Dear Inspector,
PINS Reference: APP/Z3825/W/24/3355610
Council Reference: DC/24/0974
Site: Tanglewood Equestrian, Forest Grange, Horsham, RH13 6HX
Development: Change of use of land from equestrian to mixed use, including 2 gypsy pitches, retention of existing hardstanding, and proposed biodiversity enhancements.

I am writing to object to the appeal submitted by Ms. Andrea Starns regarding the proposed change of use at Tanglewood Equestrian, Forest Grange, Horsham.

As a resident at Forest Grange, and a shareholder in Forest Grange Private Road Ltd (FGPRL), which owns the private road providing access to the Appeal Site, I have significant concerns about the potential impact of the development.

I submitted an objection to the original application, and this, together with the submission from Bell Cornwell dated 16 September 2024, and the large number of other objections remain valid.

In addition therefore to the extant original objections, which have not been addressed by the appellant, I would like to address the points raised in the Appellant's appeal.

Recent Developments
A key update since my previous objection is that a **Tree Preservation Order (TPO 1574)** was placed on a Beech tree on land adjacent to the Appeal Site (within FGPRL ownership) on 11 November 2024. The tree is considered to have high amenity value and contributes positively to the character of the area, including the **High Weald Area of Outstanding Natural Beauty (AONB)**. This tree is now under threat from the proposed development, particularly as it lies within the tree's **Root Protection Area (RPA)**. This protection should please be taken into account when assessing the appeal.

Planning History - update
In addition to the ongoing appeal, a new application (**DC/24/1499**) has been submitted by the Appellant, which seeks to remove a condition attached to a previous permission for stables at Tanglewood Equestrian. This application is due to be considered by Horsham District Council on **7 January 2025**, but at the time of writing, it remains undetermined.

Proposal Overview - update
As noted in my previous objections submitted to the LPA, the Appellant's description of the development varies from that recorded by the Council in the decision notice. The Appellant has incorrectly stated in the appeal form that the development description has not changed.

Planning Policy - update
Under **Section 70 of the Town and Country Planning Act 1990** and **Section 38(6) of the Planning and Compulsory Purchase Act 2004**, planning decisions must be made in line with the Development Plan unless material considerations suggest otherwise. While the Council's **Horsham District Planning Framework (HDPF)** is being updated, the supporting evidence for the emerging plan, particularly the **Gypsy and Traveller Accommodation Study**,

remains relevant. Furthermore, the recent updates to national policies, such as the **National Planning Policy Framework (NPPF, December 2024)** and **Planning Policy for Traveller Sites (PPTS, December 2024)**, are now relevant in this case.

Certificate B

The Appellant has submitted a **Certificate B** with the application, acknowledging that not all the land within the red line boundary is under their ownership. Notice was served on several parties, but notably, **FGPRL**—the owners of the private road that provides sole access to the Appeal Site—was not notified. This omission raises concerns about the thoroughness of the application process and highlights a lack of consideration for all relevant landowners. FGPRL does **not** grant rights of access for residential purposes (or indeed any commercial purposes) on the private road for this site.

Moreover, the **Location Plan** fails to include the land owned by the Appellant, which should have been outlined in blue as per **National Validation requirements**. This is significant, as the development proposes a change of use to include residential pitches, yet the full extent of land involved has not been properly accounted for in the application.

Application

As the **updated NPPF (December 2024)** makes clear, new traveller sites in open countryside should be **very strictly limited** and should respect the character of existing communities without putting undue pressure on local infrastructure. The proposal at Tanglewood fails this test as it would introduce residential development in a sensitive rural location, with limited justification for why this site is appropriate for such use.

The Appellant has also relied on the **"tilted balance"** argument from **Paragraph 11(d)** of the NPPF, claiming that the housing policies are out of date and therefore the application should be approved. However, the Appellant has ignored the fact that policies protecting **landscape, heritage assets, and the natural environment** (including policies on AONBs and listed buildings) remain highly relevant and should provide **strong reasons to refuse** the development. The Appellant's focus on the second limb of the tilted balance fails to account for the substantial harm the development would cause to both the landscape and heritage setting, and they have not demonstrated any public benefits that would outweigh this harm.

Turning now to the specific reasons for the LPA's refusal of the original application, which have not been addressed in the appeal:

Reason for Refusal 1 – Landscape and Visual Impact

The Appellant has downplayed the visual and landscape impact, suggesting that existing landscaping and proposed hedging will minimize the visibility of the development. However, the hedging proposed is **non-native conifers** – these are inappropriate at the site, and having been recently planted, will be years before they provide effective screening. The site is currently an open field, and the introduction of two mobile homes and associated residential paraphernalia would drastically alter the character of the area, which is contrary to policies safeguarding the **High Weald AONB**. The Appellant's argument that there would be "marginal harm" fails to meet the policy test, which requires that any harm to such important landscapes must be avoided or minimized.

Furthermore, the Appellant's claim that the development would not materially affect the area assumes the site is already residential, which it is not. The presence of the exisiting mobile home on the site is unlawful, and the introduction of a second mobile home would represent a significant change in use from agricultural/equestrian to residential. This would exacerbate the urbanizing effect on the rural landscape.

Reason for Refusal 2 – Heritage Impact
The development would cause "**less than substantial harm"** to the setting of **Forest Grange Manor**, a Grade II listed building. The Appellant has not provided any **public benefits** to outweigh this harm, nor have they sufficiently addressed how the setting of the listed building would be preserved. The comparison to the Deer Park Farm case is flawed; in that case, the development affected the parkland setting, not the setting of a listed building as here. Additionally, the Appellant's focus on **visibility** misses the broader issues of how the development would affect the relationship between the listed building and its surroundings, as well as the potential harm from other factors associated with residential use.

Reason for Refusal 3 – Biodiversity Net Gain and Protected Species
The Appellant's assertion that the development is exempt from **Biodiversity Net Gain (BNG)** requirements because it is "retrospective" is incorrect. While the existing (illegal) mobile home is on site, permission is being sought for two mobile homes, and the development is not truly retrospective. Moreover, the proposed development does not demonstrate that a 10% net biodiversity gain can be achieved on-site, nor does it adequately address the presence of protected species.

Conclusion
While the housing policies within the **HDPF** may be considered out of date, the policies relating to the protection of the countryside, AONBs, and heritage assets remain in force and provide strong reasons to refuse the proposed development. The statutory test regarding the preservation of **Forest Grange Manor's setting** has not been met, and no public benefits have been advanced to justify the harm caused. Additionally, the development fails to comply with the updated NPPF and the strict controls on new traveller sites in open countryside.
In light of these concerns, I respectfully urge the Inspector to **dismiss this appeal**. The proposed development would result in unacceptable harm to the landscape, heritage assets, and biodiversity, and there are no material considerations that would justify departing from established policies.