



**Horsham
District
Council**

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0506

Land at Grid Reference 510699 117812 To The South of Dukes Copse Community, Bramble Lane, Thakeham, West Sussex

DESCRIPTION:

Change of Use of land to Gypsy/Traveller site comprising 2 pitches with the siting of a mobile home and dayroom per pitch.

RELEVANT PLANNING HISTORY:

EN/19/0435 Untidy site and unauthorised storage on Plot 4 Case Closed

DESCRIPTION OF THE SITE

The application site is an agricultural field bounded on all sides with mature hedging. The application site is located to the north of a private single track lane some 250m north of the built up area boundary of Thakeham. The site is approached by an unmade track to the north of Crays Lane. The site itself sits at a slightly elevated position from the surrounding fields and is densely overgrown with a mixture of scrub, small trees and bushes. At the time of the site visit a small shed was sited to the rear of the site. There is woodland immediately abutting the site boundary to the east.

DESCRIPTION OF THE APPLICATION

The application seeks permission for 2 gypsy/traveller pitches, siting of a mobile home and dayroom per pitch with an area of hardstanding to comprise the parking spaces for each pitch and access.

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 4 - Strategic Policy: Settlement Expansion
- 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 29 - Equestrian Development
- Policy 31 - Green Infrastructure and Biodiversity
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 34 - Heritage Assets
- 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

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 year. 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 16: protected Landscapes
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Policy 25: Parking
Strategic Policy 43: Gypsies and Travellers

Supplementary Planning Guidance:

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

Thakeham Neighbourhood Plan to 2031

Policy 1: Spatial Plan for the Parish.
Policy 6: Design.
Policy 8: Sub division of Agricultural Land
Policy 9: Development in the Countryside.
Policy 10: Green Infrastructure and Valued Landscapes

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:

HDC Landscape Architect: Objection

Request that a proportionate Landscape and Visual Appraisal (LVA) be prepared and submitted as a minimum to assess the potential landscape and visual effects of the proposal and to inform the determination of the application

No details of tree protection or removals have been submitted; defer to specialist Arboricultural consultation on these matters. Therefore defer to the Council's Arboricultural Officer for specialist advice regarding the adequacy of the submitted information and any requirements for arboricultural assessment, tree protection measures, or mitigation.

The site is located within Landscape Study Area TA1 of the Horsham District Landscape Capacity Assessment (April 2014) where the overall landscape capacity of the site is considered Low/No. The study notes *"The visual sensitivity in this area is high due to the visual prominence of the landform, and the visibility of parts of the area from adjoining residential properties."* and the *"Amenity value of public footpaths"* noting the sites unspoilt rural character. We consider the proposals have the potential to conflict the findings of this study.

The site is located within the northern edge of LCA F1 of the Pulborough, Chiltington and Thakeham Farmlands where partly wooded low scarp is identified as a key characteristic; and close to the southern edge of LCA J2 Broadford Bridge to Billingshurst Farmlands where a key sensitivity identified is small scale incremental changes eroding character.

Given the site's location within a sensitive rural landscape, the findings of the recent appeal decisions on adjoining land, and the absence of a Landscape and Visual Appraisal, there is insufficient evidence to demonstrate that the proposal would not adversely affect the character and appearance of the site and wider countryside. The further subdivision and enclosure of land parcels is also a concern, having regard to the established pattern of change in the area.

Ecology Consultant: Objection

No information has been submitted in relation to ecology, other than that for Biodiversity Net Gain. There are multiple structures within the application site due to be removed and trees within the site which may be suitable for bat roosts. A ground level tree assessment would also be required. A Preliminary Ecological Appraisal should be undertaken, as there is rubble, debris suitable habitat for priority species such as hedgerow.

WSCC Highways response: Advice

The application is along a private access track subject to a speed restriction of 20mph. No recorded collisions have occurred within the last 5 years as such there is no evidence the access is operating unsafely currently. The proposed hardstanding would be acceptable for on site turning and the proposed two parking spaces per pitch would also be considered sufficient.

Thakeham has limited services within walking/cycling distance and limited bus service routes to Horsham and Storrington and these are only a handful of times per day. Residents would rely on private car for trips.

HDC Environmental health: Objection

There is insufficient drainage information to be able to determine the application. The siting is uncertain with the boundary treatments, the pitches would need to be a minimum 3 metres away from the boundary.

PUBLIC CONSULTATIONS:

Representations:

5 letter of objection from 5 addresses:

- Access to the site is narrow and used by dogwalkers and children such that the increase would be dangerous.
- Overdevelopment on undeveloped land
- Across a Public Right of way
- The access is unsuitable
- Outside the built up area boundary
- HDC failed to enforce against alleged other gypsy/traveller issues in the locality.

Parish Comments:

Thakeham Parish Council: Objection

- The site remains good-quality agricultural land despite the presence of various structures and should not be regarded as brownfield/brown belt land.
- The site is in a highly prominent and visually exposed location, situated on the brow of a ridge and visible from a wide surrounding area. Any new development must be appropriate to this sensitive landscape setting.
- Approval of this application could create a precedent for further piecemeal traveller pitch development, which is not considered an appropriate approach to site provision.
- While there is a need for local authorities to provide traveller sites, these should be in suitable, sustainable locations. The emerging Local Plan is expected to identify appropriate sites and is likely to be adopted soon.
- The site lies outside the Built-Up Area (BUA) and close to The Street heritage area, meaning any development requires careful consideration to ensure it preserves local character and heritage significance.
- The location has poor access to essential services, including schools, and lacks practical public transport options, making residents heavily dependent on private vehicles.
- Before any approval is considered, the applicant should provide evidence of:
 - A genuine need for the development.
 - Their current accommodation circumstances.
 - A family history of travelling.
 - Justification comparable to that accepted in the previous appeal, which was based on an urgent accommodation need.
- There appears to be no reference in the submitted planning documents to the Article 4 Direction placed on the land when it was subdivided into smaller plots.
- The Article 4 Direction was introduced because subdivision of the land posed a significant threat to the open countryside, particularly due to its prominent ridge-top location and important long-distance views.
- There have been concerns that subdivision and marketing of plots could mislead purchasers into expecting residential development opportunities, resulting in enforcement action, refused applications and dismissed appeals.
- The only traveller site approved in the area (DC/18/1543, Plot 3) was granted on appeal because the Neighbourhood Plan did not provide sufficient traveller pitch allocation at the time.
- As the approved traveller site is a private site, it does not contribute towards HDC's overall supply of traveller pitches.

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

Policy Background and the Principle of Development

The Council has progressed work on an updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) in order to understand the latest position, and to develop an appropriate Gypsy and Traveller Policy as part of the Local Plan Review. In January 2020, the 'Gypsy and Traveller Accommodation Assessment (GTAA) – Final Report' was published. This Report was part of the background evidence base that accompanied the Local Plan Review (Regulation 18) Consultation which ran from February to March 2020. The GTAA Report provides an evidence base for the provision new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2019 to 2036. The GTAA identifies that there is a need for 93 pitches for Gypsy and Traveller households over the plan period (2019-2036).

To inform the development of Strategic Policy 43 of the submitted Local Plan the Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA, November 2023) and a Targeted Update (September 2024) was also produced in response to changes regarding the PPTS's definition of who is a member of the G&T community for the purposes of planning policy. Collectively, 50 pitches are identified as being needed for the first five years of the submitted Local Plan (2023-2028) for those who meet the definition and also suggested a further need of 11 pitches for members of the community who it could not be determined whether they met the definition or not. At the time of writing 42 pitches have been approved / allowed during the relevant period.

In terms of the Council's current policy position, Policy 22 and 23 of the HDPF are considered to hold great weight, allowing speculative gypsy and traveller sites to come forward in principle. Paragraph 28 of the PPTS (updated December 2024) outlines that if a local planning authority cannot demonstrate an up-to-date five-year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.

Paragraph 11 of the NPPF states that the presumption in favour of sustainable development should apply where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and provision affordable homes, individually or in combination. This presumption is disengaged where footnote 7 exceptions provide a strong reason to refuse. Such exceptions include impacts on ecology or designated heritage assets. These matters are discussed further below.

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”*.

Policy 23 (Gypsy and Traveller Accommodation) of the HDPF seeks to resolve specific issues regarding un-allocated sites (rather than the principle of a development), and states that the following criteria (a-e in subsequent sections of this report) will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople and any planning applications for non-allocated sites. In terms of the site's location, the Policy states that it must be demonstrated that:

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

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.

The proposal would deliver 2 additional pitches, making a meaningful contribution toward addressing the identified shortfall. The policy framework for gypsy and traveller pitches does not prevent their delivery in the rural countryside, and such development is not expected to achieve the same level of accessibility as general market housing. While this site is not particularly accessible by means other private vehicle, it is not considered that this would, in isolation of any other harm, represent a reason to refuse the application.

The appeal decision relating to APP/Z3825/W/19/3225910 for one pitch at Plot 3, Bramblefield, Thakeham, West Sussex is in close proximity to the site. The appeal was allowed and a material consideration in the assessment of this current application. In the Planning Inspectorate's decision to allow the appeal, paragraph 14 states that *“It is concluded that permission should not be withheld by reason of the site's access to services”*. Paragraph 6 of the decision states *“The site is only a short distance from the settlement of Thakeham (The Street), and whilst in the countryside, neither the Local Framework nor Planning Policy for Traveller Sites preclude such a location, the latter stating 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. The site is not ‘away’ from the settlement and the access track passes through the settlement to reach the highway”*.

Given the close proximity of the appeal scheme to the current application site it cannot be argued that the current application site not within a suitable location given the precedent set by this appeal decision. These matters are of significant weight in the consideration of this application and weigh heavily in favour of granting planning permission. The principle of development of the scale proposed on this site is therefore considered acceptable, subject to all other material considerations, as set out 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.

Policy 26 of the HDPF requires proposals to be essential to the countryside location be of a scale appropriate to their countryside character location, not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside and/or conserve, and/or enhance, the key features and characteristics of the landscape character area in which it is located.

The site is bounded by mature hedging along the road to the south and west with mature woodland to the east. The proposal would provide be for 2x gypsy pitches together with associated parking, day rooms and mobile homes. The proposal would not be essential to its countryside location.

Landscape Study Area TA1 of the Horsham District Landscape Capacity Assessment (April 2014) where the overall landscape capacity of the site is considered low. The Landscape Architect considers that the introduction of development in this rural location will have some impact on the landscape character, with the layout introducing urbanising features into the rural site. The Landscape consultant considers a Landscape and Visual Appraisal to be a minimum necessity to assess the potential landscape and visual effects of the proposal. The requirement for the LVA would be important as the site is located within an area where *the visual sensitivity is high due to the visual prominence of the landform and because of the Amenity value of public footpaths.*

Policy Thakeham 8 policy responds to the recent increase in the subdivision of agricultural land into small plots. This states that development on holdings of between 0.4 and 5 hectares will be resisted unless it can be demonstrated that such development is solely for agricultural or horticultural purposes.

The development would subdivide the 0.53212 hectare plot into two non-agricultural plots, contrary to policy 8 of the Thakeham Neighbourhood plan. The weight to be given to this conflict will however need to be balanced against other material considerations.

Application DC/23/0905, for the temporary siting of a mobile home for the use as a rural worker dwelling (Retrospective), is located immediately north of the site. This was dismissed at appeal APP/Z3825/W/23/3327173 (decided 2nd April 2025). The Inspector outlined in paragraph 32 that *“the appeal site is within a predominantly open countryside setting which is separate from the built-up area of Thakeham, both physically and in visual terms.”* As per paragraph 34 of the APP/Z3825/W/23/3327173 appeal a mobile home in this location “unacceptably and harmfully erodes the character and appearance of the surrounding countryside”. The Inspector considered that a mobile home would draw the eye and would represent built form that would be an obvious, alien feature in its otherwise largely open countryside setting. The provision of two pitches with mobile homes and dayrooms would represent a much greater level of harm than that found by the Inspector, particularly in the proposed corner plot location.

It is acknowledged that the hedging around the site is shown to be maintained in the submitted plans and would soften somewhat the appearance of the development. However, given the site's location within a sensitive rural landscape, the findings of the recent appeal decision on adjoining land, and the absence of a Landscape and Visual Appraisal, there is insufficient evidence to demonstrate that the proposal would not adversely affect the character and appearance of the site and wider countryside. The further subdivision and enclosure of land parcels is also a concern, having regard to the established pattern of change in the area.

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 letters of representation have been received in relation to unauthorised development activity by Gypsy/travellers in the locality. These representation letters have been received, read, and have been considered in the assessment of the application. However the disturbance referenced within the letter of representation does not concern this application currently under consideration. Furthermore, in the absence of any immediate neighbours there is no evidence to suggest that the development would result in a significant or unacceptable increase in noise and disturbance from the proposed use.

The application proposes a post and rail fence between the two plots which would create a visual subdivision between each plot, although the degree to which this would introduce a level of privacy between the two pitches would be minimal. Nevertheless, the pitches would be angled away from one another such that there would be an acceptable level of mutual overlooking.

The proposed development is therefore considered to accord with Policies 32 and 33 of the Horsham District Planning Framework (2015).

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 proposed development would utilise the existing access from the south and create a new one to the west. WSCC Highways confirmed that there are no apparent visibility concerns with the existing access. The Local Highways Authority (LHA) were also satisfied amount of hardstanding within the site would be suitable for two parking spaces per pitch and for the turning areas required. It was highlighted that the site is situated in a rural location that lacks access to nearby services and amenities and that the residents would have a reliance on the private car, cycle parking was recommended for the site location. However, no highway safety concerns were raised by WSCC Highways.

A number of letters of representation have been received both by members of the public and Parish Council relating to the intensification of the use of the road, access and potential safety concerns for the existing users of the Highway. However, the generation of traffic created by the development would be modest and there is no evidence to suggest that the existing access has been operating unsafely in the past, or that the proposed use and access would exacerbate a safety concern. It is not considered that the proposed number of pitches would result in a significant increase in intensity or vehicle movements to and from the site, with the access considered acceptable for the intended use.

Other Matters

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

- a. There must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable;

The site does not sit within any designated flood zones, surface water flood area or groundwater protection zone.

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;

The site is historically agricultural. While information has not been provided with specifics relating to drainage and waste disposal and Environmental Health have raised concerns regarding the lack of sufficient information. Nevertheless, there is no reason that these details cannot be secured through a pre-commencement condition and as such, the absence of this information would not justify a reason for refusal.

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.

No ecological information has been submitted, and Place Services Ecology considers that given the proximity to mature trees and the amount of scrubland and hedgerow within the site, there is an absence of ecological information provided such that it cannot be concluded that there would not be any protected species within the application site. Given the density of growth within the site at the time of the Officer's site visit, it is considered likely that the site would have likelihood of some protected species and wild birds and a Preliminary Ecological Impact assessment would be required.

Given the lack of sufficient information regarding protected species it cannot be concluded with certainty that the development would not result in unacceptable harm to protected species, contrary to policy 31 of the HDPF.

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.

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. If approved, conditions to secure the following measures to build resilience to climate change and reduce carbon emissions would be imposed:

- Water consumption limited to 110litres per person per day
- Integration of SUDS
- Requirement to provide full fibre broadband site connectivity
- Dedicated refuse and recycling storage capacity
- Opportunities for biodiversity gain
- Cycle parking facilities

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 existing baseline outlined within the metric does not appear to be a fair representation of the Biodiversity value within the application site that was viewed at the time of the site Planning Officer site visit. Whilst a 'competent person' does not have to be a suitably qualified ecologist for the purposes of carrying out a Biodiversity Net Gain assessment, the assessment made would need to accurately identify the baseline biodiversity within the site. It was evident from the Officer's site visit that the vast majority of the site was densely populated with a mixture of small and mature trees, hedgerow, scrub, a variety of grasses and native species of plant.

Nevertheless, in the event that the application were otherwise acceptable, that statutory condition would require the submission of a Biodiversity Gain Plan.

Conclusions:

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

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

Nevertheless, in the case of the current application, the applicant has not submitted suitable information in the form of a Preliminary Ecological Assessment to demonstrate that the development would not harm any protected species within the site, and given the condition of the site at the time of the officer site visit, this would be a requirement of the application to reach sufficient certainty in this regard. This is a material consideration of significant weight in the consideration of the application.

It is considered, taking into account appeal decisions on neighbouring sites and the proposed development, that the site is suitably located for the proposed use. Further, the scale of the site and its relationship with surrounding properties and land is such that there would be no adverse impacts on neighbouring amenity or highways safety concerns.

The introduction of two gypsy pitches, mobile homes, day rooms, parking and associated domestic features would urbanise a currently rural and open site within a visually sensitive landscape area. The development would also involve subdividing the agricultural plot into two non-agricultural/horticultural parcels, contrary to Policy Thakeham 8, which seeks to prevent incremental encroachment and the erosion of rural character through land subdivision and associated development. Furthermore, a recent appeal decision on adjoining land concluded that a mobile home in this location would be an obvious and alien feature that would harmfully erode the open countryside character. The current proposal, involving two pitches and additional built form, would likely give rise to an even greater degree of harm through the suburbanisation and formalisation of the countryside setting. Given the limited information available in this regard, it has not been demonstrated that the proposed development would not result in harm to the character and visual appearance of the countryside setting.

Therefore, notwithstanding the significant weight attributed to the need for additional Gypsy and Traveller pitches, the absence of sufficient ecological evidence and the identified harm to the character and appearance of the countryside, when taken together, are considered to outweigh the benefits of the scheme. On balance, the proposal is therefore considered unacceptable and planning permission should be refused.

Recommendation: Application Refused

Reason(s) for Refusal:

1. Insufficient information has been provided to demonstrate that the proposed development would have no adverse impact on protected species and its habitat, and to establish how the development will contribute to measurable Biodiversity Net Gain, contrary to Policy 31 of the Horsham District Planning Framework (2015) and paragraph 187(d) of the National Planning Policy Framework (2024).
2. The proposed development would likely introduce an incongruous and urbanising form of development that fails to respect the rural character of the area, and it has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development by virtue of the cumulative impact of the built form, comprising the siting of caravans, associated day room buildings, hardstanding, and domestic paraphernalia, would not result in harm to the rural character and visual amenity of the countryside setting. The proposal therefore fails to protect the intrinsic character and beauty of the countryside, contrary to Policies 23, 25, 26, 32 and 33 of the Horsham District Planning Framework (2015), and paragraphs 135(c) and 187(b) 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/26/0506

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

Plan Type	Description	Drawing Number	Received Date
Location plan	Site Location Plan	J005516-DD-01 Rev A	19.05.2026
Block plan	As Existing Block Plan	J005516-DD-02	24.03.2026
Site plan	As Existing Site Plan	J005516-DD-03	24.03.2026
Block plan	As Proposed Block Plan	J005516-DD-12 Rev A	24.03.2026
Site plan	As Proposed Site Plan	J005516-DD-13 Rev A	24.03.2026
Elevation & Floor plan	As Proposed Dayroom Plans and Elevations	J005516-DD-14 Rev A	24.03.2026
Location plan	Site Location Plan	J005516-DD-01	24.03.2026

DELEGATED

Case Officer sign/initial Hannah Darley Date: 27 July 2026

Authorising Officer sign/initial Tamara Dale Date: 27 July 2026