

June 2026

Proposed tractor parking area, donkey enclosure, donkey stable, 3 shepherd huts and a wildlife pond.

Land Parcel To The North Of Nos. 42-54 Hurst Road Hassocks West Sussex

Letter of Objection

1) Introduction

- 1.1 This document sets out the grounds of objection to planning application no. DM/26/1132 which is for a proposed tractor parking area, donkey enclosure, donkey stable, 3 shepherd huts and a wildlife pond at land to the north of nos. 42-54 Hurst Road, Hassocks. The statement is submitted by Mr R Horney who is an immediate neighbour to the application site.

2) Grounds for objection

- 2.1 The specific grounds for objection are set out below.

i) Unsupported and unjustified development in the countryside

- 2.2 The site lies within a countryside location in planning policy terms, where new development is only supported in very limited circumstances. Furthermore, the site lies within a 'local gap' between Hassocks and Hurstpierpoint, where new development is further resisted to prevent the coalescence between the two villages.

- 2.3 District Plan Policy DP12 (Protection and Enhancement of Countryside) states that:

The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- *it is necessary for the purposes of agriculture; or*
- *it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.*

- 2.4 Policy DP13 (Preventing Coalescence) states that *"development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements."*

- 2.5 The application is separated into different elements. The proposed tractor parking area, donkey enclosure and donkey stable fall under the purposes of agriculture. The proposed shepherd huts would fall under residential use as ancillary residential accommodation to a

neighbouring dwelling and the wildlife pond would comprise a biodiversity improvement initiative.

- 2.6 While agricultural uses are generally accepted in countryside locations, any agricultural development must be carefully assessed and justified. In this case, the site does not form part of an established agricultural unit and there has been no historic agricultural uses on the site. Regarding the proposed tractor storage area, it is not considered that a storage area for two tractors is reasonably necessary for the purposes of agriculture on this site. Indeed, it is unclear why a domestic sit-on lawnmower could not be used to mow the land, with this being stored within the extensive residential curtilage of Crossways.
- 2.7 There is no particular objection to the keeping of two donkeys on the site.
- 2.8 The main area of objection relates to the placement of three shepherd huts on the site. Their use for residential purposes requires planning permission as a material change of use from agriculture to residential use. As the use of these huts would not be for agricultural uses, there is no planning policy support for their use and therefore, this directly conflicts with District Plan Policy DP12. As there are no material planning considerations that justify a diversion from the Development Plan, this is sufficient to justify the refusal of this planning application.
- 2.9 Furthermore, there is no justification for the use of this field for residential purposes. The Applicant owns neighbouring Crossways which has a large domestic garden and curtilage. There is plenty of space for all three shepherd huts to be positioned within the domestic curtilage of the property and therefore, there is no justification or need for the shepherd huts to be positioned in the open countryside. The nature of the agricultural uses is far too small-scale to justify living accommodation on the land to support this use.
- 2.10 Therefore, the first ground for objection is that the positioning of three shepherd huts on the land would not be for the purposes of agriculture and therefore, the proposal would directly conflict with both Policies DP12 and DP13. As there are no material consideration dictating otherwise, this must be a reason for refusing this planning application.

ii) Impact upon the character and appearance of the area

- 2.11 The positioning of three shepherd huts on the site would have an urbanising impact upon the character of the site and surrounding area. This would also fail to prevent the coalescence between Hassocks and Hurstpierpoint and therefore, the application would conflict with both District Plan Policies DP12 and DP13.
- 2.12 Therefore, the second ground for objection is that there would be a harmful impact upon the character and appearance of the open countryside.

iii) Ecology and biodiversity net gain

- 2.13 The proposal comprises several forms of development within an open field. No ecological information has been submitted with the application and therefore, there is no confirmation that protected ecological species would not be harmed by the proposed development.

Without a suitable assessment of the impact upon protected ecological species, the application is currently contrary to Policy DP38 (biodiversity).

- 2.14 The application is submitted on the basis that it would meet the 'de-minimis' exemption for biodiversity net gain, in that there would be a net loss of less than 25 square metres of non-priority habitat. However, the stable, associated hardstanding and the proposed tractor storage area all clearly exceed 25 square metres. The footprint of the three shepherd huts would also result in a net loss in non-priority habitat and should be included in this figure. Therefore, contrary to the submission the application does trigger biodiversity net gain and without this information, the application must be refused on this basis.

iv) Highways impact

- 2.15 A key point of contention is that the Applicant states that an existing access point will be reused. However, I wish to confirm that there has not been a formal access onto the site from Belmont Lane in the 40 years that I have lived here. The Applicant has created an access in breach of planning control. While there are permitted development rights available to create a new vehicular access onto an unclassified road, this is only where the access is '*required in connection with development permitted by any Class in this Schedule*'. However, this land does not have an existing lawful planning use and therefore, there are no permitted development rights available in this case and the access has been created in breach of planning control. Therefore, this application is also for the retrospective creation of a new vehicular access point.
- 2.16 There is great concern over the unjustified creation of a new access point, with there being poor visibility in both directions from this access. This issue is exacerbated as Belmont Lane is a public bridleway and therefore, there is increased potential for conflict between vehicles and pedestrians and horses.
- 2.17 This unnecessary highway safety harm should result in an additional reason for refusal.

v) Procedural matters

- 2.18 The application description is not accurate or correct. This is because the vehicular access has already been created in breach of planning control. The three shepherd huts are also in situ already. Therefore, these elements of the application are retrospective and the application description should be amended accordingly.
- 2.19 It is not considered that the submission of a preliminary ecological appraisal and biodiversity net gain information to address the above issues should be accepted during this application. If these were to be accepted by the Planning Authority, then it is respectfully asked that the application continues to be determined by the current determination date of 9th July 2026. There is no reason for an extension of time to be granted on this occasion.

3) Summary

3.1 Therefore, the application should be refused on the following grounds:

- Unjustified and harmful development within the countryside which is not for the purposes of agriculture
- Harmful impact upon the character and appearance of the open countryside
- Insufficient information to demonstrate that there will be no harmful impact upon protected ecological species
- Insufficient information to demonstrate that the proposal would deliver a biodiversity net gain of at least 10%
- Unnecessary harmful impact upon highway safety.