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By email only to kate.turner@horsham.gov.uk and planning@horsham.gov.uk

12th September 2025

Dear Kate

Planning Application Reference DC/25/0317

Land West of Parsons Field, Pickhurst Lane, Pulborough, West Sussex RH20 1DA

We object to the above application, which is largely identical to that refused on 6th June 2025. The refusal reasons remain unresolved. Our objections relate to:

- Principle of the development
- Harm to rural character and appearance
- Water neutrality
- Ecology
- Surface water and foul drainage
- Access

Principle of the development

National policy for gypsy and traveller sites is contained within the Department for Communities and Local Government's (DCLG) Planning Policy for Traveller Sites, most recently updated on 12th December 2024.

Policy C states that traveller sites must not dominate the nearest settled community. If this scheme proceeds and taking into account the recently approved extension to the neighbouring site, traveller provision here would increase by 200% in a rural location containing only three houses. This is clearly disproportionate.

Policy H states that, when determining planning applications for traveller sites LPAs should consider matters such as the personal circumstances of the applicant. However, no information has been provided about the applicant's circumstances or how they meet the definition of a gypsy or traveller.

Policy H also 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”. The word ‘very’ was added to this sentence, as an update to the original policy wording from 2012, to provide greater countryside protection. The site in this case is entirely separate from the settlement of Pulborough and is rural in nature, therefore the principle of new traveller and gypsy pitches in this location is contrary to national policy.

Policy H also requires LPAs to attach weight to certain matters when considering proposals for traveller and gypsy pitches. Such matters include:

- a) effective use of previously developed (brownfield), untidy or derelict land

The site was a grassed field used by grazing horses with only a stable placed upon it. Photographs contained within the submitted ecology report show the condition of this greenfield site before most of the works took place.

- b) Sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness.

The work that has taken place most certainly does not enhance the environment. Hedgerow has been stripped out, long lengths of close boarded fencing erected, the grassed field dug up and large areas of hardstanding now cover much of the site. In no way can it be described as a positive enhancement to the environment.

The Planning Policy for Traveller Sites document also advises that where there is an absence of a 5 year supply of deliverable traveller and gypsy sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply. This states that in such a circumstance permission should be granted unless the application of policies that protect areas or assets of particular importance provides a strong reason for refusing the development proposed. In this instance there are two areas which provide a strong reason for refusal, namely the South Downs National Park and the Arun Valley protected sites (SSSIs, SPA, SAC and a Ramsar site).

The site is within feet of the National Park boundary. The NPPF requires great weight to be given to conserving and enhancing the landscape and scenic beauty of National Parks. Development within their setting is required to be sensitively located and designed to avoid or minimise adverse impacts. The photographs attached to this letter, mostly taken on the National Park boundary line, clearly show the harm that has been caused to the landscape. The development cannot be said to have been designed to avoid or minimize adverse impacts.

In relation to the Arun Valley protected sites, the submitted water neutrality strategy fails to provide evidence of a rainwater harvesting system having been installed, despite the caravans now being occupied. This is discussed further below.

Furthermore, a Written Ministerial Statement (WMS) issued in August 2015 confirms that Intentional Unauthorised Development (IUD) is a material consideration in the assessment of planning applications. This WMS applies to all types of development, not solely those related to Gypsy and Traveller sites. In this case, the works carried out clearly constitute Intentional Unauthorised Development, as they continued despite a Stop Notice being in place with caravans subsequently brought onto the site. In addition, while an ecology survey was conducted prior to most of the works,

several of its recommendations have not been followed including a CEMP which was required before works began.

Impact on rural character and appearance

As stated above, Policy H of the Planning Policy for Traveller Sites document states that a consideration for LPAs is whether a site positively enhances the environment and increases its openness. The photographs and images attached to this letter show the site in its pre and post development state. These clearly show that the proposals do not achieve this.

In relation to an appeal which considered the adjacent traveller site (appeal reference APP/Z3825/A/14/2218650) the Inspector agreed with a previous Inspector's comments in stating that 'this modern mobile home looks out of place in an attractive area of open countryside' and that 'the rural character of the locality is seriously harmed by this mobile home'. The harm caused to the character and appearance of attractive countryside was described as 'considerable'.

In the most recent appeal relating to that site (appeal reference APP/Z3825/W/3246486), the Inspector made the assumption that, 9 years after the Inspector visited the site in 2014 'it is highly likely that the vegetation planted, and surrounding the site has markedly matured during this period of time, creating a different environment to that which the previous Inspector experienced.' However, historical Google Earth Images taken in August 2013 and July 2022 (attached at Appendix B) show very little difference in the levels of vegetation around the site and further afield. It is therefore likely that the 2014 Inspector's comments about the considerable harm caused by, in that case, a single mobile home, remain true. It follows that if a single mobile home would cause such considerable harm, so too would further encroachment into undeveloped countryside with two further static caravans, touring pitches, day rooms and a substantial area of hardstanding.

In addition, the submitted Arboricultural Statement indicates that the works carried out have either already caused damage or pose a risk of harm to existing trees. It notes that fence posts have been installed within the root zones of woodland trees, that concrete may have been poured into the ground potentially endangering tree health, and that the stable block has been constructed within the root protection area of three mature English oak trees. A retrospective application should be assessed in the same manner as a standard planning application, and these impacts would typically necessitate changes to the proposed layout if all other aspects were considered acceptable.

The statement also does not consider impacts caused by the removal of established hedgerow. It also refers to the impact of proposed drainage works on trees and ancient woodland as being addressed within a separate arboricultural report, however no such report has been submitted.

Water neutrality

The submitted Water Neutrality Statement states that the proposal will be entirely reliant on rainwater for both potable and grey water. As the application is retrospective in nature the applicants should be able to provide evidence of the rainwater harvesting system that presumably has been installed.

Ecology

The submitted reports show clear failures:

- A required CEMP was not provided prior to works.
- Hedgerows with dormouse potential were removed despite recommendations.
- Great Crested Newt safeguards were not followed; works occurred during sensitive phases.
- Vegetation clearance was undertaken in nesting bird season.
- The recommended 20m ecological buffer has not been implemented.

The ecological impact is therefore understated and unacceptable.

Surface Water and Foul Drainage

As the works include large areas of hardstanding further information is required to understand the surface water drainage arrangements. No information is provided within the application about the materials that have been imported on to the site, or their porosity, to create the surfaced areas.

In addition, no information has been provided to explain the foul drainage arrangements or where this will discharge to.

Access

The submitted Planning Statement describes the access into the site as established. This is incorrect as it was only installed as a field gate in December 2024. Historical Google Earth and Streetview imagery show no evidence of there having been an access into the site from Pickhurst Lane. The access should therefore be referred to within the development description.

Other Matters

The 'existing' and 'proposed' site plans are identical. The former should accurately depict pre-development conditions to allow proper assessment.

We also trust that, should this application be refused, the Council will exercise its powers under Section 70B of the Town and Country Planning Act 1990 to decline to determine any subsequent applications that are not materially different from the current proposal. The applicant retains the right to appeal any refusal, which will help to avoid unnecessary delays in the planning process.

In conclusion, the proposal is contrary to national policy, harmful to the rural landscape and protected ecological interests, and fails to address fundamental issues of water neutrality, drainage, and access. We respectfully request that it be refused.



We would be grateful if these comments would be taken into account in your consideration of the application.

Yours sincerely

Batcheller Monkhouse

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