



Stratton House
57 Lower Street
Pulborough
RH20 2AZ

01798 877555

planning@batchellermonkhouse.com

Ms Kate Turner
Planning Department
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

By email only to [REDACTED] and planning@horsham.gov.uk

14th March 2025

Dear Kate

**Planning Application Reference DC/25/0317
Land West of Parsons Field, Pickhurst Lane, Pulborough, West Sussex RH20 1DA**

We are writing to object to the above planning application on a number of grounds, namely:

- Principle of the development
- The adverse impact on the rural character and appearance of the area;
- Need for the development
- Water neutrality
- Ecology
- Surface water and foul drainage

These areas of concern are discussed in more detail below.

We also suggest that the application is reviewed for validation as key information is missing from the application, namely proposed plans of the static caravans, and details of visibility splays relating to the widened new access. In addition, a large wooden building has been erected on the land which is not shown on the Block Plan. This is shown in the attached final photograph attached to this letter.

There is also a strip of land running alongside the northern boundary which has been excluded from the red line. It is suggested that this should be included in the site area to ensure the 20m buffer suggested within the ecology report is provided to protect the surrounding hedgerow.

The development description also makes no reference to the access which has recently been installed on Pickhurst Lane without planning permission.



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. The application refers to a now superseded version of this policy document.

Policy C states 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. The site is adjacent to an existing traveller site which itself is proposed to be extended under a separate application. If both that extension and the subject application were approved, as is currently recommended by officers, it would equate to a 200% increase in traveller pitches in a rural area. There are only 3 houses on this stretch of Pickhurst Lane so such an increase would be dominating.

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 demonstrate how the scheme avoids having an adverse impact. This is discussed further below.

The adverse impact on the rural character and appearance of the area

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.

Need for the development

The latest assessment of the need for traveller accommodation in the Horsham District is set out in a Gypsy and Traveller Accommodation Assessment report dated November 2023. The assessment identifies a need, between 2023-2040, for 77 pitches for households which meet the definition of travellers or gypsies. The figure cited in the submitted Planning Statement (93 pitches) is based on a now superseded assessment carried out in 2020.

The latest assessment has informed the preparation of the emerging Horsham Local Plan which is now at Regulation 19 stage, although the Examination has been paused. The emerging Horsham Local Plan proposes to make site allocations which will deliver an additional 69 pitches, delivering almost all of the district's needs within the first 10 years of the Plan period.



Water neutrality

The submitted Water Neutrality Statement states that the proposal will be entirely reliant on rainwater for both potable and grey water but does not provide plans of the proposed static caravans to show the roof area available for water capture for the proposed rainwater harvesting.

The water neutrality strategy is based on rainfall data running up to 2020 whereas more up to date data is available. The strategy is not therefore based on a true reflection of actual rainfall.

In addition, no allowance has also been provided for the water usage of the Day Rooms.

The report also suggests pre-occupation conditions to secure the water neutrality measures. However as the site is now partially occupied full details of such measures must be provided before planning permission can be granted.

Ecology

The application is supported by a Preliminary Ecological Appraisal which was undertaken on the 14th February and pre-dates the majority of works that have taken place.

The statement states that a CEMP is required prior to the start of works. This has not been provided.

The appraisal identifies a number of ecological constraints and makes recommendations to avoid harm being caused. These recommendations appear to have been ignored.

The appraisal acknowledges Dormice potential within the existing hedgerow and woodland and avoidance of works in these areas are recommended. However, hedgerow has been removed to create the site access. The appraisal also recommends the installation of a 20m buffer zone between the areas of hedgerow and woodland and the development works to prevent any incursion into these areas and would prevent any impact on this Dormice habitat. The plans do not appear to incorporate this zone on the western and northern boundaries.

The appraisal raises an 'amber risk' of an offence being committed in relation to Great Crested Newts and recommends DNA sampling of ponds be undertaken. However, such sampling appears to have been carried out and the work has been undertaken seemingly without a District Licence having been applied for.

The appraisal also recommends the avoidance of vegetation clearance during nesting bird season. However works were undertaken in March so within this season.

The appraisal also suggests that the proposals do not require the removal of any hedgerow. However, hedgerow was stripped out recently to create the site access.

The appraisal does not therefore accurately assess the impact the proposals have had.

In relation to Biodiversity Net Gain, the applicant suggests the application is exempt as it is retrospective. However, it is only partly retrospective and BNG should still apply for the elements of the scheme that have not yet been carried out.



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 recently installed, in December 2024 and is the subject of an enforcement investigation (reference EN/24/0473).

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

Yours sincerely

Batcheller Monkhouse

Batcheller Monkhouse

Photographs of the site pre and post development



Source: Google Streetview dated June 2024 showing where the site access has recently been created



Photograph taken in December 2024 shortly after hedgerow had been removed and a gate installed.

<p>Plate 1: Stream to the South of Site</p>	<p>Plate 2: Heavily Poached Field</p>
	
<p>Plate 3: Adjacent Woodland</p>	<p>Plate 4: Grazed Field</p>
	
<p>Plate 5: Hedge to the North</p>	<p>Plate 6: Site Entrance</p>
	

Source: Preliminary Ecology Assessment dated February 2025, submitted with the application



Photographs taken 28th February 2025



Photograph taken on 2nd March 2025



Photograph taken 10th March 2025