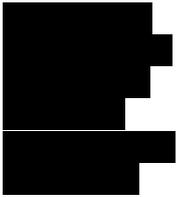


Objection to Planning Application DC/25/2079



3rd February 2026

Planning Department
Horsham District Council
Parkside, Chart Way
Horsham, West Sussex RH12 1RL

By email: planning@horsham.gov.uk

Re: Planning Application **DC/25/2079** - Use of land for the stationing of 4 static caravans for Gypsy and Traveller residential purposes and associated day rooms; Cotlands Paddock, Horsham Road, Cowfold, West Sussex, RH13 8AH.

Dear Case Officer,

I write to object to the above application. I have reviewed the submitted application material, the Horsham District Planning Framework (HDPF), the Cowfold Neighbourhood Plan (CNP), and consultee comments available at the time of writing. This representation focuses on material planning considerations and identifies evidence gaps that, in my view, prevent the Local Planning Authority (LPA) from concluding the proposal is acceptable.

Executive summary - requested outcome

Refuse the application on the grounds that fundamental information is missing, inconsistent and in conflict with local and national planning policy. Refusal should be the correct outcome on a number of grounds, and I wish to highlight the following valid matters for refusal of permission.

1. Consultation status and decision-making risk

The only West Sussex County Council (WSCC) highways response currently visible in the file (dated 22 January 2026) is from the Public Rights of Way (PROW) Team and relates specifically to Footpath 1756.

That response cannot be treated as a highway safety assessment of the proposed vehicular access onto the A281. The LPA should ensure that WSCC Highways Development Management has reviewed the proposal and provided a formal view on access geometry, visibility, and safety before determining the application.

2. Foul drainage feasibility and pollution risk

HDC Environmental Health and Licensing (consultation response dated 30 January 2026) states the application is unsupported by a Drainage Strategy and notes that there appears to be insufficient space within the red line for a drainage field. In the absence of a drainage strategy, percolation testing and a

properly sized drainage field design, the LPA cannot be satisfied that the proposal can be safely and lawfully serviced without risk of pollution to land or watercourses.

It should additionally be noted that the border of the proposed site is about 10 meters from a flood Zone 3 area and the topography of the land is such that any drainage water would add to this flood zone.

Why this matters

- Policy 23(c) (Gypsy and Traveller sites) requires the site to be properly serviced, including sewerage and drainage.
- HDPF Policy 24 (Environmental Protection) expects development to avoid unacceptable pollution and protect water quality.
- HDPF Policy 38 (Water Resources) requires development to manage water appropriately and avoid harm to water environments.

Evidence gaps

- A full drainage strategy covering foul and surface water, including justification for the proposed method of foul drainage.
- Percolation testing and ground conditions evidence, with a drainage field design sized to the proposed occupancy and compliant with relevant standards and Building Regulations.
- A plan demonstrating that the drainage field and all required offsets/constraints can be accommodated wholly within the application red line.
- Mitigation and management measures to prevent pollution during construction and operation, particularly given the proximity of watercourses and the site's slope/soil conditions.

3. Highway safety and safe/suitable access

The proposed vehicular access is onto the A281, which is a derestricted 60 mph section of road and is described in the submitted representation as being on/near a bend and gradient. In common language the proposed site entrance is on a "blind bend".

Intensification to serve four residential pitches and associated day rooms has the potential to materially increase turning movements and introduce slow-moving vehicles (including towing) at the access. The application does not provide sufficient technical evidence to demonstrate that visibility splays and access geometry are safe and adequate for the nature of the use.

Policy test

HDPF Policy 40 requires safe and adequate access and protection of highway safety. HDPF Policy 23(b) requires Gypsy and Traveller sites to have safe and convenient vehicular and pedestrian access and not to result in significant hazard to road users. National policy also requires that safe and suitable access to the site can be achieved for all users (NPPF paragraph 115, December 2024).

Evidence gaps the LPA should require

- Measured access drawing showing proposed access width, radii/swept paths (including emergency and towing vehicles) and any required works.
- Visibility splay drawings to the appropriate standard, informed by measured carriageway speeds (or a speed survey where necessary).

- A formal response from WSCC Highways Development Management confirming whether the access is acceptable or what mitigation is required.
- Pedestrian safety assessment: presence/absence of footways, lighting, crossing opportunities and the practical route to key services.

4. Location, settlement hierarchy and countryside protection

The application site lies outside the Cowfold built-up area boundary (BUAB). HDPF Policy 26 indicates that development outside BUABs will be strictly controlled to protect countryside character. The Cowfold Neighbourhood Plan (CNP) was formally made on 8 October 2025 and carries full statutory weight in decision-making. CNP policy supports residential development primarily within the built-up area. In this context, the proposal represents new residential development in the countryside and should be justified against the development plan's spatial strategy and the specific criteria in HDPF Policy 23 for Gypsy and Traveller sites.

Accessibility to services

Policy 23(d) expects sites to be within reasonable distance of a range of local services, particularly schools and essential health services. The absence of a safe, lit pedestrian route along this stretch of the A281 would increase reliance on private vehicles for day-to-day needs, undermining sustainability objectives.

5. Landscape character and heritage setting

The proposal introduces four static caravans, day rooms and associated domestic infrastructure (hardstanding, parking, storage, lighting, utilities and boundary treatments). Such elements can create a notable 'urbanising' effect in an open paddock, particularly if inadequately screened. The application should be supported by clear visual information demonstrating how the development would sit in the landscape and whether it would harm the setting of nearby heritage assets (including the Grade II listed buildings identified locally as Cotlands, West Cotlands and Brook Place).

- HDPF Policy 25 seeks to protect landscape character and avoid harmful visual impacts.
- HDPF Policy 34 requires heritage assets and their settings to be conserved in a manner appropriate to their significance.
- Planning (Listed Buildings and Conservation Areas) Act 1990

Permission should not be granted in the absence of:

- A landscape/visual appraisal proportionate to the proposal, including viewpoints from the A281 and nearby receptors, and details of boundary treatments and lighting.
- A heritage statement addressing whether and how the proposal affects the setting of nearby listed buildings, and whether any harm would be less than substantial or substantial (as applicable).

6. Residential amenity and environmental protection

HDPF Policy 33 requires development to avoid unacceptable harm to the amenity of nearby occupiers and land. The intensification from paddock use to four residential pitches plus associated day rooms is likely to increase activity, vehicle movements, external lighting and noise, particularly during evening hours. The application should demonstrate how amenity impacts will be controlled (for example through site layout, lighting design, boundary treatments and enforceable conditions).

I note recent local concerns about previous site activities (including waste-related nuisance). While such matters are primarily for separate environmental health or enforcement regimes, they underline

the importance of robust conditions and a clear management approach if the LPA were minded to approve. Any assertions relied upon should be supported by objective evidence (e.g., incident logs, dated photographs, or correspondence with statutory bodies).

7. Ecology and biodiversity

There are local reports of protected species in the vicinity (e.g., bats, dormice, buzzards and great crested newts). The application should be supported by surveys and an ecological assessment proportionate to risk, including the effects of lighting, habitat disturbance and cumulative impacts. The LPA must be satisfied that any necessary mitigation is secured and that biodiversity requirements are met in accordance with HDPF Policy 31.

Evidence gaps

- Up-to-date ecology survey evidence (and survey effort/seasonality) relevant to likely receptors on/adjacent to the site.
- An external lighting plan demonstrating avoidance of harmful light spill to habitats and potential bat foraging/commuting corridors.

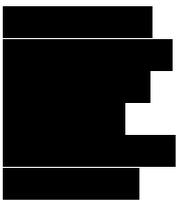
Conclusion

For the reasons set out above, the proposal conflicts with key criteria of the development plan, particularly in relation to foul drainage feasibility and highway safety.

Given the Environmental Health consultee position on drainage and the current absence of a formal WSCC Highways Development Management assessment of the access, the LPA does not currently have an adequate evidential basis to conclude that the development would be safe, acceptable and properly serviced.

I therefore request that the application is refused, or alternatively that determination is deferred until the evidence gaps identified in this representation are fully addressed.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

References

- Horsham District Council: Cowfold Neighbourhood Plan - made 8 October 2025 (webpage).
- National Planning Policy Framework (December 2024), paragraph 115 (safe and suitable access).
- HDC Environmental Health and Licensing consultation response on DC/25/2079 dated 30 January 2026 (as referenced on the planning file).
- Planning (Listed Buildings and Conservation Areas) Act 1990