

PLANNING, DESIGN and ACCESS STATEMENT to be read in conjunction with drawings submitted for:

The Spoons, Harbolets Road, West Chiltington, West Sussex, RH20 2LG

Full application for a proposed two pitch settled gypsy accommodation site (retrospective). Revised application with landscape and ecology enhancements further to dismissed appeal reference APP/Z3825/C/24/3336456

Site and Proposal:

Site is located within countryside but no other statutory designations. The site is within a semi- rural area characterised by commercial uses, farms and individually designed dwellings.

The site **circled yellow** below where the development (change of use of land) is proposed is not readily visible from public vantage points being screened by the adjoining mature boundary trees and hedging. The existing access will be used.





The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise.

Executive summary

The application is resubmitted further to the APP/Z3825/C/24/3336456 appeal decision on 25th June 2025.

Much has changed in terms of material considerations since the decision; the **Main issues from the appeal are reproduced below** – along with the italicised extracts - **COMMENTS** added in respect of this application resubmission.

Main Issues

4. The main issues in this case are:

- the effect of the development on the character and appearance of the area;**

*12. The local planning authority advise that the site lies within the landscape character area Broadford to Billingham Farmlands as set out in the 2003 Horsham District Landscape Character Assessment. The landscape features in this character area are said to include many scattered woods and copses, small scale pattern of fields with a strong sense of enclosure, a strong network of hedgerows/shaws with mature oak standards, narrow lanes, field ponds, small historic farms and some small scale ribbon development along the lanes. I observed on my visit that the surrounding area is representative of that character. The pattern of development is dispersed cottages and farmsteads with some ribbon development along Harbolets Lane and predominantly large properties constructed in traditional materials situated within substantial gardens. **There are ponds close to the site, and the area is characterised by small lanes, wide grass verges, woodland copses and native hedgerows which give the area a verdant appearance.***

*13. It is clear from the evidence submitted, including historic site photographs and observations made by a previous Inspector when considering a site proposal in 2018 that the character and appearance of the site has changed significantly over the past seven years. **Prior to the unauthorised development taking place the Land was a small paddock enclosed by timber post and rail fencing with some hedgerow planting and boundary trees. There was a timber stable within the site and an area of hardstanding laid to provide access to it. Overall, the site had an open grassland appearance which contributed to the character of the surrounding rural landscape.***

14. I appreciate that the leylandii hedge which has been planted along the site's northern and southern boundaries, together with some planting of laurels along the western boundary have now matured and provide some screening of the site. Indeed, there are only glimpses of the caravans from Harbolets Road. However, leylandii and laurel hedging are not native species and do not contribute to the existing landscape character of the area.

15. Caravan sites are a form of development that often appear in the countryside, and the PPTS makes it clear that such sites for Gypsy and travellers can be acceptable in the countryside. However, in this case by reason of the extent of hard surfacing laid, high level of enclosure and the amount of development spread across the site the unauthorised development does not reflect the spacious and verdant appearance of development in the surrounding area. I accept that the impact of the development is localised, however, it has a harmful effect on the character and appearance of the area. I have had regard to the appellant's suggestion that they would be happy for the site to just have a single caravan on it, as opposed to the two mobile homes. However, even if one of the mobile homes were to be removed, the hard surfacing and suburban character of the site would still prevail.

16. For the reasons given above, I conclude that the development conflicts with Policies 25, 26 and 23 (e) of HDPF, the aims of which are set out above. There would also be conflict with paragraphs 135 (c) and 187 (b) of the NPPF. The significant adverse impact of the development does not recognise the intrinsic character or beauty of the countryside, which has been established in case law means 'protect'. There would thus be conflict with national policy. The harm to the character and appearance of the countryside would be unacceptable and carries substantial weight.

COMMENTS – Landscape impact was the main issue of refusal with the Inspector accepting that whilst 'Caravan sites are a form of development that often appear in the countryside, and the PPTS makes it clear that such sites for Gypsy and travellers can be acceptable in the countryside' in this instance the 'non-native Leylandii and laurel hedging along with the extent of hard surfacing' were too much of a suburban character.

The applicant has instructed Artech consultants to prepare a detailed Ecological Management and Enhancement Plan which would include replacement of the Leylandii and laurel hedging with native hedging and enhanced grassland.

Enhancements.



COMMENTS - The revised proposed site plan, pictured below, goes further than that and ensures any hard surfacing is kept to a minimum with the use of grasscrete and the remainder of the site being returned to grassed paddockland.



- whether the occupants of the site would have reasonable access to services and facilities;

19. I consider the site to be near to the closest settlement of Broadford Bridge and within a reasonable distance of local services and community facilities in West Chiltington and Billingshurst. I therefore find no conflict with Policy 23 (d) of HDPF, the aims of which are set out above. I also find no conflict with the PPTS in relation to the site's accessibility to services and facilities.

COMMENTS – The site represents sustainable development within a reasonable distance of local services and community facilities.

- the effect of the development on the integrity of the Arun Valley SAC, SPA and Ramsar, with particular reference to water neutrality; and

COMMENTS – matters of water neutrality are no longer a reason for refusal
 Natural England officially withdrew its water neutrality advice for the Sussex
 North Water Supply Zone on October 31, 2025

- the effect of the development on protected species and the measures necessary to avoid, mitigate or compensate for any negative effects.

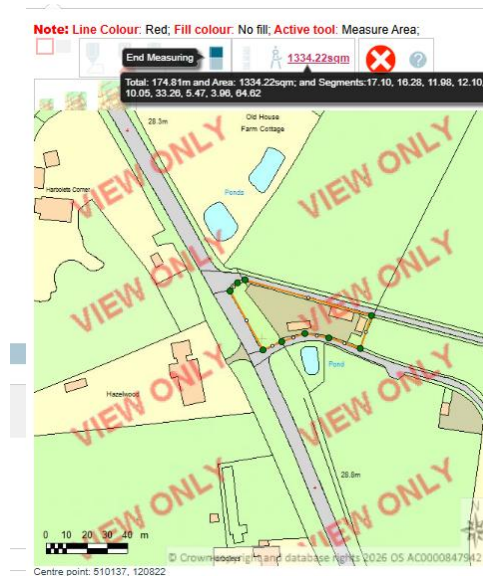
COMMENTS – The applicant has instructed Artech consultants to prepare a detailed Ecological Management and Enhancement Plan which confirms:

Given the retrospective nature of this assessment, the precautionary assumption that amphibians may have been present prior to development, and the site's location **within a red risk zone for great crested newts**, it is recommended that a series of mitigation and habitat enhancement measures are implemented to compensate for the loss of habitat and, where possible, to improve conditions for amphibians going forward.

Any suitable terrestrial habitat that may have been present prior to development has been removed as a result of the works undertaken. It is therefore recommended that the following measures are incorporated into an **Ecological Management and Enhancement Plan (EMEP)**, which should be prepared, agreed with the local planning authority and implemented in full prior to or alongside any further works on the site:

- Creation of a cordoned-off grassland area: a defined area of the site should be reinstated as species-rich grassland, using locally appropriate native seed mixes. The area where the vegetated garden is located would be suitable. **This will restore foraging, sheltering, and overwintering habitat for amphibians and contribute to the site's overall biodiversity value.**

In terms of biodiversity it is noted that the site area being less than 0.2 hectares now falls beneath the area where mandatory Biodiversity Net Gain (BNG) is required. **As such any voluntary BNG enhancements are to be included in the plus column of Planning Betterments.**



Above – Plan confirms site area is less than 0.2ha

5. Other considerations, potentially weighing in favour of the development, include the availability (or lack) of alternative accommodation for the occupiers of the site and their other personal circumstances.

COMMENTS – the Council accept that there remains a substantial unmet need for gypsy pitches which carries significant weight in favour of the proposal.

The Council accept the gypsy status of the occupiers and that **there are no suitable alternative sites available.**

The proposal is for a two-pitch site for settled gypsy accommodation. The site will include commensurate amenity areas within each pitch. **The existing permeable access will be used to serve the development.** Each pitch will have a permeable hardstanding area to provide space for parking (including an area for a touring caravan) and turning.

As highlighted on the proposed site plan the site will be laid out ergonomically in accordance with the extant guidance within the May 2008 CLG ‘Designing Gypsy and Traveller Sites - Good Practice Guide’; the proposed development will fit in well with the surrounding sporadic development context.

Each pitch has been set out to accord with site licence conditions. **The proposed development is being advanced to assist in meeting the long outstanding unmet need for Gypsy sites within the District.**

The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise.

Design and Development Objectives:

Good quality design with siting, layout, scale, form and appearance respecting the local context. The primary consideration has been to ensure the nature and extent of the proposed development are acceptable in planning terms, including any impact of the proposal on general and neighbouring amenity.

On the basis of the outstanding general need for pitches a personal permission is not requested; the applicant is happy to accept a standard planning condition to the effect that:

‘This permission does not authorise use of the land as a caravan site by any persons other than Gypsies and Travellers, as defined in Annex 1 of Planning Policy for Traveller Sites (Department for Communities and Local Government 2015).

Reason: To enable the Local Planning Authority to control the use of the site and in accordance with Policy 21, Policy 22 and Policy 23 of the Horsham District Planning Framework 2015’.

Executive summary

Planning Policy for Traveller Sites (PPTS) The Planning Policy for Travellers Sites (PPTS) document confirms that local planning authorities should set pitch targets for Gypsies, Travellers and Travelling Showpeople (GTTS), which addresses the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. **Specifically, local planning authorities should, in producing their Local Plan identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets. This is reiterated at paragraphs 9 and 10 of the PPTS document.**

Paragraph 24 of the PPTS relating to the determination of planning applications for traveller sites and states that local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

- a) the existing level of local provision and need for site;
- 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 allocation 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 26 of the PPTS also notes that local planning authorities should attach weight to the following matters:

- a) effective use of previously developed (brownfield), untidy or derelict land;
- b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;
- c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children;
- d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

Planning History:

APP/Z3825/C/24/3336456 - Full application for a proposed two pitch settled gypsy accommodation site (retrospective). Dismissed for reasons outlined above.

APP/Z3825/W/17/3192171 Decision date: 25 October 2018

Relevant italicised extracts from appeal below – [comments added](#).

1. The appeal is dismissed.

Preliminary matter

2. The Council registered the application as including the retention of the existing stable block on site, however this work did not form part of the appellant's application. Further, Mr Green for the appellant said that the planning status of the stable as a building was contested as was the length of time that it had existed on site. These elements need to be resolved by the parties separately from the appeal proposal and I have dealt with the application without reference to the stable block other than I noted that it existed on site at the time of the visit.

Comment – The stable block has been in situ for more than 4 years and can now be formerly considered Lawful and part of the context. **i.e. this is no longer an open undeveloped parcel of land.**

The extract below from the DC/17/0865 officer report evidences the existence of the stable block for more than 4 years.

The site layout would retain the existing timber stable block (approx. 4m x 7m) along the eastern side, with the mobile home sited alongside the southern post-and-rail fenced boundary (approx. 3m x 9.5m). An additional area of some 6m x 2.5m would be provided alongside the northern site the stationing of a touring caravan.

The principle of development

7. The Council says that the proposed gypsy site would be contrary to HDPF Policy 26 which deals with countryside protection, and relates to land outside of built up area boundaries. The policy puts forward four criteria for essential forms of development in such a location. While the proposal does not fall within any of the specified criteria, it is not clear to me that there is policy presumption against the proposal as the specific policy on gypsy and traveller sites, **Policy 23, does not appear to rule out a countryside location, albeit that a site must be 'in or near a settlement' according to criterion (d) of this policy.**

8. I am also conscious that Policy C of the PPTS indicates that while scale is an issue when assessing the suitability of sites in rural or semi-rural locations, **it does not rule against the principle of such locations.** The PPTS goes on to indicate in paragraph 25 that sites in open countryside that are away from existing settlements should be very strictly limited. Whilst I acknowledge that the appeal site lies in the countryside, **I would not describe it as open countryside because of the array of scattered development that exists around the site. Further, in terms of the NPPF, while this generally supports rural housing, although the emphasis is placed on this being found in settlements or groups of small settlements, I would not describe the location of the appeal site as 'isolated' in the countryside, when applying the findings of the Court of Appeal on this term in the case of Braintree.**

9. **On the basis of the main policies and national guidance put to me, I conclude that there is not a policy objection in principle to the development proposed in a general countryside location.**

Effect on character and appearance

10. In assessing this aspect at the site visit I considered the appeal proposal from the appeal site itself and from the environs of Harbolets Road in the vicinity of the site. **At the moment the site has a simple open aspect with a small timber stable and with some landscaping along its boundaries,** and it contributes to the present rural character of well scattered properties mostly set back from the road frontage.

11. The proposal involves a change of use but the **day room building proposed,** static caravan and hard surfacing would be permanent features which would be sited relatively close to the highway and seen along the road frontage. Although the day room is proposed to be constructed with a rustic timber clad form **I have concerns about the overall spread of physical development on this small plot and I am concerned that it would not have the**

similar spacious and verdant appearance as existing development in the locality.

Comment –The proposed development would be located towards the eastern end of the site. The western end of the site, most sensitive to change, would remain open and undeveloped.

12. I acknowledge that the scheme proposes additional planting and I noted the hedge landscaping already undertaken and the retention of this hedge could be conditioned, but such natural features cannot be relied on in perpetuity to screen the development. Further, it appears to me that even if new hedging is able to grow *it will take some time to make an effective screen and the proposed development would be very conspicuous in views for about 100 metres along Harbolets Road.*

Comment – The replacement native hedgerow with the correct maintenance and double row planting would form a 2m hedge **within 18 months.**

13. Overall on this issue I find that the proposed development would have a *significantly harmful effect* on the character and appearance of the present rural landscape and would not protect, conserve or enhance it.

Comment – The proposed development would no longer have a significantly harmful effect. **Based on the ongoing unmet need for gypsy pitches the presumption in favour of sustainable development would apply. Any residual marginal harm would be substantially outweighed by the planning benefits as part of the Planning Balance.**

The following extracts from the Appeal Ref: APP/Z3825/W/20/3265226 (included in full as a background document) Decision date: 30 May 2022 are a relevant material consideration and can be analogously applied to the proposed development.

Hillybarn Farmhouse, The Mount, Ifield, Crawley RH11 0LF - Full application for a proposed **two pitch** settled Gypsy accommodation site.

Character and appearance

21. The site forms the corner of a larger field with trees and bushes on the roadside and southern boundaries. It lies in the Upper Mole Farmlands landscape character area as defined in the Horsham District Landscape Character Assessment 2003. **The identified key characteristics for this area include pasture land with small to medium and irregular fields, divided by thick hedgerow and occasional blocks of woodland.** The settlement pattern is dispersed and located along lanes.

22. The provision of mobile homes, the utility buildings, hardstanding as well as associated parking and paraphernalia would plainly give the appeal site a more developed and domestic character and would reduce its openness. However, in terms of land coverage, the 2 pitches would be modest and of a comparable size to the Hillybarn Farm complex and other nearby properties. As such, the scale of the site would be in keeping with other developments in the locality.

23. Also, nearby houses tend to have smaller outbuildings and so as a group with different elements the development would not be uncharacteristic. The mobile homes would be different in style and appearance to the local houses but it is not unusual to see caravans in the countryside. Indeed, on my visit I saw from the site a nearby caravan at Hillybarn Farmhouse. The proposed utility buildings would be small and of simple form and so they would reflect the appearance of the field shelter on the site as well as other local outbuildings.

24. Access drives, parking and associated paraphernalia are seen at other local residential properties and so such features on the site would not be entirely at odds with the area's character. In the dark, existing properties already provide sources of artificial light and so lighting as part of the development would not be particularly uncharacteristic.

26. Where seen from the road, the caravans, utility buildings, parking and paraphernalia would partly obstruct vistas of the wider countryside and so would undermine the pastoral nature of the area. However, the development would be set back and so it would not be prominent. Its positioning would allow scope for additional planting to the front of the site, which could be reasonably secured by condition. This would help reinforce the vegetated nature of the lane and so positively enhance the local environment in line with the identified key characteristics of the area. I would not allow the appeal simply on the basis that the development could be concealed but additional planting would reduce its visual impact from the road.

Appeal Ref: APP/Z3825/W/17/3192171 Decision date: 25 October 2018

Additional relevant italicised extracts from appeal below – [comments added](#).

*15. The main parties and local objectors to the proposal set out the distances that the appeal site is situated away from the nearest villages and centres that provide facilities for day to day needs and to public transport. **In summary, essential services are at least 2.5km away and the closest bus stops are 1.7km away from the appeal site.** I travelled the route to the nearest main villages of Billingshurst and Ashington at my site visit.*

16. Looking at the overall picture, it is clear to me that the site lies well away from any settlements or facilities essential for day to day living or from public

transport modes. Further, I found that the Harbolets Road was a busy rural road and although there are wide grass verges in the vicinity of the appeal site, the general form of the road locally is one with narrow or no verges to give a refuge to pedestrians off the carriage when a vehicle is approaching. Also I found the lanes to be twisty in alignment with limited long distance visibility. On the basis of what I saw I understand the Council's concern that Harbolets Road is not conducive to safe pedestrian movement. *There is a likelihood that the occupier(s) of the proposed gypsy and traveller site would be very dependent on the use of private motor vehicle transport for day to day living.*

Comment – The following extracts from the Appeal Ref: APP/Z3825/W/20/3265226 Decision date: 30 May 2022 are a relevant material consideration.

Hillybarn Farmhouse, The Mount, Ifield, Crawley RH11 0LF - Full application for a proposed **two pitch** settled Gypsy accommodation site.

Suitability of location

14. The site is in the **countryside and away from the boundary for Rusper, the closest defined village** within the Horsham district boundary. Policy 2 of the HDPF looks to focus development in and around settlements while HDPF policy 26 only permits development in the countryside that is essential and meets one of four criteria. None of these are relevant and so the appeal development would not accord with HDPF policy 26.

15. At the same time, HDPF policy 23 sets out criteria to be considered in the specific assessment of Gypsy and Traveller accommodation proposals. This policy is permissive of sites near to, and not just within, settlements. This is consistent with the PPTS which does not preclude sites in the countryside.

16. Crawley lies outside the Horsham district boundary but its edge is 2.2km along roads to the south **and 3.2km to the east.** **As such, it is the nearest settlement to the site. These fairly short distances would allow a quick and easy drive from the development to a sizeable town where there are health, education and employment services.**

17. HDPF policy 23 does not provide a definition for the term “near to existing settlements”. However, there is no explicit requirement that Gypsy and Traveller accommodation should be within reasonable walking distance of a town or village, despite the policy requirement for a convenient pedestrian access. Also, the policy and the PPTS do not preclude Gypsy and Traveller sites where occupiers would be highly reliant upon the car for access to

services. In light of the short driving distances to Crawley, it is reasonable to find that the development would be near to an existing settlement and so it would comply with HDPF policy 23 in this respect.

18. Residents of the site are unlikely to walk to facilities given the separation distances. Also, only a limited bus service travels along Ifield Wood to Horsham and so it is unlikely to provide a realistic travel option for most trips. The development would be within a reasonable cycling distance of Crawley although this would be an unattractive choice of transport for many journeys, particularly during inclement weather. **As such, it is likely that occupants of the development would be highly reliant on the private car.**

19. Nevertheless, paragraph 105 of the Framework recognises the opportunity to use sustainable modes of transport varies between urban and rural areas. It is to be expected that occupants of Gypsy and Traveller sites would have less opportunity to travel by foot, cycle or public transport as they are allowed outside settlements under HDPF policy 23 and the PPTS. In light of the policy context, the short car journeys to Crawley adds in favour of the development.

20. Having regard to all factors together, I conclude the site would be a suitable location for the development. **It would not accord with HDPF policies 2 and 26 but it would be near to Crawley and so permissible under HDPF policy 23. Most trips to and from the development would be made by private vehicle but journeys to essential facilities would be short. In light of the provisions of the Framework and PPTS, the accessibility of services from the development would be acceptable.**

Relevant Planning Precedents:

Permission was granted on appeal, decision date: 1st March 2022, appeal Ref: APP/Z3825/W/20/3265710 for four gypsy pitches on Land at the junction of Hill Farm Lane and Stane Street, Codmore Hill, Pulborough RH20 1BW.

The following **italicised extracts from that appeal are analogously relevant to the current application.**

Main Issues

3. The main issues in this appeal are the effects of the proposal on the surrounding area and community.

Reasons

4. The application site is located adjacent to the junction of Hill Farm Lane and Stane Street (A29). **The Council indicates that the appeal site adjoins the defined built-up area boundary of Codmore Hill. An existing vehicular access is located on the Hill Farm Lane frontage, behind a layby, over which a right of way for the appellant exists. The site contains areas of hardstanding and some vegetation around its perimeters.**

7. The appeal scheme indicates that 2 of the pitches would be sited towards the front of the site, on a general alignment with the adjacent buildings, and 2 would be at the rear. The proposal indicates a significant degree of additional landscaping. Each pitch would provide for a static home, an area for a touring caravan and 2 parking spaces. Other open areas within the site would be landscaped and the pitches separated by hedges. Boundary vegetation is shown to be augmented.

8. The Planning Policy for Traveller Sites (PPTS) states at paragraph 14, that when assessing sites in rural and semi-rural areas, it should be ensured that the sites do not dominate the nearest settled community. I judge that the site could be said to be in a semi-rural location and not in the open countryside as set out in paragraph 25 of the PPTS. In visual terms, the plot already benefits from planning permission and this appeal scheme includes a very small expansion of that site, which in itself, would not change the dominance of the site. In relation to the structures on the site, there would be 4 static caravans, compared to 2 static caravans and a day room previously permitted. It would also accommodate the temporary presence of touring caravans and any associated vehicles. I accept that this would increase the presence of features within the site. However, the site is currently well screened particularly from the main road to the east and significant additional planting is proposed around the edges of the site and so that each pitch is separated from the others. **In my judgement, this would mean that the appeal site would not appear visually dominant in this area, where many developed plots accommodate 2 storey buildings with hard-standing areas and parked vehicles.**

10. **The Council acknowledges that it cannot demonstrate a 5 year supply of Gypsy and Traveller sites. This adds significant weight in favour of the proposal.** Reference is made by the Council to some effects on the setting of the nearby listed buildings, referred to above, within the officers' report but not expanded upon in the statement. The Council identify that any such harm would be at the very lowest end of 'less than substantial harm'. **They also refer to there being no personal or specific circumstances have been set out by the appellant to justify the proposal. In my judgement, the presence of such circumstances can only add weight to a proposal and, taking account of paragraph 24 of the PPTS, the absence of such circumstances cannot detract from a proposal; it is just one of several factors that should be taken into account, if they exist.**

The following links and extracts are for similarly approved proposals:

DC/16/2721 - [Change of Use for extension to site at Greenfield Farm for permanent use for five mobile homes to include the one existing for family members and five touring caravans for summer months only](#)
Greenfield Farm **Valewood Lane** Barns Green West Sussex - **PERMIT**

DC/17/1374 [Proposed settled gypsy accommodation site comprising 3 pitches and associated utility building](#) Land To The Rear of Pear Tree Farm Furners Lane Woodmancote West Sussex BN5 9HX – **ALLOWED on APPEAL with FULL COSTS.**

DC/17/2216 [Proposed site for settled gypsy accommodation with 4 pitches.](#)
Hawthorns Bar Lane Southwater West Sussex - **PERMIT**

Need for additional sites:

At the time of the APP/Z3825/W/17/3192171 Decision date: 25 October 2018 there was an acknowledged shortfall of c.47 pitches.

That shortfall of pitches has now doubled to around 93 pitches as confirmed by the following italicised extracts from the Appeal Ref:

APP/Z3825/W/20/3265226 Decision date: 30 May 2022 **which is now an increasingly relevant material consideration as part of the planning balance.**

Hillybarn Farmhouse, The Mount, Ifield, Crawley RH11 0LF - Full application for a proposed **two pitch** settled Gypsy accommodation site.

Considerations in favour of the development

38. HDPF policy 21 identifies sites to address a backlog in supply for Gypsy and Traveller pitches for the period 2011 to 2017. I am advised that some of

these have yet to come forward. Also, a **Council produced Gypsy and Traveller Accommodation Needs Assessment identifies a requirement to provide 93 pitches between 2019 and 2036.** There is no information before

me on the number of pitches that have been provided but the Council acknowledge that it is unable to demonstrate an up-to-date 5 year supply of Gypsy and Traveller sites as required under the PPTS. Therefore, the evidence indicates a un-met need for more pitches.

39. Furthermore, a Site Allocations Development Plan Document which would identify the provision of Gypsy and Traveller Sites to meet need beyond 2017 is at an early stage of production with no predicted adoption date provided. As such, there is significant uncertainty over how a sufficient number of Gypsy and Traveller pitches would be delivered other than through granting planning permission. The development would make a minor contribution towards the supply of sites but this attracts significant weight in light of the recognised need and the lack of any development plan that allocates land for pitches.

There are no vacancies at any gypsy sites within the Council's administrative area. Further it is widely understood that there is a long waiting list for any pitches both within the Council's administrative area and in the surrounding authorities.

It is a consistent theme in Horsham gypsy appeal decisions that...

"There is a clear existing need for gypsy and traveller sites in Horsham and there is not a sufficient supply to meet the requirement for the five year period up to 2020. The need for additional gypsy and traveller accommodation is a matter which carries significant weight, and the proposal represents an adequate way of responding to this need in accordance with criterion a in Policy DC 32 of the GDCPD."

Therefore this application could help to address the existing backlog and future need for additional gypsy and traveller pitches across the district.

Historical background - To understand Gypsies and Travellers today, it is very important to understand their history; where they come from, their traditions, customs and beliefs and how they have been viewed and treated over the ages. Travellers are part of a tradition which we all have roots in. Humankind has only settled in permanent settlements for the last 5,000 years in Britain and maybe 8,000 years worldwide. Gypsy and Traveller heritage, is of over 100,000 years of nomadism.

Within Britain the roads have thronged with travellers of various sorts over the centuries, even before Romanies arrived about 600 years ago. All types and descriptions of Travellers moved around looking for work; selling, buying, spreading the gospels. There has always probably been friction between nomads and the sedentary population - partly from competition for resources and partly from the inherent fear of the free by the settled population.

Traditionally Travellers integrated with the local rural economy via seasonal agricultural labour and also by supplying other needs of the rural population. With increasing mechanisation the need for seasonal labour slackened during the 1950's and many travellers forsook the rural for the urban and semi-urban environment.

Legislation and Guidance for Gypsies and Travellers

Decision-making for policy concerning Gypsies sits within a complex legislative and national policy framework, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2026
- » Planning Practice Guidance (PPG), 2014

PLANNING ASSESSMENT

It is considered that the main issues in the determination of the application are the need for the proposed mobile homes, the effect of the proposal upon the character of the landscape and street scene, and the amenities of neighbouring properties.

Principle

The main aim of the National Planning Policy Framework (NPPF) is to achieve sustainable development. The document sets out three dimensions to sustainable development: economic, social and environmental. It seeks to create a high quality built environment with accessible local services that reflect the community's needs and support its health, social and cultural well-being and contributes to protecting and enhancing our natural, built and historic environment. The document makes a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking.

In 2015, the government published its 'Planning Policy for Traveller Sites' (PPTS) to be read alongside the NPPF. Policy H of the guidance relates to the determination of planning applications for traveller sites. At paragraph 21, it states that applications should be assessed and determined in accordance with the presumption in favour of sustainable development.

In determining planning applications for gypsy and traveller sites paragraph 22 of the Planning Policy Guidance requires the Local Planning Authorities to consider the existing level of local provision and need.

Landscape Character

Policy 23 sets out the criteria for the consideration of both allocated and unallocated land for Gypsy and Traveller sites. Policy 23 requires that with regards to applications for Gypsy and Traveller sites the following considerations are taken into account;

“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;

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;

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;

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;

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.”

Design content:

The orientation and position of the proposed development has been chosen to provide the accommodation required for each family and to minimise its impact on the surrounding area.

The mobile homes will be sited over a permeable base bricked up under the perimeter to assist in insulating the mobile home. Each mobile home will retain its axles and wheels but these will be concealed by the brick surround. The low pitched roof will be of dark colouring.

The hardstanding and access shall be constructed in a permeable 20mm pea shingle road planings material over a hardcore base.

Amount:

The proposed footprint of the mobile homes are anticipated to be units measuring c.12 x 6m. In any event they will remain within the dimensions for a caravan under the Caravan Act 1960 (as amended); *i.e. Length – 20 metres (65.616 feet), Width – 6.8 metres (22.309 feet), Internal Height – 3.05 metres (10.006 feet)*

Layout:

As shown on the block plan - the location of the mobile homes has been chosen to make the most efficient use of the land available along with meeting the necessary 6m separation distance and the need to leave 2m to boundaries.

Scale and context:

The height of the mobile homes will be less than the height of buildings on adjoining sites. The mobile homes and proposed development will be set away from the highway boundary.

The size and scale of the proposed development will respond well to the existing sporadic pattern of development in the area and therefore will not have a detrimental effect on the area or adjacent properties. It is not considered that the development will have a detrimental effect on the adjacent area or harm any long distance views.

Any anticipated associated use / enjoyment of land surrounding the proposed development and curtilage would similarly not materially harm the character and amenities of the area. The neighbouring properties will not be affected by the proposed development. The proposed development will not cause overshadowing or overlooking. No external lighting shall be installed on the site unless it is sensor-controlled security lighting. Reason: In the interests of visual amenity.

Sustainability of the site:

The thread of achieving sustainable development runs through the Framework. As indicated in the Framework, sustainable development has economic, social and environmental roles and this is taken through into the PPTS.

To meet all the wider roles of sustainability identified in the Framework, the PPTS advises that policies should ensure that peaceful and integrated co-existence with the local community is promoted. Policies should ensure access to appropriate health facilities and provide for children to have the opportunity to attend school regularly. A settled base would reduce the need for long-distance travelling and possible associated environmental damage through unauthorised camps. Plan-making should reflect the extent to which traditional lifestyles, whereby some gypsies live and work in the same location, can contribute to sustainability by omitting many travel to work journeys. The paragraph goes on to indicate that sites should not be in areas at high risk of flooding, including functional floodplains given the particular vulnerability of caravans.

The site would be sustainable for the proposed use and would be sustainable in terms of the full implications of the Framework paragraphs 18-219. **In the wider interpretation taken through from the Framework into the Plan-making section of the PPTS, the site would also meet all of the sustainability objectives.**

In terms of the narrower considerations of sustainability covering access to transport links and facilities, the site is in a sustainable location being well related to bus stops; railway stations, convenience stores, schools and medical facilities further away. The distances to facilities are not excessive.

Impact on Neighbouring Properties

With regard to the impact of the proposed development on neighbouring occupiers, in each instance it is considered that due to this distance and the existing boundary planting together with the additional planting proposed by the applicant that the proposed mobile homes would not result in harm to the amenities of neighbouring occupiers. The applicant is also willing to supplement the existing landscaping in order to further screen the development, and a condition to this effect is agreeable.

Policy considerations:

It is considered that the application will need to be assessed against the following policies. The proposed development suitably meets the requirements of each of the policies. The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise.

In terms of the need for an overall planning balance, particularly given the multitude of applicable considerations in this instance, it is respectfully and forcefully made out that the proposed development suitably meets and creates positive outcomes against the requirements of each of the policies.

National Planning Policy Framework 2026

HO12: Traveller sites

1. Development proposals for traveller sites should be located so that they:

a. Provide a settled base while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability and may also mean that locations not well-related to existing settlements may be appropriate; and

b. Enable access to frequently used services, such as education, welfare and health services, including ensuring that children can attend school on a regular basis.

2. When considering proposals for traveller sites, including for the purposes of considering need under policies S5 and GB7, local planning authorities should take into account the existing level of local provision and need for additional sites and other personal circumstances which may be relevant. Applications from any traveller should be considered and not just those with local connections.

HO3: Providing land for homes

1. Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure and pitch and plot requirements for their areas over the plan period, drawing on the land availability assessment in accordance with policy PM9. This should include:

b. In relation to traveller sites:

- i. A supply of specific deliverable sites for five years following the intended date of adoption of the plan (as set out in Annex D); and
- ii. A supply of specific, developable sites or broad locations for growth for the subsequent years 6 to 10 and, where possible, for the remaining plan period, where the plan covers more than 10 years.

S5: Principle of development outside settlements

1. Only certain forms of development should be approved outside settlements, as set out in the following list. **These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects**, when assessed against the national decision-making policies in this Framework:
 - a. Development for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction and processing; engineering operations and infrastructure (including for transport, energy, water and telecommunications); roadside facilities in accordance with policy TR5; national defence and security; or which is solely for nature conservation, restoration and/or enhancement;
 - b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;
 - c. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building²⁵. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces;
 - d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);**
 - e. Limited infilling within groups of houses;**
 - f. An exception site as provided for in policy HO10, or development brought forward under a Community Right to Build Order or Neighbourhood Development Order;
 - g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation²⁶, provided it meets the criteria in policy HO12;**
 - h. Residential and mixed-use development which would:**
 - i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
 - ii. Be physically well-related to the station or the settlement within which the station is located;
 - iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;** and
 - iv. Not prejudice any proposals for long-term comprehensive development in the same location.
 - i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and
 - j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test²⁷), and where the development would:**

- i. **Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure;** or
- ii. Comprise major development for freight and logistics purposes which accords with policy E3.

2. In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

3. Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11.

4. Development proposals which do not **fall within one of the categories set out in this policy** should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

Footnote 26 *Including (but not limited to) where the relevant local planning authority cannot demonstrate a five year supply of deliverable sites as set out in policy HO3(1)(a) or (b).*

Footnote 27 *See Annex D: Housing calculations and supply.*

L2: Making effective use of land

1. Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:
 - a. Remediating despoiled, degraded, derelict, contaminated or unstable land;
 - b. **Making better use of vacant and underutilised land and** buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);
 - c. Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan); or
 - d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, **or through sensitive redevelopment or additional development within existing plots** (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street

corners and additional units within residential curtilages). **Such proposals should:**

i. Be consistent with the overall street scene, other than where: it is appropriate to have larger buildings (such as at street corners, or where building upwards would not cause substantial harm to the character of a building and its surroundings); the development would not be visible from the street frontage; or where specific changes are provided for through a design code which forms part of the development plan;

ii. **Maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space;** and

iii. Where the development would involve the use of residential curtilages, not occupy more than twice the footprint of all the existing buildings on the site, and, following development, would retain at least 50% of the non-developed area within the curtilage of the existing buildings³⁸; unless additional development can be accommodated without harm to the overall character of the area, and taking into account the availability of infrastructure and the importance of locating development in sustainable locations (in accordance with policy TR3).

2. A condition of simultaneous development should not be imposed on an application for multiple upward extensions unless there is a clear justification.

L3: Achieving appropriate densities

1. Development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.

2. To contribute to making efficient use of land:

a. Within settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated. The only exception is where there is a clear justification that this is either inappropriate or not possible (for example, where the prevailing density is already very high, the nature of the accommodation required precludes higher densities, or where it would conflict with other policies in this Framework). In considering the potential to increase densities, the existing character of an area should be taken into account, in accordance with policy DP3, but should not preclude development which makes the most of an area's potential;

b. **Outside settlements**, and on land at the edge of existing built-up areas which is allocated or has permission for development and so will form part of a settlement (as defined in the glossary at Annex B), **development footprints should make the best use of a site's development potential, taking into account the policies in this Framework;** and

c. Where development proposals for residential or mixed-use schemes are within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B), a density of at least 35 dwellings per hectare should be achieved within the net developable area of the site. Higher densities – of at least 45 dwellings per hectare – should be achieved where the service frequency is at least twice that of the minimum required for a well-connected station. **Exceptions to meeting these minimum standards should be made only in the case of:**

i. Sites which fall below the threshold for major development where it can be demonstrated that meeting the standard is either inappropriate or not possible; or

ii. Development for traveller sites.

3. The minimum densities in paragraph 2(c) of this policy should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. The Connectivity Tool (Connectivity Tool - GOV.UK) should be used alongside other relevant quantitative or qualitative evidence in assessing the connectivity of particular locations proposed for development.

Horsham District Planning Framework 2015

The proposed development suitably meets the requirements of each of the policies. The **traffic light highlighting** and bold type face throughout the Planning Statement emphasises the suitability of the proposal against the material planning considerations as part of the planning balance exercise.

Policies relevant to the application from the Horsham District Planning Framework 2015 are considered to be; Policy 1 Sustainable Development, Policy 2 Strategic Development, Policy 21 and 22 Gypsy and Traveller Allocations and Gypsy and Travellers Site, Policy 23 Gypsy and traveller Site Accommodation, Policy 24 Environmental Protection, Policy 25 District Character and Natural Environment, Policy 26 Countryside Protection, Policy 32 Quality of New Development, Policy 33 Development Principles, and Policy 40 Sustainable Transport.

Chapter 8: Gypsy and Traveller Accommodation

The following issues have been identified that would will be addressed through the policies in this document;

The Council must assess the accommodation needs of Gypsies and Travellers and plan for these needs in accordance national guidance. The current lack of authorised sites means that the Council faces difficulty resisting applications for windfall sites in less suitable or desirable locations. If enough sites are provided the number of illegal encampments and incursions of Gypsy/Traveller pitches which occur across the district will reduce. There is a desire for the travelling and settled communities to recognise and appreciate each other's needs and work together to build cohesive communities.

Policy 22 - Gypsy and Traveller Sites

- 1. Existing authorised sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from development that would preclude the continued occupation by these groups, unless the site is no longer required to meet identified need.**
- 2. The provision of sites to meet the objectively assessed needs beyond 2017 will be identified in a Site Allocations DPD. Further sites may be provided:**

- a. On windfall sites through the planning process in accordance with the criteria in this policy. These will be identified and safeguarded through the Annual Monitoring Report.
 - b. Extensions to existing sites.
 - c. The redevelopment and redesign of existing sites to provide more efficient use of the site to deliver additional pitches.
 - d. The allocation of sites in strategic development sites or stand alone allocations.
 - e. The use of public owned land to be developed for publicly managed traveller provision.
 - f. The release of public owned land to be used as a site available to be purchased and occupied by a Gypsy, Traveller or Travelling Showpeople family.
3. The Council will work with neighbouring authorities to make appropriate provision to meet the requirements for Gypsies and Travellers.

Policy 23 - Strategic Policy: Gypsy and Traveller Accommodation

1. 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;
- 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;
- 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;
- 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;
- 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.

2. In assessing sites for Travelling Showpeople or where mixed-uses are proposed, the site and its surrounding context must be suitable for mixed residential and business uses, including storage required and/or land required or exercising animals, and would not result in an unacceptable loss of amenity

and adverse impact on the safety and amenity of the site's occupants and neighbouring properties.

Access and parking:

Access to the site will remain as existing. Visibility from the site meets the required standards and is sufficient to serve the vehicle movements related to the proposed development.

Sufficient parking and servicing area is proposed within the site.

Landscaping:

The site has very good landscaping to its boundaries. The granting of consent would facilitate consideration as to the improvement of landscaping and addition of native planting which will enhance biodiversity and ecology.

If required additional proposed native hedging and understorey planting around the site boundaries could comprise a double staggered row mix of:

Hawthorn - *Crataegus monogyna* (25%) / Field maple - *Acer campestre* (25%) / Blackthorn - *Prunus spinosa* (25%) / Common hazel - *Corylus avellana* (25%)

Planting density will be 5 per linear metre (understorey planting 1/sq.m). Hedging will be planted as bare root plants at 60-80cm planting height so as to achieve the effect in the images below.



Existing boundary trees and hedging will be maintained. No trenching is required within 5m of any trees. Ground levels will not be required to be raised within 5m of any trees.

Infrastructure:

Adequate services and infrastructure already exist / are capable of being provided and public resources will not be required to improve services.

Foul Sewage – A detailed drainage layout will be designed in due course, for the proposed utility blocks and mobile homes. All drainage will be new and sized and laid in full accordance with the building regulations.

A Matrix sewage treatment tank or similar is proposed with capacity proportionate to the number of occupants. The tanks are modern, sealed systems and will be emptied by way of a regular service contract.

The images below are of the suggested sewage treatment tank. The installation of the sewage treatment tanks would be the responsibility of the pitch holder and will be of suitable capacity.



The “**Matrix**” treatment plant is of unitank design and incorporates Primary Settlement (PST) Biological Treatment (Biozone), and Final Settlement (FST) within the same structure, allowing delivery to site as a complete unit to provide for a simple and straightforward installation. The Treatment plant has been designed to optimize the aesthetic qualities of the final installation by ensuring that there is minimum visual impact. The “**Matrix**” process is designed in accordance with the requirements of BS 6297.

The primary settlement tank is a two stage tank designed to maximize the removal of gross and suspended solids prior to transfer of the settled effluent to the biozone for treatment. The primary settlement tank also incorporates for a sludge storage volume (based on full load) depending on the desludge periods as identified for individual applications.

The biological treatment phase utilizes BAF technology (biological aerated filter) which incorporates two proven principles of biological process in the form of a fixed film reactor for process stability and a suspended floc dispersed growth system for high transfer rates and operational control, to ensure a stable treatment process which is largely unaffected by shock loads. The process incorporates a submerged, high rate, plastic media on which a fixed film of biomass is grown. This film takes nutrition from the incoming settled effluent and is provided with oxygen by means of a small blower unit which aerates the media through HDPE membrane diffusers to provide fine bubble aeration. The action of the fine bubble aeration is carefully controlled to provide optimum oxygen transfer rates and to provide a scouring action to slough off excess biomass to keep the thickness of the fixed biological film at

optimum levels, thereby preventing the production of anaerobic bacteria and ensuring maximum process efficiency. The fact that the media remains submerged allows for an element of suspended floc dispersed growth which basically means that there will be biomass which is “unfixed” to the media but achieves treatment through suspended aeration.

The biozone incorporates a two stage process as standard that allows for constant mixing of incoming settled effluent to provide optimum treatment stability and to avoid any “short-circuiting.” The use of a two stage biozone ensures a high degree of process efficiency to not only reduce B.O.D. levels to that required, but will also achieve reductions in ammoniacal nitrogen in excess of standard requirements. The final settlement tank is designed in accordance with the requirements of BS 6297 to ensure relevant surface areas and rise rates are achieved to provide maximum settlement of any suspended solids prior to discharge.

The “Matrix” system also incorporates continuous and automatically timed humus sludge return systems to return humus sludge from both the final settlement tank and each biozone, back to the primary settlement tank. Additionally this system also provides for continuous recycling of treated effluent back to the P.S.T. to not only provide dilution of incoming settled effluent but to also ensure continuous flow during periods of low or no flow, thereby keeping the biomass in prime condition. To maximize efficiency and to minimize maintenance requirements and potential problems, there are NO mechanical or moving parts contained within the treatment plant.

Surface water disposal details.

The site preparation and finished development would not present any increased risk from flooding or water pollution. Water butts would be proposed to down pipes to facilitate rain water recycling for landscaping.

The development in question does not involve the construction of soakaways. Rather, surface water drainage utilises the existing properties of rainfall infiltration through the moderate permeability ground. The proposed development would not significantly change the existing infiltration mechanism. The proposal will not increase flood risk in the 1% climate change event, either through uncontrolled increase in surface run-off or by increasing the risk of groundwater flooding.

The existing drainage ditches in the vicinity of the site and there is limited overland surface flow of surface water from the site with the great majority of surface water soaking into the ground. There are no nearby water features that would be contaminated by runoff.

Surface water from proposed development can be reduced by the use of water butts attached to the drainage down pipes. Should it be found to be necessary a sustainable drainage system, designed by experts, will be incorporated.

Water and electricity utilities (gas is via Calor gas bottles) are available to the site and connection is practicable. All services are believed to be capable of sustaining the load of the proposed development.

All services will be connected in accordance with the relevant undertaker's requirements and existing equipment limitations. All will be sited to as to facilitate maintenance and inspection.

Summary and Conclusion:

In terms of the need for an overall planning balance, **particularly given the multitude of applicable considerations in this instance**, it is respectfully and forcefully made out that the proposed development suitably meets and creates positive outcomes against the requirements of each of the policies.

The proposed development has been carefully considered to relate sympathetically to its natural and built surroundings.

The proposed development will be set well away from the highway boundary. The associated uses of land surrounding the proposed development would not materially harm the character and amenities of the area and will not conflict with the openness of the site, the countryside and the purposes of including land within it. The proposed use and the form, bulk and general design of the proposed development are in keeping with their surroundings.

The application suitably considers Local and National planning policies and guidance. There is a need to look at the applicable planning policies sensibly with respect to the site. The Council has no sites to meet the unmet demand that are deliverable now; **the proposed site is deliverable now.**

The proposal involves a small-scale site, it is considered that the site is capable of peaceful and integrated co-existence with the local community. The proposals comply with the wider considerations of sustainability, and represent sustainable forms of gypsy site development. As such it is considered that the application is in compliance with the relevant policies in the Development Plan and is consistent with the NPPF and CLG guidance on Traveller sites.

The site provides for a local need and on the basis of our assessment the proposed permanent Gypsy and Traveller site:

- would not detract significantly from the appearance and openness of the countryside; would not cause unacceptable levels of noise, effluent discharge or damage to designated sites;
- promotes peaceful and integrated co-existence between the site and the local community;
- promotes access to appropriate health services for the family;
- ensures that children can attend school on a regular basis;
- provides a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- provides for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
- avoids placing undue pressure on local infrastructure and services
- is not located at a site at risk of flooding
- avoids prominent locations and blends into the landscape;

- would not generate volumes of traffic that would prejudice highway safety or cause significant harm to the environmental character of country roads.
- is well-related in terms of its location, size and colour to existing buildings
- would not adversely affect the amenities of any nearby residential properties.

Both the general need for gypsy sites for whom there is currently no suitable available alternative accommodation, carry significant weight. Personal circumstances of intended occupiers would no doubt provide further weight in support of the proposals. Taken together, the general and personal need for accommodation provide the compelling circumstances required to justify development. Any marginal harm arising from the proposals is clearly outweighed by other material considerations. A personal condition restricting occupancy is unnecessary.

Given the limited progress made to date by the Council in facilitating the provision of other gypsy sites and the lack of information available, it is not considered that there is a realistic expectation that sites would be available in the immediate future. For the reasons given above, and having regard to all matters raised it is concluded that the application should be permitted.

Thank you in advance of your balanced consideration of the proposed application.

In advance of any decision on the application, please maintain a dialogue with myself and the applicants if you have any questions, concerns or matters that require further elaboration.