Planning Application DC/24/0426

Land To The North East of Long Wells Vineyard and To The South of Marches Road Warnham Horsham West Sussex RH12 3SL

Application to confirm the continuous use of land and buildings for storage purposes for a period in excess of ten years (Lawful Development Certificate - Existing)

Statement by Garmans, Marches Road, Warnham, Horsham, RH12 3SL Resident since 1988.

Objection to the Planning Application

This Planning Application is essentially a re-run of Mr. Maloney's previous Planning Application ref. DC/23/2057, which was refused, but with significant additions. The new application has been prepared by a Planning Enforcement Consultancy and, in the Planning Statement contains a long lecture, presumably aimed at the Planning Department, on the perils of refusing such an application.

The Planning Statement also describes and, thereby, maybe seeking to introduce, an established use of habitation [redacted] the owner and farmer of the land who bequeathed the site of DC/24/0426 to a local resident. This plot is now owned by the Applicant, Mr. Maloney. The Planning Application form describes Mr. Maloney's address as the "Land at Marches Road", indicating that he was living on site. [redacted]. Details of which have been passed to HDC Planning Department.

Below are my comments concerning [redacted] housing and storage arrangements after his sale of his farmland at, what was, Joelands Farm, as they may have a particular relevance.

After sale of the farm, whilst retaining the site of DC/24/0426, [redacted] first lived with his parents in their house in Northlands, Warnham. During this time, he moved two of the farm's steel containers onto the site for storage of some retained farm equipment and personal items from his house but, <u>crucially, at no time did he trade in storage and distribution of any kind.</u> When his parents had died he sold the inherited property in Northlands. He than moved into accommodation in Ditchling, on the South Downs, for some years. In his declining years, by now in ill health, he moved back to the area to live in a cabin at a property in Marches Road where he was cared for until his death. At no time was he observed by me, or other locals I have consulted, to have lived in a camper-van, or any other type of accommodation, on the site. [redacted] had he done so he would have had to live in extremely primitive conditions, without water and electricity supply, sanitary facilities, heating, lighting or sewage disposal.

The agent is relying on a statement made by a local resident. Their "Sworn Statement", dated 16 October 2023, is unsigned, unwitnessed and the "Solicitors of Oath" *sic*, name, address and signature are, anyway, omitted. *To my knowledge, there is no such legal title as "Solicitors of Oath" so I doubt the authenticity of this document*.

As I understand it, the land has remained classified as agricultural and the storage containers have served no more purpose than the function of secure barns in connection with agricultural and personal use. The land has not been Used for personal habitation. No planning application has ever been made to alter the classification of the land from that of agriculture.

I do not believe an established use for general or commercial storage, either open or contained, or distribution, as defined in B8 Use Classification, has been demonstrated, owing to the current agricultural classification of the land and the past storage use being solely in connection with the farm owner's property (storing agricultural equipment/personal items).

The existing gate access onto Marches Road to and from the site is situated at the north-eastern corner of the site, very close to the dangerous, blind bends where there have been several major motor accidents involving serious injuries. Marches Road is now a very busy "cut-through" between the A29 and the A24, particularly at peak times. The traffic is fast and drivers often notappreciate the danger of the bends, particularly in bad weather. This road is now also used as a recreational race track for speeding motor bikers.