Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:
DC/25/1209
Land North of Stonepit Lane, Henfield, West Sussex, BN5 9QT

DESCRIPTION:
Use of land for the stationing of 3 static caravans for residential purposes along with utility building, the formation of hardstanding and associated landscaping.

RELEVANT PLANNING HISTORY:

DC/22/1874	Erection of a single storey detached workshop including the provision of 6no rooflights, new access and track.	Application Refused on 25.07.2023
DC/23/2076	Erection of a single storey detached workshop / woodland management / forestry building. Installation of 6No. rooflights, new access and track.	Withdrawn Application on 15.01.2025

DESCRIPTION OF THE SITE

The application site is approximately 350 metres to the west of the Built-Up-Area boundary of Henfield on the northern side of Stonepit Lane.

The site consists of sloping grazing land, highest to the south adjacent to Stonepit lane and lower towards the PROW at the bottom of the field to the north. There is an informal field access within the hedgeline that has overgrown.

This part of Stonepit Lane is a narrow single track road which is lined with a mixture of mature trees and hedging. The surrounding area is predominantly characterised by a very sporadic mix of residential properties and large expanses of agricultural and equestrian land, bound by hedgelines. Further to the east of the site lies Stonepit nurseries, which opens to the public seasonally and provides a range of plants. To the south and north the area appears to comprise agricultural land, with the field immediately to the east being used for grazing sheep. Public Right of Way 2528 runs along Stonepit Lane to the south of the site and 2524 runs north to south across the field opposite the site.

Approximately 160- 200 metres to the east of the site, on the southern side of Stonepit Lane, is a permitted Gypsy and Traveller site, allowed at appeal under DC/24/0367 for 3 static caravans and associated buildings and hardstanding.

DESCRIPTION OF THE APPLICATION

The application seeks full planning permission for the ‘Use of land for the stationing of 3 static caravans for residential purposes along with utility building, the formation of hardstanding and associated landscaping’.

The application includes the formalisation of the existing access way to Stonepit lane and the removal of some hedgerow to accommodate this. Each static would have parking for at least two vehicles and a private amenity space and cycle and bin store.

The day room would be situated closest to the boundary with Stonepit Lane and be 17.85 metres long, and divided into three separate attached dayrooms with utility room and shower.

The proposal includes additional planting to create a new boundary and effectively reduce the size of the field by dividing it into two.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 21 - Strategic Policy: Gypsy and Traveller Sites Allocations
Policy 22 - Gypsy and Traveller Sites
Policy 23 - Strategic Policy: Gypsy and Traveller Accommodation
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Henfield Neighbourhood Plan (2021):

Policy 1: A Spatial Plan
Policy 5: Utility Infrastructure
Policy 10: Green Infrastructure and Biodiversity
Policy 12: Design Standards for New Development

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

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 3: Settlement Expansion
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 11: Environmental Protection
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 15: Settlement Coalescence
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

Policy 43: Gypsies and travellers

Supplementary Planning Guidance:
Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes:
Shaping Development in Horsham
Biodiversity and Green Infrastructure

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

Consultations:
INTERNAL CONSULTATIONS
HDC Arboricultural officer: Advice

15.04.2026: Advice
The Arboricultural Report prepared by D. Wynn provides a fair assessment of the trees at the site in respect of their condition, form, and the potential impact of the development proposals. If the tree protection measures set out within the supporting Tree Protection Plan are installed and adhered to, this should ensure that any tree-related impacts arising from the proposals are appropriately limited.

06.03.2026: Advice
The previously submitted Block Plan (Drawing No. 2503 TH_R1_001s) has been edited to include some basic tree protection measures and has been renamed Appendix 3: Tree Protection Plan, however, the drawing is still named as a Block plan in the key; the edited plan has not been prepared in accordance with BS 5837:2012.

A Tree Protection Plan (TPP) is normally produced as a scaled drawing with a clear legend and supported by related arboricultural documents such as, an Arboricultural Method Statement, as previously requested.

Furthermore, a TPP typically identifies the location and species of retained trees, their crown spreads, and Root Protection Areas (RPAs), along with the position of protective fencing to create construction exclusion zones. The plan may also indicate ground protection, special construction methods where works occur near RPAs, to ensure that damage to roots, stems, and canopies is avoided during the works.

The submitted TPP (Block Plan) (Drawing No. 2503TH_R1_001) does not contain sufficient detail to enable an informed assessment of the development proposal at the site, nor does it adequately demonstrate how the retained trees along the northern boundary, which are collectively of good amenity value, or the mature tree/hedge belt on the site boundary would be safeguarded during the proposed development works, or post development.

19.09.2025: Advice/ More Information

The site is bordered to the south by a line of mature countryside trees, and to the east by a line of off-site trees. Both groups of trees are readily visible when viewed from the south on Stone Pit Lane and are considered to make a positive contribution to the rural countryside setting. Collectively, both groups of trees are of high landscape and amenity value. No detailed supporting tree information has been provided with the application.

The supporting block plan shows the trees along the southern boundary and their Root Protection Areas (RPAs) within the site. However, some trees along the eastern boundary are missing from the plan — in particular, the mature hazel stool located adjacent to the proposed site entrance. The access, as proposed, would significantly impact the key rooting area of this tree.

No detailed supporting tree information has been provided with the application to appropriately assess the impact on the trees within the site or those located in the field to the east, which are a material consideration in the planning process due to their proximity to the site boundary. Nor have any tree protection measures been proposed to ensure that trees within influencing distance of the proposed development area on the southern boundary would be appropriately safeguarded should the application be approved.

To allow the Council to make an informed decision on the tree-related impacts of this proposal, please request that a tree survey undertaken in accordance with BS5837 standards, supported by an Arboricultural Method Statement and Tree Protection Plan.

Please note that it would not be appropriate to secure this information by way of a pre-commencement condition, because once the scheme has been deemed acceptable in planning terms, it would be very challenging to request amendments or alternative construction techniques if these matters were to be dealt with later by condition.

HDC Strategic Planning: Advice/ No Objection
[Summary]
The proposal is for Gypsy & Traveller (G&T) provision on a site not identified in the development plan. It is therefore not supported by HDPF Policy 21. An assessment against the criteria in HDPF Policy 23 must take place by the case officer.

It is noted that the site is not identified as an allocation in the Council's emerging Local Plan (eLP). However, the eLP should not be afforded anything other than limited weight.

The Henfield (HNP) forms part of the development plan for the site. However, there is no policy relating to the principle of G&T provision. It is therefore my view that the NP will not be significant in the determination of whether the principle of the development should be accepted but regard should be had to any relevant policies.

The Council cannot demonstrate a sufficient supply of sites to meet identified needs for G&T provision. In such circumstances national policy (as expressed in the PPTS and NPPF) explains that relevant policies of the development plan should be considered out of date and the 'tilted balance' should be engaged – though exceptions exist in relation to defined environmental issues. Such issues include those which relate to Habitats sites. As such, the scheme will need to demonstrate that the proposed development would be water neutral. It is for the case officer to consider any information provided relating to this, but if it assessed that the exceptions to engaging the 'tilted balance' do not exist, the case officer should therefore recommend approval unless the adverse impacts of doing so would significantly outweigh the benefits.

Based on the information considered and presented in these comments, I do not object to the principle of the proposed development.

HDC Drainage Engineer: Objection
[Summary]
No Drainage information has been provided so far within this application. HDC Drainage need More Information to determine that the site drainage meets the requirements of the NPPF and PPG, National standards for sustainable drainage systems (June 2025), and the Horsham District Planning Framework (2015) – Policy 35 and Policy 38. HDC Drainage DO NOT recommend drainage is conditioned. The applicant must demonstrate that the proposed development manages it's foul and surface water appropriately, for HDC Drainage to determine that the propped development does not present a flood risk or a significant risk of contamination to watercourses and groundwater.

HDC Environmental Health: Comment
02.09.2025: Comments on rainwater harvesting (no longer required)

28.08.2025: More Information Required/ Conditions Recommended
[Summary]
There is insufficient information in this application with regard to disposal of sewage from the site for the application to be properly assessed or determined. We would normally recommend permission is not given until details are provided to prove the feasibility of the occupation requested, however this application is very similar to one which has been permitted on appeal (DC/24/0367) for the same site and number of caravans with a pre-commencement condition for drainage. In these circumstances a pre-commencement condition seems acceptable, unless there is a material change which we have not noted. If this is the case, please respond so that we can consider this new information

HDC Landscape Architect: Objection
19.02.2026: Objection
[Summary]
We reviewed the additional information provided and while most of our requests with regards to the additional planting and type of cladding materials have been satisfied, the sections provided confirm the original concern with the sloping nature of the site and proposed changes to existing topography to create the necessary flat areas to accommodate the built form.

Further, it also demonstrates that the proposed caravans and particularly the day room positioned at the highest point within the site, will be noticeably visible from the surrounding public footpaths, also reinforced by the now available winter views.

Although the proposed sections are crude, do not give detailed existing and proposed site levels and are not accompanied by a levels plan or cut and fill plan, they indicate the likelihood to include retaining walls within the scheme to form the building platforms. While the visibility of built form is not in itself an impediment to development, particularly noting the proposed measures to soften the views such as the reduction in size of the caravans and the proposed timber cladding material, the changes to topography are significant and will negatively change the intrinsic characteristics of the receiving landscape and its visual qualities.

The long-distance views experienced from Stonepit Lane towards the wider countryside and views of the valley slope from the PRoWs 3517, 2525 and 2530 significantly diminished in its quality by the level of engineering works required to facilitate the development.

Further, concern remains with the proposed access and its suitability in regards to egress without the need to create a bellmouth and additional vegetation removal for necessary visibility splays. The absence of a gate or gates is also noted. This is a feature usually included with this type of application. While encroachment is minimal, there is no apparent justification as to why the access road could not be located outside the existing RPA's and in accordance with BS 5837 and to provide a better relationship with the existing landscape features. Further, subject to necessary earthworks, the encroachment could be more severe.

In conclusion, without fully reconsidering the sitting of the caravans or demonstrating these can be accommodated in a more considerate manner into the receiving slope, the proposal will have an adverse effect on the landscape character of the area, particularly when associated with increased levels of activity in the countryside location which will also erode the tranquillity Stonepit lane and users of surrounding public rights of way, and to a lesser degree, it will give rise to adverse effects on the visual amenity of the area.

20.10.2023: Holding Objection/ More Information
[Summary]

The site lies within a predominantly rural setting, albeit some sporadic development along Stonepit Lane. While the scale of the development would not over-dominate the wider pattern of development along the

lane and the immediate vicinity, the site's positioning within a sloping valley and proximity to public rights of way requires careful consideration. Views are generally limited due to the interviewing vegetation; however, a number of details remain unclear, specifically proposed changes to topography, in plot boundary treatment, access gate, and the cladding materials for the caravans. These elements have the potential to result in significant adverse effects on landscape character, particularly when associated with increased levels of activity in this countryside location.

In the absence of appropriate detail and mitigation, such elements risk undermining the rural character of the area and the proposed development could appear incongruous and intrusive, particularly when set against the established pleasant and rural qualities of the immediate locality.

In the absence of a landscape and visual appraisal (LVA) to demonstrate otherwise, it is our professional judgement that the proposal will have an eroding effect on the landscape character of the area and to a lesser degree, it is likely to give rise to adverse effects on the visual amenity of the area. The sloping nature of the site is likely to require significant level changes to flatten the area for the sitting of the static caravans. A plan indicating the level changes proposed must be submitted to fully understand the effects of the proposals on this key character characteristic. No Arboricultural Survey and Report has been provided. We would advise that a tree survey, Arboricultural Impact Assessment (AIA) and Tree Protection Plan (TPP) are submitted to give us a greater understanding of the impact on existing trees and hedgerows on Stonepit Lane and to ensure root protection areas are not adversely impacted by the proposed building and access lane layout. The loss of any of the boundary vegetation would have a significant effect on the landscape character of the area and visual amenity of users of the footpath. Although blue dashed lines are shown within the block plan which presumably indicate RPA's, no details are provided.

The proposal includes tree and hedgerow planting to define the site's boundaries. These measures could be a positive strategy to mitigate the visual effects of the proposals. Notwithstanding, further details as to the planting details such as species, sizes, numbers, etc should be provided. Boundary treatments details between plots are also required, noting that native hedgerow with post and rail is considered the most appropriate treatment for the rural context. While details of both post and rail fence and close board fence have been provided within the drawing titled 'refuse, boundary and surfacing', their proposed locations aren't clear.

OUTSIDE AGENCIES

Ecology Consultant: No Objection
[Summary]
We are satisfied that there is sufficient ecological information available to support determination of this application. However, please note we have no comments on Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership. This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

WSCC Highways: Advice
[Summary]
The site is located Stonepit Lane, a privately maintained road – as such, these comments should be considered as advice only.

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.

WSCC Fire and Rescue: Comment

The nearest fire hydrant for the supply of water for firefighting is 675-metres away, 500-metres further than the 175-metre distance required for a domestic premises. If an alternative water supply for firefighting is to be considered it will need to conform with the details identified in Approved Document-B (AD-B) Volume 1: B5 section 14 and agreed with West Sussex Fire & Rescue Service. Evidence is also required to show suitable access and turning facility is provided for a fire appliance in accordance with AD-B Volume 1 B5 section 13.

PUBLIC CONSULTATIONS:
Representations:
55 letters of Objection have been received from 40 addresses, objecting to the application on the following grounds (summarised):

- Conflict with HDPF policies
- Outside Built Up Area Boundary
- Not an allocated site
- Out of keeping with the character of the area
- No access to services like gas water sewage system
- Cumulative amount of G&T sites in Henfield
- Poor highways/ road access for cars and pedestrians
- Increase in traffic
- Loss of agricultural land
- Impact on rural views and vistas across the hillside
- Landscape Impact at this very open site
- Unsuitable access
- Sloping site – substantial groundworks needed
- Overdevelopment
- Impact on wildlife
- Canopy and tree damage

The Campaign to protect Rural Henfield (CPRH) have also objected:

1. Conflict with the Henfield Neighbourhood Plan and NPPF
2. Impacts on the Countryside
3. Impacts on Tourism and the Visitor Economy
4. Cumulative Impact and Traveller Sites Policy

Parish Comments:
Henfield Parish Council: Objection
Contrary to HDPF policies 1,2,3,4,19, 21, 23, 25 31, 33, 34, 39, 40

HUMAN RIGHTS AND EQUALITY:
The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

PLANNING ASSESSMENT

Policy 23 of the Horsham District Planning Framework (HDPF) (2015) mandates the provision of 39 additional permanent residential pitches for Gypsies and Travellers between 2011 and 2017, with a commitment to meet further needs beyond this period as identified in the Council's Accommodation Needs Assessment. To address current and future unmet needs, specific sites were allocated for development. The identified sites, in addition to granted windfall proposals, therefore met the needs of the District at the time.

The latest evidence to support the emerging local plan (eLP) is by Opinion Research Services for Horsham Council and was published in December 2023. This update indicates a need between 2023-2040 (the plan period) for 128 pitches. This follows the result of the Lisa Smith Judgement where the Planning Policy for Traveller Sites (PPTS) was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller by reintroducing those who have ceased to travel permanently due to education, ill heath, or old age into the definition (now referred to as the 2023 PPTS). This includes those who: a) meet the (PPTS) definition of 'gypsy and traveller' (79) and b) do not meet the definition (as per a) (20), and; c) are 'undetermined' (29). The Revised Gypsy and Traveller Accommodation Assessment (September 2024, ORS) document details a need to accommodate of 79 (50 in the first five years, and the remaining to 2040).

The above needs will be delivered by Policy 43 (Gypsy, Traveller, and Travelling Showpeople Accommodation) of the submitted Regulation 19 Horsham District Local Plan (HDLP / eLP) which states that the Council will meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople in Horsham District through the regularisation or intensification of existing sites, and through the allocation of new sites.

The Horsham District Local Plan Regulation 19 document was approved at the meeting of full Council on 11 December 2023. Consultation on the draft document is took place between 19 January to 1 March 2024, and was formally submitted to the Planning Inspectorate on Friday 26 July 2024. Public hearings on the contents of the draft plan will re-commence on 21st April 2026 and then in September 2026, with adoption anticipated at end 2026 / early 2027. As the eLP is at examination stage it carries limited weight. It does however provide guidance with respect future policy direction, demonstrating that the identified need (as above) will be met through the democratic allocation process.

In terms of the Council's current policy position: Policy 23 is now out of date, thus the Council is unable to demonstrate a five year supply of pitches. Paragraph 28 of the Planning Policy for Traveller Site (PPTS) (2024) states that if a local planning authority cannot demonstrate an up–to-date five-year supply of deliverable sites, then the NNPF paragraph 11d provisions apply (the 'tilted balance').

Policy C of the PPTS relates to sites in rural areas and the countryside, with paragraph 14 stating that "*when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community*". Paragraph 26 of the PPTS continues that local planning authorities "*should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure*".

As the eLP presently holds limited weight in the determination of applications, policies contained within the current HDPF remain relevant for consideration. As above, as the Council cannot currently demonstrate a five-year housing land supply for traveller sites, restrictive housing policies are afforded reduced weight in the overall planning balance (further detailed below). However, Policy 23 (Gypsy and Traveller Accommodation) seeks to resolve specific issues regarding sites (rather than the principle of a development), and states that the following criteria (a-e in subsequent sections of this report) will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople and any planning applications for non-allocated sites. In terms of the site's location, the Policy states that it must be demonstrated that:

d. The site is located in or near to existing settlements, or is part of an allocated strategic location, within reasonable distance of a range of local services and community facilities, in particular schools and essential health services;

A number of recent appeal decisions for gypsy and traveller sites have considered the location of these sites. The Inspector recognised under APP/Z3825/W/21/3284138 (DC/20/1488) Valewood Farmhouse, Mobile Home, Valewood Lane, Barns Green, that the lane connecting the site to the village has no pavements or lighting. However, it was noted that the site was not a significant distance to Barns Green and the lane has good forward visibility, where there is a reasonable prospect of trips to and from the village being made by means other than by motorised transport. The Inspector thereby concluded that the location of the site was acceptable.

In considering the appeal under reference APP/Z3825/W/20/3265226 Hillybarn Farmhouse (DC/20/1993), The Mount, Ifield, the Inspector recognised that residents of site were unlikely to walk to facilities given the separation distances. Also, only a limited bus service travels along Ifield Wood to Horsham and so it was unlikely to provide a realistic travel option for most trips. The development was considered to be within a reasonable cycling distance of Crawley, although it was recognised that this would be an unattractive choice of transport for many journeys, particularly during inclement weather. As such, it was noted likely that occupants of the development would be highly reliant on the private car. However, the Inspector considered that occupants of Gypsy and Traveller sites would have less opportunity to travel by foot, cycle or public transport as they are allowed outside settlements under HDPF policy 23 and the PPTS. In light of the policy context, the short car journeys to Crawley were considered to add in favour of the development. It was thereby concluded that the site would be a suitable location for the development.

Under APP/Z3825/W/22/3290615 at Redgates, Burnthouse Lane, Lower Beeding (DC/21/1233), the Inspector noted that the nearby narrow and twisting lanes lack facilities for pedestrians, with no footways or street lighting, although due to their nature, traffic speeds are unlikely to be high. It was noted that there are public rights of way that provide shorter routes to nearby villages, but these are unlikely to be readily useable on a daily basis or throughout the year as they are unlit and may not be easily accessible. The Inspector noted that it was likely that most journeys would be made by the private car, with these likely to be relatively short. While the site is not in or near to an existing settlement or part of a strategic allocation, it was recognised to be within a reasonable distance of a range of local services and community facilities in nearby villages by car. It was acknowledged that the PPTS and relevant development plan policies do not specifically refer to avoiding reliance on the
private car. The Inspector was therefore of the view that the site was a suitable location for the development due to its accessibility to local facilities and services.

In the case of the Pear Tree Farm appeal APP/Z3825/W/22/3311819 (DC/21/1796), the Inspector found the proposal for a settled gypsy accommodation site with five pitches to align with policies supporting accommodations for gypsies and travellers. Although the site is outside the designated area for new developments, the Inspector concluded that it met sustainability criteria for access to local services and facilities, with no major traffic or safety concerns. In addition, the Inspector concluded that the development's visual impact on the surrounding countryside would be minimal. Due to existing tree cover and hedgerows, the site would remain largely screened from public view, and the increased activity was not seen as harmful to the rural character.

As above, the Council are not currently able to demonstrate a five-year housing land supply to accommodate an identified need of Gypsy and Travelling Showpeople sites within the District. It is recognised that there is a lack of deliverable sites for gypsies and travellers, and there remains an identified need for such accommodation within the District. These matters are of significant weight in the consideration of the application, and weigh in favour of granting planning permission. On the basis of these matters, the proposed development is considered acceptable in principle, subject to all other considerations as discussed below.

Landscape Character and Appearance:

Policy 23(e) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:

e. The development will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.

In addition, Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape and townscape character from inappropriate development. Proposals should take into account townscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.

Paragraph 27 of the PPTS states that Local Authorities should attach weight to:

a) effective use of previously developed (brownfield), untidy or derelict land;
b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;
c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children; and
d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community

The site is located to the west of the settlement of Henfield, set outside the built up area boundary in a countryside location. It forms part of a well-defined larger field parcel that positively contributes to the rural settlement setting. The site itself is bounded by mature hedgerow and trees along its eastern boundary and southern boundary. The northern boundary is defined by a stock proof fence and the western boundary is currently undefined.

The site's wider landscape context can be described as a mixture of pastoral and agricultural fields interspersed by woodland belts generally associated with River Adur tributaries. As such and despite its proximity to residential development further east, the site and its context retains a strong rural character.

The slopping nature of the site is reflective of key landscape characteristics of the area with the topography rising towards Stonepit Lane from the River Adur tributary to the north of the site.

The site falls within Landscape Character Type D2 Henfield & Small Dole Farmlands, of the Horsham District Landscape Character Assessment. The site and the surrounding landscape is deemed representative of the local landscape character, exhibiting many of the key characteristics of D2, including: *undulating landscape of low ridges, and narrow valleys with small streams, long views to and from the ridges, small to large size regular and irregular fields with a variable hedgerow pattern, isolated farmsteads and looseknit groups of cottages strung out along roads and lanes.*

Views of the site as proposed will be experienced from PRoW 2454 which sits adjacent to the southern boundary, along Stonepit Lane, including open views from the proposed access. Glimpse views will also be experienced from PRoW 3517 to the west of the site, PRoW 2525 to the north and PRoW 2530 to the east, particularly in winter when the vegetation is sparse. A site visit confirmed that the site is actually highly visible from the north in winter/ spring from PRoW 2525. PRoW 2528 also runs directly opposite the site in a north-south direction. Glimpsed views of the proposed development will be experienced by users of this footpath on arrival Stonepit Lane.

The Council's Landscape Officer has raised objection to the proposal and requested additional information. Additional information relating to levels and materials was subsequently provided but the objection still remains. In the absence of a landscape and visual appraisal (LVA) to demonstrate otherwise it is considered that the proposal will have an eroding effect on the landscape character of the area and to a lesser degree, it is likely to give rise to adverse effects on the visual amenity of the area.

It is considered that the sloping nature of the site is likely to require significant level changes to flatten the area for the sitting of the static caravans. Section plans showing the levels on the site and the positioning of the units on the slope were requested and a plan was provided showing that the slope would be cut away at 2 levels. While crude sections were submitted, an existing and proposed levels plan has not been provided.

The sections provided are considered to confirm the original concern with the sloping nature of the site and proposed changes to existing topography to create the necessary flat areas to accommodate the built form. Further, it also demonstrates that the proposed caravans and particularly the day room positioned at the highest point within the site, will be noticeably visible from the surrounding public footpaths, also reinforced by the now available winter/ spring views. Although the proposed sections are crude, do not give detailed existing and proposed site levels, and are not accompanied by a levels plan or cut and fill plan, they indicate the likelihood to include retaining walls within the scheme to form the building platforms.

While the visibility of built form is not in itself an impediment to development, particularly noting the proposed measures to soften the views such as the reduction in size of the caravans and the proposed timber cladding material, the changes to topography are significant and will negatively change the intrinsic characteristics of the receiving landscape and its visual qualities.

The long-distance views experienced from Stonepit Lane towards the wider countryside and views of the valley slope from the PRoWs 3517, 2525 and 2530 would be significantly diminished in their quality by the level of engineering works required to facilitate the development.

Further, concern remains with the proposed access and its suitability in regards to egress without the need to create a bellmouth and additional vegetation removal for necessary visibility splays. The absence of a gate or gates is also noted. This is a feature usually included with this type of application.

The applicant considers that the granting of a gypsy and traveller site nearby on Stonepit Road has great weight in the consideration of this proposal. This application was refused by the Council on landscape impact grounds (character and appearance of the area) and impact on trees. This decision was overturned at appeal with the inspector concluding that the landscape character of the area would be unchanged by the proposal. However, it is not the case that these findings on a site some 200m to the east must mean that landscape impact in this current case must also be acceptable. The development of these two sites, although geographically close, would have a very different impact on the wider landscape. It is useful to draw upon the Inspector's remarks to clarify how different the sites are.

The Inspector states in their decision at paragraph 11 that:

> *'the proposal would not result in any radical or discernible changes to the landscape of the area. For example, there is limited indications that the ground levels or landscaping features would be drastically changed. Put another way, if the proposed development were removed in the near future the site would likely be able to return to its existing form without the need for any significant changes to the landform, for example'.*

This is clearly not the case for the current application site. The proposal would require significant excavations to create level platforms for the pitches to sit upon. It would also require significant boundary planting to attempt to screen the site, which may result in a more visibly screened site than exists now, but would interrupt the views across the site to and from the PROWs to the south and north.

The Inspector states in their decision at paragraph 12:

> *The combination of the apparent changes in ground levels, and the likely height of static caravans, and the height of the day rooms shown, suggest most if not all of the urbanising features would be screened; especially from views from the south towards the site from West End Lane. Landscaping is proposed, which would further ameliorate the visual effects of the proposal when seen from further afield.*

In contrast, at this current application site, the existing open nature of the landscape and sloping valley results in wide views from and to the PROWs meaning the urbanising features would be highly visible and out of character. The site lies within a predominantly rural setting, albeit some sporadic development is present along Stonepit Lane. While the scale of the development would not over-dominate the wider pattern of development along the lane and the immediate vicinity, the site's positioning within a sloping valley and proximity to public rights of have the potential to result in significant adverse effects on

landscape character, particularly when associated with increased levels of activity in this countryside location.

In the absence of appropriate detail and mitigation (acknowledging that some boundary hedging and tree planting is proposed) such elements risk undermining the rural character of the area and the proposed development could appear incongruous and intrusive, particularly when set against the established pleasant and rural qualities of the immediate locality.

In conclusion, without fully reconsidering the sitting of the caravans or demonstrating these can be accommodated in a more considerate manner into the receiving slope, the proposal will have an adverse effect on the landscape character of the area, particularly when associated with increased levels of activity in the countryside location which will also erode the tranquillity Stonepit Lane and users of surrounding public rights of way, and to a lesser degree, it will give rise to adverse effects on the visual amenity of the area. The proposal is therefore considered to be contrary to policies 23, 25, 26 and 33 of the Horsham District Planning Framework (2015), and Paragraph 27 of the Planning Policy for Traveller Sites.

Trees

The loss of any of the boundary vegetation would have a significant effect on the landscape character of the area and visual amenity of users of the footpath.

No Arboricultural Survey and Report was originally provided. Concern was raised with the lack of information and an Arboricultural Report prepared by D. Wynn was subsequently submitted. The Council's Tree officer has confirmed that the Report provides a fair assessment of the trees at the site in respect of their condition, form, and the potential impact of the development proposals. If the tree protection measures set out within the supporting Tree Protection Plan are installed and adhered to, this should ensure that any tree-related impacts arising from the proposals are appropriately limited. Officers have no reason to disagree with this conclusion.

Residential Amenity:

Policy 33(2) continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land. Policy 23(e) is also of material consideration when assessing amenity impact for non-allocated gypsy / traveller sites.

It is acknowledged that objections have been received in relation to increased noise and disturbance from the proposed use. However, the application site is located at a distance from nearby residential properties; the nearest residential dwellings are situated around 100 metres to the southwest and around 100 metres to the south and east. Given the distance between the site and the nearest residential properties, and in considering the residential nature of the proposed development, it is not anticipated that the proposal would result in harm through overlooking, loss of privacy, or unacceptable noise and activity.

Highways Impacts:

Policy 23(b) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:

b. The site is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users;

In addition, Policy 40 of the HDPF seeks to direct development to areas which are integrated with sustainable transport networks, encourage sustainable transport choices and ensure that new development is safe for all modes of transport, including vehicles, cyclists and pedestrians. In addition, proposals should minimise conflict between traffic, cyclists and pedestrians.

The proposal seeks to utilise an existing farm entrance to the site, which is accessed from Stonepit Lane. Areas of hardstanding would be laid to each pitch, with a formalised access road and parking for 2no.

vehicles. No turning head is provided but there appears to be sufficient space for on-site turning to be achievable, allowing vehicles to exit the site onto the publicly maintained highway in a forward gear.

Although the landscape context is considered very different to the nearby site to the east approved on appeal under DC/24/0367 (referred to in the landscape section above), the highways access is similar. The site is around 200 metres further along the lane, which does narrow, but remains similar. The appeal decision stated that '*There is pedestrian access to a recently built housing development to the east off Stonepit Lane, with the settlement of Henfield and the daily amenities there a short walk, cycle or drive from the appeal site*'.

Following consultation with WSCC Highways, access to the maintained highway network is at the junction with West End Lane. From inspection of WSCC mapping, there are no apparent visibility concerns with the existing point of access on to West End Lane. In addition, the LHA does not anticipate that the proposed development would give rise to a significant material intensification of vehicular movements to or from the site.

An inspection of collision data provided to WSCC by Sussex Police from a period of the last five years reveals no recorded collisions within the vicinity of the junction with West End Lane. Therefore, there is no evidence to suggest this junction is operating unsafely or that the proposal would exacerbate an existing safety concern.

For these reasons, it is considered that safe and adequate access would be provided for users of the site, and the proposed development is not considered to have a severe cumulative impact on the function and safety of the highway network. The proposal is therefore considered to accord with the above policies.

Ecology:

Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate.

The application is supported by a Preliminary Ecological Appraisal (JWK Wildlife Surveys, May 2025) (PEA) relating to the likely impacts of development on designated sites, protected and Priority species & habitats, and identification of appropriate mitigation measures. The appraisal notes that there are no existing buildings on site and no trees for Potential Roost features for bats to be effected. This is agreed.

The non-licensed Precautionary Method Statement for Hazel Dormouse of the PEA is supported, as well as the Precautionary Method Statement for reptiles and mobile protected species which should be secured by a condition of any consent and implemented in full.

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

This provides certainty for the Council of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

Water Neutrality:

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Biodiversity Net Gain (BNG)

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG (unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains (on unregistered sites) and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

The Applicant has submitted a Biodiversity Metric which demonstrates a 23.24% net gain in habitat units and 19.53% net gain in hedgerow units. This is achievable by way of significant onsite biodiversity gains. A legal agreement would be required to secure the maintenance and monitoring of the significant onsite biodiversity gains for the required 30 years, were the application being recommended for approval.

Other Matters

Policy 23(c) of the HDPF states that development for non-allocated gypsy / traveller sites must demonstrate that:

c. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas;

No drainage details have been provided. The application form states that surface water will be disposed of via soakaway and that foul sewage will be disposed of by package treatment plant. The location of this

does not appear to be shown on a plan. The site permitted under DC/24/0367 (amended by DC/25/0583) has not currently been able to discharge its drainage strategy due to concerns with the strategy including septic tanks within root protection areas. Issues like this are exactly why it is important to have and assess this information up front rather than by condition, and it remains the Council's opinion that this is the correct approach on greenfield sites in the countryside.

The Council's Drainage officer has requested that more information be provided before an application be permitted and has stated that they do not recommend that drainage details be conditioned. Their comments list the details that should be provided up front, including an assessment of the flood risk, surface water flow rates, assessments of permeable/ non permeable surfaces, fully designed surface water management strategy, details on mains water connections. The applicant must demonstrate that the proposed development manages its foul and surface water appropriately, for the Council to be able to determine that the proposed development does not present a flood risk or a significant risk of contamination to watercourses and groundwater.

It is therefore considered that insufficient information has been provided to assess the acceptability and suitability of the sewerage, drainage and waste disposal at the site, contrary to HDPF policies 23 (c) and 38, and Paragraph 182 of the National Planning Policy Framework (2024).

Conclusion and planning balance

The Council cannot currently demonstrate a five-year supply for gypsy sites, and at present there remains an identified undersupply of available sites within the District. Paragraph 11(d) of the NPPF states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. It is therefore recognised that the proposal would go a small way to addressing the identified need, but two pitches are considered limited in their contribution. This is a material consideration of *significant weight* in the overall planning balance.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

The existing open nature of the landscape and sloping valley, results in wide views from and to the nearby PROWs and the urbanising features would be highly visible and out of character. The site lies within a predominantly rural setting, and while the scale of the development would not over-dominate the wider pattern of development along the lane and the immediate vicinity, the site's positioning within a sloping valley and proximity to public rights of have the potential to result in significant adverse effects on landscape character, particularly when associated with increased levels of activity in this countryside location. In the absence of appropriate detail and mitigation, such elements risk undermining the rural character of the area and the proposed development and will appear incongruous and intrusive, particularly when set against the established pleasant and rural qualities of the immediate locality.

In conclusion, without fully reconsidering the siting of the caravans or demonstrating these can be accommodated in a more considerate manner into the receiving slope, the proposal will have an adverse effect on the landscape character of the area, particularly when associated with increased levels of activity in the countryside location which will also erode the tranquillity Stonepit Lane and users of surrounding public rights of way, and to a lesser degree, it will give rise to adverse effects on the visual amenity of the area.

Whether or not the harm identified would significantly or demonstrably outweigh the benefits of meeting the unmet need is a matter of consideration in the planning balance. The benefits of the proposal include a number of pitches (three), which would have a welcomed but *small benefit* in terms of the extent to which it would alleviate the shortage.

With the above in mind, it is considered that the provision of three additional gypsy pitches on this site is not justified when balanced against the lasting harm that the development would cause by virtue of the unacceptable harm to the landscape character and appearance of the area, contrary to Policies 23, 25, 26 and 33 of the Horsham District Planning Framework (2015) and Paragraph 27 of the Planning Policy for Traveller Sites. It is considered that given the nature of harm identified, that a temporary or personal permission would not overcome or alter the above planning balance (no personal circumstances have been put forward). It is therefore recommended that planning permission be refused.

Recommendation: Application Refused

Reason(s) for Refusal:

1. The development, through the introduction of three residential pitches and associated structures, parking / turning areas/ internal access road, and related domestic activity, would result in an unacceptable adverse visual and landscape impact that conflicts with the undeveloped and open character of the surrounding countryside landscape. This is further exacerbated by the need to cut into the sloped ground to enable the placement of the units, which would fail to conserve or enhance the natural environment. The development therefore results in unacceptable harm to the landscape character and appearance of the area, contrary to Policies 23, 25, 26 and 33 of the Horsham District Planning Framework (2015) and Paragraph 27 of the Planning Policy for Traveller Sites.

2. Insufficient information has been provided to demonstrate that the proposals would provide for satisfactory essential utility services to the site (foul and surface water drainage) which would afford environmental protection and avoid increasing flood-risk elsewhere, in conflict with Policies 23, 24 and 32, 33, 38, 39 of the Horsham District Planning Framework (2015) and Paragraph 182 of the National Planning Policy Framework (2024).

POSITIVE AND PROACTIVE STATEMENT
Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/25/1209
(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Block plan		2503TH_001	22.01.2026
Elevation & Floor plan		2503TH_100	22.01.2026
Elevation & Floor plan		2503TH_101	22.01.2026
Location plan		2503TH_000 REV 000	22.01.2026
Supporting Statement	Preliminary Ecological Appraisal	NONE	23.07.2025
Supporting Docs		NONE	23.07.2025
Layout plan	Baseline Habitats	NONE	23.07.2025

Supporting Statement	Water neutrality report and water management plan	NONE	23.07.2025
Supporting Statement	Planning services	NONE	23.07.2025
Layout plan	Post-Intervention Habitats	NONE	23.07.2025
Supporting Statement	BNG metric	NONE	23.07.2025
Section plan		300	22.01.2026
Elevation & Floor plan		2503TH_102	22.01.2026
Details plan	Tree Protection Fencing Plan		22.01.2026
Supporting Statement	Arboricultural Report	TS/25/42	22.01.2026

DELEGATED

Case Officer sign/initial Kate Turner Date: 15.04.2026

Authorising Officer sign/initial Adrian Smith Date: 16/04/2026