

Planning Department  
Horsham District Council  
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West Sussex  
RH12 1RL  
Attn: Ms. Kate Turner

Sent by email to: [REDACTED] / [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

18<sup>th</sup> March 2025

Dear Ms. Turner

**RE: OBJECTION TO PLANNING APPLICATION DC/25/0317**

On behalf of my client, a nearby local resident who resides on *Coombelands Lane* (accessed via *Pickhurst Lane*, which runs aside the site of the subject property), I am writing to formally object to the retrospective planning application DC/25/0317 for the “*Retrospective Application for the continuous use of land for the stationing of 2 static caravans for residential purposes and associated day rooms and associated landscape works*” at the site at *Land West of Parsons Field, Pickhurst Lane, Pulborough, West Sussex RH20 1DA*. My objections are based on several key issues, outlined in detail below.

**1. Principle of the Development**

The proposed development is contrary to national and local planning policies for gypsy and traveller sites. The Department for Communities and Local Government’s (DCLG) Planning Policy for Traveller Sites (most recently updated in December 2024) clearly states in Policy H that new traveller site development in open countryside, away from existing settlements, should be “very strictly limited.” The inclusion of the word “very” in policy updates reinforces the need for rigorous controls over such developments in rural areas.

The application site is located within open countryside, detached from the defined settlement boundary of Pulborough. The introduction of further gypsy and traveller pitches in this area would be at odds with the overarching spatial strategy and would fail to comply with the objectives of sustainable development as outlined in the National Planning Policy Framework (NPPF).

Furthermore, Policy C of the Planning Policy for Traveller Sites requires that any such development should not dominate the nearest settled community. If this application is approved alongside a separate application for an adjacent traveller site expansion, it would result in a significant 200% increase in the number of pitches in the immediate area. Given that Pickhurst Lane contains only three residential properties, the scale of this development would clearly be disproportionate and would overwhelm the existing community and would be in contention with Planning Policy guidance.

Additionally, Policy H requires decision-makers to consider the personal circumstances of the applicant yet no information has been provided regarding the personal circumstances of the applicant or how they meet the definition of a gypsy or traveller. This lack of transparency makes it impossible to assess whether the application is in compliance with policy requirements, not to mention the failure to include this information raises concerns about the validity of the application.

The National Planning Policy Framework (NPPF), particularly paragraph 11(d), states that in the absence of a five-year supply of deliverable traveller sites, planning permission should be granted unless other policies protecting areas of importance indicate otherwise. In this case, two significant constraints, the proximity to the South Downs National Park and the Arun Valley protected sites (SSSI, SPA, SAC, Ramsar site), strongly justify refusal of the application.

## 2. Adverse Impact on the Rural Character and Appearance of the Area

The development conflicts with Policy H of the Planning Policy for Traveller Sites, which states that sites should be well planned and landscaped to enhance the environment and increase openness. However, the site has undergone drastic changes, including:

- The removal of existing hedgerows
- The erection of long stretches of close-boarded fencing
- The digging up of grassed areas and the installation of large hardstanding surfaces

The character and appearance of the countryside in this location are already under pressure from incremental development. The introduction of two static caravans, two touring pitches, day rooms, and a significant area of hardstanding will further erode the rural landscape and disrupt the open, undeveloped nature of the area.

National policy emphasizes the importance of preserving the scenic beauty of rural areas, particularly where development is in proximity to National Parks. The proposed site is located immediately adjacent to the boundary of the South Downs National Park. The National Planning Policy Framework (NPPF) states that "great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks." Given the prominent location of the site, this development would be highly visible from public viewpoints and would cause demonstrable harm to the setting of the National Park.

In previous planning appeals related to the adjacent traveller site (e.g., APP/Z3825/A/14/2218650 and APP/Z3825/W/3246486), the Inspector noted that a single mobile home caused "considerable harm" to the landscape and rural character of the area. The assumption in the 2024 appeal that vegetation growth has mitigated the impact is incorrect, as historical aerial imagery shows little change in vegetation cover. Given that a single mobile home was found to cause harm, the addition of multiple units in this application would exacerbate the detrimental impact on the countryside and underscores the inappropriateness of further expansion in this sensitive location.

### 3. Lack of Demonstrable Need

The most recent Gypsy and Traveller Accommodation Assessment (GTAA) for Horsham District, published in November 2023, identifies a total need of 77 pitches for gypsy and traveller households between 2023 and 2040. However, the emerging Horsham Local Plan proposes to allocate sites for 69 new pitches within the first ten years of the plan period (89.61% of site allocations). This nearly fulfils the identified need and undermines any justification for additional speculative traveller site development in unallocated countryside locations.

The applicant's Planning Statement incorrectly references an outdated 2020 GTAA, which identified a need for 93 pitches. This discrepancy further calls into question the lack of evidence supporting and justification for this application.

### 4. Water Neutrality Concerns

The submitted Water Neutrality Statement is inadequate in several respects and is in contention with the requirements set out in Policy H of the Planning Policy for Traveller Sites. The key issues include:

- The application claims that the development will be entirely reliant on rainwater harvesting, but no detailed plans have been provided to show how this will be achieved.
- There are no technical drawings of the proposed static caravans to demonstrate the roof area can effectively capture necessary rainwater harvesting.
- The rainfall data used in the strategy is outdated, relying on figures up to 2020 when more recent data is available.
- The water consumption of the proposed day rooms has not been accounted for, meaning the overall calculations are incomplete further calling into question the credibility of the strategy.
- The applicant suggests that pre-occupation conditions could be used to secure water neutrality measures, but as the site is already partially occupied, these measures must be provided upfront.

Given the site's proximity to the Arun Valley protected sites (which include Sites of Special Scientific Interest (SSSI), a Special Protection Area (SPA), a Special Area of Conservation (SAC), and a Ramsar site), a robust water neutrality strategy is essential. Without clear evidence that the development will not increase water consumption and the failure to demonstrate true water neutrality, there is a strong reason for refusal under the NPPF and Habitat Regulations.

## 5. Ecological Impact and Lack of Compliance

The submitted Preliminary Ecological Appraisal is inadequate, outdated, and does not accurately assess the site's current ecological condition. Furthermore, the assessment was conducted in February 2025, before significant site works were undertaken.

The applicant was required to submit a Construction Environmental Management Plan (CEMP) before commencing works, yet no such document has been provided.

The site lies within a habitat area for protected species, however, no evidence has been provided that appropriate ecological surveys have been carried out or that mitigation measures are in place.

For instance:

- The appraisal identified potential Dormice habitats, yet hedgerow removal has occurred, violating best practice.
- Great Crested Newt DNA testing was recommended but has not been carried out.
- Vegetation clearance occurred during the nesting season, which is in direct violation of ecological best practices and legal protections for nesting birds.
- The required 20m buffer zone to protect hedgerows and woodland has not been implemented, further demonstrating a disregard for ecological requirements.

The application incorrectly claims exemption from Biodiversity Net Gain (BNG), even though it is only partially retrospective.

## 6. Surface Water and Foul Drainage Deficiencies

The application provides no details on surface water drainage, in violation of best practice and Sustainable Drainage Systems (SuDS) requirements. The hardstanding added to the site has unknown porosity, and no information has been given about the proposed disposal of foul water. The site has undergone extensive resurfacing with hardstanding, yet no permeability assessment has been provided to determine whether adequate drainage measures are in place.

Additionally, the application does not specify how foul water from the static caravans and day rooms will be managed. Given the lack of existing mains drainage infrastructure in this area, the omission of a drainage strategy is a serious oversight.

## 7. Unauthorised Access Construction

The new access point on Pickhurst Lane was installed without planning permission and is currently subject to enforcement investigation (reference EN/24/0473). The application misleadingly describes the access as "established," failing to acknowledge that it was only recently constructed in December 2024. This raises concerns about the applicant's approach to compliance with planning regulations.

## Conclusion

This application is wholly inappropriate and fundamentally flawed, contrary and in conflict to multiple national and local planning policies, and would cause irreversible harm to the countryside, poses irreversible ecological risks, and lacks proper infrastructure planning. It should be refused on the grounds of:

- Policy conflicts (Traveller Sites Policy C & H, NPPF, Arun Valley Habitat Regulations, South Downs National Park protections)
- Detrimental impact on the rural landscape
- Lack of demonstrable need
- Failure to meet water neutrality requirements
- Harm to protected species and habitats

On account of the reasons set out, I strongly urge Horsham District Council to reject this application in order to uphold the principles of good planning and protect the rural environment.

I trust my objections, on behalf of my client, will be given full consideration.

Yours sincerely,

For STRETTONS

