

FORMAL OBJECTION TO PLANNING APPLICATION DC/26/0955

1. INTRODUCTION

This Application is identical to DC/25/0234 which was withdrawn in June 2025. Before that and since then, despite having no planning permission this waste management business has conducted its operation of bagging raw untreated horse manure, euphemistically called 'soil improver' approximately 10 metres from our boundary and adjacent to a stream which leads to the River Adur a few hundred metres away.

Since the start of this operation in December 2024 we have on numerous occasions reported with evidence to HDC Enforcement, HDC Environmental Health and the Environmental Agency, the bagging operation on our boundary which has had a significant impact on our business and our well-being but to date and despite having the support of our District and County Councillor and our MP, no action has been taken other than the Applicant having a Notice served on him to **not store** the bagged material in a permitted agricultural barn, which they have **ignored**. This barn was approved under Permitted Development Agricultural barn in 2017 for the storage of Hay, Straw & machinery (*due to its close proximity to our property*) and as such is not eligible to be considered for a Change of use until 2027 at the earliest.

We submit this objection as a long-established hospitality business (The Artisan Bakehouse) and our home located immediately adjacent to Calcot Farm, separated only by the natural stream forming the Ashurst–Steyning parish boundary.

Our objection to this Application is based on fact and experience over the last 20 months so the impact is actual and is not hypothetical.

Our business includes:

- a national and local award-winning bread-making school of 14 years standing
- a licensed pop up café awarded Sussex's Best Eating Experience in the prestigious Sussex Food & Drink awards
- two holiday cottages,
- and a tranquil rural experience that has earned hundreds of 5-star reviews from customers visiting from the UK and internationally.

The success of our business and Tourism to the area depends on:

- **peaceful quiet surroundings,**
- **clean air,**
- **unspoiled landscape,**
- **healthy wildlife populations,**
- **and high environmental quality.**
- Maintaining **high 5 star food hygiene** standards for our **public health** obligations

This B2/B8 industrial operation is materially harming these essential qualities and is **not compatible** with this rural environment or with neighbouring land uses.

2. POLICY OBJECTIONS

A. HDPF Policy 26 – Countryside Protection

The applicant claims the proposal is “an appropriate re-use of redundant agricultural facilities”. However, Policy 26 requires that development **must be essential to its countryside location**.

This proposal is **not essential**. It is a **commercial industrial operation** handling **raw horse manure (animal faeces)**. **It is being bagged for commercial use under the PuckaMuck brand so not being stored and used for agricultural use on the holding**. It therefore does **not support agriculture**, nor does it constitute quiet recreation or sustainable rural development.

The applicant also states:

“one vehicle running three return trips per day... in busy periods... two vehicles”

This is simply not the case, is disingenuous and greatly understates the traffic movements that occur weekly, sometimes daily and at weekends and Bank Holidays in and out of the site for the last 20 months. Bagging has been commencing at 7am completely different to the hours of operation in the statement in Section 5.1 of the Application

What Section 5.1 doesn't say is that the raw horse manure is transported several days a week to the site in open 10/25 tonne lorries, increasing pollution to the site, the local area and neighbours as well as our food and drink business and allowing dangerous pathogens such as Ecoli, Salmonella and Campylobacter to be released into the air as well as internal parasites such as strongyles and roundworms (The Owner of Sussex Manures, the Operator on this site, openly admits on his own website that raw manure is a **toxic waste product** but takes no precautions to mitigate its dangers).

This represents a **significant intensification** of activity in open countryside, contrary to Policy 26.

B. HDPF Policy 33 – Development Principles

The applicant asserts that amenity will not be harmed because “the built environment will not change”. This is incorrect.

Policy 33 requires protection from:

- noise,
- odour,
- disturbance,
- traffic,
- and changes in activity levels.

This waste management business has introduced and we have been experiencing:

- noise and diesel fumes of lorries and mechanical bagging equipment,
- telehandler loading with reversing alarms
- pallet handling,
- pollution from commercial heavy vehicle movements,
- raw manure handling and the odours that this creates (capable of constituting a statutory nuisance under the Environmental Protection Act 1990 s79)
- the introduction of vermin & flies
- Contaminates in the air are a significant health risk to us, our neighbours and our customers. We are very concerned as a registered food & drink business as we have customers eating outside only 15 metres from this operation. The risk of airborne pathogens contaminating food is of high concern to us and general public health.

This represents a clear **loss of amenity**, contrary to **NPPF para 174**, which requires protection of the intrinsic character and beauty of the countryside, and contrary to local policies safeguarding rural tranquillity and landscape quality. No noise, odour, amenity assessments or mitigations have ever been put in place nor have they in this Application

This industrial activity is **incompatible** with our existing hospitality business whose value depends on tranquillity and a relaxing, healthy visitor experience. We not only operate a bread making school but also BBQ classes outside in summer months where staff & customers are handling & consuming food within 15 metres of this operation.

Horsham District Council's own Environmental Health Officer (Kevin Beer) visited on one occasion and acknowledged the waste bagging equipment is very noisy.

C. HDPF Policies 40 & 41 – Transport, Access & Parking

1. Hazardous access onto the B2135

The access to Calcot Farm joins the B2135, a 60mph B-road with a **sharp bend immediately to the north**.

Vehicles exiting the site to turn north must turn **directly into fast-moving traffic emerging around the bend**. This is a **serious collision hazard**.

The applicant's claim that visibility is "excellent" is demonstrably incorrect.

The previous site of this commercial operator was in Findon on the A24 with far better links to the A283, A272 and A27 roads instead of the B roads linking the local villages of Ashurst, Partridge Green, West Grinstead, Shermanbury and Cowfold who are all now experiencing increased heavy lorry traffic and pollution.

2. Driveway width only 2.6m - 2.8 m — below fire and commercial standards and is A Direct Breach of Building Regulations 2010 (Approved Document B, Volume 2)

The driveway into Calcot Farm being in breach of the Regulations is significant, as plastic bagged raw horse manure, as being stored in the barn, with fermentation, can produce flammable gases such as methane and is clearly a potential **fire hazard**.

The driveway is significantly narrower than:

- the **3.7 m minimum width** required for fire appliances,
- the **3.1 m minimum gateway width**,
- and the width required for safe two-way movement of commercial vehicles.

This narrow access:

- forces vehicles to swing wide into oncoming traffic on the B2135,
- increases collision risk at the bend,
- prevents safe emergency access,
- and is unsuitable for intensified commercial use.

3. No transport evidence provided

There is:

- no transport assessment,
- no speed survey,
- no evidence provided for reducing travelling road miles
- no visibility splay analysis,
- no swept-path analysis,
- no emergency access assessment,
- no collision risk assessment.

The proposal fails to demonstrate compliance with Policies 40 and 41.

D. HDPF Policy 25 – Landscape Character

The applicant claims the proposal “will not change the character of the development”. This is incorrect.

Policy 25 protects:

- tranquillity,
- rural character,
- landscape sensitivity,
- ecological qualities.

Industrial activity of this nature — noise, malodour, machinery, vehicle movements — is a **material change in activity** and erodes the rural tranquillity essential to The Artisan Bakehouse’s visitor experience and neighbours’ amenity. This is a waste management commercial business wholly inappropriate for this rural setting

E. HDPF Policies 24 & 31 – Environmental Protection & Biodiversity

1. Bagging machinery located ~ 10 m from a stream feeding the River Adur

The bagging operation takes place **approximately 10 m from and above a natural stream** forming our boundary. Such bagging operations create fine particulates that wash into adjacent watercourses. This stream flows directly into the **River Adur a few hundred metres downstream**. Run off into a watercourse constitutes **water damage** under The Environmental Damage Regulations 2015.

Risks include:

- nutrient and pathogen runoff,
- contamination from raw manure transportation and bagging,
- accidental spillage,
- sediment disturbance from vehicular movements,
- pollution entering the River Adur SSSI catchment.

No drainage strategy, SuDS assessment, or water protection measures have been provided. No mitigations to avoid this are in place or proposed. This breaches **Policy 24 (Environmental Protection)**.

2. Presence of a natural borehole on Calcot Farm

There is a **natural borehole** on the Calcot Farm property.

Industrial handling of raw manure near a borehole poses risks of:

- groundwater contamination,
- nutrient leaching,
- bacterial pollution,
- aquifer contamination feeding the Adur catchment.

The Planning Statement does **not mention the borehole**, nor provide any hydrogeological assessment.

This is a serious omission under **Policy 24**.

3. Biodiversity and Geological Conservation.

The applicant has indicated 'No' in all areas A-C on the Application Form but this is clearly NOT the case and they should all be 'Yes', as biodiversity is affected on our adjacent land.

Raw horse manure is a toxic waste product that is being transported in open top lorries and being bagged in this area it is of huge detriment to the local environment. It is known to contain pathogens and bacteria such as E.Coli, Salmonella and Campylobacter as well as internal parasites such as strongyles and roundworms. In addition, this raw excrement is rich in nitrogen and phosphorus which can lead to excessive algae growth reducing oxygen levels and harming fish and other aquatic organisms. Locating this enterprise within a few metres above a water course, where rainfall will easily wash disruptive particles into the

stream that leads only a short distance away to the River Adur gives rise to a significant concern of pollution.

3a) ***Protected and priority species***

This stream which borders this proposal and our land which is adjacent - (just 10 metres from the proposed application) is designated on the West Sussex Habitat Plan as one of the 'Areas that could become of Importance for Biodiversity ACIB' and also has enhanced priority Woodland, Parkland status. It homes several protected and priority species including Bats, Nightingales, Barn Owls, House Martins, [REDACTED] and water voles in both the stream and our ponds (25 metres from the proposed development)

We have had many national and international wildlife enthusiasts stay with us as part of their exploration of the abundant species of both birds and mammals here as part of a tour of the area including the nearby Knepp estate

3b) **Designated sites, important or other biodiversity features**

Again, applicant says NO when clearly as stated above this is not the case as our land which is only 10metres away is designated and has biodiversity features

3c) ***Features of geological conservation importance***

The Applicant indicates NO but again the answer should be YES as **there is impact on** our adjacent land. Our land and ponds were also selected in 2023 by the local conservation movement 'Steining for Trees' as a preferred site for planting to improve the biodiversity corridor from coast to countryside. This application is damaging the biodiversity movement and species which have been flourishing in our woodlands and land.

3d) **Biodiversity net gain**

The Applicant has indicated NO here and suggests no significant change to any of the surfaces, increased vehicle movement or types of vehicle. This is a total misrepresentation. Video evidence has been provided to the Environment Agency and HDC & WSCC Councillor Victoria Finnegan over the last 18 months showing numerous regular movements of trucks, including 25 tonne open trucks, carrying raw horse excrement into the site.

The applicant provides:

- no ecological survey,
- no bat activity survey,
- no barn owl assessment,
- no mitigation strategy.

Industrial noise and activity disrupts:

- hunting behaviour,
- roosting sites,
- flight corridors along the stream,
- nocturnal activity patterns.

This breaches **Policy 31 (Green Infrastructure & Biodiversity)**.

4. Impact on The Artisan Bakehouse — a tranquillity-dependent hospitality business

The Artisan Bakehouse, established 14 years ago is a successful, well-known, National and local award-winning hospitality business with **hundreds of 5-star reviews**. Our guests and visitors come to use us as a base to explore Sussex specifically for:

- peace,
- nature,
- wildlife,
- rural quiet,
- a restorative and healthy environment

Industrial activity next door — noise, odour, increase in vermin, machinery, traffic — has been **materially harming**:

- visitor experience,
- business viability,
- the quiet rural character that underpins our reputation.

This is a breach of **Policy 24, Environmental Protection** which states: **The high quality of the district's environment WILL be protected through the planning process** thus requiring the Local Authority to **protect** environmental quality and amenity for existing land users.

This has been an extremely stressful time since the illegal bagging operation started. We have had to explain away the noise and odours to customers, pay compensation to customers who felt impacted, change some of our working practices to mitigate the disruption and public health risks and work extremely hard to avoid bad reviews which are devastatingly damaging to hospitality businesses and visitor experiences in Sussex.

F. HDPF Policies 35–38 – Climate, Energy, Flooding

The applicant's climate and energy claims are generic assertions without evidence. Flooding is addressed only through a single sentence referencing the EA map, with **no drainage strategy** or **SuDS assessment**.

G. HDPF Policy 10 Rural Economic Development

‘There is an ongoing need to maintain and enhance the rural economy.....and maximising visit spending through tourism across the district’

Our business attracts visitors from all over the world, from all parts of the UK and from districts outside of Steyning/Ashurst bringing in much needed vital income to a whole variety of rural hospitality businesses including our local village pub, The Fountain, Steyning and Partridge Green’s High Streets and various restaurants and attractions in Horsham District and West Sussex including many in the thriving wine industry which is becoming increasingly more important to the economy in our part of Sussex. In addition, increasingly, our guests are seeking to explore and support biodiversity initiatives and rewilding projects such as the Knepp Estate.

The relocation of the Puckamuck business **fails** in ‘meeting of rural community needs’ ‘maximising visit spending’ ‘generating employment opportunities’ ‘generating social and environmental benefits for local communities’ **and particularly** ‘promoting recreation in, and the enjoyment of the countryside, **in fact the complete opposite**, it significantly impacts negatively on tourism in this area.

3. ADDITIONAL MATERIAL CONSIDERATIONS

- **Odour** from raw manure is affecting us as a family and our guests and outdoor dining.
- **Noise** from the extremely loud bagging machinery and vehicles disrupts classes, café service, and holiday stays.
- **Cumulative impact:** Calcot Farm already hosts multiple commercial uses; no cumulative assessment is provided.
- **Seasonal peaks** in vehicle movements coincide with peak tourism periods.

The Applicant’s assertion that the business will use less energy than previous years is totally unsubstantiated and unproven

4. SIGNIFICANT CONFLICT WITH HORSHAM DISTRICT LOCAL PLAN STRATEGIC OBJECTIVES

The Horsham District Local Plan sets out overarching objectives that guide all development. The proposal at Calcot Farm conflicts with several of these core objectives.

Objective 1 – Sustainable development balancing economic, social and environmental priorities

The proposal does not strike the required balance:

- **Environmental harm:**
 - industrial activity 10 m from a stream feeding the River Adur
 - bagging of raw horse excrement likely to contain air borne pathogens and bacteria
 - Increased pollution from bagging equipment and heavy lorry traffic
 - proximity to a natural borehole

- risk to protected species (eg barn owls, bats)
 - no ecological assessment or mitigations proposed
- **Social harm:**
 - loss of tranquillity
 - impact on neighbouring hospitality business and neighbouring residential properties
 - increased traffic and safety risks (*both road access & fire hazards*)
 - loss of revenue and reputation
- **Economic imbalance:**
 - industrial activity undermining an established rural tourism business
 - **no new local employment created**
 - **no innovation or community benefit**
 - **relocation of an existing business**, not a new rural enterprise

The proposal therefore **fails Objective 1**, which requires development to support *balanced* communities and environmental protection.

Objective 2 – Meeting employment needs and reducing commuting distances

The applicant implies the proposal supports rural employment, but this is **incorrect**.

- This is **an existing business relocating**, not a new enterprise.
- It is **not employing local people**.
- It is **not creating additional jobs**.
- It is **not reducing commuting distances**.
- It is **not contributing to local economic growth**.

In contrast, The Artisan Bakehouse already provides:

- local employment,
- year-round economic activity,
- tourism revenue spent in local shops, pubs, restaurants and attractions
- training and educational opportunities,
- a business model aligned with rural character.

The proposal risks **damaging existing local employment** rather than enhancing it.

It therefore **fails Objective 2**.

Objective 5 – Promoting a living and working rural economy

This objective emphasises:

- supporting rural businesses,
- reducing travel,
- maintaining rural character,
- enabling innovation,
- protecting the countryside as an economic asset.

The proposal conflicts with this objective because:

- It introduces **industrial activity** incompatible with rural tranquillity.
- It threatens the viability of a successful rural hospitality business.
- It increases vehicle movements on a dangerous stretch of the B2135.
- It does not reduce travel — the applicant provides **no evidence** of reduced road miles.
- It does not promote innovation — the business is **simply relocating**, not innovating.
- It does not create rural employment — **no new jobs** are being created.
- It harms the environmental qualities that underpin rural tourism and recreation.

The Artisan Bakehouse is a model example underpinning the rural economy the Local Plan seeks to promote. The proposed B2/B8 industrial use would **undermine**, not support, this objective and **completely fails Policy 10 and Objective 5**

5. CONCLUSION

The Applicant refers to ‘agricultural soil improver’. This is a euphemism for raw horse excrement or animal faeces being left festering in vast quantities, initially at a location a few hundred metres away on the Applicant’s adjacent property with the resultant foul odours and infestation of flies and vermin to then be transferred, noisily bagged and stored metres from our registered food and drink business.

This is a commercial waste business from start to finish, operating without licenses or planning permissions for 2 years, trying to avoid the stricter legislation that applies to legal waste operators. Raw horse excrement is being stored in the open air metres away from neighbouring residential properties at Northover Manor and Sussex Place then being openly transported a few hundred metres in heavy lorries to Calcot Farm.

The proposal **does not comply** with multiple Horsham District Planning Framework policies, particularly those relating to countryside protection, amenity, landscape character, biodiversity, water quality, and transport safety.

The access onto the B2135 near a sharp bend, combined with a driveway width of only 2.6m - 2.8 m, makes the proposal **unsafe**.

The proximity of industrial bagging equipment to a stream feeding the River Adur, the presence of a natural borehole, the presence of protected species, and the impact on a

highly successful, award-winning hospitality business at The Artisan Bakehouse, the home of its owners and our neighbours further demonstrate that the proposal is inappropriate and harmful.

The Applicants haven't introduced any mitigations to safeguard the local environment from their disruptive and destructive operation nor does the Application offer to in the future.

The assertion in the Applicant's Conclusion that the Application complies with Horsham's Local Plan is blatantly untrue and completely unproven.

For all of the above reasons, we respectfully request that Horsham District Council **refuse** planning application DC/26/0955.