

SK TRANSPORT PLANNING

TRAFFIC TRANSPORT HIGHWAYS



SECOND TECHNICAL SUBMISSION – HIGHWAY SAFETY MATTERS

Date: 12th May 2026

Project: Planning Application DC/25/2079 – Use of Land for the Stationing of 4 no. Static Caravans (Gypsy and Traveller Residential Purposes)

1. INTRODUCTION

- 1.1 This second Technical Submission has been produced by SK Transport Planning Limited on behalf of our client [REDACTED]. This response has been prepared following a review of the following additional technical information submitted by the applicant, and remains a formal objection to the development proposals.
- 1.2 This second submission draws on the additional technical responses that were not available when we prepared our first technical submission to Horsham District Council (HDC):
- the 16th April 2026 consultation response prepared by West Sussex County Council (WSCC) to HDC
 - the 30th April 2026 WSCC response to the pre-application protocol letter
 - WSCC's Freedom of Information request response, which summarises the Council's Highways Officers site visit/access review undertaken on the 12th February 2026
- 1.3 Both HDC and WSCC Officers have had the opportunity to review our independent assessment of the development access strategy associated with planning application DC/25/2079. This confirms that the planning application looks to use an existing vehicular access onto the A281 Horsham Road to access 4 no. static caravans, 4 no. touring caravans and 4 no. day rooms for gypsy and traveller residential purposes.

2. THE PROPOSED ACCESS STRATEGY

- 2.1 For absolute clarity, the applicant has confirmed in the Planning Application form submitted with the application that:
- no new or altered vehicular access is proposed to or from the public highway
 - no new or altered pedestrian access is proposed to or from the public highway
- 2.2 This information confirms to all parties, including HDC and WSCC Officers that the existing access to the site from the A281 is not proposed to be modified in any way to serve the 4 no. static caravans and day rooms. This includes the access width and geometry, and also the access visibility splays when emerging from the site access, as well as the forward visibility/stopping sight distance required for vehicles turning right into the application site access, and other highway users travelling northbound on the A281.
- 2.3 We note in WSCC's April 2026 consultation response (provided in **appendix a**) they confirm that Officers have reviewed the technical submissions prepared by [REDACTED] Planning Consultant, Woolf Bond Planning (**appendix b**). As a reminder this formal objection included a highway safety technical note, which confirmed that the A281 corridor is subject to the national speed limit, which for private cars is 60mph on this route.
- 2.4 On this type and classification of road, with this speed limit in place visibility splays with a "Y" distance dimension of 215m should be provided in both the leading (northern) and trailing (southern) traffic directions. We note that as part of the planning application submissions no technical drawings have been submitted confirming the achievable visibility splays from the site access point, or the required 215m visibility splays for a road with this speed limit in place.

- 2.5 We are aware that the first WSCC consultation response (**appendix c**) confirmed that:

The application site is located on Horsham Road, an A-classified road (A281) which is subject to (the) national speed limit in this location. The site is served by an existing vehicle access point on Horsham Road.

- 2.6 The first WSCC consultation letter intimated that the WSCC Highways Officer had visited the site. The formal response states:

On-site there were no observed concerns with vehicular visibility at the existing vehicle access point. A review of WSCC mapping also suggests that suitable visibility splays can be achieved solely within the maintained highway boundary.

- 2.7 We now know from the Freedom of Information (Fol) response (extract provided in **appendix d**) that:

- two Highway Officers undertook the site visit on the 12th February 2026
- no speed surveys were undertaken on the day of the site visit
- no “X” or “Y” visibility splay dimensions were assumed, or physically measured during the site visit

- 2.8 This Fol response raises a number of significant concerns, particularly as WSCC has confirmed in their April 2026 consultation response that they are maintaining their position of “no objection”. As confirmed above the Highway Authority’s formal position is being maintained on:

- the knowledge that this section of the A281 is subject to the National Speed Limit
- that the current use of the access is agricultural/access to a private equestrian stable and paddock
- no technical information has been submitted by the applicant confirming the required dimensioned visibility splay/forward visibility dimensions
- WSCC Highway Officers not undertaking any measurements of visibility splay/forward visibility dimensions or speed surveys when assessing the acceptability of the access

- 2.9 We take the opportunity to remind all interested parties that the live planning application is to allow four or more families to live on the site in a total of eight caravans (4 no. static caravans and 4 no. touring caravans), and use this access point onto the A281 for all their pedestrian, cycle and vehicular access requirements. It should be assessed on this basis, to ensure the access is safe and can be used on a daily basis in perpetuity by residents and their visitors.

3. WSCC DEVELOPMENT TRIP ASSESSMENT

- 3.1 Alongside this we note that WSCC Officers attempt in their April 2026 consultation response (**appendix a**) to build a case that they have given added weight as the access is existing, and appears to have been in situ “for several years”.
- 3.2 Whilst the length of time that this vehicular access is not disputed, we cannot agree with Officers with their conclusion that an agricultural access to a paddock and stables will be comparable (in terms of movements to and from the site access) to 4 no. individual static caravans, 4 no. touring caravans and 4 no. day rooms.
- 3.3 The evidence to confirm this was presented in the technical information submitted with the 2025 planning application for the stables and barn on the site. HDC and WSCC Officer will have reviewed

this before granting planning permission for the enlarged stable and store building. The February 2025 Planning Statement (provided in **appendix e**) states:

“The existing site contains a small stable with two (horse) boxes as well as a small store located close to the western boundary. The current lawful use of the land is for the grazing of horses.”

“The land however amounts to 5.2 acres and so is capable of supporting 5 horses according to British Horse Society standards if on permanent grazing.”

“The applicants’ horses are however not permanently grazed and so require much less land with a requirement of 0.5 acres per horse. As such the site is capable of supporting 10 horses.”

“The proposal is for the applicants’ own horses and the development would be for private use only.”

“There is no commercial use proposed, and the applicant is happy to accept a condition restricting this.”

“The applicant lives locally in Coolham and would travel to site each day to tend to the horses.”

- 3.4 This Planning Statement, prepared and submitted by the same consultant team working on the live residential planning application, confirms that the movements associated with the consented 2025 equestrian use are in no way comparable in terms of trip-making patterns to 4 no. individual static homes, 4 no. touring caravans and associated day rooms.
- 3.5 The applicant confirmed that the equestrian facilities were for private use. They also confirmed that vehicle movements would be limited to the applicant travelling from their home in Coolham to travel to the site each day to tend to their horses.
- 3.6 Even if they made those trips twice a day, this would only generate four vehicle movements across the day to/from the A281. This would be a level of traffic movements materially lower than would be expected from the combined 8 no. static and touring caravans, with a combined parking provision for 8 no. vehicles across this residential accommodation.
- 3.7 We also note that the submitted layout drawing shows the 2025 consented stables and barn retained, so the potential future use of the existing access to/from the A281 will be for this equestrian use and the 8 no. static and touring caravans. No technical evidence has been provided to show what the cumulative impacts of the use of this sub-standard access point onto the A281 will be.

4. LACK OF SUSTAINABLE ACCESS OPPORTUNITIES

- 4.1 Returning to the residential development proposals, it would be reasonable to conclude that this use will generate trips associated with work, school, shopping and leisure activities. The December 2025 Planning Statement (**appendix f**) confirms that the application site is outside of the built-up area of Cowfold and within the Countryside.
- 4.2 Site visits have confirmed that there will be significant reliance on the private car to make any trips to and from this residential development.
- 4.3 This reliance on the private car to make trips to and from the proposed residential accommodation is confirmed in the December 2025 Planning Statement (**appendix f**) confirming:

“While there is no footpath along Horsham Road (A281), neither Policy 23 HDPF (2015), Strategic Policy 43 HDLP (reg 19) (2024), nor the provisions of the PPTS (2024) explicitly require gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village.”

- 4.4 Whilst in local policy there may not be any explicit requirement for gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village, we highlight to the applicant and HDC and WSCC Officers that the application site location means there are no safe pedestrian routes for the end occupiers to access the local facilities in Cowfold.

- 4.5 Families, including young children cannot be expected to walk along a live carriageway to access local facilities in the village. Accordingly there will be a high reliance on the private car to make both short and longer distance trips, and all of these vehicle movements will route to/from the existing unmodified access to/from the A281.
- 4.6 All parties are also aware of the requirements of the National Planning Policy Framework, in particular Paragraphs 110, 115, 116 and 117. It is certainly challenging to see how the residential scheme submitted to the Council meets the requirements of Paragraph 117, being devoid of any opportunities for end occupiers to safely walk and cycle to and from the site.
- 4.7 As expanded on later in this submission, the scheme also fails to make any attempt to consider how it will be safely accessed by service/refuse vehicles.
- 4.8 Having highlighted the inconsistencies in the Council's assessment of the equestrian and residential uses trip making behaviour, and the expected over-reliance on the private car for trips to and from the site, we return to the technical matter of the use of a sub-standard access onto the A281.

5. SUB-STANDARD ACCESS ARRANGEMENTS

- 5.1 Our previous submission included photographic evidence in the previously submitted highway safety note (**appendix b**). This clearly shows that a 215m visibility splay, measured from a 2.4m "X" distance cannot be achieved in the leading (northern) traffic direction. The vegetation and hedgerow, located on third party land significantly obscures traffic travelling southbound towards the site access point.
- 5.2 We have previously submitted an extract of WSCC's adopted highway boundary information (provided in **appendix g**) and Land Registry Title information for the adjacent land parcel (provided in **appendix h**). This information confirms that the 215m visibility splay will cross third party land. This is shown on the SKTP visibility splay drawing provided in **appendix i**. The hatched area on the plan is land outside of the applicant's control and the extent of adopted highway on the eastern side of this corridor.
- 5.3 In addition the previously submitted highway safety note (**appendix b**) confirmed that the forward visibility, for vehicular traffic travelling northbound on the A281, if needing to slow because of a right turning vehicle into the development access was materially lower than the required 215m. The technical evidence confirmed that the forward visibility sightline is severely restricted by trees, vegetation and banking.
- 5.4 As set out earlier in this submission, with an intensification of the use of the site (residential development and retained use of the stables and barn) the likelihood of vehicles waiting to turn right from the A281 will increase. With sub-standard forward visibility the potential risk of rear end shunt collisions will also increase, prejudicing safety for both the end occupiers of the development and users of the A281 corridor.
- 5.5 Based on this raft of technical evidence, and the lack of any technical drawings, speed survey data or assessment of the cumulative impacts of the residential accommodation and the operational/consented use on the site, we fail to understand how WSCC are prepared to maintain their "no objection" position.
- 5.6 We remind HDC and WSCC Officers that:
 - a) the A281 corridor has no footways between the site and Cowfold
 - b) no streetlighting is present on this section of the A281
 - c) this route is subject to the national speed limit (60mph for private cars and motorcycles)
 - d) it is a corridor that accommodates c.9,000 vehicles a day (source DfT AADT flow data)
 - e) the existing access has sub-standard visibility to the north, when exiting from the existing track, and cannot deliver the required 215m visibility splay without crossing third party land
 - f) the forward visibility in the northbound direction approaching the access is substandard, and is restricted by trees, vegetation and banking
 - g) the proposals appear to retain the equestrian stables on the site alongside the proposed residential accommodation, with no assessment provided as to the cumulative impacts of both uses using the existing access

- h) no information has been provided as to how the 4 no. static caravans and 4 no. touring caravans will be serviced

- 5.7 On point (h) listed above, we note that the proposed development layout shows, quite correctly, a bin and cycle store for each of the residential plots. What the development proposals have not confirmed is how these 4 no. static caravans and 4 no. touring caravans will be serviced, in particular by weekly refuse collection visits.
- 5.8 Based on the layout as submitted with the planning application, the positioning of each refuse collection store, and adherence to Manual for Streets refuse carry/wheel distances, we assume that the refuse collection vehicle will enter the site, access each store and then turn and leave in a forward gear, via the existing access to/from the A281.
- 5.9 No technical information has been provided to demonstrate that this access or turning manoeuvres can be accommodated on the site or through this existing access point. We also highlight that the existing track surface from the A281 is not of a standard that would be suitable for a large refuse vehicle to use safely. The geometric layout of the existing access is also not considered to be suitable for this size and type of vehicle.
- 5.10 If the applicant's intention is that refuse collection is to be made from the A281, with residents wheeling their bins to a collection point adjacent to the highway, this introduces a new highway safety concern. Not only would the carry distances across the site exceed the recommendations set out in Manual for Streets, but this alternative collection strategy would require the refuse collection vehicle to wait on the carriageway of the A281 whilst these collections take place. In a location where both forward and intervisibility is substandard this is not considered to be a workable and safe solution. We request that as part of any future submissions from the applicant that their proposed servicing strategy for the site is confirmed.
- 5.11 We also note that the latest landscaping drawing submitted with the planning application (**appendix j**) shows the existing gated access moved closer to the edge of the carriageway. This reduces the space for vehicles to safely wait clear of the A281 corridor, and introduces yet another highway safety issue at the development site access.

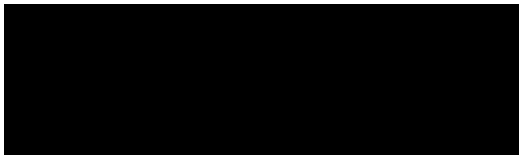
6. CONCLUSIONS

- 6.1 Based on the raft of technical evidence included in this second technical submission, as well as the evidence appended to this document, it remains our professional opinion that allowing residential development in this location, which is devoid of any practical, safe routes for end occupiers to travel by means other than the private car is not compatible with the requirements of the National Planning Policy Framework (NPPF).
- 6.2 Paragraph 116 in the NPPF states:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."
- 6.3 The development proposals will result in residential accommodation being located in a wholly unsustainable location, where there are no opportunities for end occupiers to safely walk to and from the site to the nearest village, to local facilities, shops, education and places of work.
- 6.4 It has previously been confirmed that it is not possible for the applicant to deliver the required 215m visibility splays without a reliance on third party land. Forward visibility is also substandard on the northbound approach to the development access point.
- 6.5 No servicing strategy has been presented for the residential units, and we highlight that WSCC's position that the proposed residential development would be comparable to the equestrian use is incorrect. This is based on the previous technical evidence submitted by the applicant in February 2025 for the enlarged equestrian use.
- 6.6 This submission also highlights that the application appears to propose that the consented equestrian stables and barn would be delivered as well as the proposed 4 no. static caravans, 4 no. touring caravans and day rooms. This means any assessment should consider the cumulative

impacts (in traffic movement terms) through the sub-standard access onto the A281, not compare the trip rates from one consented use against another.

- 6.7 Based on the technical information contained in this submission there is clear and unchallengeable evidence that the proposals will have an unacceptable impact on highway safety, for end occupiers of the proposed development, and users of the A281 Horsham Road corridor.
- 6.8 Based on the information contained in this Technical Submission we request again that WSCC Highway Officers carefully review their “no objection” position, and consider all the evidence presented to them in this submission.
- 6.9 We trust that this submission assists HDC and WSCC Officers in considering their position on the application presented to them, and allows them to understand the adverse highway safety risks that granting planning permission could generate for both end occupiers of the proposed development, and other highway users on the A281 corridor.
- 6.10 If Officers would like to discuss the technical information contained within this submission we would be pleased to arrange a meeting to discuss these matters.



Company Director

BSc (Hons) MSc CMCILT

SK Transport Planning limited

APPENDIX A

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Shazia Penne
FROM:	Highways, WSCC
DATE:	16/04/2026
LOCATION:	Cotlands Paddock, Horsham Road, Cowfold, RH13 8AH
SUBJECT:	DC/25/2079 Use of land for the stationing of 4no. static caravans for (Gypsy and Traveller) residential purposes and associated day rooms.
DATE OF SITE VISIT:	12/02/2026
RECOMMENDATION:	Advice

This application has been dealt with in accordance with the Development Control Scheme protocol for small scale proposals.

WSCC in its role as Local Highway Authority (LHA) has been reconsulted by the Local Planning Authority (LPA) following the applicant's submission of amended plans. For context, the LHA previously provided comment on this application, dated 16/02/2026, raising no highway safety or capacity concerns.

From inspection of the amended plans, the proposed changes appear minor and would not warrant further comment from a highway safety point of view. The LPA are advised to refer to the LHAs previous consultation response, dated 16/02/2026, as the comments contained within can be applied for the current set of plans.

Given the number of written representations for this application, I thought it be best to clarify some points in regards to the LHA's assessment for this application. WSCC officers undertook a site visit on the morning of 12/02/2026 to assess the typical highway/traffic conditions as well as the existing vehicle access point. As stated previously, the LHA is of the view that there are no significant visibility concerns with the existing access point. I would add to this that there is vegetation either side of the access point (within the maintained highway boundary) that can be cut back to ensure suitable visibility levels are achievable in both directions.

Whilst I appreciate some representations highlight this to be an issue, I will stress the added weight to the use of an existing vehicle access point for these proposals. Historic Streetview mapping suggests that this vehicle access has been in use for several years, with Streetview imagery suggesting it has been in operation since at least 2009. The access has served an existing agricultural use, which has the potential to generate significant vehicle movements. Furthermore, such a use has the potential to utilise vehicles associated with agriculture, such as a tractor with trailer, without the need for planning permission. The proposed residential use is not anticipated to result in a significant material increase in movements to or from the site.

Following on from the above points, I have also checked five-year collision data, which shows no recorded collisions within the vicinity of the existing access point. Therefore, there is no evidence to suggest the existing vehicle access has been operating unsafely during this time, or that the proposals would exacerbate an existing safety concern.

I have also seen some requests for a Stage 1 Road Safety Audit (RSA) to be undertaken. WSCC's policy for RSAs dictate that an RSA should be required if:

- A development of 20 or more residential units is proposed
- An intensification of the existing vehicle access that would generate 100 or more two-way vehicle movements per day
- If off-site highway works are proposed

The proposed development is a relatively small one, only seeking 4 residential units. A development of this scale would not be anticipated to generate the 100 two-way vehicle movements stipulated by the policy. In addition, no off-site highway works are proposed – the existing vehicle access arrangement will be retained. Taking this into consideration, it would be unreasonable to request a Stage 1 RSA for a development of this scale.

Based on the above points, as well as comments provided previously, and observations made on-site, it would be very difficult for the LHA to justify an objection on highway safety grounds. 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.

Kyran Schneider
West Sussex County Council – Planning Services

APPENDIX B

Cotlands Paddock, Horsham Road, Cowfold

Technical Note – Highway Safety Issues

Introduction

This Technical Note presents information on items related to highway safety for the access to Cotlands Paddock, Horsham Road, Cowfold.

The Planning Statement produced by JHB Planning (December 2025) states that the existing vehicular access from the A281 Horsham Road will be used by the development and that no road safety concerns in relation to the proposed access are apparent.

However, no plans are provided showing the achievable or required visibility splays based on the 60mph speed limit. Furthermore, no Road Safety Audit by a qualified auditor has been submitted and it is likely, for these reasons, that the highway safety concerns were not apparent to the planner.

Site Access

The existing site access comprises an informal driveway with a gate located approximately 15m from the main road.



Figure 1 - View of access from A281 Horsham Road

Cotlands Paddock, Horsham Road, Cowfold

Technical Note – Highway Safety Issues

The approach to the main road is steep, with a gradient of around 1 in 10 for the first 15m from the main road. This gradient is far from ideal for a junction as it means that vehicles, and especially larger vehicles, exiting onto the main road can lose traction and cannot get up to speed as quickly, increasing the risk of collisions.

There is no footway for pedestrians at the site access or along the A281. Therefore, people wishing to walk along the A281 to local facilities would have to walk in the carriageway along this 60mph road. The presence of hedges means that there is little opportunity for pedestrians to stand out of the way of approaching vehicles.

Visibility

Visibility is required both from the access in both directions along the main road, and along the main road on the approach to the junction.



Figure 2 - View looking left from the access

Looking from the access to the left, the vegetation and banking on the opposite verge create a blind spot along the main road.



Figure 3 - View looking right from the access

Looking to the right, the trees and hedgerow block clear visibility from the access along the main road. This visibility splay goes through third party land.

The visibility from the access in both directions along the main road are therefore restricted.

The forward visibility for traffic travelling northbound on Horsham Road to a stationary vehicle waiting to turn right into the access is also an important factor. The photos on the next page show views from a vehicle travelling northbound and show that the access and any vehicles waiting to turn right are obscured. There is therefore a genuine risk of rear-end collisions if a vehicle is stationary waiting to turn into the site.

It should also be noted that the views in the photos show winter vegetation. When the vegetation is in leaf it will further obscure views along the highway with no ability to see through the bare branches.



Figure 4 – Views looking north towards the access (approximate location marked with arrow)

The required lengths of visibility splays are based on the speed of traffic, and for traffic speeds of 60mph the visibility splay is 215m. The plans below show the extent of a 215m visibility splay at the access. The plans confirm that the visibility splays go through third party land and are severely restricted by trees, vegetation or banking.



Figure 5 – Visibility splays

The achievable forward visibility for vehicles travelling northbound has been measured as being less than 80m. This distance is appropriate for traffic speeds of around 35mph or less and is therefore not suitable for the higher speed of traffic on this 60mph road.

Vehicle Swept Path Analysis

No evidence of vehicle swept path tracking has been presented with the application documents. The nature of the proposed development will mean that vehicles with large trailers will be accessing the site. There is evidence that vehicles have overrun onto the soft verges in the vicinity of this access and therefore the ability for the expected vehicles to safely access the site should be confirmed.

Collision Data

The Crashmap database has been interrogated to review road collisions from the past five years in the vicinity of the site access. This shows that there have been two “serious” collisions, one each side of the site access.

The incident to the north of the access occurred in June 2021 and involved six vehicles with two casualties. The collision occurred in daylight hours in fine weather. The incident to the south of the access occurred in May 2023 and involved a single vehicle with one casualty. The collision occurred in daylight hours in fine weather.

There have been three fatal collisions to the north of the site in the last twenty years, with two of these occurring in the last ten years. The incident closest to the site access occurred in November 2015, the next nearest in February 2007, and the third incident in April 2017.

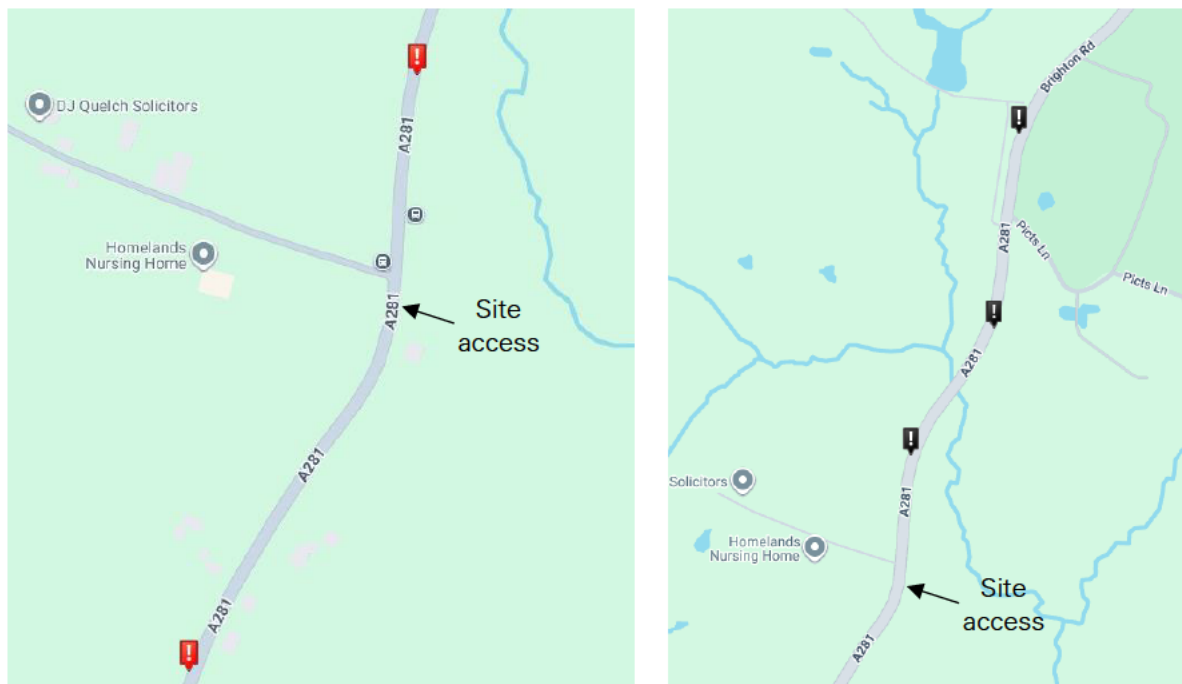


Figure 6 – Location of collisions (“serious” incidents shown in red, “fatal” incidents shown in black)

The intensification of use of the existing access increases the risk of incidents occurring at the site access.

Summary

Based on the information available, sufficient visibility splays towards and from the access junction based on the speed of the road are unable to be provided within land under the control of the applicant. The reduced visibility presents highway safety concerns on a road that has a history of serious and fatal road traffic collisions in the vicinity of the existing access.

We consider the serious nature of the matters detailed in this technical note cannot be resolved - in fact - with three fatalities and a number of further casualties in recent crashes, this is without question undeliverable both technically and from the casualty data evidence. The proposal cannot be considered compliant with highway standards. It is therefore recommended that the application be refused to avoid any future fatalities and serious injuries.

APPENDIX C

WEST SUSSEX COUNTY COUNCIL CONSULTATION

TO:	Horsham District Council FAO: Shazia Penne
FROM:	Highways, WSCC
DATE:	16/02/2026
LOCATION:	Cotlands Paddock, Horsham Road, Cowfold, RH13 8AH
SUBJECT:	DC/25/2079 Use of land for the stationing of 4no. static caravans for (Gypsy and Traveller) residential purposes and associated day rooms.
DATE OF SITE VISIT:	12/02/2026
RECOMMENDATION:	Advice
S106 CONTRIBUTION TOTAL:	N/A

This application has been dealt with in accordance with the Development Control Scheme protocol for small scale proposals.

WSCC in its role as Local Highway Authority (LHA) has been consulted on highway matters by the Local Planning Authority (LPA) for the proposed use of land for the stationing of four static caravans for (Gypsy and Traveller) residential purposes and associated days. The LHA undertook a site visit on the morning of 12/02/2026 as part of its assessment for this application.

The application site has some relevant application history:

- DC/25/0054 (*Construction of stables and barn with yard and access track*) – The LHA was a consultee for this application, raising no highway safety or capacity concerns. The LPA permitted the application.

The application site is located on Horsham Road, an A-classified road (A281) which is subject to national speed limit in this location. The site is served by an existing vehicle access point on Horsham Road. On-site there were no observed concerns with vehicular visibility at the existing vehicle access point. A review of WSCC mapping also suggests that suitable visibility splays can be achieved solely within the maintained highway boundary.

As stated above, the site already benefits from planning permission for the construction of new stables and a barn. The addition of four caravans for residential purposes would not be anticipated to give rise to a significant material intensification of movements on the local highway network.

Regarding parking, the applicant proposes two car parking spaces per pitch for this development. 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. As such, the LHA considers the proposed car parking provision to be sufficient. Furthermore, there appears to be sufficient space for on-site turning to be achievable, allowing vehicles to exit the site onto the maintained highway in a forward gear.

The site is situated approximately 1km north of the village of Cowfold, which does provide some local services and amenities. However, I do acknowledge that this stretch of A281 lacks formal footways and street lighting, so some residents may have a reliance on the

private car for trips. Though as mentioned above, a development for four residential units is not anticipated to give rise to a significant highway capacity impact. Cycle storage has been demonstrated in the plans, and cycling does remain an option for confident cyclists.

In summary, 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.

Kyran Schneider
West Sussex County Council – Planning Services

APPENDIX D

Our Ref: FOI/12628

On 22/04/2026 you made the following request for information, which has been dealt with, in accordance with the provisions of the Environmental Information Regulations 2004 (EIR).

Highways report ref planning application Ref: DC/25/2079 Cotlands Paddock

We have now completed a search for the information which you requested and confirm that this Authority holds data relevant to your request. The Response to your request is as follows:

Who requested this site visit and were there specific reasons that one was requested? County Councillor Sarah Payne requested that officers undertake a site visit based upon the number of written objections received in relation to planning application DC/25/2079.

What are the professional qualifications of the people undertaking the site visit? West Sussex County Council (WSCC) officers have the relevant experience and qualifications in order to undertake the requirements and duties of their roles. In addition to developing knowledge and experience from undertaking their roles, technical knowledge is developed through specific training courses and mentoring with more experienced officers. Two WSCC officers undertook the site visit to this site on 12 February 2026. Both officers are members of the Chartered Institution of Highways & Transportation (CIHT) and have the relevant knowledge, experience and skills to undertake their role. One officer has a BSc undergraduate degree in Geography and 7 years post university experience working as a transport planner. The other officer has a BTEC National Diploma in Highways & Transport and 19 years' experience in planning.

What time did the site visit take place on 12/2/26 and what were the weather conditions? The site visit took place on the morning of 12 February 2026. The officers recall it would have been approximately 10am. Whilst no notes of the site visit were taken, including the nature of the weather on that day, the officers recall it was cloudy.

Were speed surveys conducted as part of the site visit to confirm the speed of approaching traffic? No recorded vehicle speeds were taken on the day of the site visit. Officers observed the speed of other vehicles whilst undertaking the site visit.

What x-distance and y-distances were assumed when determining there was no observed concerns with vehicular visibility? No specific x or y distances were assumed when undertaking the site visit. Rather an assessment based upon professional opinion was taken based

on observations of the site visit and information known at the time, such as road safety records.

Were measurements taken during the site visit and, if so, what equipment was used for measurements? No measurements taken during the site visit.

Were photographs taken of the visibility splays both from and to the existing access? If so, were the observations made at a car driver's eye height? No photos were undertaken during the site visit.

Was the impact of the proposed gated access at the boundary of the site considered as part of the site visit? Yes, the specifics of the existing access and the presence of the gated access were taken into account.

Please provide the original site visit record notes made at the time of the visit as well as any subsequent site reports and site images. No site visit record notes were taken.

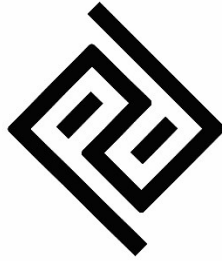
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APPENDIX E



PROMETHEAN PLANNING

COTLANDS PADDOCK
HORSHAM ROAD,
COWFOLD,
WEST SUSSEX,
RH13 8AH

*Construction of traditional style stables and barn with
yard and track.*

PLANNING STATEMENT

8th February 2025

Prepared by Ben Kirk MSc

The proposal is for the construction of a detached stable building and barn for private use.

The application site comprises an open field surrounded by mature trees and vegetation on the east side of Horsham Road, approximately half a mile from the centre of Cowfold.

The existing site contains a small stable with two boxes as well as a small store located close to the western boundary. The current lawful use of the land is for the grazing of horses.

The land however amounts to 5.2 acres and so is capable of supporting 5 horses according to British Horse Society standards if on permanent grazing.

The applicants' horses are however not permanently grazed and so require much less land with a requirement of 0.5 acres per horse. As such the site is capable of supporting 10 horses.

The proposal is for the applicants' own horses and the development would be for private use only. There is no commercial use proposed, and the applicant is happy to accept a condition restricting this. The applicant lives locally in Coolham and would travel to site each day to tend to the horses.

Policy 29 of the Horsham District Planning Framework states that in order for equestrian development to be supported, proposals should demonstrate that the re-use of existing buildings on site for related equestrian use is not appropriate, before new or replacement buildings are considered.

The existing stables are insufficient for the applicants' horses which range between 6 and 8 horses at a time.

There is also the need for storage of food, hay and machinery in connection with the maintenance of the land and this is proposed in the barn and tack and feed store.

The existing trees along the western boundary will be retained and protected to ensure the building is not prominent from the road.

The proposed stable is, in any case, a high-quality stable building of traditional character using high quality local materials such as timber cladding, clay tiles and flint walls and so would represent an attractive form of development rather than the typical pre-fabricated stable buildings.

The material of the proposed track and hardstanding will be a permeable MOT Type 3 subbase overlaid with gravel to provide a permeable surface with only a small strip of concrete hardstanding under the canopies of the stables.

APPENDIX F



JHB Planning

**“Cotlands Paddock”,
Horsham Road,
Cowfold,
RH13 8AH.**

**Use of land for the stationing of 4 static caravans for
residential purposes and associated day rooms**

Planning Statement

10th December 2025

Prepared by James Brazil, C-SPS, JHB Planning on behalf of Promethean Planning

A solid black rectangular box used to redact the signature of the preparer.

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Introduction

This planning statement is provided in support of a full planning application for the use of land for the stationing of 4 static caravans for residential purposes and associated day rooms at “Cotlands Paddock”, Horsham Road, Cowfold, RH13 8AH.

This statement sets out the proposed scheme in detail with regard to the following aspects: the planning history of the site, the development proposals, the relevant planning policy and the planning merits of the scheme. Specifically, the LPA's lack of a 5-year supply position, immense need for gypsy and traveller accommodation, challenges facing any identifiable deliverable sites in the near future, and the proposals overall compliance with local and national policies.

Site and existing use

The application area amounts to approximately 0.42 Hectares (redline), contained within a larger parcel of land under the applicant's ownership amounting to approximately **2.21** hectares (blue line). The site is located to the eastern side of Horsham Road, approximately 600 metres north of the village of Cowfold. The site has an established access at the eastern boundary from Horsham Road (A281).

The site is currently used as a Paddock and is an L-shaped parcel of land, although providing a functionally square layout. Trees and hedgerows run along the boundaries of the site, and three trees are present in the centre. There is an area of woodland immediately north of the site.

There is an existing stable block located at the north western corner of the site, with the rear elevation of the building fronting Horsham Road (A281), permitted August 2004. A recent application permitted in April 2025 (ref. DC/04/1217) comprises of a new barn & stables with a yard and track, also located in the north western corner of the site, although this development has not yet been built out.

The surrounding area is predominantly characterised by a mix of residential development, agricultural, and equestrian land. Notably there is a large care home located to the immediate west across Horsham Road (A281) known as “Homelands Nursing Home”.

The Proposal

The proposal is for the use of land for the stationing of 4 static caravans for residential purposes and 4 associated day rooms. The plans also include parking for 2 cars, a touring caravan, amenity space, and a bike and bin store (in addition to the day room / utility buildings for each pitch). The development is being pursued to assist in meeting the long outstanding unmet need for Gypsy and Traveller accommodation within the LPA jurisdiction.

The development proposed is in the northeastern section of the site, set back from the road, and has been sympathetically designed to take account of existing hedgerow and treeline. While a footpath runs along the eastern boundary of the site, additional planting is intended to screen the development and reduce visibility from this PROW and contribute towards BNG.

As highlighted on the proposed site plan, the site will be laid out ergonomically to provide all necessary amenities for future occupiers and adequate amenity space. Overall, the proposal has been designed to be sympathetic of the surrounding sporadic development context and reduce visibility from any public vantage points. The site will benefit from use of an existing access in the northwestern corner of the site from Horsham Road.

Planning history:

Ref.	Proposal	Decision	date
DC/04/1217	Erection of 2 stables, tack room and haybarn	Permitted	02 Aug 2004
DC/25/0054	Construction of stables and barn with yard and access track	Permitted	01 Apr 2025

The application permitted 2004 has been completed and is present on site, however the stables and barn permitted 2025 have not yet been built out.

Site constraints

After completing constraints checks using Land stack (an online site sourcing and planning data platform), EA flood risk, Historic England, Magic map, LA PROW, and LPA mapping, the following constraints on and nearby the site were identified.

Constraint	Feature	Description/location
Water source	A stream runs north and east of the application site	The development is not within a flood zone or at risk of surface water flooding as identified by the Environment Agency, however, a stream that runs north and east of the site results in flood zone 3 located nearby. The stream is approximately 30m from the blueline boundary at its closest point and the distance exceeds this were built development is to take place.
Grade II listed building	Cotlands	Approximately 200m south west of application area lies "Cotlands". "Cotlands" is located on the eastern side of Horsham Road (A281) but is clearly separated from the application area by various treelines, hedgerows, and built form.
Grade II listed building	West Cotlands	Approximately 250m south west of the application site is "West Cotlands". "West Cotlands" lies to the west of Horsham Road (A281) and is clearly separated from the application area.

Public Right Of Way at eastern site boundary	PROW reference COW-1756	PROW reference COW-1756 runs along the eastern boundary of the site, the opposite side of an existing hedgerow and treeline. It is noted that there are other rights of way present around the site, however these are located at significantly further distances.
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Current planning policy context

The local planning policy context for the village of Cowfold and Horsham District Council has changed much in recent years. This section aims to set out the most up-to-date policy/guidance documents and significant changes that may affect this proposal.

National:

At the national planning level, this application should be considered inline with requirements as set out within the most up-to-date version of the NPPF and PPTS. Given this application relates to gypsy and traveller pitches, the significance of the PPTS is of great importance as it sets out the planning definition for those who qualify as Gypsies, Travellers, and Travelling Showpeople. The PPTS was last updated 12 December 2024. The definition of Gypsies and Travellers has faced many changes in recent years but can be summarised as follows:

- Initial definition created PPTS 2012.
- Change to definition in PPTS 2015, narrowing the definition of G&T, essentially removing G&T status from ethnic/culturally identified G&T who have stopped travelling.
- Lisa Smith Court of Appeal Judgement handed down in October 2022 finding the 2015 PPTS G&T definition discriminatory.
- December 2023 PPTS, annexe 1 updated to revert G&T definition to the 2012 PPTS definition.
- December 2024 PPTS updated inline with changes to NPPF, and again widening the criteria for those who qualify as Gypsies and Travellers for planning purposes.

The most recent changes from the 2023 to 2024 PPTS are highlighted below:

PPTS 2023	PPTS December 2024
1. For the purposes of this planning policy "gypsies and travellers" means: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. 2. In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such [emphasis added].

25. The use of the phrase 'cultural tradition of nomadism or of living in a caravan', makes it considerably more inclusive and reflective of the accommodation needs of Romany Gypsies and Irish Travellers.

Extract from Planning Reforms December 2024: Impacts on Planning for Gypsy and Traveller Communities Note compiled by Dr Simon Ruston MRTPI, on behalf of Friends, Families and Travellers.

The 2024 change to definition is of great importance due to implications it can have on any identified need figure in LPA's GTAA's, with many identified need figures actually being lesser than real world needs.

Local level:

At the time of submission of this application there is uncertainty regarding local planning policy in the Horsham district. The Horsham District Planning Framework adopted 2015 is the adopted plan for the area, however this plan has significantly "out-of-date", leading to a presumption in favour of sustainable development in line with paragraph 11 of the NPPF (2024).

A new local plan, "the Horsham District Local Plan 2023-2040", has completed a regulation 19 consultation and was submitted to the planning inspectorate in July 2024, however the inspector's initial findings letter recommended withdrawal April 2025. The latest update constitutes the Council's letter to the Inspector, document ref. HDC44 on the council's local plan examination library, dated 13 November 2025.

While ongoing work and discussion is likely taking place regarding the new local plan, and challenges in the form of ever persistent changes to the planning system, the fact remains that the regulation 19 Horsham District Local Plan 2023-2040, 2024 is not adopted.

The existing HDPF (2015) is still the primary Policy, however weight should be given as a matter of planning judgement, especially where said policies are consistent with more up-to-date national policies and guidance. The evidence base for the emerging local plan is considered adequate to inform decisions.

In addition to challenges facing the emerging local plan, and as highlighted in letter HDC44 on the council's emerging local plan examination library, the issue of water neutrality has recently reached a solution within the district, with Natural England having formally withdrawn its position statement that had recommended a water neutrality-based approach to development within the Sussex North Water Resource Zone on 31 October 2025.

While a precautionary approach should still be taken, the key outcome of this change is that applications no longer require water usage statements, or to demonstrate water neutrality.

Neighbourhood Level:

Cowfold Village, located 600 metres south of the site, has a recently adopted "the Cowfold Neighbourhood Plan 2019 – 2031" in October 2025.

Relevant policies

As discussed above, relevant policies lie within the PPTS (2024), the NPPF (2024), the HDPF (2015), and the emerging HDLP (reg 19) (2024) documents. While each of these documents should be read as whole and in conjunction with one another, key policy considerations relevant to this application are set out below.

HDPF 2015 (the adopted plan)

Policy 26 of the HDPF (2015) seeks to protect the rural character and undeveloped nature of the countryside against inappropriate development, seeking to support certain forms of development related to the needs of rural enterprise and sustainable rural development, while seeking to prevent a significant intensification of use and retain important components of rural character.

Policy 23 of the HDPF sets out the criteria for assessment in the determination of planning applications for non-allocated gypsy and traveller development, seeking to ensure that sites are appropriate in terms of ground conditions, vulnerability to flood risk, served by safe and convenient vehicular/pedestrian access, appropriate to local character, appearance and neighbouring amenity.

Policy 23 seeks to support sites located in or near existing settlements, within reasonable distance of local services and community facilities, in particular to schools and essential health services.

HDLP (reg 19) 2024 (the emerging plan)

Strategic policy 14 of the HDLP (reg 19) (2024), similarly to Policy 26 of the (HDPF) 2015, also seeks to protect the rural character and undeveloped nature of the countryside from inappropriate development, seeking to support only developments that can justify a countryside location and meet one of four criteria. The policy also seeks for development in the countryside to preserve and enhance key characteristics and features of the area in which they are located.

Strategic Policy 43 of the HDLP (reg 19) (2024) is the emerging policy relating to the assessment and determination of planning applications for gypsy, traveller, and travelling showpeople developments. seeking to ensure that sites are appropriate in terms of ground conditions, vulnerability to flood risk, served by safe and convenient vehicular/pedestrian access, appropriate to local character, appearance and neighbouring amenity. This policy is believed to relate to the 2015 version of the PPTS, and the discriminatory definition of gypsies and travellers contained within, as discussed earlier in this document. While there have been multiple updates to the PPTS since the creation of Strategic policy 43, it is considered that the decision criteria for proposals containing gypsy and traveller developments are generally acceptable (and are similar to that set out in the currently adopted HDPF (2015)). The matter of national policy and gypsy and traveller definition changes will be addressed below in the “needs” section of this statement.

PPTS 2024:

Policy H of the PPTS (2024) sets out steps that LPAs should take when determining planning applications for GTTSP sites. Like the NPPF there is the need to determine applications in line with the development plan, unless material considerations indicate otherwise. There is also a presumption in favour of sustainable development as set out in paragraph 11(d) of the NPPF (2024) where a 5-year supply cannot be demonstrated.

Various sections of Policy H attach weight in favour of applications where proposals positively enhance their environment, promote opportunities for healthy lifestyles, and do not give the impression of deliberately isolating sites and their occupants. Policy H also sets out that the matter of need should be considered in planning applications for GTTSP sites, and the need resulting from all members of either the G&T or TSP community, not just those with local connections.

Occupants Gypsy and Traveller status

While the Gypsy and Traveller status of the occupants is not directly a material consideration when specifically assessing the applications built form, the fact that the future occupiers meet the definition of gypsies and travellers as set out in the PPTS (2024) does reinforce their own personal needs for accommodation, and the fact that they would be able to lawfully occupy the site in the event of permission being granted.

Any future occupiers of the site would meet the definition of gypsies and travellers as set out in annexe 1 of the PPTS (2024) and have their own personal need for accommodation.

Need and supply

This section aims to highlight the current state of need and supply within the district.

Need

Currently the District is subject to a substantial unmet need for gypsy and traveller pitches which has subsisted for several years, with no clear pathway for resolution through the adoption of a new local plan.

The latest GTAA was completed in November 2023 and relied upon the illegal 2015 PPTS definition for gypsies and travellers. An update was made to the identifiable need figure in July 2024 and published September 2024 finding a slight increase in the need figure using the 2023 PPTS definitions. The need figures are highlighted below:

Revised Need for Gypsy and Traveller households in Horsham (2023-2040)

Status	2024 Need	2023 Need
Meet Planning Definition	79	77
Undetermined	0-20	0-20
Do not meet Planning Definition	29	31
TOTAL	128	128

Revised need for Gypsy and Traveller households in Horsham that met the 2023 Planning Definition by year periods

Year Period	Dates	2024 Need	2023 Need
0 – 5	2023 – 27	50	48
6 – 10	2028 – 32	10	10
11 – 15	2033 – 37	12	12
16 – 18	2038 – 40	7	7
0 – 18	2023 – 40	79	77

Figures taken from document H06 Horsham Gypsy and Traveller Accommodation Assessment Targeted Update September 2024. Available to view on the councils emerging local plan examination library.

This figure is the most up-to-date available from the LPAs evidence base, however it is not the current need. The above need figure follows the Lisa Smith case (Smith v. SoS for Levelling Up, Housing and Communities (CA-2021-00171, 31st October 2022) and the Dec 2023 PPTS Definition, and while within document H06 it is argued that the 2023 PPTS definition update would not result in an increase in need (despite accepting that on average up to 25% of ethnic/cultural Gypsies and Travellers might have moved under the 2023 definition), this need figure does not take account of the updates made to the PPTS December 2024. As discussed above in the “policy context” section of this report, the 2024 PPTS definition more adequately reflects the needs of

many Romani Gypsies and Irish Traveller who have only a cultural tradition of nomadism or living in a caravan.

Given the further widening of the traveller definition in the December 2024 PPTS, the identified need is assumed to certainly underrepresent the planning definition need figure, and still possibly underrepresents the actual real-world need of all gypsies and travellers through excluding any individuals that may meet ethnic/cultural definitions of G&T, but are not included in the 2024 PPTS definition.

Using the most up-to-date figures as identified in the LPAs most up-to-date GTAA update 2024, one could assume that the actual need figure for those meeting the PPTS December 2024 Traveller definition would reach 128 pitches to the period leading up to 2040, using the combined figures meeting the 2023 planning definition, those who did not meet the definition, and those undetermined individuals – and still this figure only represents a starting point. While it is impossible for anyone to put a figure on the actual present-day need meeting the December 2024 PPTS definition, 128 pitches represents a minimum.

The GTAA is also inherently flawed due to the failure to interview a large portion of the GTTSP population. Out of 150 known properties of gypsy and traveller occupation (mostly consisting of authorised and unauthorised permanent pitches but also including a minute number of bricks and mortar and roadside), only 94 interviews took place, representing 63% of the population (see figure 6, page 25/26 of the November 2023 GTAA, Document H05 in the local plan examination library).

So, over a third of the population was not interviewed at all. The GTAA argues that this figure, when adjusted for pitches or plots that were not occupied by Travellers, and for undeveloped or vacant pitches or plots, represents a response rate closer to 86%, however this still does not take account of the December 2024 PPTS definition (i.e. those that may not have in the past, but at present day do meet the planning definition of a “Traveller”), nor individuals that could not be identified at all.

Therefore, the response rate is more likely to be closer to the initial 63%, meaning over a third of the known gypsy and traveller population were not interviewed. While the GTAA estimates that the need arising from undetermined households is estimated to range somewhere from 6-13 pitches. This calculation uses both a national average conversion rate of “undetermined households” to those meeting the 2023 PPTS G&T definition of 30%, and a local conversion rate of 67% (please see page 33 of the GTAA). However, this figure once again does not take account of the December 2024 PPTS widened G&T definition.

This point further strengthens the fact that much of the need figure of undetermined G&TS status, would likely constitute to individuals meeting the 2024 PPTS definition, and strengthens the claim that the actual need figure is closer to 128 pitches.

Supply

The current adopted local plan is “out of date” and cannot display a 5-year land supply for pitches.

While the adopted local plan is out of date, we can look to the emerging HDLP (reg 19) (2024) to identify what the supply of pitches over the plan period might look like.

Site	Existing Authorised Gypsy & Traveller Pitches	Proposed Additional Net Pitches	Total Gross Pitches (Total Net Pitches)
1. Land at Junction of Hill Farm Lane and Stane Street, Codmore Hill (Existing Site)	2	2	4 (2)
2. Fryern Park, Storrington (Existing site)	2	2	4 (2)
3. Northside Farm, Rusper Road (Existing site)	1	3	4 (3)
4. Southview, The Haven, Slinfold (Existing Site)	1	4	5 (4)
5. Sussex Topiary, Rudgwick (Existing Site)	4	8	12 (8)
6. Plot 3, Bramblefield, Crays Lane, Thakeham (Existing Site)	1	3	4 (3)
7. Land at Girder Bridge, Gay Street Lane, North Heath, Pulborough	0	5	5 (5)
8. Land East of Billingshurst (Strategic Site Allocation)	0	5	5 (5)
9. Land West of field (Strategic Site Allocation)	0	15	15 (15)
10. Land North West of Southwater (Strategic Site Allocation)	0	5	5 (5)
11. Kingfisher Farm, West Chilmington Lane, Barns Green (Regularisation of Existing Site)	0	11	11 (11)
12. Land East of Coolham Road, Thakeham	0	2	2 (2)
13. Land North West of Junipers, Harbolets Road, West Chilmington	0	3	3 (3)
14. Downsview Paddock, New Hall Lane, Small Dole	0	1	1 (1)
TOTAL	11 pitches	69 pitches	80 pitches (69 pitches)

Strategic Policy 43 Horsham District Local Plan Regulation 19 2024

As seen above the emerging local plan only allocates enough land to provide a total net increase of 69 pitches. This figure is far off the actual need figure, which as established above is likely exceeding 128 pitches. The timeframe in which any of these sites could be delivered is unknown and not guaranteed given the challenges facing the emerging local plan as discussed earlier in this statement, with the adoption of the above allocations certainly not being available in the immediate future or considered deliverable in the near future.

Summarised

The following summarises the current state of pitch need and supply:

- **The actual need figure for those meeting the December 2024 PPTS traveller definition likely exceeds 128 pitches in the period up-to 2040.**
- **It is understood that HDC cannot display evidence of a 5-year supply of deliverable gypsy and traveller sites through allocations, especially given uncertainty surrounding the emerging local plan.**
- **There are no vacancies at any gypsy sites within the Council’s administrative area. Further, it is widely understood that there is a long waiting list for any pitches both within the Council’s administrative area and in the surrounding authorities.**

This constitutes material considerations weighing heavily in favour of the proposal.

Location and Sustainability

The site is located to the eastern side of Horsham Road, approximately 600 metres north of the village of Cowfold, with an established access from Horsham Road (A281). The site is therefore considered to be outside of the built-up area and considered to be within the countryside; however, it is only 600 metres from a medium village in policy terms of both the HDPF (2015) and emerging HDLP (reg 19) (2024).

Settlement Type	Settlement Characteristics and Function	Settlements
Medium Villages	These settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements.	• Ashington • Barns Green • Cowfold • Partridge Green • Rudgwick and Bucks Green • Slinfold • Warnham • West Chiltington Village and Common

Policy 3 (Policy 3): Horsham District Planning Framework 2015.

Medium Villages	These settlements have a moderate level of services, facilities and community networks, together with some access to public transport. These settlements provide some day-to-day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements.	• Partridge Green • Rudgwick, Cox Green and Bucks Green • Cowfold • Ashington • West Chiltington and West Chiltington Common • Slinfold • Barns Green • Warnham
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Strategic Policy 2: Development Hierarchy Horsham District Local Plan regulation 19 2024.

The services offered in Cowfold are highlighted within document “EN07 Settlement Sustainability Review Assessment” of the emerging HDLP evidence base, last updated July 2024. Please see the below extract:

Cowfold	
Summary	The village has a good range of services and facilities, including a doctor surgery, pre-school, primary school, sports facilities and a convenience store. The village also has a good bus service, including weekends. Cowfold has limited local employment, with main work destinations outside of the settlement being Crawley, Horsham, London and Mid Sussex. 23.5% households are with residents aged 65+ and 29.5% households have dependent children. There is a good range of clubs and societies for all interests and ages. There is a Regulation 17 Cowfold Neighbourhood Plan.
Key Sustainability Issues	Air pollution is a concern around the A272 junction, with an Air Quality Management Area (AQMA) declared. Development would help support local services and facilities but the impacts on the AQMA would need to be assessed and be mitigated.
Recommendation	Medium Village

Document EN07, Local Plan Review – Background Paper Settlement Sustainability Assessment 2019-2022, updated July 2024, available on the local plan examination library

Cowfold is considered to contain a good range of services and facilities, and a good bus service including weekends. While there is concern regarding local employment, It is important to note that many gypsies and travellers are self-employed and live and work from the same location as a part of their traditional lifestyles, omitting many travel to work journeys and actually contributing to sustainability (Please see Policy B, Paragraph 11, PPTS (2024)) and negating an excessive need for local employment.

While there is no footpath along Horsham Road (A281), neither Policy 23 HDPF (2015), Strategic Policy 43 HDLP (reg 19) (2024), nor the provisions of the PPTS (2024) explicitly require gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village.

When considering the proposal against the countryside protection policies of both the adopted and emerging local plans, a clear exception for development outside built-up area boundaries is to “enable the sustainable development or rural areas”. The proposed development would meet these criteria through the following considerations:

- the development would be helping meet an excessive need for pitches in the local area,
- the site would provide access to a range of local services and facilities for the occupants - the least of which amount to a doctor's surgery and schools,
- the site would provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment and possibly negate many travel to work journeys.

When taken together the proposal aims to accord with criteria set out in Policy 23 HDPF (2015), Strategic Policy 43 HDLP (reg 19) (2024), and precedents set out within the PPTS (2024), to create an economically, socially, and environmentally sustainable site.

Due to the close proximity to a “medium village” containing a range of services and facilities, and the many benefits of providing a settled base to those that would otherwise be permanently travelling, it is therefore considered that the site constitutes an acceptable location for the proposed development.

Landscape impacts

Requirements of the local area

Policies 25 and 26 of the HDPF (2015), as well as emerging strategic policies 13 and 14 of the emerging HDLP (reg 19) (2024), support development where proposals protect, conserve, and enhance the landscape character of the district: including the landform, development pattern, protected landscapes, and habitats. Development is required to take account of areas or features identified as being of landscape importance, individual settlement characteristics, and settlement separation. In addition, development will be supported where it maintains and enhances the Green Infrastructure Network.

When specifically referring to sites located in the open countryside, and where said location has been justified through enabling sustainable development of the rural area (as this site is), proposals are considered acceptable where:

- they do not lead to a significant increase in the overall level of activity in the countryside,
- they protect, conserve, and seek to enhance, the key features and characteristics of the landscape character area in which it is located, including:
 - o The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;
 - o The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features;
 - o The landform of the area;
 - o The protection of dark skies, in particular where it may impact on a designated International Dark Sky Reserve (IDSR), Neighbourhood Plan designations and High Weald AONB Management Plan objectives.

These policies cumulatively push developments towards the philosophy of a **landscape-led design**. (the term “landscape-led” is used within Strategic policy 13 HDLP (reg 19) (2024)).

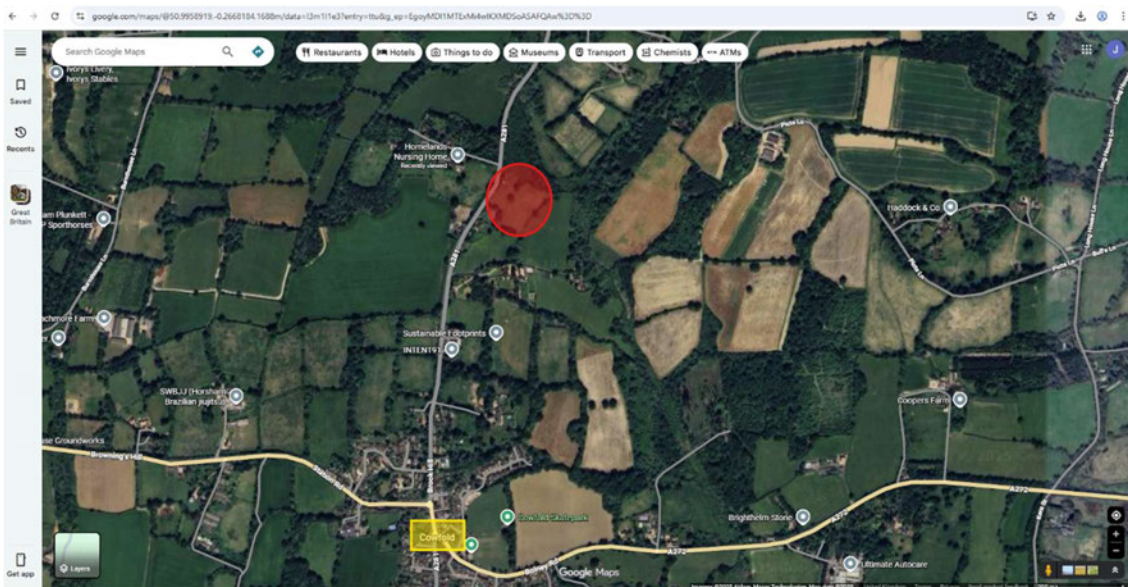
Policies 32 and 33 of the HDPF (2015), and strategic policies 19 and 20 of the emerging HDLP (reg 19) (2024), seek to prosper a high quality of new development through various development principles. These policies support development of a high standard of design and layout. These policies require development proposals to be locally distinctive in character and respect the character of their surroundings, and where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built surroundings, landscape, open spaces and to consider any impact on the skyline and important views.

Policy 23 HDPF (2015) and Strategic Policy 43 HDLP (reg 19) (2024) also require that proposals for gypsy and traveller accommodation do not have **an unacceptable impact** on the character and appearance of the landscape and are sensitively designed to mitigate any impact on their surroundings.

The sites landscape character

This part of Horsham Road is located within landscape character M1 Crabtree and Nuthurst Ridge and Ghyll Farmlands of the Horsham District Landscape Character Assessment (2003). The site sits within an area of a rural appearance, characterised by irregularly shaped pasture fields, and strong areas of woodland and hedgerow, with development along either side of Horsham Road as it heads North from Cowfold, in line with the characteristics identified in landscape character area M1. **The site does not sit in any protected or designated landscape.**

As seen below from google earth satellite imaging, there is precedent for built form/development along Horsham Road heading north from Cowfold.



Google earth satellite imagery 2025 for indication purposes only. Site circled in red, Cowfold highlighted in yellow.

The site consists of a predominantly open area of grassland sloping down gently from north to south, and from the west to east across the site. The site is bounded on all sides by mature trees and hedgerows, with an area of woodland immediately north of the site. There is an existing stable block present in the northwestern corner of the site, with the rear facing Horsham Road (A281). As seen in the below google street view the views into the site from Horsham Road are screened and obstructed by the existing hedgerow and treeline.

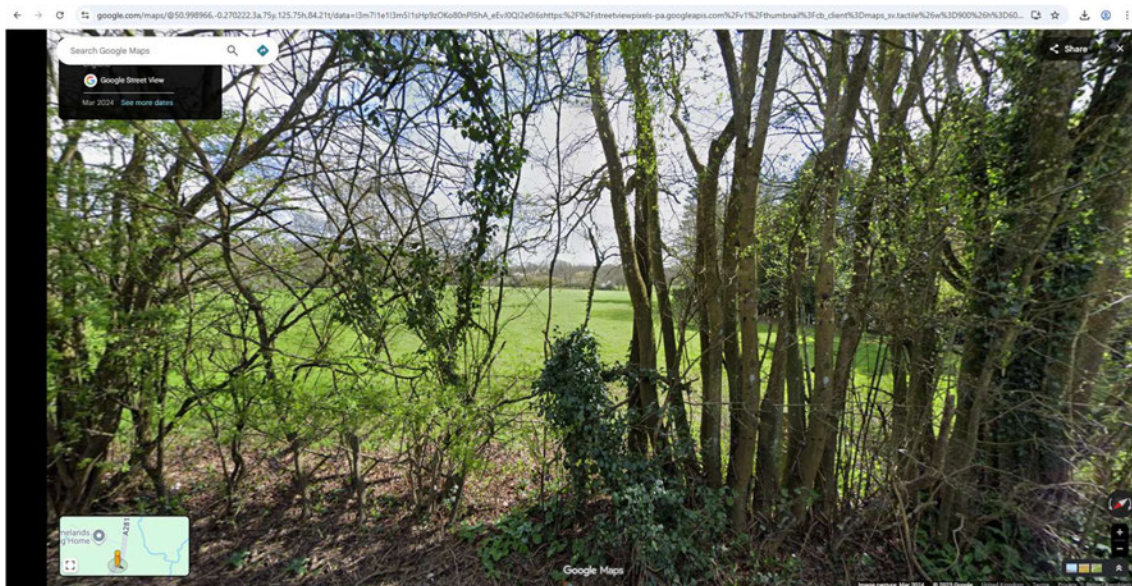
It is also raised to the LPA's attention that the lack of public footpath along the road front and speed of vehicular traffic limits the visibility of views into the site further from Horsham Road (A281).



Google street view looking from Horsham Road near the north western most point of the site, into the site and along the road, March 2024.



Google street view looking from Horsham Road near the existing site access into the site, March 2024.



Google street view looking from Horsham Road near the south eastern most point of the site, looking into and across the site, March 2024

As also detailed in the accompanying location plan, PROW reference COW-1756 runs along the eastern boundary, however the existing hedgerow and treeline at the eastern boundary is significantly denser than that at the road front, therefore limiting the views from the public realm into the site further. It is noted that there are other rights of way present around the site, however these are either located some distance away, or other buildings are present between these and the site / the location of the proposal.



iMap PROW online mapping tool, 2025. Available online at: <https://www.westsussex.gov.uk/land-waste-and-housing/public-paths-and-the-countryside/public-rights-of-way/public-rights-of-way-imap/imap/>

How the proposal preserves and enhances to landscape

The proposal seeks to retain the surrounding trees and hedgerows and provide dense planting of native hedging at the Eastern side of the site (as detailed in the accompanying site plan and BNG metric). The denser planting along the eastern boundary provides both on site biodiversity value and thorough screening from any public vantage points along PROW ref. COW-1756.

The proposal would not result in any radical or discernible changes to the landscape of the area, with existing ground levels and landscaping features retained. The proposal involves minimal areas of hardstanding and modest single storey buildings/caravans. As such, in the event the proposed development was removed following the granting of permission, the site would likely be able to return to its existing form without the need for any significant changes to the landform.

Taking into account the context of the site; including its topography and the ground levels that would be maintained, the nature of the proposal being single storey in form, the proposals for additional landscaping and planting to reinforce existing landscape features, and the nature of the proposed development which is on the outskirts of Cowfold and not dissimilar in character to the sporadic residential development in the area, it is considered that the proposal would not have an adverse effect on the character and appearance of the area, and would in fact preserve and enhance the local character through enhancements to planting and improvements to the local green infrastructure network.

Whilst any form development will result in some change to the character of a site and the visual amenity of the area, the proposal is not considered to meet the threshold of **'unacceptable harm/impact'** as set out in policy 23 HDPF (2015) and strategic policy 43 HDLP (reg 19) (2024).

In this instance the only aspect of visual amenity that is considered to change is likely from the existing views into the site along Horsham Road (A281), however any existing views are already obstructed due to mature planting that is of character of Horsham Road, and the views into the site from Horsham Road would be further limited due to the proposed pitches being set back from the

road and the location of two mature trees on site that lie between the pitches and the road front. Additionally, as mentioned above, it is also raised to the LPA's attention that the lack of public footpath along the road front and speed of vehicular traffic limits the visibility of views into the site further from Horsham Road (A281).

Overall, the combination that the proposal:

- does not lie within any protected or designated landscape,
- is not readily visible from the road,
- includes planting to further restrict visual amenity from nearby PROWs,
- retains all existing landscape features, and
- provides improvements to the local green infrastructure network,

means the proposal would represent appropriate development within the countryside, and would comply with requirements set out in Policies 23, 32, and 33 of the HDPF (2015); and strategic policies 19, 20, and 43 of the emerging HDLP (reg 19) (2024).

The applicant is also willing to accept a condition removing any permitted development rights for further fencing installation of fences, recognising that tall solid fencing could result in a subdivision of the site which would have the potential to be harmful to the character of the site.

Heritage impact

Policy 34 of the HDPF (2015) states that development should reinforce the special character of the historic environment through appropriate siting, scale, form and design; and should make a positive contribution to the character and distinctiveness of the area. Proposals should also preserve and ensure clear legibility of locally distinctive vernacular building forms and their settings, features, fabric and materials.

Two Grade II listed building, “Cotlands” and “West Cotlands”, are located ≥200m south west of the application site. These listed buildings are well screened by a mature hedgerow and treeline at the southern site boundary, preventing views to and from the application site. For this reason, it is considered that the proposed development does not result in harm to the setting of the Grade II listed buildings

In a previous application permitted on site for the “construction of stables and barn with yard and access track” (ref. DC/25/0054), the assessing officer found that the development permitted at the western side of the application site did not harm to the setting of the listed buildings mentioned above. This was reinforced via a site visit carried out by a Council officer during winter months confirming that the existing trees and hedgerows at the southern boundary of the application site limited views to and from the nearby listed buildings. This assessment sets precedents for the lack of heritage impact from development at the application site. Given this proposal’s greater distance from the nearby listed buildings, it is considered that the proposal would certainly not impact the setting of either listed building.

Due to the mature screening and distance from heritage assets, the proposal is considered to comply with requirements set out in policy 34 of the HDPF (2015) and is acceptable in heritage terms.

Impact On trees

The site is bound my mature trees which screen it well from the surrounding area and contribute to the character of the site and the wider area.

The proposed development seeks to avoid incursion into the RPA of the trees proposed to be retained on site.

The application is accompanied by a detailed arboricultural report, completed October 2025, detailing the impact on the trees and ensuring the development will not lead to harm to any of the trees retained on site.

The proposal is therefore considered to compliant with policies 25 and 26 of the HDPF (2015); strategic policies 13, 14, and 17 of the emerging HDLP (reg 19) (2024); and policy 2 of the Cowfold Neighbourhood Plan (2025), which seeks to preserve and enhance features and characteristics of the landscape character, such as trees.

Ecology

A Preliminary Ecological Assessment (PEA) was carried out on the site in December 2025 and is included with the submission.

The PEA found the proposed development was unlikely to significantly impact ecological receptors, provided that precautionary and protective measures are implemented.

The woodland edges, hedgerows and mature trees will be protected using buffer zones and root protection fencing during construction as set out in the accompanying arboricultural method statement October 2025 and described within the PEA December 2025.

Recommendation was made to install bat roosting, and bird nesting features with any new development on site. Adequate bat and bird boxes are proposed at various points around the site, in suitable locations, as described within the PEA that minimise the risk of impact from occupiers.

The scheme provides for ecological enhancement, through planting of new native hedging lining the proposed road through the site, and substantial areas of planting and infilling at the existing hedgerow and tree line along the site boundaries. The location of new planting has been sympathetically designed to retain and enhance the existing features and habitats on site, along with strengthening the existing hedgerows which provide nature corridors, further joining up the green infrastructure network around the site. As result of the proposed planting, post development the site would contain the following habitats: developed land/sealed surface, modified grassland, native species rich hedgerow, mixed scrub, and medium sized trees.

As shown in the accompanying BNG assessment the post development habitat creation within the design of the scheme would result in a significant increase of habitat units, totalling 0.2308, giving a Biodiversity Net Gain of +11.66% and a gain of 1.0603 hedgerow units. Therefore, the proposal exceeds the requirement to achieve at least a 10% biodiversity net gain under the Environment Act 2021.

Highways and Access

The proposed development would utilise the existing vehicular access from Horsham Road to the West of the site.

No road safety concerns in relation to the proposed access are apparent.

It is clear that the proposed development would be serviced by a safe and suitable means of access such as to satisfy the requirements of Policies 23 and 40 HDPF (2015), and Strategic policy 24 and 43 HDLP (reg 19) (2024).

Policy 41 HDPF (2015) and Policy 25 HDLP (reg 19) (2024) seek to ensure that proposed development is supported by adequate parking for vehicles, electric-vehicles, and cyclists. The proposed layout provides that each pitch would benefit from hardstand providing a space for 2x cars and a refuse store incorporating an EV charging point and storage for 2x cycles.

The site also benefits from a turning head at the eastern most point of the proposed access track to each pitch, in line with requirements set out in Strategic Policy 43 HDLP (reg 19) (2024).

Water efficiency

Following letter HDC44 on the councils emerging local plan examination library, the issue of water neutrality has recently reached a solution within the district, with Natural England having formally withdrew its position statement that had recommended a water neutrality-based approach to development within the Sussex North Water Resource Zone on the 31 October 2025. While a precautionary approach should still be taken, the key outcome of this change is that applications are no longer required to provide water usage statements, or to demonstrate water neutrality.

The proposal will meet the requirements of water efficiency as sets out in Part G of Schedule 1 and regulation 36 of the Building Regulations 2010 (as amended). These usage rates are set in national regulations and inform the requirements of many emerging local planning policies across the nation to prevent harm from excessive water usage.

An effort will also be made to meet criteria 7 of emerging strategic policy 7 HDLP (reg 19) (2024), so that each pitch is designed to utilise no more than 110 litres of mains supplied water per person per day, inline with the Building Regulations optional requirement for tighter water efficiency, although it is stressed that this is not a formal requirement given the status of the emerging local plan and the withdrawal of Natural England position statement.

Flooding and surface water Drainage

The development is not within a flood zone or at risk of surface water flooding as identified by the Environment Agency, however, a stream that runs north and east of the site results in flood zone 3 located nearby. The stream is approximately 30m from the blueline boundary at its closest point and the distance exceeds this were built development is to take place. There is therefore no risk of flooding.

The site preparation and finished development would not present any increased risk from flooding or water pollution. Water butts would be proposed to down pipes to facilitate rainwater recycling for landscaping.

The development in question does not involve the construction of soakaways. Rather, surface water drainage utilises the existing properties of rainfall infiltration through the moderate permeability ground. The proposed development would not significantly change the existing infiltration mechanism. The proposal will not increase flood risk in the 1% climate change event, either through uncontrolled increase in surface run-off or by increasing the risk of groundwater flooding.

There is limited overland flow of surface water from the site with the great majority of surface water soaking into the ground. While there is a main river located nearby, the distance is great enough that it would not be contaminated by runoff.

Surface water from the proposed development can be reduced by the use of water butts attached to the drainage down pipes. Should it be found to be necessary, a sustainable drainage system will be incorporated.

A detailed drainage report does not accompany the application, however if required we seek to address the matter via standard planning condition to the effect requiring a report.

Utilities

Water is already connected to the site, currently serving the existing stable yard. The proposed caravans will receive gas via Liquefied Petroleum Gas (LPG) bottles. Where further utilities are required, they are available to the site and connection is practicable.

The site is located on a road with other dwellings so waste collection services will be readily available. All services are believed to be capable of sustaining the load of the proposed development.

All services will be connected in accordance with the relevant undertaker's requirements and equipment limitations. All will be sited to as to facilitate maintenance and inspection.

Foul water and waste

A detailed drainage layout will be designed in due course for the proposed mobile homes. All drainage will be new and sized and laid in full accordance with the building regulations.

A package treatment plant is proposed with capacity proportionate to the number of occupants. The tanks are modern, sealed systems and will be maintained by way of a regular service contract.

The package treatment plant will be installed and fully operational prior to occupation of the development in accordance with the manufacturer's recommendations and instructions, and in accordance with Building Regulations.

The package treatment plant will be serviced by a qualified British Water accredited engineer on an annual basis in accordance with the manufacturers servicing and maintenance guide to ensure it is operating efficiently and effectively.

This package treatment plant would include a desludge to ensure a solids build-up doesn't compromise the treatment chamber if the sludge level reaches 70% of the permitted maximum.

The annual service would include an assessment of the activated sludge volume in the reactor in accordance with the manufacturers servicing and maintenance guide.

The annual service would include checking of all working parts including:

- Air blower strength/efficiency
- Air filter check/change
- Final water quality
- Mechanical component checks/replacements
- Air pipe checks
- Diffuser checks
- Health of bacteria

The runoff from the treatment plant will be taken to a soakaway drainage field.

Resource sustainability statement

The proposal seeks to utilise sustainable design and construction techniques, for example, energy conservation and efficiency, water efficiency, reducing waste, re-using materials and recycling materials to ensure the most efficient use of limited resources.

The application seeks to meet these aims in the following ways:

- Provision of an electric vehicle charging point for each plot.
- Improvements to the biodiversity of the site through substantial additional planting to the boundaries including enhancing existing hedgerows.
- Provision of separate waste and recycling bins along with suitable covered storage.
- Water limiting measures as described earlier in this statement.

The measures detailed above contribute to the overall environmental sustainability of the proposal, and relate to climate change, energy efficiency, and ecological policies set out within both the adopted and emerging local plans, and precedents set out in national planning policy.

Summary and conclusion

The following factors weigh in favour of the application:

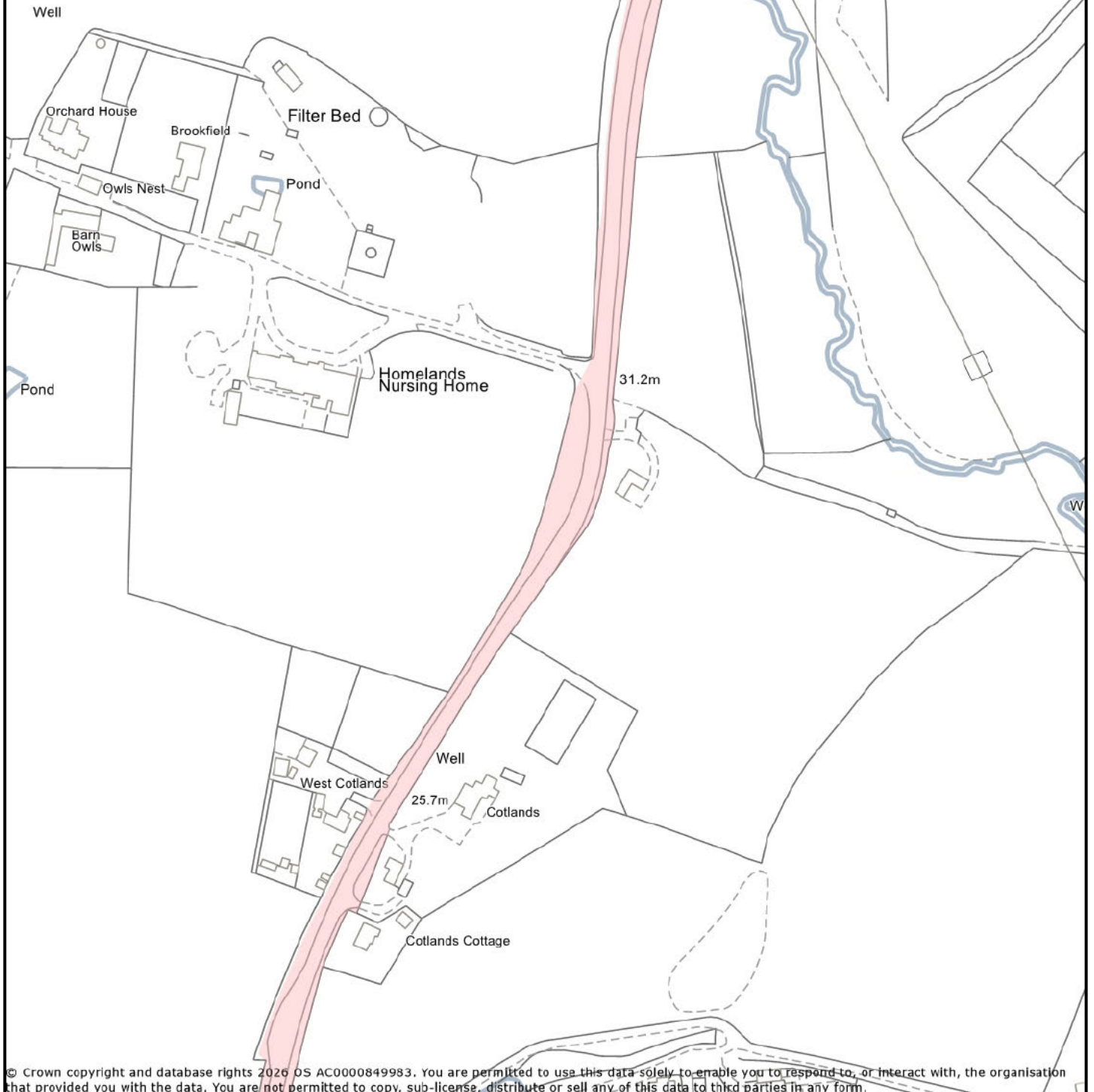
1. The proposal complies with Policy 23 HDPF (2015) and the presumption in favour of the plan applies.
2. The identified need within the district is underestimated following changes to the definition of Gypsies and Travellers in the PPTS (2024).
3. The LPA cannot demonstrate a five-year supply.
4. The identified need for Gypsy Traveller pitches is underestimated in the district, and even the identifiable need is not being met. Issues with the emerging local plan make it even more difficult for the LPA to meet this need. Therefore, where a suitable site comes forward that meets the requirements of Policy 23 of the HDPF (2015) (as this proposal does) they should be granted.
5. This proposal would help relieve an immediate excessive need as identified in this statement by providing 4 pitches that are considered to be deliverable now.
6. Public Sector Equality duty is relevant to the proposal. The effect of the discrimination is set out in the Lisa Smith judgement and the change of definition led to a reduction on need by some 2/3. The Council had been working on the wrong figures sometime between at least 2020 to July 2024 when an update to the GTAA responded to changes made to the PPTS in December 2023. This engages the Public Sector Equality duty. There has been a clear breach, and this is factor that must be taken into account.
7. The likely location of any new Gypsy Traveller site in Horsham will be in the Countryside. The PPTS accepts that gypsy sites will be in the countryside. Simply because a site is within the countryside is not an automatic assumption that it will be harmful to the character of the area. In this instance, it can be displayed that the proposal not only **does not lead to unacceptable harm** to the open countryside, but also preserves and enhances the local character of the area. The application site has no statutory or local landscape designation, is not within the Green Belt, and is not a national landscape or National Park. The site is therefore exactly the type of area in which sites are likely to be found.
8. The proposal does not lead to any harm of nearby heritage assets or their settings.
9. The proposal achieves a Biodiversity Net Gain of +11.66%, exceeding the requirement to achieve at least a 10% biodiversity net gain under the Environment Act 2021.
10. The proposal involves a small-scale site; it is considered that the site is capable of peaceful and integrated co-existence with the local community. The proposal complies with the wider considerations of sustainability and represents a sustainable form of gypsy site development; therefore, the proposal accords with the presumption in favour of sustainable development that should be followed as set out in national planning policy.

Overall, therefore, the limited impact considered to arise for the development proposals would be far outweighed by the significant benefits as identified above. It is, therefore, considered that planning permission should be approved.

APPENDIX G

Highway Boundary

WSSC



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25 February 2026
Kira Divey

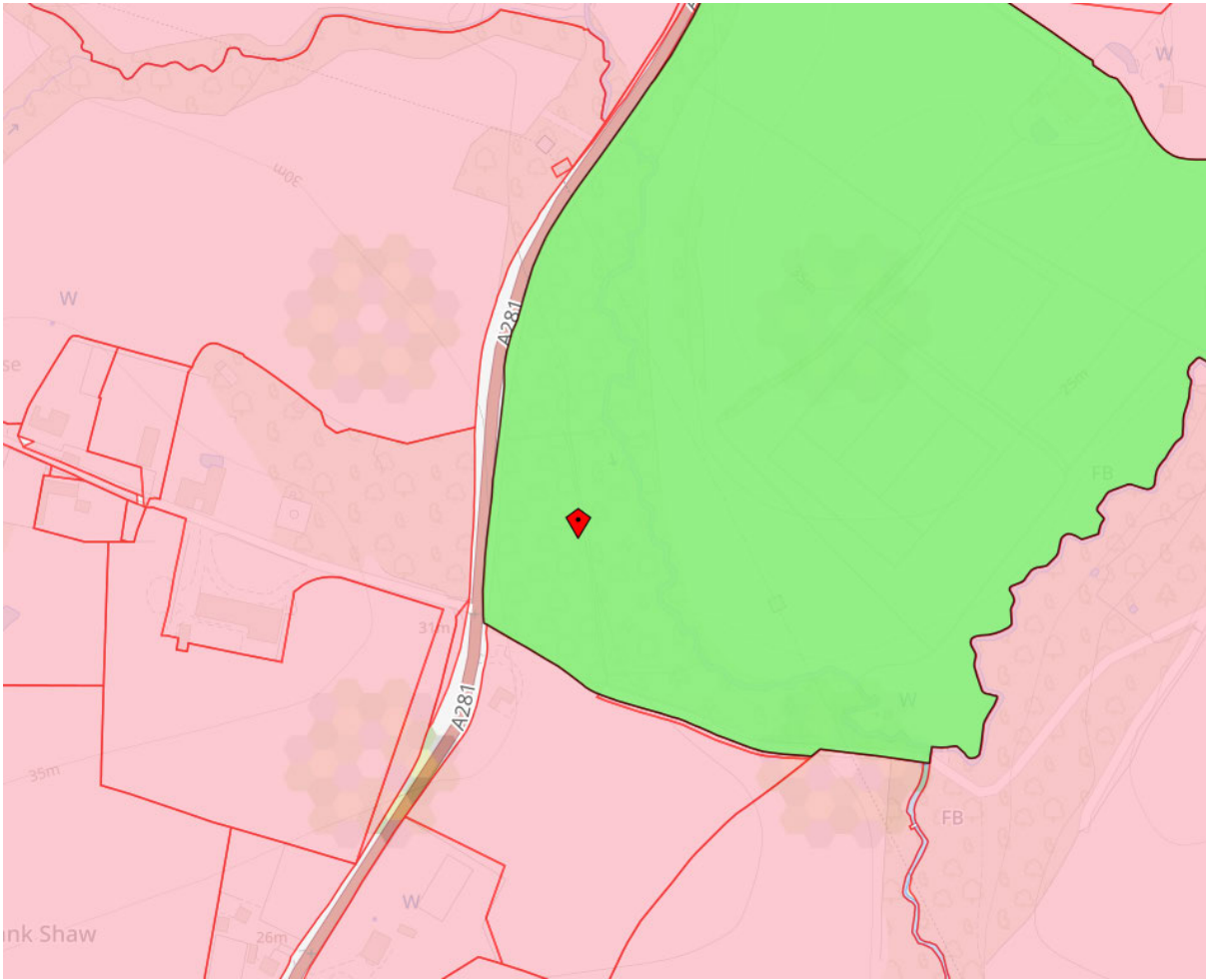
Planning Services

Information about the status of a highway, and in some circumstances the extent of the highway, may be taken from a number of sources held by the County Council. Unless taken from a legal agreement the information should be regarded as guidance only.



1:2500

APPENDIX H



Adjacent Land Registry Title Plan

APPENDIX I



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NOTES

Revision Details	By	Date	Suffix
	Check		

Drawing Number

COWFOLD-01

Cotlands Paddock

Drawing Title

Required 215m
Visibility Splays
(National Speed Limit)

Scale at A3

1:1000

Drawn	KAT	Approved	MAK
Check	KAT	Date	11/03/26

SK Transport Planning Ltd
Albion Wharf, 19 Albion Street
Manchester M1 5LN
Telephone (0161) 234 6509
Fax (0161) 236 7959

SK TP



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NOTES

Revision	Details	By	Date	Suffix
		Check		

Drawing Number

COWFOLD-02

Cotlands Paddock

Drawing Title

Required 215m Visibility Splays (National Speed Limit)

Scale at A3

1:1000

Drawn	KAT	Approved	MAK
Check	KAT	Date	11/03/26

SK Transport Planning Ltd
Albion Wharf, 19 Albion Street
Manchester M1 5LN
Telephone (0161) 234 6509
Fax (0161) 236 7959

SKIP

APPENDIX J



This drawing is the copyright of Promethean Planning Ltd but may be used for planning purposes by the Local Authority without breach of copyright.

Do not scale from this drawing unless for Local Authority planning purposes.

All dimensions must be checked on site prior to commencement of works.

Construction (Design and Management) Regulations 2015

This drawing is intended for Planning purposes only and as such does not highlight residual design related health and safety risks.

This information can be provided on request, however, it is anticipated that the full extent of residual risks will be identified during the detailed Building Regulations or construction design Status and prior to construction works commencing on site.

All responsibilities and duties of Principle Designer as stated within the above regulations now revert to the client unless Promethean Planning are appointed to undertake Building Regulations or construction drawings.



Suite 114
26 The Hornet
Chichester
West Sussex
PO19 7BB

tel: 01243 201 102
email: enquiries@prometheanplanning.co.uk
web: www.prometheanplanning.co.uk

Address
Cotlands Paddock, Horsham
Road, Cowfold, RH13 8AH

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Drawn By MD

Checked By BK

Drawn On 10.02.2026

Issued On 10.02.2026

Status Proposed

Drawing Block Plan

Submission Planning

