

Horsham District Council
Planning Department
Parkside, Chart Way
Horsham RH12 1RL
24 November 2025

Re: Formal Objection to Planning Application DC/25/1727

Long Wells Vineyard, Marches Road, Warnham, West Sussex RH12 3SL

Proposal: Retrospective full application for a six-pitch settled Gypsy accommodation site

I am writing to object in the strongest planning terms to the above application, which seeks retrospective permission for the erection of a six-pitch Gypsy and Traveller site at Long Wells Vineyard, Warnham. Having reviewed the submitted material—including the Planning, Design and Access Statement—and having regard to the current Development Plan and recent appeal decisions, I submit that the proposal is in clear conflict with multiple adopted policies and that planning permission should be refused.

The proposal is wholly inappropriate for its location and fails to comply with the site criteria set out in Policy 23 of the Horsham District Planning Framework (2015), along with associated policies 25, 26, 31, 32, 33, 38 and 40. These policies establish a strong presumption against unplanned and visually intrusive development in the open countryside and require that Gypsy and Traveller sites be sustainably located, visually contained, and supported by adequate services and access. This application meets none of those requirements.

The application site lies deep within the open countryside, well beyond the built-up area of Warnham. It is situated along a narrow rural lane with no footpaths, lighting or connection to public transport. It is functionally and physically isolated from local services. The applicant's own site plan confirms its remoteness, and there is no dispute that the land lies outside any settlement boundary. In spatial terms, the location is unsuitable for residential intensification. This immediately brings the proposal into conflict with Policy 23(a), which requires that sites be located in or near existing settlements with reasonable access to facilities and infrastructure.

The development comprises multiple static caravans, touring caravans, hard surfacing, timber utility buildings and domestic fencing. It introduces a distinctly suburban layout into an otherwise open rural landscape. The application includes no Landscape Visual Impact Assessment, no tree or hedgerow survey, and no mitigation planting plan. Despite claims in the planning statement, the site is visible from Marches Road and surrounding land. The fencing and structures interrupt the previously open character of the field and contribute to the perception of built form and domestic occupation in an area otherwise defined by agricultural uses. This results in a direct conflict with Policy 25, which seeks to protect the natural environment and landscape character, and Policy 26, which only permits development in the countryside where it is essential and appropriate to a rural location.

The applicant dismisses the resulting landscape and visual impact asserting, without evidence or justification, that this should not constitute a reason for refusal. This is not a planning argument—it is a statement of preference. No visual appraisal, no mitigation strategy, and no landscape analysis is provided to substantiate this claim, despite the fact that the caravan's bright white external finishes stand out starkly against the surrounding landscape, particularly in winter months when boundary vegetation is sparse. Policy 25 of the Horsham District Planning Framework requires that development protect and enhance landscape character. In this case, the harm to openness, rural views and visual tranquillity is clear from the site layout and location. It is not open to the applicant to simply dismiss landscape harm as irrelevant. Nor have they demonstrated that the development is sustainably located; indeed, they make no attempt to do so, relying solely on general need to justify a clearly inappropriate and poorly integrated site. These are material planning considerations, and cannot be circumvented by unsubstantiated assertions.

The applicant suggests that the proposal should be supported on the basis of an unmet need for Gypsy and Traveller accommodation, relying on figures from a 2017 Gypsy and Traveller Accommodation Assessment (GTAA). However, that assessment is now significantly out of date. It has since been superseded by updated evidence published in December 2023 by Opinion Research Services (ORS) for Horsham District Council. That study, referenced in the Sussex Topiary appeal decision (DC/24/1502) issued in October 2025, identified a need for 128 pitches between 2023 and 2040. The applicant has not referred to or addressed this updated evidence base.

Crucially, the application does not demonstrate how this site has been selected in response to the current need, nor whether the occupants fall within the planning definition of “Travellers” as clarified by the Planning Policy for Traveller Sites. No personal circumstances are submitted and no evidence is provided to show that this specific location meets any identified cultural, family or welfare need. In the absence of this evidence, it is not possible to conclude that the proposal addresses the identified shortfall or is consistent with the spatial strategy for new pitches. Unmet need alone does not override the requirement to comply with Policy 23. The proposal fails to do so.

The layout and access arrangements raise additional concerns. The site is accessed from a narrow rural road (Marches Road) with a 50mph limit, no lighting or pavements, and limited visibility. The intensification of use from six pitches, each with touring and static caravans and multiple vehicles, will increase the risk to highway safety. No swept path analysis or tracking has been provided to demonstrate that towing vehicles can enter and exit safely. There is also no passing provision at the site entrance. The reliance on car travel for all journeys, including school and healthcare access, highlights the site’s unsustainable location and brings it into conflict with Policy 40.

Drainage and servicing have not been addressed adequately. The application makes general reference to foul drainage being managed via a treatment plant, but no details are provided of the specification, capacity, location or outfall of such a system. There is no surface water drainage plan, no percolation test data and no sustainable drainage strategy. The site lies on elevated land and there is a legitimate risk that foul or surface water could migrate to neighbouring land, particularly during high rainfall. This lack of information is contrary to Policy 38, which requires that flood and pollution risks be clearly understood and mitigated.

Amenity impacts on surrounding properties have also been disregarded. The site introduces continuous domestic activity, noise, lighting and vehicle movements into what is otherwise a low-activity rural location. The application does not include a lighting plan or management strategy. Uncontrolled lighting would harm the rural dark skies, while early morning and evening movements of large vehicles would adversely affect residential amenity. This is contrary to Policy 33, which requires protection of neighbouring living conditions and rural character.

The applicant has failed to properly assess the ecological value of the site and its surroundings. The submitted Preliminary Ecological Appraisal (PEA), dated March 2024, is limited to a walkover and desktop survey and does not include any species-specific survey effort. Critically, it omits bat activity surveys, breeding bird surveys, or any assessment for the presence of priority species such as hedgehogs. As a local resident, I can confirm that the site is regularly visited by bats, which forage in the area during dusk and nighttime hours, and that there are at least two bird species present that are on the national Red List for conservation concern. The site and surrounding hedgerows also support hedgehogs, which are now classified as vulnerable and declining. The Common Toad is also present in this area, and although not on the red list it is classed as near threatened. These species are protected either under the Wildlife and Countryside Act 1981 or listed as UK Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006. Despite this, no detailed ecological assessment has been provided, and there is no evidence that the potential impact of the development—through lighting, vegetation clearance, noise, or increased disturbance—has been evaluated or mitigated. Furthermore, the caravans currently on site are bright white and visually intrusive, and no effort has been made to assess their effect on wildlife movement or visual sensitivity in what is otherwise a low-lit rural area. The applicant has also made no effort to engage with relevant conservation bodies or to respond to these potential constraints. This failure to address known ecological risks places the proposal in direct conflict with Policy 25 of the Horsham District Planning Framework, which requires development to maintain and enhance biodiversity and be supported by adequate ecological information before it is determined.

Finally, the applicant references several other appeal decisions to support the proposal, including sites at Pear Tree Farm, Kingfisher Farm and Sussex Topiary. However, none of those decisions are directly comparable in terms of location, landscape context or access. Each was determined on its own facts and some were approved due to specific family circumstances or temporary harm mitigation. In contrast, this site lacks any personal justification, any mitigation strategy, and any strategic planning support. It is entirely unplanned and clearly at odds with the adopted Development Plan.

A nearby application for a similar Gypsy and Traveller use was refused under reference DC/22/2046, which proposed the siting of two static caravans and two touring caravans for occupation by Travellers along with associated development. That site, also located on Marches Road and in close proximity to the current application site, was found to be in an unsustainable location and to result in visual and landscape harm to the open countryside. The Council concluded that the proposal failed to meet the criteria of Policy 23 of the HDPF and would introduce a form of development incompatible with the rural character of the area. This refusal is particularly relevant, as it involved fewer pitches and less built form than the current proposal under DC/25/1727, which now seeks consent for six pitches and an even greater degree of landscape change and activity. The current application offers no material improvements over the earlier refused scheme and indeed amplifies the very concerns which led to that decision. It would therefore be inconsistent with established planning judgment in the area to grant permission on this more intensive proposal.

The Council's very recent decision to refuse application DC/25/0497, dated 8 October 2025, is of direct relevance to this proposal. That application, for a smaller Gypsy and Traveller site on land to the north of the current site, was refused for reasons including visual harm, unjustified development in the countryside, and failure to meet the policy criteria under Policies 23 and 26 of the HDPF. The Council concluded that the development would result in an unacceptable impact on the character and appearance of the countryside and that the applicant had not demonstrated that the site was suitable, sustainable, or essential in this rural location. The current application under DC/25/1727 seeks permission for a larger and more intensive development, including six pitches, and introduces a greater degree of built form and residential activity. No meaningful attempt has been made to distinguish this proposal from that recently refused, and none of the underlying policy conflicts have been resolved. This strengthens the conclusion that the current application also fails to comply with established planning policy and reinforces the consistent application of development plan principles in this locality.

In conclusion, the application is unacceptable in principle and in practice. It is contrary to the Council's adopted planning strategy and fails to meet the requirements of Policies 23, 25, 26, 31, 32, 33, 38 and 40 of the Horsham District Planning Framework (2015). The applicant has not demonstrated that the site is sustainably located, visually contained, well-serviced or necessary to meet the specific needs of any identified household. It is also retrospective in nature and regularises unauthorised development that has already caused harm to the countryside. I therefore respectfully request that the application be refused in full and that appropriate enforcement action is taken to remedy the breach of planning control.

Regards,



2 Norhlands Cottages, Northlands Road, Warnham, West Sussex.