Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/25/0794
Oldfield Stables , Fryern Road, Storrington, West Sussex, RH20 4BJ

DESCRIPTION:

Use of land for the stationing of a further 4 static caravans for residential purposes. New access on to highway. Associated landscape works. (part retrospective)

RELEVANT PLANNING HISTORY:

DC/12/2345	Stationing of one residential mobile home for occupation by gypsy family	Application Refused on 17.09.2013
DC/15/2815	Siting of two no. additional mobile homes for occupation by persons falling within the definition of a gypsy (family members) and erection of a day room to serve the three pitches	Application Permitted on 16.03.2016
DISC/16/0085	Discharge of conditions 8, 9, 10, 11, 15 and 16 on DC/15/2815	Application Permitted on 17.05.2016
DC/19/1558	Change of use of land to use as extension of existing gypsy caravan site accommodating 3 pitches for the stationing of 3 caravans/mobile homes for residential occupation, including laying of hard standing	Application Permitted on 22.11.2019

DESCRIPTION OF THE SITE

The application site is located to the west of Fryern Road, outside of any designated built-up area. The site is therefore located within the countryside in policy terms. The site falls within the “Green Gap” as designated under Policy 9 of the Storrington, Sullington and Washington Neighbourhood Plan.

The application site comprises a total of 6no. pitches, each comprising a static caravan and parking area. A day room is positioned to the eastern boundary of the site, with hardstanding laid to the site.

The surroundings are characterised by sporadic agricultural and equestrian development, with some examples of residential development within the vicinity.

DESCRIPTION OF THE APPLICATION

The application seeks full planning permission for the change of use of land for the stationing of 4no. caravans, along with the creation of a new access, and the addition of landscaping. The 4no. caravans subject of the current application, alongside the new access to the highway, have been constructed, where the development is therefore considered to be part-retrospective.

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 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities

Storrington, Sullington and Washington Neighbourhood Plan (2018-2031):
Policy 1 – A Spatial Plan for the Parishes
Policy 8 – Countryside Protection
Policy 9 – Green Gap
Policy 14 – Design
Policy 15 – Green Infrastructure and Biodiversity
Policy 17 – Traffic and Transport
Policy 18 – Car Parking

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 1 years. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

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 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
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 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Policy 40: Improving Housing Standards in the District
Strategic Policy 43: Gypsies and Travellers

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

Parish Design Statement:

Planning Advice Notes:
Facilitating Appropriate Development
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 Strategic Planning: No Objection

The site is not identified in the Development Plan and is therefore not supported by Policy 21 of the HDPF. An assessment against the criteria in Policy 23 of the HDPF must take place.

It is noted that the site is not identified as an allocation in the Council's emerging Local Plan. However, the emerging Local Plan should be afforded only limited weight.

The Storrington, Sullington and Washington Neighbourhood Plan (SSWNP) forms part of the Development Plan for the site. However, there is no policy relating to the principle of Gypsy and Traveller provision.

The Council cannot demonstrate a sufficient supply of sites to meet identified needs for Gypsy and Traveller 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 that which relate to Habitats sites. As such, the scheme will need to demonstrate that the proposed development would be water neutral.

HDPF Policy 22 seeks to:

- Protect existing sites (clause 1)
- Commit the Council to preparing a Site Allocations DPD for needs beyond 2017 (clause 2)
- Commit the Council to working with neighbours to make provision for G&T needs (clause 3).

Clauses 1 and 3 are not relevant to the application. Clause 2 is also not directly relevant to the application as it sets out the scope of sites for a Site Allocations DPD. It is noted that sub-clause 2b does identify that "further sites may be provided (as) extensions to existing sites" and thus the application site would

have been in the scope of such work. The Council did not adopt a Site Allocations DPD to meet G&T provision and it finds itself being unable to demonstrate a five year supply of sites.

HDPF Policy 23 sets the approach for considering any applications for G&T provision on unallocated sites. The case officer should review the policy in full but in short, clause 1 of the policy seeks to ensure:

- that consideration is given to various environmental factors (sub-clause 1)
- safe and convenient access and avoid significant hazard to other road users (sub-clause b)
- that the site is supplied with all utilities and essential services, parking and amenity space (sub-clause c)
- the site is located in or near to existing settlements and within reasonable distance of local services (sub-clause d)
- development would not have an unacceptable impact on landscape and the amenity of neighbours and is designed sensitively to mitigate impacts (sub-clause e)

Must assess the proposal against the full criteria of clause 1. Clause 2 of the policy relates to travelling showpeople provision and is not of relevance to this application.

The SSWNP does not contain policies which specifically relate to G&T provision. However, the site forms part of the Green Gap designation as identified by Policy 9 of the NP. The policy looks to resist development between the settlements of Storrington and West Chiltington, in order to prevent coalescence and refers to HDPF Policy 27, which in itself seeks to prevent coalescence of settlements and identifies four criteria that applications ought to demonstrate.

National policy for G&T provision is set out in the Planning Policy for Traveller Sites Document (PPTS), most recently updated in December 2024. Of most relevance to the application is Policy H of the PPTS, which relates to the determination of planning applications.

In addition, and of particular relevance to this application, is the explanation within PPTS para 28 that "if a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in para 11(d) of the National Planning Policy Framework apply." As is discussed further in this response, the Council cannot demonstrate a year supply of deliverable sites for Gypsy and Traveller provision.

The case officer should review NPPF para 11(d) in full, including all sub paragraphs and associated footnotes. However, unless exemptions apply (see below), it is the view that the policies which are most important in the determination of this application are out of date. The consequence of this is that the 'tilted balance' is to be engaged, and that permission should be granted unless any adverse impacts of doing so would significantly outweigh the benefits, taking account of relevant national policies.

NPPF paragraph 49 sets out that "Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The Council prepared a Local Plan to replace the HDPF, which was submitted for examination in July 2024. The emerging Local Plan (eLP) sets out planning policies and proposals intended to guide development in the district up to 2040. Examination hearings started in December 2024. The remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024 and on 22 April 2025, the Council published the Inspector's subsequent Interim Findings Letter which has recommended that the Plan be withdrawn, due to his view that the Council has failed to satisfactorily comply with the legal Duty to Co-operate.

Of most relevance to this application, Strategic Policy 43 of the emerging eLP sets out the approach with respect of G&T provision and is split into 2 clauses. The policy should be read in full but is summarised below:

- Clause 1 seeks to protect existing sites and identify allocations to meet G&T needs
- Clause 2 identifies the criteria that the proposals for G&T applications should be determined against

The Council will need to decide what actions to take in response to the receipt of the Inspector's letter but notwithstanding the Inspector's letter, the emerging plan remains the Council's own agreed policy position, and the approach to G&T provision has been subject to two periods of representation/comment (Regulation 18 and Regulation 19) during the plan preparation process to date.

There is nothing in the Inspector's Report to suggest that there were any concerns over the proposed policy for G&T applications and the approach reflects national policy and recommendations contained within the Gypsy and Traveller Accommodation Assessment (GTAA). Accordingly, the Policy Team is of the view that it is reasonable to attach some, albeit limited weight, to Policy 43. As such, the case officer should assess the application against the criteria in clause 2 of the policy but it is unlikely to be determinative. It is noted that the site was not proposed as an allocation in clause 1 of the policy.

To inform the development of Strategic Policy 43 the Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA, November 2023) and a Targeted Update (September 2024) was also produced in response to changes regarding the PPTS's definition of who is a member of the G&T community for the purposes of planning policy.

Collectively, 50 pitches are identified as being needed for the first five years of the eLP (2023-2028) for those who meet the definition and also suggested a further need of 11 pitches for members of the community who it could not be determined whether they met the definition or not.

Against this need, it is my understanding that one pitch had been delivered in the district since 2023 and a further nine pitches approved. For the reasons stated previously, I give little weight to the proposed allocations within the eLP and thus I do not assess that they can reasonably form part of our five year supply. Collectively, therefore, the supply is insufficient to meet needs within a five-year period. As such, per national policy contained within the NPPF and PPTS, the 'tilted balance' is in effect (subject to addressing any water neutrality issues and any other issue referenced in footnote 7 of NPPF).

From the material presented by the applicants, aware that they believe that the need figure is an underestimate, albeit they appear to be referencing a previous GTAA undertaken by the Council. It is the view of the Council that the up to date GTAA is robust and accurately reflects needs. The Council would not be able to demonstrate that a sufficient supply exists in either scenario, so even if the applicants view was accepted, this would not affect the analysis above.

HDC Environmental Health: Comment

The report fails to include a schematic diagram of the proposed RWH system, this is required. The report makes no reference to compliance with the standards and guidance provided by The Private Water Supplies (PWS) (England) Regulations 2016 or the Drinking Water Inspectorate (DWI). There is no mention of a risk assessment in the report. We would expect the risk assessment to follow the DWI risk assessment tool, which can be downloaded from their website. Additionally, the report needs to ensure that the proposed sampling regime is in line with the PWS regulations. There is no mention of the pipework associated with the system, including the material used or their location. Nor is there any reference to the siting of the package treatment plant (septic tank) on the site, which poses a risk for cross-contamination.

Note there is existing units on site. It must be clarified whether these units will be supplied by the proposed RWH system. If so, the report shall specify how many existing units are to be served. Confirmation is required on whether each of the new units will be served by a separate rainwater harvesting (RWH) systems (the report mentions two tanks). The applicant must provide clarity on the proposed system layout and distribution, particularly in terms of infrastructure design and water allocation across all the units. While the report offers general commentary on maintenance, it lacks specific details on how issues such as water sample failures or periods of drought will be managed. The report needs a be a statement of positive intent/action so use of the word 'should' will need to be replaced with 'shall'.

The plan shows 4 caravans between some pairs of caravans, but the licence will only allow one, so the layout needs to be redesigned to provide adequate parking spaces without allowing more than one car between any two caravans.

The discussion with the Applicant on site about capacity of the sewage treatment systems is not reflected in the information provided as part of the application. This needs to be updated with capacities of the tanks provided so that it can be established that the system (there are three) will have adequate capacity for the likely numbers occupying the new and existing caravans. This could be conditioned, but as the systems are already in place and further information needs to be provided with regard to water neutrality, it would be better to ensure that the information about sewage systems is also provided first so any required alterations can be agreed before further work commences on site.

OUTSIDE AGENCIES

Natural England: Further Information Required to Determine Impacts on Designated Sites

In order to mitigate adverse effects and make the development acceptable, the following should be secured:

- Robust information demonstrating how the proposed development will not result in increased levels of abstraction within the Sussex North Water Supply Zone.

WSCC Highways: Comment

The site is located on Fryern Road, a C-classified road subject to national speed limit in this location.

The applicant proposes a second vehicle access point on Fryern Road to serve the site. Visibility splays of 2.4m x 48.9m to the north and 2.4m x 67.6m to the south have been demonstrated for the proposed access point.

The Planning Statement states that the proposed access point represents an improvement over the existing vehicle access point in terms of visibility. However, visibility has not been demonstrated for the existing access point. The LHA would request that visibility be demonstrated for both access points, to allow the LHA to compare and assess their suitability.

Notwithstanding the above comments, the LHA question the need for a second access point whilst still retaining the existing one. The proposed access works will require a licence obtained from WSCC to implement the access and undertake works within the maintained highway.

PUBLIC CONSULTATIONS:

Representations:

7 letters of Objection have been received from 6 addresses, objecting to the application on the following grounds:

- Retrospective nature of the development
- Necessity of second entrance
- No visibility splays
- Narrowness of road
- Increase in traffic movements
- Not in keeping with the style, materials, and character of the nearby properties
- Unsafe access
- Frequency of vehicle movements
- Noise pollution

1 letter of Support has been received from 1 address, and this can be summarised as follows:

- Supports flexible housing arrangements
- Sustainable response to local housing and care needs
- Subordinate to the main use and does not become a separate planning unit

Parish Comments:

Storrington Parish Council: Strong Objection

- Disregard for the planning process

Member Comments:

None received

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

Principle of Development:

Policy 21 of the Horsham District Planning Framework (HDPF) indicates that provision shall be made for 39 permanent pitches to 2017, with further provision made from 2017 to 2031 through a Site Allocations Development Plan Document (DPD). It is acknowledged that a number of other sites allocated through Policy 21 of the HDPF have yet to come forward, and the Council is therefore currently unable to demonstrate an up-to-date 5 year supply of deliverable sites.

The Council began preparation of a revised Gypsy, Traveller and Travelling Showpeople Draft Site Allocations Development Plan Document– Preferred Strategy in 2017. This set a pitch requirement for 60 gypsy pitches over a ten year period (up to 2027), and a 15 year requirement for 78 pitches. The 10 year requirement, which is essential, includes a backlog of 40 gypsy pitches, a need for 1 pitch in years 1-5 (2017-2022) and a requirement for a further 19 pitches between 2022-2027. This document initially identified a supply of 68 gypsy pitches to meet the 10 year requirement need for 60 pitches. However, following the drafting of this DPD, the site at Bromeliad Nursery, Billingshurst was withdrawn, which meant the removal of 15 pitches from the 68 pitches identified. On this basis a supply of 60 pitches over the 10 year plan period (up to 2027) could not be demonstrated, and the document did not proceed to formal submission or adoption.

Most recently, the Council has progressed work on an updated Gypsy and Traveller Accommodation Needs Assessment in order to understand the latest position, and to develop an appropriate Gypsy and Traveller Policy as part of the Local Plan Review. Consultants were appointed in March 2019 to research the number of pitches currently in use in the District, as well as to identify what the current need for Gypsies and Travellers in the District is likely to be over the next 17 years. In January 2020, the 'Gypsy and Traveller Accommodation Assessment (GTAA) – Final Report' was published. This Report was part of the background evidence base that accompanies the Local Plan Review (Regulation 18) Consultation which ran from February to March 2020. The GTAA Report provides an evidence base for the provision new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2019 to 2036. The GTAA identifies that there is a need for 93 pitches for Gypsy and Traveller households over the plan period (2019-2036). Neither the GTAA nor the Regulation 19 Local Plan Consultation document considers sites for potential allocation.

In August 2015, the Government published its Planning Policy for Traveller Sites (PPTS) to be read alongside the NPPF. Paragraph 22 of the PPTS confirms that applications for planning permission be determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. Paragraph 23 of the PPTTS continues to confirm that applications involving traveller sites must be assessed in accordance with the presumption in favour of sustainable development, and the application of specific policies contained within the PPTS and NPPF relating to traveller sites. Paragraph 24 of the PPTS provides that Local Planning Authority's must consider the following issues, amongst other relevant matters, in the determination of applications for traveller sites:-

a) The existing level of local provision and need for sites;

b) The availability (or lack) of alternative accommodation for the applicants;

c) Other personal circumstances of the Applicant;

d) That the locally specific criteria used to guide the application of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites;

e) That they should determine applications for sites from any travellers and not just those with local connections.

Paragraph 27 of the PPTS states that if a Local Planning Authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, this should be a significant material consideration in any subsequent determination when considering applications for the grant of temporary planning permission. An exception, however, exists for defined protected landscapes, Sites of Special Scientific Interest or protected under the Birds and Habitats Directive.

Policy 24 of the Draft Horsham Local Plan states that the Council will meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople in Horsham District by: allocating new sites on strategic site locations, and if required, reconfiguring existing private and public sites (which will be determined through a site assessment). Development of additional permanent or temporary Gypsy and Traveller pitches must meet an up-to-date and evidenced need and will be determined in accordance with the National Planning Policy for Traveller Sites (2015) document and Gypsy and Traveller/Travelling Showpeople definitions. Proposals must demonstrate a suitable layout of the site; that the site has essential services such as water, power, sewage, drainage, and waste disposal; and high quality boundary treatment and landscaping of the site. Proposals must have safe and convenient access to the highway and public transport services; there is provision within the site for parking, turning and servicing; the site has reasonable access to local services and community facilities; the proposal would not result in significant adverse impact on the amenity of occupiers of neighbouring sites; and the proposal would not result in significant adverse impacts on the visual amenity of the local area; and sites at risk of flooding should be subject to the sequential and exception tests.

The Horsham District Local Plan Regulation 19 document was approved at the meeting of full Council on 11 December 2023. Hearings for the plans' adoption took place in December 2024, though were halted by the Inspector subsequently. Therefore, the draft Local Plan has yet to be adopted and is of limited weight. It does however provide guidance with respect future policy direction.

In the absence of an adopted DPD, Horsham District Council is unable to demonstrate a 5 year supply of Gypsy and Traveller pitches. In accordance with Paragraph 27 of the PPTS, the absence of such a supply is a significant material consideration, and this weighs in favour of granting planning permission for the proposed development, subject to compliance with other relevant planning policies.

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 25 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".

Policy 26 of the HDPF states that outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria: support the needs of agriculture or forestry; enable the extraction of minerals or the disposal of waste; provide for quiet informal recreational use; or enable the sustainable development or rural areas. In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.

Policy 23 of the HDPF outlines the criteria that must be considered when determining planning applications for non-allocated sites. These provisions include that the site is located in or near to existing

settlements, within reasonable distance of a range of local services and community facilities, in particular schools and essential health services.

Paragraph 13 of the PPTS states that Local Planning Authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Paragraph 25 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.

Policy 1 of the Storrington, Sullington and Washington Neighbourhood Plan defines that built-up area boundaries of Storrington, Sullington and Washington. Development proposals outside of the built-up boundary of Storrington will be required to conform to Development Plan policies in respect of the management of development in the countryside.

Policy 29 of the Storrington, Sullington and Washington Neighbourhood Plan states that development between Storrington and West Chiltington will be resisted in line with Policy 27 of the HDPF which seeks to prevent the coalescence of rural settlements.

The application site is located outside of any designated built-up area boundary and is within the countryside in policy terms. It is however recognised that the site is located approximately 350m from the defined built-up area of Storrington and 670m of the defined built-up area of West Chiltington. The application site comprises an established gypsy and traveller site where it has previously been concluded that the site is located within reasonable distance of local services, amenities, and facilities. The proposal represents an extension to an established site, where the proposal would satisfy the requirements of Policy 23 of the HDPF.

It is recognised that the proposed development would increase the total number of pitches at the site to 10. Given the rural nature of the site, it is necessary to consider the scale of the development to ensure that it respects and does not dominate the nearest settled community, and avoid placing undue pressure on the local infrastructure. Whilst the cumulative number of pitches would increase, where the resulting quantum would contrast the relatively sporadic nature of development within the immediate surroundings, it is recognised that the application site is located in close proximity to the built-up areas of both Storrington and West Chiltington. Given this context, it is not considered that the development would dominate the nearest settled community or place undue pressure on the local infrastructure.

Overall, it is therefore considered that the proposal would be acceptable in principle, subject to all other material considerations.

Design and Appearance:

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.

The importance given to the continued protection of rural areas remains a key policy criteria in assessing new gypsy and traveller sites. The PPTS states 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”. Furthermore, it advises that any sites in rural areas respect the scale of, and do not over-dominate, the nearest settled community.

Paragraph 26 of the PPTS advises Local Planning Authorities to attach weight to the following matters when considering new gypsy site proposals:-

a) effective use of previously developed land (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;

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.

Policy 23 of the HDPF states that development should not have an unacceptable impact on the character and appearance of the landscape and should be sensitively designed to mitigate any impact on its surroundings.

Policy 9 of the Storrington, Sullington and Washington Neighbourhood Plan states that development between Storrington and West Chiltington will be resisted in line with Policy 27 of the HDPF which seeks to prevent the coalescence of rural settlements.

Policy 14 of the Storrington, Sullington and Washington Neighbourhood Plan states that the scale, density, massing, height, landscape design, layout and materials of all development proposals, will be required to reflect the architectural and historic character and scale of the surrounding buildings and landscape.

The application site is located within the "Green Gap" as designated by Policy 9 of the Storrington, Sullington and Washington Neighbourhood Plan. This constitutes an extensive swathe of countryside between Storrington and West Chiltington, however it is recognised that sporadic forms of residential, agricultural, and equestrian development is located within this. In the immediate locality, the rural character of the landscape is influenced by the prevalence of horsiculture activities to the north, west and east of the site, in addition to various development north of the public right of way (2646) to the south-east. There are established hedgerows to the north and east of the application site, which the proposal would further reinforce to the west.

The proposal would increase the number of caravans on the site, where the development would further expand the site to the west. The caravans and associated development are appreciable along the adjacent public right of way, however these are read in the context of established built form on the site. Therefore, while the proposal has expanded the built form further to the west, and resulted in additional suburban development, it is not considered that this has resulted in such significant harm to justify a reason for refusal. Furthermore, the introduction of additional landscaping would further mitigation the visual impact.

While the proposal has resulted in some encroachment into the adjacent field, the expansion is not considered significant, where the resulting site sits reasonably within the setting. The additional landscaping would integrate the site within the surroundings, where this is considered to reduce the visual impact of the development on wider views.

For these reasons, the development is considered to accord with Policies 23, 25, 26, 27, 32, and 33 of the HDPF and Policies 8, 9 and 14 of the Storrington, Sullington and Washington Neighbourhood Plan.

Residential Amenity:

Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contribute a sense of place both in the buildings and spaces themselves. Policy 33 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 of the HDPF states that development will not have an unacceptable impact on the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.

The application site is located approximately 50m north of Oldfield Cottage and 45m south-east of The Meadows. It is considered that there is sufficient distance between the site and these neighbouring residential properties to prevent any unacceptable harm in respect of loss of light, loss of privacy, and overbearing impact.

It is considered that the site is of sufficient size to enable appropriate spacing between the pitches, with an acceptable standard of amenity provided.

For these reasons, the development is considered to accord with Policies 23 and 33 of the Horsham District Planning Framework (2015).

Highways Impacts:

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. Policy 41 of the HDPF aims to ensure that developments are served by adequate parking facilities including provision for cycle, motorcycle, low emission vehicles and the mobility impaired.

Policy 17 of the Storrington, Sullington and Washington Neighbourhood Plan states that development proposals will be supported provided they can demonstrate that their residual traffic impacts on the local road network are not severe.

Following consultation with WSCC Highways, it is noted that visibility splays of the new access have been provided demonstrating 2.4m x 48.9m to the north and 2.4m x 67.6m to the south. It is unclear whether this would amount to an improvement over the existing situation. It has also been queried whether there is a need for an additional access, where it is highlighted that due to the rural location, the existing access may need to be closed off in order to implement the proposed access.

Had the development been considered acceptable in all other regards, the above matters would have been addressed.

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.

Policy 15 of the Storrington, Sullington and Washington Neighbourhood Plan states that development proposals must ensure the green infrastructure assets of the Parishes are protected and maintained, and wherever possible, enhanced. Development proposals will be supported provided their layout and landscape schemes have regard to, among other things, the retention of existing hedgerows, trees, banks, ponds, watercourses, and other important landscape and natural features. Development proposals should demonstrate that appropriate consideration has been given to providing for wildlife and that, wherever possible, sustainable proposals to protect wildlife interests have been incorporated into the design.

The development has resulted in the laying of hardstanding and the siting of caravans on an area of land formerly used as maintained paddock. Given the rural context of the site and its location in close proximity to hedges and woodland belts, the site may have acted as a transitional space for wildlife. Had the application been considered acceptable in all other regards, a condition to secure biodiversity enhancements would have been recommended.

Water Neutrality:

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

The Applicant has submitted a Water Neutrality Statement which outlines that the proposal relates to 4no. pitches, each of which would support a 3-bed static caravan. The Statement outlines that the water demand for each static caravan would be 64.3 litres per person per day through the installation of water efficient fixtures and fittings. This is supported by a Part G Calculator. Based upon an average occupancy of 2.47 for a 3-bed dwelling, each pitch would generate a water demand of 158.82 litres per day. This would create an overall demand across the development of 635.28 litres per day.
The Water Neutrality Statement outlines that rainwater harvesting (collected from 2no. static caravans and the existing day room) would be installed to meet non-potable water demand, including external use, washing machines, and toilets. The Statement outlines that the available roof area of the wider site

(comprising of existing outbuildings within the wider site ownership) is 211m2, where 74.74 litres per day per pitch could be supplied by rainwater harvesting for non-potable purposes. This would amount to a total of 298.96 litres per day. The calculations provided demonstrate that 1no. 12,500 litre rainwater harvesting tank would be required to accommodate a 35-day drought period. An associated Maintenance and Management Schedule has been provided.

A total of 336.32 litres per day would need to be offset. It is proposed to address this remaining demand through the installation of rainwater harvesting to meet the non-potable water demands of the existing Units 1 and 2. This would equate to 43.45 litres per person per day. An average occupancy of 2.47 persons has been used to calculate the resulting demand, where this is given as 107.32 litres per unit. This would give a total collection of 214.64 litres per day.

Subsequent to these mitigation measures, a total mains water of 121.68 litres per day per day would need to be offset. The Water Neutrality Statement outlines that the remaining water demand would be met through the purchase of 168 water credits through the Sussex North Water Certification Scheme (SNWCS). The justification for this is that 2no. of the 4no. units proposed have yet to be brought onto site. As these units are not retrospective, the Statement considers that these would be eligible for SNWCS, where a Grampian condition could be imposed to restrict these units being brought onto site before the credits had been purchased.

The proposal seeks to install water efficient fixtures and fittings to the proposed units, along with the installation of rainwater collection for non-potable purposes. Subsequent reductions are sought to be achieved through the installation of rainwater collection to 2no. of the existing units on the site (1 and 2) which would be used for non-potable purposes. It is however noted that the occupancy has been estimated, where the Council's guidance requires that *actual* occupancy figures be used to ensure certainty of the water reduction. As such, it is considered that insufficient information has been provided to demonstrate that the water reduction measures on the existing units would be sufficient. In addition, the Water Neutrality Statement indicates that the remainder of the water demand would be addressed through purchasing water credits by way of the Sussex North Water Certification Scheme (SNWCS). However, as the development is retrospective, none of the development would be able to access SNWCS.

For the above reasons, insufficient information has been provided to demonstrate with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 193 and 194 of the National Planning Policy Framework (2023), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species).

Other Matters

Climate Change:

Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change. The proposed development includes the following measures to build resilience to climate change and reduce carbon emissions:

- Requirement to provide full fibre broadband site connectivity
- Dedicated refuse and recycling storage capacity
- Cycle parking facilities
- Electric vehicle charging points

Subject to these conditions the application will suitably reduce the impact of the development on climate change in accordance with local and national policy.

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 and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of:

- The application is retrospective made under Section 73(A) of the Town and Country Planning Act.

Conclusions:

The Council do not have a 5-year land supply for gypsy sites, and at present there remains an identified undersupply of available sites within the District. It is therefore recognised that the proposal would go some way to addressing the identified need. This is a material consideration of significant weight in the balance. Paragraph 11(d) 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 clear 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.

However, footnote 7 of paragraph 11 confirms that the policies referred to in the Framework are those relating to, among others, habitat sites. Insufficient information has been provided to demonstrate that the development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites. Paragraph 11(d) is not therefore engaged in this instance.

While the current shortfall for gypsy sites is a material consideration of significant weight, it has not been demonstrated that the development would not have a likely significant effect on the designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, , contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 194 of the National Planning Policy Framework, thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species).

The benefit of providing gypsy and traveller sites within this location is not considered to outweigh the harm as identified. It is not considered that the harm identified could be overcome by the granting of a temporary consent, or indeed a personal permission. The proposal is therefore considered contrary to relevant local and national planning policies, and is recommended for refusal.

Recommendation: Application Refused

Reason for Refusal:

1 Insufficient information has been provided to demonstrate with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 193 and 194 of the National Planning Policy Framework, thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species).

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/25/0794
Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Location plan	Existing Location Plan	2504OL_R0_000	08.09.2025
Block plan	Proposed Block Plan	2504OL_R0_001	08.09.2025
Plans	Refuse, Boundary & Surfacing	2504OL_R0_100	08.09.2025
Supporting Docs	Planting Specification	400	08.09.2025
Supporting Statement	Water Neutrality Report and Water Management Plan by Promethean Planning dated 23.08.2025	NONE	08.09.2025
Block plan	Visibility Splays	2504OL_R0_002	08.09.2025

DELEGATED

Case Officer sign/initial Tamara Dale Date: 29.09.2025

Authorising Officer sign/initial RHERMITAGE Date: 29.09.2025