

Daniel.Holmes

From: Jane Bromley [REDACTED]
Sent: 08 April 2026 09:44
To: Daniel.Holmes
Subject: DC/25/2089- Appeal Statement of Case

Follow Up Flag: Follow up
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Dear Daniel

We have read the Statement of Case for the above application at appeal. We are concerned the applicants appear to be misleading in this statement presenting an established enterprise ahead of the caravan's arrival but that as a third party we are unable to comment at appeal.

These would be our comments but of course they may be of no use now.

Representation Regarding Appeal for Temporary Rural Worker's Dwelling – Pinkhurst Stud DC/25/2089

We have read the appellant's Statement of Case and do not recognise the scenario described as an established farmyard. We wish to draw the Inspector's attention to the sequence of events on the site, as this is relevant to whether a genuine functional need existed before the caravan was brought onto the land the date being 10th December 2025 the day before we notified enforcement.

We are owners and residents of Foxways, Pinkhurst Lane and our house overlooks the site. In winter the view from the bedroom windows is of the site unencumbered by any foliage as the boundary hedging is deciduous. The manure heap, car park and mobile home lie adjacent to our property. The stables and pigs sty area are beyond towards the Downs Link.

The caravan was moved onto the site **within the same month that** the animals were introduced. Prior to this point, the land had been used only for **low-intensity seasonal grazing**, with no breeding activity, no foaling, and no mixed livestock operations. Two horses had grazed the field over summer 2025 and these animals were removed ahead of this enterprise arriving. Ad hoc grazing over summer/autumn months had occurred in the past over the 26 years we have lived at Foxways.

There was some activity ahead of the arrival of the caravan the erection of fencing and animal pens. The animals and caravan arrived almost concurrently and in the week after establishing the caravan, the pigs arrived. We were alerted to the activity as

our dogs became restless due to the unusual activity and smells. The livestock enterprise therefore did not exist in any meaningful form before the caravan arrived.

This raises concern that the claimed functional need has been **created concurrently with the arrival of the caravan**, rather than arising from an established agricultural enterprise. National policy requires that the need for a dwelling must come **from an existing enterprise**, not be generated by placing a dwelling on the land and then concurrently assembling livestock around it. The importing of two brood mares with the caravan establishing the immediate need for the caravan. The brood mares were not bred on site.

In addition, it is our observation that the caravan is being occupied as a residential dwelling. Three cars are parked overnight, and lights are on in the caravan with blinds drawn. We are aware of this due to observations from last thing at night walks with our dogs.

Given the previous grazing-only use and the timing of events, We do not believe the appeal demonstrates a genuine, pre-existing essential need for a worker to live on site. We therefore respectfully support Horsham District Council's objection to this application and request that the appeal be dismissed.

Regards

Andrew Ellis and Jane Bromley