



WISTON PARISH COUNCIL

Clerk: Matthew Thomas, Water Lane Cottage, Water Lane, Wiston,
West Sussex, BN44 3DW.

E-mail: clerk@wistonpc.org

Website: <https://wistonpc.org/>

FAO Daniel Holmes,
Planning Department,
Horsham District Council,
Albery House, Springfield Road,
Horsham, West Sussex RH12 2GB

2nd June 2026

Dear Mr Holmes

DC/26/0732: 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.

Coombewick House Mobile Home London Road Ashington West Sussex

I write on behalf of Wiston Parish Council, which agreed the contents of this letter by email on Tuesday 2nd June 2026.

The Council resolved to OBJECT to the application in its entirety on planning policy grounds, for the reasons set out below.

The Council's objection is grounded in the statutory development plan, which for this site comprises the adopted Horsham District Planning Framework 2015 (HDPF), read together with the National Planning Policy Framework (NPPF) and relevant Planning Practice Guidance (PPG). By virtue of section 38(6) of the Planning and Compulsory Purchase Act 2004 the application must be determined in accordance with the development plan unless material considerations indicate otherwise. In the Council's view they do not.

The application has two distinct elements with materially different policy implications, and the Council addresses them separately:

- (i) the further three-year temporary residential occupation of the mobile home (with decking and ramped access); and
- (ii) the permanent retention of the access track and turning area.

1. Preliminary: the planning history and the proper policy test

The Council notes that residential occupation of this site has been authorised in successive three year periods since 2016:

- DC/16/0932 — original temporary stationing of mobile home, access decking, and road/access (2016)
- DC/20/0941 — variation of conditions 1 and 2 of DC/16/0932 (2020)
- DC/23/1202 — variation of conditions 2 and 3 of DC/20/0941 (2023)
- DC/26/0732 — the present application, seeking a further three-year period
-

If granted, the cumulative duration of "temporary" residential use will extend to approximately thirteen years. The PPG on the Use of planning conditions is clear that "it will rarely be justifiable to grant a second temporary permission," and that temporary permissions are not a mechanism for circumventing the policy framework that would otherwise apply to permanent development. The present application is, in substance, the third renewal. The Council respectfully submits that the proposal should be assessed as if it were a permanent residential dwelling in the open countryside, and tested accordingly. It does not pass that test.

2. Element 1 — Further temporary siting and residential occupation of the mobile home

2.1 Conflict with HDPF Policy 26 (Countryside Protection)

The site lies outside any defined Built-Up Area Boundary (BUAB) and is therefore in the open countryside for the purposes of the HDPF. Policy 26 provides that outside BUABs "the rural character and undeveloped nature of the countryside will be protected against inappropriate development" and that any proposal must be essential to its countryside location and fall within a limited range of acceptable uses (the support of agriculture or forestry, mineral extraction or waste disposal, quiet informal recreational use, or development that otherwise enables the sustainable development of the rural area).

Open-market residential occupation of a mobile home is not within any of those categories. The supporting documents (so far as available to the Parish Council) do not demonstrate that residence at this location is essential to a countryside use. The proposal is therefore inappropriate development for the purposes of Policy 26.

2.2 Conflict with HDPF Policies 3 and 4 (Development Hierarchy and Settlement Expansion)

Policies 3 and 4 establish a plan-led spatial strategy that directs growth to Horsham Town and a defined hierarchy of villages with adequate services. The application site is well outside that hierarchy and is not allocated for development. Granting further residential occupation would be contrary to that strategic approach.

2.3 No rural worker justification — HDPF Policy 20

HDPF Policy 20 (Rural Workers Accommodation) is the only HDPF policy that contemplates new residential occupation in the open countryside in a context such as this, and it does so only where the applicant demonstrates — by reference to the well-established functional and financial tests — that on-site residence is essential for the operation of an existing rural enterprise. The Parish Council has seen no evidence in the present application that those tests are met: no agricultural appraisal, no business plan, no labour requirement assessment.

If the original 2016 permission was granted on the basis of personal or transitional circumstances (for example, the construction of a permanent dwelling, ill-health of a family member, or a start-up agricultural unit), the Council respectfully submits that the LPA should now require positive, current, and independently-tested evidence that those circumstances continue to subsist. A further three-year extension should not be granted on the assumption that the original justification persists.

2.4 HDPF Policy 19 (Park Homes and Residential Caravan Sites) does not assist the applicant

Policy 19 applies to established park home and residential caravan sites; it is not a route to authorising a single, isolated mobile home in the open countryside. The Council is concerned that, absent a Policy 20 rural-worker justification, the proposal would in substance create a single dwelling in the countryside outside the framework established by the development plan.

2.5 Cumulative effect and the proper application of temporary permissions

As noted in Section 1 above, this would be the third renewal. The PPG, and a substantial body of appeal practice, treat repeated temporary permissions with caution: temporary permissions are intended to deal with situations where the planning circumstances are genuinely expected to change within the period of consent (e.g. a permanent dwelling under construction; a viability period for a new agricultural unit; the implementation of an enforcement strategy). They are not a mechanism for authorising open-ended residential occupation.

In the present case, no clear "end-state" has been articulated. The Council asks the LPA to invite the applicant to specify precisely what is expected to change at the end of the proposed three-year period that has not already changed at the end of the previous two periods. In the absence of such an explanation, the application falls to be refused.

2.6 Conflict with HDPF Policies 25 and 30 (Character, Natural Environment, and Protected Landscapes)

The site lies in close proximity to the boundary of the South Downs National Park. Policy 25 requires development to conserve and enhance the District's landscape character, and Policy 30 affords particular protection to designated landscapes and their settings. The visual presence of a mobile home, decking, and ramped access in this location detracts from local landscape character and from the setting of the National Park. This is a continuing harm that the proposal would extend.

2.7 Sustainability and accessibility — HDPF Policies 1 and 40

The site is remote from services, employment, education, and public transport, and use of the dwelling is necessarily dependent on private vehicle journeys. The proposal does not meet the locational requirements of sustainable development as set out in Policy 1 or the modal-shift objectives of Policy 40.

3. Element 2 — Permanent retention of the access track and turning area

This element raises additional, distinct policy concerns because, unlike the mobile home, the access track and turning area would be authorised in perpetuity.

3.1 Permanent harm to countryside character — HDPF Policy 26

The access track and turning area were originally authorised as ancillary infrastructure to a temporary use. Making them permanent now would entrench an engineered feature in the open countryside for the long term, even if the mobile home itself were removed at the end of the proposed three-year period. That is precisely the type of permanent erosion of countryside character that Policy 26 is intended to prevent.

3.2 No independent essential-need justification

A permanent access and turning area must be assessed on its own merits against Policy 26, separately from the use it presently serves. Once the temporary residential use is set aside, there is no evidence of any essential countryside need for the infrastructure: it does not serve agriculture, forestry, mineral extraction, waste disposal, quiet informal recreation, or any other Policy 26- compliant purpose. It is therefore inappropriate development in its own right.

3.3 Decoupling, precedent, and enforcement

Authorising permanent access infrastructure while leaving the mobile home consent temporary is, in the Council's view, inherently contradictory and unsound in policy terms. It would:

- (a) guarantee in practice the continued usability of the site for residential or related occupation after any future expiry of the mobile home consent, since the supporting infrastructure would remain;
- (b) create an unhelpful precedent — that permanent hard infrastructure in the countryside can be secured through a temporary residential application — that other applicants in the District will rely upon; and
- c) materially weaken the LPA's enforcement position should the residential use cease and any subsequent unauthorised use of the site arise.

3.4 Drainage and surface water — HDPF Policy 38

Permanent hard-engineered access and turning surfaces have implications for surface water management. The application should be required to demonstrate compliance with HDPF Policy 38 (Flooding), including the use of SuDS where technically feasible, and to confirm that surface water

run-off will not be increased into surrounding land and watercourses. The Parish Council is not currently satisfied that this has been adequately evidenced.

3.5 Highway safety

The Council requests confirmation from West Sussex County Council Highways that the visibility splays, geometry, and intensity of use of the access onto London Road are acceptable on a permanent basis (as distinct from a time-limited one), having regard to the speed and traffic volume on this route. The Council expects a substantive WSCC response on this point before determination.

5. Conclusion and recommendation

Taken together, the application is contrary to:

- HDPF Policies 1, 3, 4, 19, 20, 25, 26, 30, 38 and 40;
- The intrinsic character and beauty of the countryside as protected by the NPPF; and
- The PPG on the Use of planning conditions, in respect of repeated temporary permissions.
-

The Parish Council therefore respectfully requests that:

(a) The further three-year temporary residential occupation of the mobile home be REFUSED, on the ground that the cumulative effect of repeated temporary permissions has displaced the proper policy test for residential development in the open countryside, which the application does not pass under Policies 20 or 26; and

(b) The permanent retention of the access track and turning area be REFUSED, on the ground that it constitutes inappropriate permanent development in the open countryside contrary to Policy 26, lacks independent justification, and would entrench landscape harm beyond the life of the residential use it presently serves.

If, contrary to this submission, the LPA is minded to grant any consent, the Parish Council requests that:

i) any further temporary consent for the mobile home be limited to a final, non-renewable period, expressly tied to evidenced and continuing essential need, with a "tailing-down" condition requiring removal of the mobile home, decking, and ramped access on expiry;

(ii) the access track and turning area consent be time-limited to match the residential consent, with a condition requiring restoration of the land to its previous undeveloped condition on cessation of that use; and

(iii) the Parish Council be consulted on the precise wording of any such conditions before the decision is issued.

The Council formally requests that, if the application is referred to Planning Committee, a representative of the Parish Council be afforded the opportunity to address the Committee.

Yours sincerely,

Sid Garner
Chair, Wiston Parish Council