

OBJECTION - REQUEST FOR REFUSAL

Planning application DC/25/2079

Site: Cotlands Paddock, Horsham Road / Brighton Road, Cowfold, West Sussex RH13 8AH

Proposal: Stationing of 4 static caravans for (Gypsy and Traveller) residential purposes and associated day rooms

To	Development Management, Horsham District Council planning@horsham.gov.uk
█	█
Date	3 rd February 2026
Decision route shown	Expected delegated decision (per case record)
Neighbour consultation expiry	05 February 2026
Determination deadline	10 March 2026

1. Summary

I object to planning application DC/25/2079 and request that planning permission is refused.

This objection is based solely on material planning considerations and the adopted development plan. This objection concerns whether this proposal on this specific site is acceptable on the evidence submitted.

The application fails to demonstrate compliance with key development plan tests relevant to Gypsy and Traveller accommodation and development in the countryside.

Given the proximity of three listed buildings (including the Grade II* Brook Place), and the absence of a proportionate heritage/setting assessment and verified visual evidence, the Council cannot reach a lawful and robust conclusion that the proposal preserves heritage significance and countryside character; refusal is therefore warranted on the information submitted.

In multiple areas the evidence is missing, internally inconsistent, or explicitly queried by consultees (notably Environmental Health).

On the evidence submitted, the Council cannot robustly conclude that the development would be acceptable; the correct outcome is refusal.

Refusal grounds at a glance (policy-led)

Ground	Policy hook	Issue	Why refusal now
A	HDPF Policy 26	Countryside harm / unjustified intensification not shown to be avoided	No robust landscape/visual evidence; mitigation largely asserted
B	HDPF Policy 23(b)	Safe vehicular and pedestrian access not demonstrated	No highways-safety assessment on file (WSCC response is PROW-only in relation to a single footpath)
C	HDPF 38 + Cowfold NP 1	Surface water, groundwater and foul drainage feasibility not demonstrated	No drainage strategy/tests/exceedance routing; EH indicates refusal until feasible EH notes there appears to be insufficient space within the red line for a drainage field, putting agricultural land at risk of pollution and adding to flood risk
D	HDPF Policy 23(e) / Policy 26 + s66(1) Planning (Listed Buildings and Conservation Areas) Act 1990	Landscape, lighting, ecology and amenity impacts not evidenced	No heritage/setting assessment for nearby listed buildings (incl. Grade II*); Council cannot discharge s66 duty or conclude "no harm" on current evidence; no detailed lighting plan and noise evidence is only screening-level
E	HDPF 23(c) / 37	Servicing, spacing and practical operation not demonstrated	EH flags spacing/parking/nuisance; servicing/refuse/turning not evidenced
F	BNG statutory compliance	BNG inputs/validity appear inconsistent – multiple identified factual errors	Inconsistent site area measurements in application / incorrect basic facts regarding site location & address / baseline validity concerns undermine statutory compliance demonstration / missing evidence of protected species present in area
G	Material consideration	Baseline ground condition uncertain (HDC Planning Enforcement EN/26/0023 / Temporary Stop Notice)	Raises drainage / hydrogeology / ecology / countryside risk; basis for permission now unsound

2. Policy framework, consultation and decision-making basis

The application must be assessed against the adopted development plan and other material considerations. The principal adopted policies that appear directly relevant include (non-exhaustive):

- Horsham District Planning Framework (HDPF): Policy 23 (Gypsy and Traveller accommodation), Policy 26 (Countryside Protection), Policy 37 (Sustainable Construction), Policy 38 (Flooding). - Cowfold Neighbourhood Plan: Policy 1 (Groundwater and Surface-water Flood Risk).

This representation requests refusal. Any late or materially revised submissions would require appropriate re-consultation; however, on the evidence currently submitted, refusal is the correct decision.

Statement of Community Involvement (SCI) and consultation integrity:

The Council's adopted Statement of Community Involvement explains that once a planning application is validated there is a statutory consultation period for comments, and that the Council consults parish councils and statutory consultees and publishes applications and supporting documents online.

It also explains that in making a decision the Council can only take account of planning considerations, and that comments received after the consultation period will be taken into account wherever possible up to the point the application is determined.

Given the significance of this proposal, and the current absence on file of a highways safety assessment from the highway authority (distinct from Public Rights of Way), this objection proceeds on the basis that

consultation should be complete and decision-making should rely on a coherent evidence base; **on the evidence currently submitted, refusal is the correct outcome.**

3. Grounds of objection (policy-led)

Ground A - Principle of development in the countryside (HDPF Policy 26)

HDPF Policy 26 applies a strong test for development in the countryside, including protecting countryside character and avoiding unjustified intensification of activity.

The proposal introduces a new permanent residential use (four pitches with day rooms) with associated movements, servicing, domestic paraphernalia and potential lighting.

On the evidence submitted, the application does not demonstrate that these effects can be accommodated without unacceptable harm to rural character.

Accordingly, the proposal conflicts with HDPF Policy 26 and permission should be refused.

Ground B - Failure to demonstrate safe and suitable access (HDPF Policy 23(b))

HDPF Policy 23 requires that a Gypsy and Traveller site has safe and convenient vehicular AND pedestrian access and does not create a significant hazard for road users.

On the evidence submitted, safe access is not demonstrated. The only WSCC consultee response presently on file is explicitly from Public Rights of Way and does not assess highway safety, visibility, speeds, traffic impact, swept paths for servicing/emergency vehicles, or pedestrian safety on the derestricted 60mph A-road.

In the absence of a highways-safety evidence base from the highway authority, the Council cannot robustly conclude that the access arrangements satisfy Policy 23(b).

Permission should be refused.

Ground C – Satisfactory drainage, foul drainage and flood risk mitigation are not demonstrated (HDPF Policy 38 + Cowfold NP Policy 1)

Ref: Annex C

Cowfold Policy 1 requires proposals to manage surface water and groundwater flood risk using sustainable drainage, and to direct development to the lowest flood risk areas.

The response submitted by Environmental Health and Licencing to HDC on 30th January specifies very clearly that the site is of inadequate size to support sufficient drainage for the proposed development:

“The application also mentions that the runoff from the treatment plant will be taken to a soakaway drainage field, this is not identified on the block plan and there appears to be insufficient space within the redline for a drainage field.”

HDPF Policy 38 requires assessment of all forms of flooding and appropriate use of SuDS, supported by evidence where relevant.

In the event that there is any run off of foul drainage, the topography of the land is such that this will drain into the neighbouring field to the east and then enter the Cowfold Stream.

The field immediately to the east is used every year for grazing cattle (sold as meat for human consumption) and growing hay used as feedstuffs for cattle (the cattle also being sold as meat for human consumption).

Additionally the proposed development site is less than 20 meters from a flood Zone 3 area. See Annex C.

The submission does not provide a coherent, evidenced drainage solution: there is no detailed drainage/SuDS design with infiltration testing, exceedance routing and maintenance arrangements. Foul drainage feasibility is not demonstrated. Environmental Health identify that the application does not establish feasibility and support refusal until feasibility is shown.

Permission should be refused.

Ground D - Landscape/visual, heritage (setting of listed buildings), lighting, ecology and amenity impacts are not evidenced (HDPF Policy 23(e) / Policy 26 and statutory heritage duty)

Ref: Annex D

There are three designated heritage assets in close proximity to the site, including one Grade II* listed building:

Brook Place (Grade II*, List Entry No. 1027087)

West Cotlands (Grade II, List Entry No. 1074957)

Cotlands (Grade II, List Entry No. 1193092)

The proposal introduces a new permanent residential use (four pitches with day rooms) and associated operational effects (domestic paraphernalia, activity, vehicle movements and potential external lighting) which have clear potential to affect rural character and views, and critically the setting of the above listed buildings. This is particularly important in relation to the Grade II* asset, where the planning system requires especially careful consideration of significance and setting.

Brook Place (Grade II*) is in direct line of sight of the proposed development (see Annex D).

The application does not provide a proportionate, evidence-based assessment of heritage impact on the setting of these listed buildings (e.g., a Heritage Statement including setting analysis, clear description of significance, verified viewpoints/visualisations, and an assessment of the change in experienced setting in both leaf-on and leaf-off conditions). In the absence of such evidence, the Council cannot properly discharge its statutory duty under s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to give special regard to the desirability of preserving listed buildings and their settings, nor can it robustly conclude that the proposal would preserve significance.

Separately, and in combination with the heritage issue, the submission still does not provide robust evidence to demonstrate that wider landscape/visual, lighting, ecological sensitivity and neighbour amenity effects would be acceptable (no detailed lighting specification/contours, and noise evidence remains screening-level). Taken together, the proposal fails to demonstrate compliance with the development plan tests requiring sensitive design and avoidance of unacceptable amenity impacts.

HDPF Policy 23 requires that proposals should not have unacceptable impacts on the landscape or the amenities of nearby residents and should be sensitively designed with appropriate mitigation.

Please refer to Annex D.

Permission should be refused.

Ground E - 'Properly serviced' and practical operation not demonstrated (HDPF Policies 23(c) and 37)

HDPF Policy 23 requires that sites can be properly serviced and have adequate space for practical operation, including parking, circulation and amenity space.

HDPF Policy 37 includes expectations for appropriate refuse/recycling storage as part of sustainable design. Environmental Health raise concerns about spacing, parking and potential nuisance, and note that reliance on Building Regulations is not applicable to caravan sites.

Permission should be refused.

Ground F - BNG submission reliability and statutory compliance not robustly demonstrated

The BNG submissions appear to contain inconsistencies on fundamental inputs (including site area) and include baseline validity entries that appear inconsistent with determination timing.

The BNG submission states the site to be "Cotlands Paddock East, Brighton Road, Cowfold, RH13 8AJ". The site location is the A281 Horsham Road, not Brighton Road, and the postcode is incorrect, as the site's postcode is RH13 8AH. Given such basic errors this calls into question the reliability of the entire report.

The BNG metric records a walkover date (19/11/2024) with a "data valid until" entry (19/05/25), which appears inconsistent with a decision in 2026.

Accordingly, statutory BNG compliance is not robustly demonstrated on the evidence submitted; permission should be refused.

Ground G - Enforcement context: Temporary Stop Notice indicates baseline uncertainty (material consideration)

Horsham District Council has served a Planning Enforcement, Temporary Stop Notice (EN/26/0023) relating to alleged unauthorised importation of waste and other material on the land.

This is materially relevant to drainage, hydrogeological/pollution risk, ecology baseline and countryside character.

In this context, granting permission for residential occupation without robust certainty on baseline, soil composition, ground pollution levels and drainage impacts would be unsound.

Permission should be refused.

4. Parish Council and neighbour representations (summarised)

The Cowfold Parish Council response raises material planning concerns including access safety, drainage/effluent feasibility and wider impacts.

Neighbour representations raise consistent concerns on highway safety, drainage/effluent risks, amenity impacts (noise/light) and countryside character.

These concerns align with the policy tests above and reinforce the refusal case.

5. Conclusion

For the reasons above, I request that planning permission for DC/25/2079 is refused due to conflict with the development plan and because the application does not provide adequate, coherent evidence to demonstrate compliance with key adopted policy tests.

Yours faithfully,

3rd February 2026

Annex A - Documents referenced (non-exhaustive)

Key submissions and responses referenced in this objection.

Date	Type	Document
12/12/2025	Plan	Location Plan - 2509CO_000
12/12/2025	Plan	Proposed Block Plan - 2509CO_001 Rev 004
12/12/2025	Form	Application Form
12/12/2025	Form	CIL Form
12/12/2025	Statement	Planning Statement
12/12/2025	Ecology	Preliminary Ecological Appraisal
12/12/2025	BNG	BNG Report
13/01/2026	BNG	Statutory BNG Metric
12/12/2025	Amenity	Noise Impact Assessment
12/12/2025	Trees	Tree Report
22/01/2026	Consultee	WSCC Highways Response (Public Rights of Way)
29/01/2026	Consultee	Cowfold Parish Council response
30/01/2026	Consultee	HDC Environmental Health response
29/01/2026	Enforcement	Temporary Stop Notice (EN/26/0023)

Annex B - Evidence gaps relied upon as refusal reasons

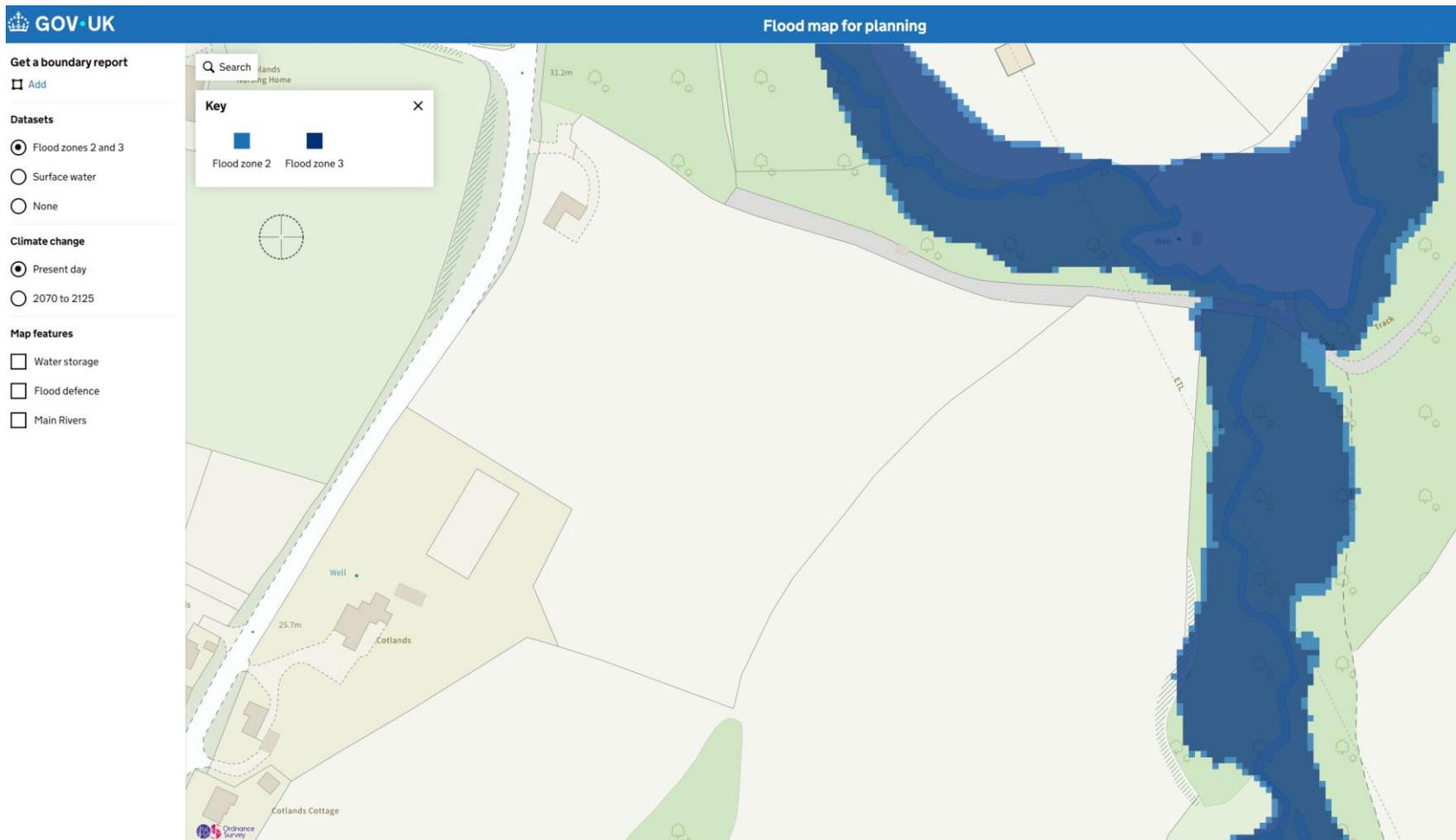
The following typical technical evidence is not provided as discrete submissions. These omissions and inconsistencies mean the applicant has failed to demonstrate compliance with adopted policy tests.

- Highways/access: Transport Statement or access design note; visibility splays and speed evidence; swept-path tracking for servicing/emergency/refuse vehicles; pedestrian accessibility assessment.
- Drainage/flood risk/foul drainage: detailed surface-water drainage strategy/SuDS calculations (including infiltration testing, exceedance routing and maintenance); foul drainage design and lawful discharge route/consents; groundwater emergence considerations where relevant.
- Landscape/lighting: landscape and visual appraisal; detailed lighting plan/specification (lumens/heights/beam control/timers/sensors and lux contours).
- Operational practicality: refuse storage and collection plan (including collection point and vehicle access/turning), and confirmed servicing arrangements.

Annex C – Drainage, pollution, flooding

The proposed development site is less than 20 meters from a flood zone 3 area.

Any overflow of foul water drainage would fall into the neighbouring eastern agricultural field (the product of which enters the human food chain directly as beef meat and foodstuffs for cattle sold for human consumption) and to the Cowfold stream.

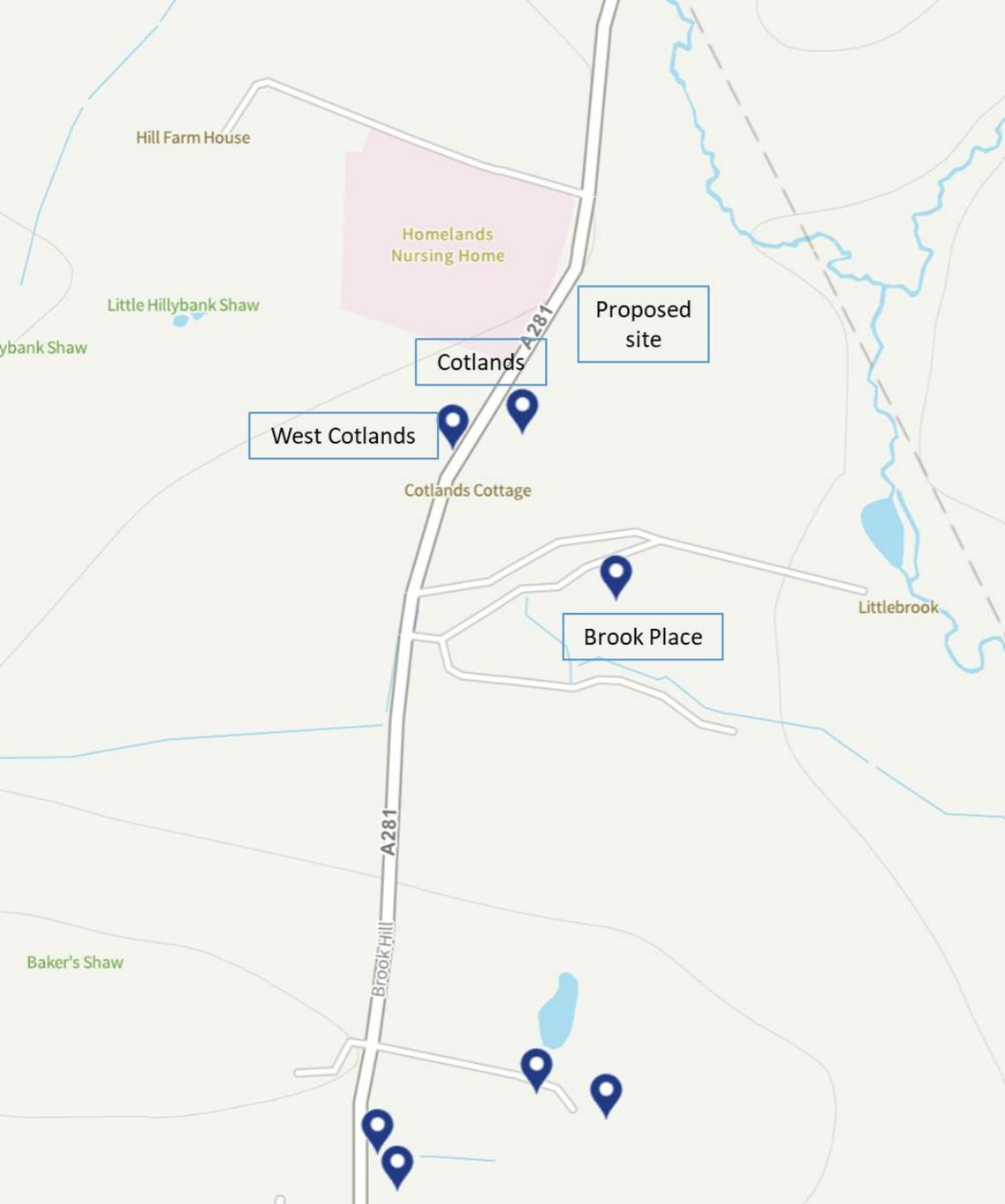


Annex D – Heritage assets

Brook Place (Grade II*, List Entry No. 1027087)

West Cotlands (Grade II, List Entry No. 1074957)

Cotlands (Grade II, List Entry No. 1193092)



Annex E – BNG Report errors

The BNG Report has multiple inconsistencies, errors and omissions (protected species present in area) including the site location address (road name) and postcode. It calls into question the overall reliability of the report.

The BNG report referencing site postcode RH13 8AJ is clearly not that of the actual site, and the site is on the A281 Horsham Road not the Brighton Road.

