

Site: Coombewick House Mobile Home London Road Ashington West Sussex RH20 3AU

Proposal: Temporary siting and residential occupation of mobile home with associated decking and ramped access for a (further) temporary period of three years, together with permanent retention of the existing access track and turning area.

Reference: DC/26/0732

I am writing on behalf of my clients [REDACTED] Coombewick Farm, London Road, Ashington RH20 3AU to **OBJECT** to the above-quoted planning application.

Before I continue to set out the planning rationale for the objection, it is worth noting from the outset that this is the fourth application to place a temporary mobile home on the land. The main difference now is the proposal to make the new access permanent.

This objection relates specifically to the principle of the development. We note the objection from the EHL Officer, and will monitor any further consultee responses, and any further submissions to respond to any consultee comments.

Relevant Planning Policy

The following policies are most relevant to the proposal:

Policy 1: Sustainable Development. This is a strategic policy which seeks to promote the objectives of achieving sustainable development

Policy 2: Strategic Development. This seeks to focus development in sustainable settlements in accordance with the development hierarchy (as set out in Policy 3) and to manage development elsewhere to protect rural character and landscape.

Policy 25: Natural Environment and Landscape Character . This policy seeks, amongst other things, to protect, conserve and enhance landscape and townscape character, and to maintain settlement separation.

Policy 26: Countryside protection. This states that the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location and meet a defined set of criteria. Development must also be of a scale appropriate to countryside character and location, taking into account features such as the historical development pattern, natural features and landform.

Policy 32: Quality of New Development. This seeks to ensure that development provides, amongst other things, an attractive, functional, accessible, safe and adaptable environment, complements local character and heritage and contributes to a sense of place.

Policy 33: Development Principles. This provides a range of criteria for assessing proposals, including protection of neighbour amenity, ensuring high standards of design, utilising locally distinctive design and materials and paying regard to natural landscape features.

Policy 35: Climate Change. This policy provides support for development which furthers the aims of climate change mitigation, including energy efficiency and promoting patterns of development which reduce the need to travel by private car.

Policy 40: Sustainable Transport. This policy states that proposals will be supported if it helps to forward the objectives of developing an integrated sustainable transport system, including minimising the distance people need to travel and locating development where there is a range of transport options.

Relevant Planning History

The original grant of temporary consent for the mobile and access works (DC/16/0932) was allowed at appeal (reference 3168013). A consent under Class Q for the conversion of a barn on site to a dwelling had been recently granted (DC/15/1272). In allowing the appeal, the Inspector made the following statements:

4. *The area is generally quiet and tranquil, open views across the fields can be seen through the gaps in the hedgerow, and the area has a distinct rural character and appearance.*

6. *... it is the appellant's intention to remain in the caravan whilst work is carried out to complete the permitted barn conversion.*
11. *... Following the expiration of [3 years] the caravan and access way would be removed and the land restored to its former condition, including the alterations to North Lane.*
13. *I acknowledge the issues relating to the provision of a permanent access for the appeal site, however the development before me is of a temporary nature, and I have determined the appeal accordingly. I am satisfied that a 3-year permission is acceptable to allow the work to be carried out by the appellant.*

Since that decision, a further 3 consents have been granted for the barn conversion (DC/20/0630, DC/22/1633 and DC/25/0830) and an application to erect a new-build dwelling was refused (DC/21/1474). The temporary mobile home and access works were granted an extension in 2020 (DC/20/0941), with a further application in 2023 being disposed of.

Water neutrality became a significant issue in 2021, but the NE Position Statement was withdrawn in October 2025.

The mobile home and access works became unauthorised after July 2023 but no action was taken by the Council to remedy the breach of planning control. The site owners were eventually given a deadline of the 18th May 2026 to remove the works, but the current application was submitted just before.

Planning Grounds for Objection

The NPPG states that, *"It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities). Further permissions can normally be*

granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning permission will then be granted permanently” (Paragraph: 014 Reference ID: 21a-014-20140306).

The submission states that various circumstances have conspired to prevent the barn conversion scheme from being implemented, and this justifies an additional period for the mobile home to remain.

The most recent barn conversion consent has been capable of implementation since November 2025, some 7 months ago. As far as we are aware no works have taken place, and there is no indication of when the consent may be implemented. The subject barn is in a very poor condition, with loose panels that clatter in the wind to the detriment of my client’s amenity, and it is debatable whether the most recent Class Q consent could even be implemented. There is no concrete evidence that the barn conversion scheme will ever be implemented.

As it stands, the mobile home has been on site for over 10 years and may be in situ for a further 3 years if the current application is granted. The mobile could potentially be in situ for a period in excess of 13 years in total, which is considerably longer than the period assessed as part of the original appeal decision.

Whilst it is not entirely uncommon for temporary mobile homes to be sited on land while a residential conversion or renovation takes place, it is less common for temporary accommodation to be granted in advance of works commencing, and even less so for repeated temporary consents to be granted over a lengthy period in spite of repeated failures to make any attempt to undertake the consented permanent works.

Indeed, there must be some doubt as to whether there is, in fact, any serious intention on the part of the landowner to carry out the consented barn scheme. Given previous statements about the function of the barn conversion consent, and the fact that various consents have stalled over a long period of time (notwithstanding any extenuating

circumstances) it must be viewed that the barn conversion scheme is no more than a theoretical possibility.

A significant piece of evidence in this regard is within the Planning Statement submitted with DC/25/0830, which states the following:

Due to, initially, the impacts of the Covid-19 pandemic and since then, the applicant's ongoing planning applications for a replacement dwelling on the site, the most recent of which was refused on 21st October 2024, the class Q scheme remains undeveloped. The agents for the applicant are in discussions with the LPA regarding next steps to achieve permission for a dwelling at the site. This Class Q Prior Notification application is being resubmitted to ensure this fallback scheme remains a genuine option for the applicant, should a scheme for a new replacement house not be achievable.

There are three clear observations from this highly illuminating passage. Firstly, the clear priority for the applicant is to erect a new-build dwelling. Secondly, the lack of action to undertake the succession of Class Q consents was not purely down to extenuating circumstances, as claimed in the current submission, but moreover their failure to gain permission for a new-build dwelling. Thirdly, on that basis, the Class Q consent is clearly a mechanism simply to justify a new-build dwelling by enabling a 'fallback', which is demonstrated by the deliberate use of that specific term, which has been the subject of caselaw and many appeal decisions before.

It follows that there is clearly no intention or desire to carry out the Class Q conversion, and therefore the justification for unending temporary consents for the mobile home, without any indication of light at the end of the tunnel, simply does not exist. The applicants have had ample opportunity, but their most recent statements lay bare their actual intentions and the Council have to take affirmative action to draw an end to a highly unsatisfactory situation.

It cannot be a justification to retain the mobile home on the basis of a proposal for a new-build dwelling which has yet to be submitted, or determined, and it would be wholly unacceptable for such a scheme to be predetermined. Suffice to say, such an application would be objected to in the strongest terms.

It is also concerning if the Council have given any encouragement to this current application, which would be wholly inappropriate.

To repeat, there is clearly no intention to implement the barn conversion scheme. The long-term ambition clearly remains to achieve a new-build dwelling, with the barn consent acting only as a mechanism to circumvent policies which seek to prevent new-build dwellings in unsustainable locations.

Much is made within the submission of the original appeal decision, but this entirely ignores the specific context in which the appeal was assessed and determined.

The context of the appeal decision was a recently granted barn conversion scheme and the siting of a mobile home and access works that would persist for a relatively short amount of time and would be fully removed at the end of that time. The Inspector clearly took the view that the level of harm generated by the temporary works would be acceptable over such a limited time period and the appeal was allowed on that basis. It would be entirely incorrect to conflate the Inspector's comments on the acceptability of the scheme in the context at that time to a much longer-term retention with no realistic prospect of the barn conversion scheme being implemented. Put simply, the original appeal decision in no way justifies the further retention of the mobile home, potentially for a period in excess of 13 years, and perhaps even beyond.

The clear and obvious intention to use the barn conversion scheme only as a fallback to justify a new-build dwelling is a significant material consideration. The alternative is to simply continue to grant consents with no end in sight, which would fly in the face of national guidance, providing the certainty my clients deserve, protecting the local environment and the fundamentals of good planning. It would be wholly inappropriate in the circumstances to grant an additional period of consent.

Instead, the Council should assert authority, refuse the application and serve an enforcement notice seeking removal of the unauthorised development, which would

remedy a long-standing breach and provide a pathway to resolving the long-standing planning issues on this site. If the applicants did indeed eventually commence the barn conversion scheme, then it may be more appropriate at that point to explore any temporary accommodation needs, although such a proposal would need detailed justification and full and proper planning assessment. The applicants cannot be simply allowed to continue to live on the site indefinitely contrary to established planning policies and with no idea of how matters might be permanently resolved. To not take clear action would seriously undermine the integrity of the planning system and send a signal that persistent breachers will simply be allowed to get away with it.

There would similarly be no justification for the conversion of the temporary access to a permanent feature, especially given that the barn conversion scheme is no more than theoretical and there would be no justification to serve any existing permanent development on the site. There would be no compelling planning reason to allow the access to remain permanently, and it would be entirely premature if any justification related to the provision of a permanent dwelling at the site. Again, the original Inspector considered the access works acceptable on a strictly temporary basis. Allowing the access works to become permanent would be wholly premature in the circumstances and cause unacceptable and unjustified permanent harm to the character and visual amenity of the area.

The proposal as it stands would be unsustainable and cause long-standing harm to the character and appearance of the surrounding countryside – which, as recognised by the original appeal inspector, is quiet and tranquil, with views across open land and with a distinct rural character and appearance. The proposal would allow an incongruous and urbanising development to remain in situ for an entirely unjustified and excessive period. The proposal would be contrary to the historical development pattern, natural features and landform of the area, and the retention of the temporary access works would be unjustified and unacceptably harmful to landscape character and visual amenity. The development is fundamentally unsustainable and encourages private car use. For those reasons, the development would fail to comply with policies 1, 2, 25, 26, 32, 33, 35 and 40 of the HDPF.

We will continue to monitor the application and any consultation responses and reserve the right to make additional comments as and when appropriate. This may include reference to other material considerations and may relate to other national and local policies where appropriate.

We would advise the Council that my clients have engaged Counsel to review the position with regard to whether a statutory challenge under S288 of the TCPA 1990 (as amended) may be appropriate in the event of approval.

We respectfully ask that the application be refused without delay.

[REDACTED]

4th June 2026