

RE: Planning Application: DC/25/2133 Erection of New Storage Building, Associated Hardstanding, and (Part-Retrospective) Retention of Existing Hardstanding

Dear Sir/ Madam,

I am writing to **object** to planning application DC/25/2133.

The objections to the proposed development are concerned chiefly with the principle and appropriateness of the development, location in the open countryside, policy conflict with the adopted Local Plan and Neighbourhood Plan, highways, and amenity impacts, harm to the setting of local heritage assets, and the erosion of countryside character in the District.

1. Red Line Boundary, Subdivision, and Planning Unit Concerns

The submitted red line plan excludes significant parts of the wider landholding, suggesting the applicant may be seeking to segment or subdivide the existing site into smaller planning units the existing planning unit to avoid the effect of previous permissions or conditions imposed on the land.

Previous applications on the site, by the same applicant have put the red line application site boundary around the whole of the site, including the paddocks, sand school and the buildings and hard standings on the site(E.G. DC/22/0388).

Other applications have shown a smaller red line area, with the remainder of the surrounding land edged in blue to indicate adjacent land that is in the control or ownership of the applicant. (E.G. DC/20/0613, and DC/22/0565).

The result of these ever-changing red line boundaries is a very confusing planning history for the site, with multiple permissions, usually obtained retrospectively, and with conditions that relate only to the relevant redline area for each application.

This undermines proper assessment of cumulative impacts and the lawful functioning of the site as a whole.

The application that is the subject of this objection letter indicates the site boundary to include the existing area of the sands school, the driveway entrance to the site and some of the hardstanding area, but excludes the existing buildings and other structures on the east part of the site, and excludes the wider site which includes pasture/paddocks. No blue line is included in the site location plan.

This separation of the application site from the wider Beckly Stud site makes a mockery of the applicant's case that the warehouse that is proposed is required in relation to the sui generis Equestrian use of the wider site, as by its very nature the remainder of the "equestrian" wider site is excluded from the application site. The effect of this would be that if granted permission, the Warehouse would become its own planning unit within the wider site, and not subject to any existing conditions imposed on planning permissions for the wider site.

Such a false subdivision of the site would conflict with HDPF Policy 1 (Sustainable Development), which requires a holistic and plan-led approach to proposals, ensuring that development is considered in full context and supports the proper functioning of land uses district-wide.

We believe this to be an intentional tactic on the part of the applicant to avoid conditions being applicable to the current retrospective planning application that have been imposed on previous grants of planning permission on the wider Beckly Stud site, such as those imposed by the

planning inspector on appeal reference APP/Z3825/W/23/3324019 - which the limit amongst other things the number of employees on the site, limits on hours for deliveries and collections. In relation to the Application forms submitted, it is noted that the forms state the works to erect the building that is the subject of the application were commenced on the 17th May 2023. This is not considered to be correct.

2. Inappropriate Commercial Development in the Countryside

The site is outside of any Built-Up Area Boundary. Under the adopted local plan, and National Planning Policy Framework, countryside development is tightly controlled and resisted. The following list of policies sets out the most relevant and important policies relating to the proposal. Other policies of the development plan are referred to elsewhere in this letter of objection.

Most Relevant HDPF 2015 Policies:

- Policy 26 – Countryside Protection: Strictly resists development outside settlement boundaries unless it is essential to a countryside location and must meet one of the four following criteria:

1. Support the needs of agriculture or forestry;
2. Enable the extraction of minerals or the disposal of waste;
3. Provide for quiet informal recreational use; or
4. Enable the sustainable development of rural areas.

A commercial storage/distribution warehouse for an equestrian business (Which is neither Agriculture or Forestry) does not meet any of these criteria.

If one of the four criteria above is considered to be met, the second part of the policy sets out further test/assessments which must all be met; require the development to be of appropriate scale for the character of the location, and that the development must not lead individually or cumulatively to a significant increase in activity on the site and must protect, conserve and/or enhance the landscape character area in which it is located.

- Policy 25 – District Character and the Natural Environment: Requires protection of landscape character and prevention of harmful urbanising effects.
- Policy 10 – Rural Economic Development: Supports rural economic development only where it is appropriately scaled, contributes to the rural economy, and does not harm the character or amenities of the countryside. Where development is considered to meet the above test it then **MUST** either be contained within an existing building that is appropriate for conversion or be within the boundaries of an existing industrial estate. If this is not the case, the policy allows for exceptional cases to provide new buildings, only where the development would result in substantial environmental improvement, and a reduction in the impact on the countryside.
- Policy 9 – Employment Development, commercial employment uses should be directed to sustainable, well-located sites that minimise impacts on the countryside.
- Policy 40 – Sustainable Transport: Requires development to minimise private vehicle use and ensure safe access in line with the character and capacity of local roads.

- Policy 24 – Environmental Protection: Seeks to prevent unacceptable noise, pollution, and disturbance impacting residents and rural amenity.
- Policy 41 – Parking: Requires appropriate, safe, and context-sensitive parking provision.
- Policy 34 – Heritage Assets and Managing Change within the Historic Environment - requires that development protect the setting of listed buildings and avoid harm to heritage significance.

The above local plan policies set a high bar for new development of commercial buildings in the countryside, and the application that is the subject of this letter does not meet the requirements and tests of these policies. The proposal offers no justification for deviating from this plan-led hierarchy and is therefore contrary to both local plan policy and National Planning Policy Guidance.

Most Relevant National Planning Policy Framework (NPPF) (Dec 2024) Principles:

Paragraph 48. Of the NPPF confirms that : *“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”*

The NPPF requires that development in rural areas be sensitive to its surroundings, avoid isolated new industrial buildings, and protect the intrinsic character and beauty of the countryside (NPPF Chapters 6 & 15).

The application that is the subject of this letter is for the erection of a 1575 square metre (floorspace) warehouse for storage and distribution. Therefore it is a MAJOR development, that has no essential or operational need to be in the countryside. Furthermore it is not of an appropriate scale and would represents an urban/industrial use incompatible with a rural equestrian/agricultural setting.

3. Lack of Demonstrated Need

There is no evidence that this countryside location is necessary for the proposed warehouse. This is clear policy requirement of Policy 26 that has not been met meaning the proposed development is directly in conflict with this policy.

Existing appropriately located facilities including storage and distribution units in nearby Southwater and other industrial estates provide clear alternatives. There are many existing warehouse facilities with the district that are available for rent or for sale and are correctly located on industrial estates and/or within the built up area boundaries of existing settlements. The NPPF requires applicants to demonstrate economic need and ensure that development is located in sustainable locations, rather than expanding industrial uses into rural landscapes without justification. The application fails to provide any such justification and therefore is contrary National Planning Policy in the NPPF.

4. Highways, Traffic, and Safety Impacts

NPPF and Horsham District Council identifies highways safety, traffic, noise, and parking as material planning considerations.

Narrow rural lanes in the vicinity are unsuitable for frequent HGV traffic, creating legitimate safety risks for pedestrians, equestrians, and other road users.

The proposal would significantly increase:

- HGV and LGV movements on the local road network which is comprised of narrow lanes completely unsuited to a storage and distribution facility. The submitted planning statement includes photographs of the site showing a number of articulated lorry trailers and shipping containers that can only have been brought onto site by articulated HGV's of the largest size.
- Staff vehicle traffic (proposed staff numbers to increase by over 50% from 12 to 19 onsite)
- Parking demands and turning activity
- Noise/disturbance from loading, reversing alarms, and operating hours. The applicant has indicated on the application forms that operating hours are not relevant to this proposal – which is clearly incorrect.

These proposals therefore directly conflict with: Policy 40, Policy 24 and Policy 41.



Above: The narrow Reeds Lane which is the only access to the application site

5. Harm to the Setting of Nearby Listed Buildings

Local and National planning policy and guidance confirms that effects on listed buildings and their setting are material considerations to be given significant weight in the determination of planning applications.

Local Plan policy 34 – Heritage Assets and Managing Change within the Historic Environment - requires that development protect the setting of listed buildings and avoid harm to heritage significance.

The introduction of an industrial warehouse, new hardstanding, increased lighting, and intensified vehicle movements would erode the traditional rural setting that contributes to the significance of nearby heritage assets. Including KINGS FARMHOUSE, COLTSTAPLE LANE, which

is a Grade II listed building located approximately 65m to the north of the proposed warehouse building.

The proposed warehouse would have a significantly harmful impact on the openness of the surrounding countryside which is an important part of the setting of the listed building. Such an impact is unacceptable, unjustified should be given significant weight in the decision making process and required by the NPPF's statutory heritage protections and HDPF Policy 34



Above: the Grade II listed Kings Farmhouse is 65m to the north of the proposed warehouse.



Above: The Grade II listed Kings Farmhouse shown in context with the application site. There is an existing unauthorised temporary warehouse building that has been erected on the site which is marked on the photograph with a dashed outline. This temporary building is much smaller than the warehouse proposed but clearly demonstrates how harmful to the setting of the listed building any permanent warehouse building would be in this location.

6. Landscape Character, Rural Openness, and Visual Impact

The proposal introduces a large, visually intrusive warehouse structure and extensive hardstanding, harming the openness and rural character of the landscape.

This is contrary to the following HDPF 2015 Policies:

- Policy 25 – District Character and the Natural Environment: Requires maintaining landscape character and avoiding visually harmful development.
- Policy 26 – Countryside Protection: Prevents inappropriate encroachment and urbanisation of rural land.
- Policy 32 – The Quality of New Development and Policy 33 – Development Principles: Require high-quality, context-sensitive design that respects site surroundings. Industrial buildings in an agricultural/equestrian landscape clearly fail these requirements.

The existing hardstanding areas that have been provided on the site compound the visual and environmental harm and sets an undesirable precedent for further incremental industrialisation of this previously undeveloped greenfield site.



Above: The existing buildings on the site (granted retrospectively on appeal) are dominant when viewed from the street. Any increase in scale and amount of development on the site would cause substantial and unacceptable harm to the openness, appearance and character of the locality.

Horsham District Council Landscape Character Assessment

The Site is within Area M1 (Crabtree and Nuthurst Ridge and Ghyll Farmlands) in the Horsham District Council Landscape Character Assessment. This document identifies this landscape

area as having a high sensitivity to change, particularly from changes to traditional land management. The recent development of Beckly Stud from open farmland, to grazing land and paddocks, the addition of several significant buildings, including residential uses and now the proposals for a very large storage and distribution warehouse have seen a significant and harmful change to the way in which the land is used and managed. This is harmful to the identified character of the area. The Landscape Character Assessment sets out clear guidelines for planning and land management in the area, these include:

- Conserve the strongly rural unspoilt character
- Ensure any new development responds to the historicity dispersed settlement pattern and local building design and materials.

The proposed erection of a warehouse with a height of 8.5m, a width of 35m and a length of 45m (almost half an acre of footprint to the building), would clearly cause significant harm to the Landscape Character that has been identified in the Study, and would not comply with the planning and land management guidelines that are set out in the study.

7. Conflict with the Southwater Neighbourhood Plan (Made June 2021)

The Southwater Neighbourhood Plan (SNP) forms part of the statutory Development Plan and must be considered in the determination of applications in the parish. The proposed development conflicts with several of its core principles and policy directions, including SNP1, 4.1, 14.3, and 16.

SNP1 – Core Principles

The Plan identifies a series of Core Principles guiding all development, including protecting semi-rural character, ensuring infrastructure capacity, and supporting development only where it is appropriately integrated with Southwater's settlement pattern.

The significance of SNP1 is confirmed by the parish's consultation priority list showing it as one of the most important policies for review and application. A new commercial warehouse in open countryside fails to respect the rural character of this part of the Neighbourhood Plan area, introduces industrial activity into an agricultural landscape, and does not integrate with the established settlement hierarchy or built-up-area boundary strategy. As such there are clear and unresolvable conflicts with the provisions of the Neighbourhood Plan for the area.

Neighbourhood Plan Policy 4.1 "Keeping Our Roads Moving" and general Transport Policies contained in Section 4 of the Neighbourhood Plan

Section 4 of the Neighbourhood Plan address transport, car parking, and movement, including safe traffic flow and minimising adverse impacts on rural roads. The Plan heavily emphasises safe and sustainable movement.

The proposal would substantially increase HGV/LGV activity on narrow rural roads, contrary to the Neighbourhood Plan's emphasis on safety, walkability, and appropriate traffic management. It therefore undermines the principles of limiting vehicle impacts on the parish's constrained road network, and is in conflict with the policies and principles of the Neighbourhood Plan.

Policy SNP16 Design, Environment or Landscape Protection

Neighbourhood Plan policy SNP16 is concerned with design quality, site levels, landscape protection, treed landscapes, and heritage settings.

The proposed large warehouse with extensive hardstanding conflicts with the Plan's emphasis on maintaining rural landscape patterns, ensuring development respects village character, and integrating sensitively with topography, vegetation, and heritage features.

Conclusion

The proposal to erect a large storage and distribution warehouse on this site is fundamentally inconsistent with the adopted Horsham District Planning Framework (2015), including:

- Policies 1, 9, 10, 24, 25, 26, 32, 33, 34, 40, and 41

and also directly conflicts with the adopted Neighbourhood Plan and the core NPPF principles governing sustainable development, countryside protection, heritage conservation, and highway safety.

For these reasons, we respectfully request that Horsham District Council REFUSES application DC/25/2133.

Yours faithfully,