveller Accommodation) of the HDPF seeks to resolve specific issues regarding un-allocated sites (rather than the principle of a development), and states that the following criteria (a-e in subsequent sections of this report) 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. In terms of the site's location, the Policy states that it must be demonstrated that:
- 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;*

- 6.7 As above, the Council are not currently able to demonstrate a five-year housing land supply to accommodate an identified need of Gypsy and Travelling Showpeople sites within the District. It is recognised that there is a lack of deliverable sites for gypsies and travellers, and there remains an identified need for such accommodation within the District. These matters are of significant weight in the consideration of the application, and weigh in favour of granting planning permission. On the basis of these matters, the proposed development is considered acceptable in principle, subject to all other considerations as discussed below.
- 6.8 The proposal would deliver 6 additional pitches, making a meaningful contribution toward addressing the identified shortfall. The policy framework for gypsy and traveller pitches does not prevent their delivery in the rural countryside, and such development is not expected to achieve the same level of accessibility as general market housing. While this site is not particularly accessible by means other private vehicle, it is not considered that this would, in isolation of any other harm, represent a reason to refuse the application.
- 6.9 Immediately to the north of the application site is Land at Marches Road, a gypsy and traveller site which gained planning permission for 2no. pitches under application ref: DC/25/0982. This neighbouring site adjoins the boundary with the current application, with DC/25/0982 considering the locality was an acceptable location for this type of development. It would be irrational to take a different as part of this current application, with the location therefore considered acceptable with regard to sustainability.

Character and Appearance

- 6.10 Policy 23(e) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:
- 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.
- 6.11 In addition, Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape and townscape character from inappropriate development. Proposals should take into account townscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.
- 6.12 The site is bounded by mature hedging along the road and mature woodland to the south-east. The proposal would provide for 6x gypsy pitches together with associated parking. The proposed mobile homes would be single storey and timber clad. The proposed mobile homes would be of an expected design and appearance, and each plot would have sufficient parking and amenity space. It is acknowledged that Environmental Health raised that the plans do not appear to have sufficient distanced between some structures and between proposed spaces for touring caravans, however, it is considered that this matter is addressed as part of a caravan licence.
- 6.13 The site lies in within a landscape character area that is highly sensitive to “small-scale incremental change”. The Council’s Landscape Architect noted that the proposed development falls within this category, noting the recent development immediately to the north of the site (ref: DC/25/0982). The Landscape Architect considers that the introduction of development in this rural location will have some impact on the landscape character, with the layout introducing urbanising features into the rural site.
- 6.14 The site benefits from established vegetation along Marches Road and the eastern boundary, with no alterations proposed and the vegetation along the boundary retained. It

is considered that the development could be accommodated on the site without any adverse landscape impacts. While the development would be visible from nearby residential properties to the southwest (along Northlands Road) it is considered that any potential for adverse impacts could be mitigated by additional landscaping. This would be secured through condition which would require a comprehensive hard and soft landscaping plan, including details of boundary treatments.

- 6.15 It is considered that this approach would suitably soften the appearance of the development, such that although there would be some urbanising effect, the wider landscape impacts would be limited and not to a level of harm which would create undue conflict with the above policies. This view reflects those of the Council's Landscape Officer, who raise no objections to the proposal.

Amenity Impact

- 6.16 Policy 33(2) continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land. Policy 23(e) is also of material consideration when assessing amenity impact for non-allocated gypsy / traveller sites.
- 6.17 It is acknowledged that objections have been received in relation to increased noise and disturbance from the proposed use and inappropriate siting. These representation letters have been received, read, and have been considered in the assessment of the application. However, it is noted that the application site is located at a distance from nearby residential properties, with the on-site residential dwelling located approximately 27m from the nearest mobile home, and the next nearest residential dwellings outside the site situated around 90m away to the south. The application proposes hedge screening between each plot to ensure that there is a level of privacy between the six pitches. The Environmental Health Officer considers that there is potential for nuisance from noise, lighting, or work activities that would potentially affect existing residents and that further consideration would be required to whether the potential nuisance impacts could be managed by conditions.
- 6.18 However, given the distance between the site and the nearest residential properties, it is not anticipated that the proposal would result in harm through overlooking, loss of privacy, or unacceptable noise and activity, although conditions relating to soft landscaping mitigation will be required to mitigate this further. The proposed development is therefore considered to accord with Policies 32 and 33 of the Horsham District Planning Framework (2015).

Highways Impact

- 6.19 Policy 23(b) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:
- 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;
- 6.20 In addition, policy 40 of the HDPF seeks to direct development to areas which are integrated with sustainable transport networks, encourage sustainable transport choices and ensure that new development is safe for all modes of transport, including vehicles, cyclists and pedestrians. In addition, proposals should minimise conflict between traffic, cyclists and pedestrians.
- 6.21 The proposed development would utilise the existing access from Marches Road. The existing access is utilised by the existing dwelling on site and has been utilised previously in association with the vineyard. WSCC Highways confirmed that there are no apparent visibility concerns with the existing access point onto Marches Road. The Local Highways Authority (LHA) were also satisfied that the anticipated number of vehicle movements the site could

generate can be accommodated without adverse safety impact. With regard to car parking, each pitch has two car parking spaces, the LHA confirmed that there appears to be suitable space within the proposed pitch areas for this to be accommodated with space for on-site turning achievable. It was highlighted that the site is situated in a rural location that lacks access to nearby services and amenities and that the residents would have a reliance on the private car, cycle parking was recommended for the site location. However, no highway safety concerns were raised by WSCC Highways.

- 6.22 The Parish Council concerns relating to the intensification of the access providing trips to and from the site and potential safety concerns are acknowledged. However, it is considered that this is an existing and established access, and the visibility splays are considered sufficient by the Local Highways Authority. This is an existing established vehicle access point that has previously served vineyard/agricultural uses, and these could have generated significantly more traffic movements than that of the proposed residential use. Given its previous use, the access would have facilitated access from vehicles associated with those uses. There is no evidence to suggest that the access has been operating unsafely in the past, or that the proposed use would exacerbate an existing safety concern. It is not considered that the proposed number of pitches would result in a significant increase in intensity or vehicle movements to and from the site, with the access considered acceptable for the intended use.

Other Matters

Barriers to Development

- 6.23 Policy 23(a) of the HDPF states that development for non-allocated gypsy / traveller sites states that:
- 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;
- 6.24 The site does not sit within any designated flood zones, surface water flood area or groundwater protection zone.

Services

- 6.25 Policy 23(c) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:
- 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;
- 6.26 The site is historically agricultural, in use as a vineyard. There is also an existing dwellinghouse on the site, and it is expected that due to this, there would be a level of services available. The Planning Statement confirms that there are adequate services and infrastructure already in place, which are capable of being provided to the proposed pitches. While information has not been provided with specifics relating to drainage and waste disposal, the Planning Statement states that a Matrix sewage treatment tank or similar is proposed with capacity proportionate to the number of occupants. According to the Planning Statement, foul sewage drainage layout will be designed in due course.
- 6.27 The HDC Drainage Officer has stated that insufficient information has been provided to determine whether the site would meet the requirements of the NPPF and PPG, National Standards for sustainable drainage systems (June 2025) and Horsham District Planning

Framework (2015) – Policy 38. These comments are echoed by the Environmental Health Officer who also noted the insufficiency of the information in determining the feasibility of the proposal on this site.

- 6.28 Following these comments, the Agent confirmed that for surface water, any new hard surfacing (for roads and under the caravans) will be porous/permeable. Water from the roofs of the caravans will be disposed of by collecting in rainwater butts and discharge water at a controlled rate into nearby watercourses so as not to change pre-existing surface water flows. For foul water, a package treatment plant is proposed and would discharge at a controlled rate to the boundary ditches. Package plants actively treat sewage mechanically, producing effluent clean enough to discharge directly into a watercourse. Officers consider that these details can be secured through a pre-commencement condition and would not justify a reason for refusal.

Ecology:

- 6.29 Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.
- 6.30 While no ecological information has been submitted, the Council's Ecology consultant considers that the site appears as grassland with no trees on site, although there are hedgerows around the site. The existing boundary trees and hedgerows would be retained. The Landscaping section of the Planning, Design and Access Statement states that planting of additional native hedging and understorey planting (comprising Hawthorn and Blackthorn) will be undertaken around the site boundaries. This should be secured condition and implemented in full. The biodiversity enhancements should be identified by a suitably qualified ecologist and implemented to secure net gains for biodiversity; these can also be secured through a condition of consent. The Ecologist was satisfied that there was sufficient ecological information available for determination, and recommended that in absence of some information, these could be secured through condition of consent, and no objection was therefore raised, subject to conditions.
- 6.31 The application site is within the Amber Impact Risk Zone for Great Crested Newts. There is also a pond approximately 75m from the application site boundary. NatureSpace were consulted and required further information due to the potential impact on great crested newts' habitat. The Agent confirmed that they would enter the District Licensing scheme to mitigate potential impacts of the development on Great Crested Newts. NatureSpace confirmed that the applicant had entered the District Licencing Scheme. A number of mandatory planning conditions are therefore attached to the application.

Water Neutrality:

- 6.32 A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.
- 6.33 On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

- 6.34 To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.
- 6.35 Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.
- 6.36 Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Other Matters:

Biodiversity Net Gain (BNG):

- 6.37 Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG), unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024, and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development may not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.
- 6.38 The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains (on unregistered sites) and significant on-site enhancements will be secured over this period by way of a Legal Agreement.
- 6.39 The Applicant has submitted a Biodiversity Metric which demonstrates a 15.27% net gain for habitat units and 96.08% net gain for hedgerow units is achievable by way of onsite biodiversity gains. However, this is not so significant as to warrant a legal agreement for monitoring. The informative attached details that the proposed net gain shall be secured post-decision.

Conclusions and Planning Balance:

- 6.40 The Council cannot currently demonstrate a five-year land supply for gypsy sites, and at present there remains an identified undersupply of available sites within the District. Paragraph 11(d) of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for

refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. It is therefore recognised that the proposal would go some way to addressing the identified need. This is a material consideration of significant weight in the overall planning balance in favour of approval.

- 6.41 It is considered, taking into account decisions on neighbouring sites and the nature of the scheme, that the site is suitably located for the proposed use. Further, the scale of the site and its relationship with surrounding properties and land is such that there would be no adverse impacts on neighbouring amenity, highways safety concerns and landscape character subject to appropriately worded conditions. No other adverse findings have been found in respect of any other material consideration.
- 6.42 For the reasons set out above, and having regard to the development plan read as a whole, national policy, and material considerations including the unmet need for Gypsy and Traveller accommodation, the proposal is considered acceptable. The application is therefore recommended for approval, subject to conditions.

7. RECOMMENDATIONS

- 7.1 It is recommended that planning permission is granted subject to appropriate conditions as detailed below.

1 Approved Plans

- 2 **Pre-Commencement Condition:** No development shall commence until a drainage strategy detailing the proposed means of foul and surface water disposal shall be submitted to the Local Planning Authority for its approval in writing. The drainage strategy shall be implemented within 3 months of such approval being given in strict accordance with the agreed details. The drainage strategy shall be retained as such thereafter.

Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).

- 3 **Pre-Commencement Condition:** No development shall commence until a Biodiversity Compensation and Enhancement Strategy (for protected and Priority species and habitats) has been submitted to and approved in writing by the Local Planning Authority. The Biodiversity Compensation and Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed compensation and enhancement measures;
- b) detailed designs or product descriptions to achieve stated objectives;
- c) identification and numbers of native species to be planted;
- d) locations, orientations and heights of proposed compensation and enhancement measures by appropriate maps and plans (where relevant);
- e) persons responsible for implementing the compensation and enhancement measures; and details of initial aftercare and long-term maintenance (where relevant).

The strategy shall be implemented prior to the first occupation of the development in strict accordance with the agreed details. The strategy and related measures shall be retained in that manner thereafter.

Reason: To compensate and enhance native hedgerow and woodland and protected, Priority and threatened species & habitats and allow the LPA to discharge its duties under the NPPF (December 2024) and s40 of the NERC Act 2006 (as amended).

- 4 **Pre-Commencement Condition:** No development shall commence until a lighting design scheme for biodiversity shall be submitted to the Local Planning Authority for its approval in writing. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans, Isolux drawings and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. No further external lighting shall be installed without the prior written consent of the Local Planning Authority by way of a formal application.

Reason: As these matters are fundamental to safeguard the ecology and biodiversity of the area in accordance with Policy 31 of the Horsham District Planning Framework (2015), and to enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

- 5 **Pre-Commencement Condition:** No development shall commence until a certificate from the Delivery Partner (as set out in the District Licence WML-OR177, or a 'Further Licence'), confirming that all necessary measures regarding great crested newt compensation have been appropriately dealt with, has been submitted to and approved in writing by the Local Planning Authority.

Reason: In order to adequately compensate for negative impacts to great crested newts, and in line with section 15 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

- 6 **Pre-Commencement Condition:** No development shall commence until a scheme of hard and soft landscaping and boundary treatment for the site has been submitted to and approved, in writing by the Local Planning Authority. The scheme shall include: -

- Any proposed changes in ground level and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction.
- The soft landscaping plan shall include plant species, number, density, location and sizes of the proposed planting. The planting specification shall provide details of tree planting pits, green roofs, planting preparation and establishment operations.

- The hard landscaping plan shall include details of specific materials, colours and finishes of paved or otherwise hard surfaces, built features and street furniture. The plans should clearly show the position of any new fencing and hard surfaces in relation to existing and proposed planting.

The approved landscaping scheme shall be fully implemented in accordance with the approved details within the first planting season following the first occupation of any part of the development. Unless otherwise agreed as part of the approved landscaping, no trees or hedges on the site shall be wilfully damaged or uprooted, felled/removed, topped or lopped without the previous written consent of the Local Planning Authority until 30 years after completion of the development. Any proposed or retained planting, which dies, is removed, or becomes seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: To ensure a satisfactory development that is sympathetic to the landscape and townscape character and built form of the surroundings, and in the interests of visual amenity in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 7 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until a landscape management plan has been submitted to and approved, in writing, by the Local Planning Authority. This should include:

- a) Drawing/s showing the extent of the LMP i.e. identifying the areas to which the LMP applies
- b) A Written Specification detailing:
 - All operation and procedures for soft landscape areas; inspection, watering, pruning, cutting, mowing, clearance and removal of arisings and litter, removal of temporary items (fencing, guards and stakes) and replacement of failed planting.
 - All operations and procedures for hard landscape areas; inspection, sweeping, clearing of accumulated vegetative material and litter, maintaining edges, and painted or finished surfaces.
 - Furniture (Bins, Benches and Signage) and Play Equipment.
 - All operations and procedures for soft landscaping to SuDS features; inspection of linear drains, basins and swales, removal of unwanted vegetative material and litter, including inlets and outlets.
- c) Maintenance task table which explains the maintenance duties across the site in both chronological and systematic order.
- d) Mechanism for monitoring and review of the management plan and operations.

Reason: To support plant establishment and ensure appropriate management is carried out and to maintain functionality and visual aesthetic.

- 8 **Pre-Occupation Condition:** No part of the development shall be occupied until a fire hydrant(s) to BS 750 standards or stored water supply (in accordance with the West Sussex Fire and Rescue Guidance Notes) shall be installed, connected to a water supply with appropriate pressure and volume for firefighting, and made ready for use in consultation with the WSCC Fire and Rescue Service. The hydrant(s) or stored water supply shall thereafter be retained as such.

Reason: In accordance with fire and safety regulations in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 9 **Regulatory Condition:** No part of the development hereby permitted shall be occupied until details for the provision for the storage of refuse and recycling facilities shall be supported to the Local Planning Authority for its approval in writing. These facilities shall be provided prior to occupation of the development hereby permitted and thereafter be retained for use at all times.

Reason: To ensure the adequate provision of recycling facilities in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 10 **Regulatory Condition:** This permission does not authorise use of the land as a caravan site by any persons other than Gypsies and Travellers, as defined in Annex 1 of Planning Policy for Traveller Sites (Department for Communities and Local Government 2024).

Reason: To enable the Local Planning Authority to control the use of the site and in accordance with Policy 21, Policy 22 and Policy 23 of the Horsham District Planning Framework (2015).

- 11 **Regulatory Condition:** There shall be no more than six pitches on the site with no more than one mobile home/static caravan (as defined in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968) stationed on each pitch at any time. There shall be no more than one touring caravan stationed on each pitch at any time and these shall not be occupied by any person at any time whilst stationed on the application site.

Reason: To avoid an overcrowded appearance and to secure satisfactory standards of space and amenity and to enable the Local Planning Authority to control the use of the site, in accordance with Policy 21, 22, 23 and 26 of the Horsham District Planning Framework (2015).

- 12 **Regulatory Condition:** No Heavy Goods Vehicles (defined as any vehicle having 3 axles or more and with a weight exceeding 3,500kg) shall operate to or from the site or be stationed, parked or stored on the site at any time.

Reason: In the interest of highway safety and amenity in accordance with Policies 33 and 40 of the Horsham District Planning Framework (2015).

- 13 **Regulatory Condition:** The development hereby permitted shall limit the water usage of each pitch to no more than 110 litres per person per day. The subsequently installed water limiting measures shall thereafter be retained.

Reason: To limit water use in order to improve the sustainability of the development and to ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policies 31 and 37 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 14 **Regulatory Condition:** Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 or Orders amending or revoking and re-enacting the same, no additional gates, fences, walls, or other means of enclosure shall be erected or constructed on the site other than those permitted under this application.

Reason: In the interests of amenity in accordance with Policy 33 of the Horsham District Planning Framework 2015.

- 15 **Regulatory Condition:** No external storage of any waste or waste materials, or burning of such, shall take place at any time.

Reason: To safeguard the amenities of the locality in accordance with Policies 32 and 33 of the Horsham District Planning Framework (2015).

- 16 **Regulatory Condition:** No development hereby permitted shall take place except in accordance with the terms and conditions of the Council's Organisational Licence (WML-OR177, or a 'Further Licence') and with the proposals detailed on plan "Long Wells Vineyard: Impact plan for great crested newt District Licensing (Version 1)", dated 16th June 2026.

Reason: In order to ensure that adverse impacts on great crested newts are adequately mitigated and to ensure that site works are delivered in full compliance with the Organisational Licence (WML-OR177, or a 'Further Licence'), section 15 of the National Planning Policy Framework, Circular 06/2005 and the Natural Environment and Rural Communities Act 2006.

Biodiversity Net Gain Condition

Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 states that planning permission is deemed to have been granted subject to the "biodiversity gain condition" which means development granted by this notice must not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission is Horsham District Council.

This permission will require the submission and approval of a Biodiversity Gain Plan before development is begun.

For guidance on the contents of the Biodiversity Gain Plan that must be submitted and agreed by the Council prior to the commencement of the consented development please see the link:

[Submit a biodiversity gain plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain).

Statutory exemptions and transitional arrangements

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These can be found at Paragraph: 003 Reference ID: 74-003-20240214 of the Planning Practice Guidance, which can be found at <https://www.gov.uk/guidance/biodiversity-net-gain>.

Irreplaceable habitat

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

Great Crested Newts

It is recommended that the NatureSpace Best Practice Principles are considered and implemented where possible and appropriate.

It is recommended that the NatureSpace certificate is submitted to this planning authority at least 6 months prior to the intended commencement of any works on site.

It is essential to note that any works or activities whatsoever undertaken on site (including ground investigations, site preparatory works or ground clearance) prior to receipt of the written authorisation from the planning authority which permits the development to proceed under the District Licence (WML-OR177, or a 'Further Licence') are not licensed under the great crested newt District Licence. Any such works or activities have no legal protection under the great crested newt District Licence and if offences against great crested newts are thereby committed then criminal investigation and prosecution by the police may follow.

8. USE OF AI

- 8.1 This report has not been prepared with the support of artificial intelligence tools.