



PROMETHEAN PLANNING

Land West Of Parsons Field Stables,
Pickhurst Lane,
Pulborough,
West Sussex,
RH20 1DA

Use of land for the stationing of 2 static caravans for residential purposes and associated day rooms. Erection of stable buildings and formation of hardstanding (retrospective) Associated landscape works including planting of native hedges and removal of hardstanding

Planning Statement

16th August 2025

Location

The site amounts to approximately 0.6 hectares and is located to the south of Pickhurst Lane.

The site is accessed via an existing entrance from Pickhurst Lane.

The site to the immediate east benefits from planning permission for the change of use of land for stationing of up to 3 caravans for occupation by Gypsy and Traveller family with associated development (timber utility shed, utility trailer, septic tank, hard standing and additional landscaping)

This was granted at appeal under reference APP/Z3825/W/20/3246486

This appeal was following refusal of application DC/19/2105, dated 15 October 2019, which was refused by notice dated 31 January 2020.

The application sought to extend a planning permission Ref DC/16/2388 (the original permission), dated 18 January 2017 which granted consent by way of condition for a limited period up to 31 December 2019.

A further 2 pitches on this adjacent site were recently permitted under application DC/24/0256

The site is enclosed by established hedging to its western and southern boundaries as well as an established hedgerow to the northern boundary with Pickhurst Lane albeit part of this was removed to allow access for construction works which have taken place. This hedgerow has now been reestablished.

Public right of way 1983/2 runs along the western boundary of the site and is separated from the appeal site by woodland.

The surrounding area is characterised by sporadic development, comprising residential, agricultural, commercial and equestrian developments.

The site is well screened from the road and neighbouring fields by mature hedgerows and trees.

The Proposal

The proposal, which is in part retrospective, is for the use of the land for the stationing of 2 static caravans for residential purposes for a gypsy traveller family, together with the formation of hardstanding and associated landscaping.

The plans include space for the stationing of a touring caravan for each pitch. The plans also include parking for 2 cars for each pitch and a bike and bin store, a day room / utility building.

The application also includes the erection of two stable buildings

Associated landscape works are also included including the planting of native hedges and removal of hardstanding which have not yet been carried out but are proposed to be undertaken.

An application for a similar development was refused under application DC/25/0317.

The reasons for refusal stated were:

1. Insufficient information has been provided to demonstrate with a sufficient degree of certainty that the development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015) and the National Planning Policy Framework (2024), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority Habitats & Species).
2. It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposal would not result in an adverse visual and/or landscape impact, or cause harm to the semi-rural character and setting of the site, with particular reference to the laying of hardstanding and removal of hedgerow and impact on adjacent woodland. The development is therefore contrary to Policies 23, 25 and 33 of the Horsham District Planning Framework (2015).
3. Insufficient information has been submitted to establish the protection of the ecological and biodiversity interests of the site and whether suitable mitigations or enhancements are necessary and achievable, contrary to Policy 31 of the Horsham District Planning Framework (2015).

This application seeks to address the previous reasons for refusal through a number of amendments to the scheme as well as through the provision of further supporting information.

Relevant policies

Policy 26 of the HDPF seeks to protect the rural character and undeveloped nature of the countryside against inappropriate development, seeking to support certain forms of development related to the needs of rural enterprise and sustainable rural development, while seeking to prevent a significant intensification of use and retain important components of rural character.

Policy 23 of the HDPF sets out the criteria for assessment in the determination of planning applications for non-allocated gypsy and traveller development, seeking to ensure that sites are appropriate in terms of ground conditions, vulnerability to flood risk, served by safe and convenient vehicular/pedestrian access, appropriate to local character, appearance and neighbouring amenity.

Policy 23 of the HDPF seeks to support sites located in or near existing settlements, within reasonable distance of local services and community facilities, in particular to schools and essential health services.

Paragraph 22 of the Planning Policy for Traveller Sites (PPTS) (2015) confirms that applications for planning permission should be determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.

Paragraph 23 of the PPTS confirms that applications involving traveller sites must be assessed in accordance with the presumption in favour of sustainable development, and the application of specific policies contained within the PPTS and NPPF relating to traveller sites.

Paragraph 24 of the PPTS sets out that Local Planning Authorities must consider the following issues amongst other relevant matters, in the determination of applications for traveller sites:

- a.) The existing level of local provision and need for sites;
- b.) The availability (or lack) of alternative accommodation for the applicants;
- c.) Other personal circumstances of the applicant;
- d.) That the locally specific criteria used to guide the application of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites;
- e.) That they should determine applications for sites from any travellers and not just those with local connections.

Paragraph 25 to the PPTS sets out that LPAs should strictly limit new traveller site developments in the open countryside that are away from existing settlements or outside areas allocated in the development plan.

Paragraph 27 of the PPTS confirms that if an LPA cannot demonstrate an up-to-date 5 year supply of deliverable sites, this should be a significant material consideration in any subsequent determination when considering applications for the grant of temporary planning permission. An exception, however, exists for defined protected landscapes, Sites of Special Scientific Interest and/or areas protected under the Birds and Habitats Directive.

Need

At this time, the district is subject to a substantial unmet need for gypsy and traveller pitches which has subsisted for a number of years, with no clear pathway for resolution through the adoption of a new local plan.

The Council has progressed work on an updated Gypsy and Traveller Accommodation Needs Assessment (GTAA) in order to understand the latest position, and to develop an appropriate Gypsy and Traveller Policy as part of the Local Plan Review. In January 2020, the 'Gypsy and Traveller Accommodation Assessment (GTAA) – Final Report' was published.

This Report was part of the background evidence base that accompanied the Local Plan Review (Regulation 18) Consultation which ran from February to March 2020.

The GTAA Report provides an evidence base for the provision new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2019 to 2036. The GTAA identifies that there is a need for 93 pitches for Gypsy and Traveller households over the plan period (2019-2036).

The need of 93 pitches for Gypsy Traveller Households stated in the GTAA dated January 2020 has since been updated by Opinion Research Services for Horsham Council and published in December 2023.

The update indicates a need between 2023-2040 (the plan period) for 128 pitches. This follows the result of the Lisa Smith Judgement where the Planning Policy for Traveller Sites (PPTS) was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller by reintroducing those who have ceased to travel permanently due to education, ill health, or old age into the definition (now referred to as the 2023 PPTS).

The needs assessment produced to support the local plan review provides the most up to date evidence base.

This constitutes a major consideration weighing heavily in favour of the proposal provided that the development does not significantly depart from the criteria laid-out in Policy 23 of the HDPF and the PPTS.

Location

The application site is located within a rural area in an area characterised by sporadic development including residential caravans.

The site is in close proximity to Billingshurst and Pulborough, providing access to employment and educational opportunity in addition to a full range of services, amenities and transport options.

This situation, however, is not dissimilar to circumstances considered in the determination of appeal ref: APP/Z3825/W/20/3265226, (LPA ref: DC/20/1993), where the Inspector noted at paragraph 18 that future occupiers would prove highly dependent on the use of the private car, though, neither HDPF Policy 23 nor the provisions of the PPTS explicitly require gypsy and traveller sites to be located within reasonable walking and cycling distance of a town or village, or otherwise preclude a high degree of reliance on the private car at paragraph 17.

The Inspector considered at paragraph 19 that the likelihood of short car journeys to nearby settlements would constitute a factor weighing in favour of a gypsy or traveller proposal, noting that NPPF paragraph 105 recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural environments, and found the appeal proposal acceptably located at paragraph 20 such to comply with the requirements of HDPF Policy 23

Similar conclusions have been reached in appeals relating to more remote sites, including APP/Z3825/C/21/3271264

It is therefore considered that the site constitutes an acceptable location for the proposed development in relation to HDPF Policies 23 and 26

Landscape impacts

The starting point must be that the likely location of any new Gypsy Traveller site in Horsham will be in the Countryside. The PPTS accepts that gypsy sites will be in the countryside.

Simply because a site is within the countryside is not an automatic assumption that it will be harmful to the character of the area. Each site must be assessed for landscape sensitivity and the impact of the proposal must be considered.

The application site has no statutory or local landscape designation, it is not within the Green Belt and is not a National Landscape or National Park. The application site is therefore exactly the type of area in which Gypsy Traveller sites are likely to be found.

The application site is well screened on all boundaries and is not readily visible from Pickhurst Lane or any residential properties. It would not impact the amenity of local properties, none of which are adjacent to the site.

Whilst any form development will result in some change to the character of a site, the changes here are not considered to be harmful. The character of the site is that of a residential caravan site and it is not considered that the proposal will result in change to the established character that would result in harm to the character of the area.

In the allowed appeal decision for the site to the east DC/19/2105 the Planning Inspector stated in their appraisal of the site that

'overall, the extent of the vegetation surrounding the site, comprises sufficient mitigation to screen the development, preventing any significant harm to the visual amenity of the surrounding area'.

The inspector concluded that

'the development does not create any significant harm to the character and appearance of the site or the surrounding area. The scheme therefore complies with the design, character and appearance aims of HDPF Policy 23 e. which requires development not to have an unacceptable impact on the character and appearance of the landscape and are sensitively designed to mitigate any impact on its surroundings, amongst other things. The scheme also accords with the requirements of the Framework'.

It is considered that this remains the case and the development is unlikely to have any additional impact on the visual amenity of the surrounding area due to the mature site boundaries.

The site is enclosed by established hedging to its western and southern boundaries as well as an established hedgerow to the northern boundary with Pickhurst Lane albeit part of this was removed to allow access for construction works which have taken place. This hedgerow has now been reestablished.

Previous comments were made by the LPAs landscape Architect who commented that:

In our judgement, the urbanising form and more importantly, the recent loss of mature boundary vegetation, has an adverse effect on the visual amenity of receptors on Pickhurst Lane and Public Right of Way (PRoW) 1983, as well as an eroding effect on the rural landscape character of the area, contrary to policies 23 and 25 of the HDPF.

Whilst part of the hedgerow was removed to allow access for the construction works which have taken place this hedgerow has now been reestablished with mature plants and this has reinstated the boundary leaving only the small access gate.

This encloses the site further and reduces the visibility of the site significantly, softening the appearance of the development and retaining the wooded and verdant character of the area.

The comments previously stated that

due to the recent clearing of hedgerow and vegetation on Pickhurst Ln and the site's western boundary, the site is now visually open and particularly sensitive to views. The dense vegetation which contributed to the verdant character of the lane and PROW 1983 and positively reinforced the rural character enjoyed by these receptors has been lost.

This comment is however misinformed as no vegetation has been removed from western boundary of the site other than some bramble along the wooded edge to facilitate the installation of the fence. There remains large amounts of vegetation on the western side of the fence and in fact the applicant has not located the fence on their boundary, choosing instead to locate it east of their boundary slightly so as to ensure the trees and vegetation between the site and the PROW remain.

It is accepted that the introduction of closeboard fencing along the boundary has introduced and urbanising detractors to the rural setting but with the dense vegetation and tree line between the fence and the PROW its appearance is significantly softened and views of it are filtered by the vegetation.

The application proposes to plant further natural scrub as mitigation and replacement planting to the western side of the fence and once fully established the fence will be all but invisible.

Associated landscape works including planting of native hedges and removal of hardstanding are also proposed so as to reduce the impact of the development and integrate it better in to the rural area as well as reinforcing connectivity for wildlife.

Trees

The comments previously made also raised concerns with regards to the trees stating that:

Furthermore, as result of the substantial ground works along the woodland edge to install the closeboard fence, concern is raised with the long term retention of existing trees on the western boundary, which are likely to suffer decline and future loss as a result of their RPAs being heavily disturbed during works and encroached by hardstanding. This will have a further eroding effect on the wooded character of the area.

The application is accompanied by an arboricultural report which assesses the potential impact on the trees on site.

It concludes that there are no signs of decline at this point that can be attributed to the recently completed work.

It concludes that it is unlikely that excavation for post-holes will have resulted in significant root loss and that construction of the close-board fence will have had little impact on the trees, with those at greatest risk likely to be BS5837 Category C young hazel & field maple in the shrub layer closest to fence posts/

It further concludes that construction of the new access drive is unlikely to have a long-term impact on those trees in the shrub layer & understorey with smaller root systems and that the foundation base for the stable block is unlikely to have a significant impact on the smaller trees in the shrub layer & understorey but they may have some impact on the RPA of the English oaks (T1-T3) – the tree at greatest risk of decline is the English oak (T1)

It is by no means certain however that the oak will suffer any decline but to assist with mitigating for any potential impact the report recommends that an annual inspection, for the next five to ten years, is undertaken to assess tree condition and monitor possible decline of individual trees.

A programme of planting of replacement trees could be undertaken to replace any trees that are lost over that period attributable to the construction and landscape works.

This could be suitably controlled by condition.

Furthermore the amount of hardstanding currently on site is proposed to be significantly reduced as shown on the accompanying plans with only sufficient permeable hardstanding remaining so as to facilitate access for vehicles to the various parts of the site.

The amount of hardstanding is no greater than that on the site to the east which was previously permitted.

The reduction in hardstanding, the reinstatement of the hedgerow to the northern boundary and the proposed mitigation planting along the western boundary result in a site that is significantly more contained than it was within the last application and in a development which whilst visible in glimpsed views from the road and PROW is not detrimental to the undeveloped character and quality of the local landscape.

The Officer report from the previous application stated:

The Ancient Woodland must have a minimum buffer of 15m from new development. Although amended plans show this to be the case, it is not clear from site visits that this is the case on the ground. The drainage plans more recently provided do not enable the buffer to be left undisturbed. In order to assess the impacts of the drainage proposals, from both an arboricultural and in particular from an impact pathways (ecological) perspective, further information would be required to make a fair assessment.

The application includes further detail as to the location of the Ancient Woodland and shows the 15m buffer zone clearly on the plans which is outside of the developed part of the site.

The drainage outfall to the ditch will fall entirely outside of the 15m buffer of the Ancient Woodland and as a result there will be no potential for impact on the Ancient Woodland.

Strategic Policy 23: Gypsy and Traveller Accommodation states that any planning applications for non-allocated sites must not have an **unacceptable impact** on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings. (our underlining added)

The resulting impact following the proposed changes and the proposed mitigation is limited and certainly could not be considered to meet the threshold of **‘unacceptable harm’** as set out in the policy.

It can therefore be concluded that the proposals and retrospective development would be in accordance with HDPF Policy 23, 25 and 26.

Highways and Access

The site is accessed via an established access from Pickhurst Lane. There was previously an access along Pickhurst Lane which had become overgrown within the hedge, This access has been reopened.

It is clear that the proposed development would be serviced by a safe and suitable means of access such as to satisfy the requirements of HDPF Policies 23 and 40

Policy 41 of the HDPF seeks to ensure that the proposed development is supported by adequate parking, including for vehicles, electric-vehicles and cyclists.

The proposed layout provides that each pitch would benefit from hardstand providing a space for 2x cars, a touring caravan and a refuse store incorporating an EV charging point and storage for 2x cycles.

It is therefore the case that the proposal would not have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network and therefore is not contrary to the National Planning Policy Framework.

The previous application concluded that

On balance, and on the basis that Pickhurst Lane at this point is lightly trafficked and with vehicle speeds below the posted speed limit, it is not anticipated that the proposed would have a severe cumulative impact on the publicly maintained highway at this point. As stated earlier in the report, the number of vehicular movements during the peak hours for this proposal is not anticipated to be high. Therefore, the access arrangements as proposed are unlikely to result in detrimental impact.

There are not considered to be any material changes that would warrant a different conclusion.

Ecology

The proposal would not result in the removal of any further trees or hedges and so would not impact on any protected species.

Whilst some hedges were removed at the front of the site to allow access for machinery these have now been replanted and in any case the removal of hedges does not constitute development.

Protected species surveys have been carried out and are included with the submission.

One of the reasons for refusal of the previous scheme related to the submitted Ecology survey (Sylvatica Ecology Ltd., February 2025) which stated that no trees or hedgerow will be impacted.

The LPA considered that this statement was incorrect, although at the time of the application the works had been completed and therefore the report was correct in that no further trees or hedges were proposed for removal.

An updated report is supplied with this application that addresses this statement to ensure that the information given is clear and relevant to the application.

The scheme provides for ecological enhancement, including the installation of bird boxes and additional native hedge planting. The net result will be a significant increase in native hedging on the site when compared to the pre development scenario and this will reinforce connectivity for wildlife to the boundaries.

The development does not result in an adverse impact on protected species and its habitat and so is in accordance with Policy 31 of the Horsham District Planning Framework (2015) and the NPPF.

As the application is retrospective Biodiversity Net Gain is not required to be demonstrated.

.

Water neutrality

The application site falls within the Sussex North Water Supply Zone, where increased demand for mains-water would exacerbate demand for the continued use/scale of public groundwater abstractions at Hardham Water Works contributing to associated adverse effect upon the integrity of the Arun Valley SAC, SPA and Ramsar sites.

The attached water neutrality demonstrates a strategy which would result in no net increase in water usage and follows a method which has been accepted numerous times on other applications within the district.

The previous application was refused as it was considered that it would be reasonable to apply a condition to limit the size of the caravan to a minimum size to ensure rainwater harvesting would supply sufficient water.

This was following combined appeals at Oaks Farm, Wineham Lane, Wineham under references APP/Z3825/C/24/3350120/121/122/123/124/125/126/127/128, where the Inspector considered that there was no surety over the size of caravans to be installed on each plot.

However, the recent appeal decision at Tanglewood Equestrian, Forest Grange, Horsham, West Sussex RH13 6HX (APP/Z3825/W/24/3355610) accepted that it was possible to control the size of a caravan by condition.

The application sought permission for 2 gypsy traveller pitches. Whilst the appeal was ultimately dismissed on landscape ground (due to the National Landscape location) the application proposed an identical water neutrality strategy using rainwater harvesting from the caravan roof along with a barn. The Inspector concluded that

To offset the site's increase in water usage, rainwater harvesting systems would collect rainwater using the roofs of the caravans and the existing barn. Rainwater would be filtered to a potable standard, and the proposal demonstrates there would be sufficient roof area to yield the required water plus a 60-day drought tolerance. Planning conditions would be necessary to secure submission of water quality test results to the Council, to secure the implementation of the management plan, and to ensure the proposed water neutrality measures are maintained in perpetuity.

During the appeal, Natural England were consulted and raised no objection subject to the imposition of conditions relating to the treatment of rainwater, and delivery, management and maintenance of the WNS's water neutrality measures

Subject to securing the strategy for water neutrality and treatment of collected rainwater through planning conditions, the proposal would not increase water abstraction. Therefore, the potential harm to the integrity of the Arun Valley SPA/SAC would be adequately mitigated.

I therefore consider appropriate mitigation would be secured and is necessary to make the development acceptable in planning terms. Consequently, the proposal would not have significant effects on the integrity of the Arun Valley SPA/SAC and the proposal would satisfy the requirements of the Habitats Regulations.

In addition, a legal opinion on this matter has been obtained and previously provided to the LPA which concludes that it is possible to secure the rainwater harvesting by condition to ensure water neutrality mitigation.

Furthermore, the recent appeal decision at the application site (APP/Z3825/C/25/3361551) confirmed that it was possible to control the size of a caravan roof in relation to water neutrality. The Inspector concluded at paragraph 42 that

A planning condition to secure the implementation of a management and maintenance plan as set out in the paragraph above would be reasonable, necessary and enforceable having regard to the details contained within the WMP submitted.

Suitable conditions were agreed with the LPA for this during the appeal.

Whilst the appeal was dismissed on other grounds it is clear that the water neutrality approach was not an issue.

The proposal would therefore not result in an increase in water abstraction in the River Arun and Western Streams catchment of the Sussex North WRZ.

Therefore, it would not adversely affect the integrity of the Arun Valley SAC, SPA and Ramsar sites. Consequently, it would be consistent with Policy 31 of the HDPF which seek to protect the hierarchy of designated sites and habitats.

Alternative approach

The Council have recently confirmed that Gypsy Traveller development will have access to the Councils' own mitigation scheme SNOWS.

It is understood that development deemed compliant with a current or emerging (post-submission) local plan or neighbourhood plan would be deemed eligible for access to purchasing SNOWS water credits.

Gypsy and Traveller proposals are considered to be eligible to access SNOWS to offset the increased water demand associated with the proposal.

SNOWS is not live at the time of this submission, but it is anticipated that it is likely to go live during the course of the application. The applicant therefore proposes that in the event that SNOWS is live before determination of the application that the requisite number of credits be secured through SNOWS as an alternative to the above bespoke mitigation measures.

Foul water and surface water Drainage

The applicant proposes foul water disposal by a highly efficient package treatment plant.

In the absence of mains drainage this is considered to be an appropriate means of foul water disposal which would avoid harm to the quality of the soils.

The new package treatment plant will be a Rewatec Solido Smart 2-8 Person Sewage Treatment Plant manufactured by Premier Tech Aqua, 2 Whitehouse Way, South West Industrial Estate, Peterlee, Co Durham, SR8 2RA.

The package treatment plant will be installed and fully operational prior to occupation of the development. The package treatment plant will be installed in accordance with the manufacturer's recommendations and instructions, and in accordance with the Building Regulations.

The package treatment plant will be serviced by a qualified British Water accredited engineer on an annual basis in accordance with the manufacturers servicing and maintenance guide to ensure it is operating efficiently and effectively.

This should include a desludge to ensure a solids build-up doesn't compromise the treatment chamber if the sludge level reaches 70% of the permitted maximum.

The annual service should include an assessment of the activated sludge volume in the reactor in accordance with the manufacturers servicing and maintenance guide.

The annual service should include checking of all working parts including:

- Air blower strength/efficiency
- Air filter check/change
- Final water quality
- Mechanical component checks/replacements
- Air pipe checks
- Diffuser checks
- Health of bacteria

The runoff from the treatment plant will be taken to a soakaway drainage field.

The site is not within a flood zone as identified by the Environment Agency.

Surface water will be discharged to the water course as set out in the detailed drainage report.

A detailed drainage report is supplied with the application.

Sustainability statement

The proposal seeks to utilise sustainable design and construction techniques, for example, energy conservation and efficiency, water efficiency, reducing waste, re-using materials and recycling materials to ensure the most efficient use of limited resources.

The application seeks to meet these aims in the following ways:

- Provision of an electric vehicle charging point for each plot
- Improvements to the biodiversity of the site through substantial additional planting to the boundaries including enhancing existing hedgerows.
- Provision of separate waste and recycling bins along with suitable covered storage.
- Water limiting measures will be provided to ensure the water neutrality.

Factors weighing in favour of the appeal.

The following factors weigh in favour of the application:

- i) The proposal complies with Policy 23 and the presumption in favour of the plan applies.

Strategic Policy 23: Gypsy and Traveller Accommodation states as follows (our comments in red):

The following criteria will be taken into consideration when determining the allocation of land for Gypsies, Travellers and Travelling Showpeople and any planning applications for non-allocated sites:

- a. *There must be no significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable;*

The site is outside of a flood zone with no known drainage issues, no contamination issues or hazards such as overhead lines. The site is level and accessible.

- b. *The site is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users;*

The site has a safe established access

- c. *The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas;*

There is power and water on the site. Foul drainage will be addressed by way of a package treatment plant and the site is located in a residential lane with other dwellings so waste collection services will be readily available. Sufficient parking and turning is available on site as well as sufficient amenity space for the families.

- d. *The site is located in or near to existing settlements, or is part of an allocated strategic location, within reasonable distance of a range of local services and community facilities, in particular schools and essential health services;*

The site is located 0.5 miles from the nearest built-up area boundary (Pulborough)

Future occupiers would benefit from indirect access into the larger settlement, which provides services and facilities, with public transport access to larger settlements.

- e. *The development will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.*

As set out above. The application site is well screened on all boundaries and is not readily visible from Pickhurst Lane or any residential properties. It would not impact the amenity of local properties, none of which are adjacent to the site.

The site is not a protected or sensitive landscape and whilst any development will result in some change to the character of a site, the changes are not considered to be harmful.

The resulting impact is limited and certainly could not be considered to meet the threshold of 'unacceptable harm' as set out in the policy.

- ii) The identified need for Gypsy Traveller pitches is not being met and issues with water neutrality make it even more difficult for the LPA to meet this need. Therefore, where a suitable site comes forward that meets the requirements of Policy 23 and can demonstrate water neutrality they should be granted.
- iii) The LPA cannot demonstrate a five-year supply.
- iv) There is a clear failure of Policy. The LPA have failed to deliver on their allocations so did not meet the identified need for 128 pitches (even though that was an underestimate.) From 2015 to date the Council has relied on a discriminatory definition that has tainted their entire approach. There has been a clear failure of policy.
- v) Public Sector Equality duty is relevant to the proposal. The effect of the discrimination is set out in the Lisa Smith judgement and the change of definition led to a reduction on need by some 2/3. The Council have been working on the wrong figures since at least 2020 and this engages the Public Sector Equality duty. There has been a clear breach and this is factor that must be taken into account.
- vi) The likely location of any new Gypsy Traveller site in Horsham will be in the Countryside. The PPTS accepts that gypsy sites will be in the countryside. Simply because a site is within the countryside is not an automatic assumption that it will be harmful to the character of the area. The application site has no statutory or local landscape designation, it is not within the Green Belt and is not a National landscape or National Park. The site is therefore exactly the type of area in which sites are likely to be found. The proposal results in limited impact on the landscape character of the area.

Overall, therefore, the limited impact considered to arise for the development proposals would be far outweighed by the significant benefits as identified above.

It is, therefore, considered that planning permission should be approved.