



**Horsham
District
Council**

THE GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE

**DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
(DPD) – PREFERRED STRATEGY APRIL 2017**

**REGULATION 18 CONSULTATION REPORT – SUMMARY OF
REPRESENTATIONS**

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1.0 INTRODUCTION

Gypsy and Traveller Site Allocations Document April 2017

- 1.1 In April 2017, the draft Gypsy and Traveller and Travelling Showpeople draft Site Allocations Development Plan Document was published for a six week period of consultation between Friday 21 April 2017 and 2 June 2017. This document set out the Council's preferred approach to the provision of sites for Gypsy and Traveller accommodation for the period to 2032. As set out in the consultation document, it was stated that the representations submitted during this period to the Council would be summarised and that suggested changes/deletions to the document would be considered in full by the Council. This document therefore sets out a summary of the responses received and the steps taken by the Council in response.
- 1.2 The Consultation was undertaken in accordance with the Council's Statement of Community Involvement, published in February 2017.

2.0 SUMMARY OF COMMENTS RECIEVED

Volume and nature of comments received

- 2.1 A total of 393 representations were received on the consultation document from 321 individuals or organisations. A further six comments were made anonymously and while these cannot be formally taken into account, the content has been noted and they did not raise any new issues in addition to those set out in this summary document. Of the 393 comments received, 55 were made on the document as a whole, while the rest were submitted in regard to specific sites. Most of these were objections to the proposed sites, however there were also a limited number of representations in support of particular site options. The remainder of the representations were observations about a particular site rather than an objection.
- 2.2 Comments were received from a wide range of organisations including statutory consultees such as West Sussex County Council (WSSCC), the Environment Agency and Southern Water together with non-statutory bodies such as neighbouring authorities and local resident or community organisations. The largest volume of comments was received from local residents.

Summary of General Comments

- 2.3 55 comments were made on the document as a whole of which one was in support of the plan. Three statutory consultees – Surrey County Council, Natural England and the Highways Agency stated that they had no objection to the proposals.

- 2.4 WSCC stated that it would be necessary to ensure that sites in the plan do not conflict with any Minerals Safeguarding Areas (MSA) which have been identified in the WSCC Minerals Plan which is currently at examination. In response to this comment, the Council have cross referenced the proposed sites with the proposed MSAs and only Lane Top Farm falls within any safeguarding area. This is an existing site of three pitches with personal permission which has been identified for full authorisation and no additional pitches. As the site falls below 0.5ha and is fewer than ten dwellings, the site does not exceed the proposed threshold set out in the draft guidance where the impact of such a site would need further consideration.
- 2.5 The Environment Agency highlighted the need for adequate foul drainage to be provided on sites, but recognised that this has been addressed as a general issue in Policy 23 of the HDPF. Where sites are allocated for Gypsy and Traveller use, the issue of foul drainage will be considered in accordance with this policy.
- 2.6 Two Local Authorities (Arun DC and Reigate and Banstead) submitted comments on the plan together with information on the preparation of policies for the provision of land for Gypsies and travellers within their own authority areas. Both authorities expressed a wish to continue discussions as part of the duty to co-operate, and these conversations are ongoing.
- 2.7 Detailed points were raised by Reigate and Banstead BC regarding the methodology used to identify the need for Gypsy and Traveller pitches and they highlighted the need to ensure that the proposed sites are deliverable. Clarification has been provided in the document and this will be kept under review. The Council has undertaken the assessment in as thorough a manner as possible and in accordance with the relevant guidance. Horsham District Council is also of the view that the sites that are set out in the revised document are deliverable.

3.0 SITE SPECIFIC COMMENTS

Draft Site Allocations

Fryern Park Farm

- 3.1 58 representations were submitted in relation to this site. The majority of these were from local residents, but comments were also received from the Parish Council, WSCC and two developers.
- 3.2 A key issue raised in response to this site was how access could be achieved. Representations were received from adjoining landowners stating that the access track was not in the ownership of the landowner promoting this site. WSCC also stated that improvements to visibility would be necessary to bring the access forward in the stated location. Given the need for the provision of upgraded access to the site, one developer representation questioned whether the site would be viable.

- 3.3 Other comments submitted on this site concerned the impact of the development on the rural character and landscape of the area, and the cumulation that this may have with other gypsy and traveller sites in the area. The Parish Council and other respondents stated that the site would not be in accordance with the HDPF as it was not in a BUAB and did not meet the criteria set out in Policy 26 of the plan.
- 3.4 Due to the concerns regarding the potential access to this site at this stage, which have not been resolved, it is considered that the site should not be proposed for Gypsy and Traveller accommodation. It should however be noted that although the site is located away from a built-up area boundary, the key policy consideration for Gypsy and Site Allocations is Policy 23 and not Policy 26.

Hurston Lane Depot, Hurston Lane, Storrington

- 3.5 53 comments were received on this site including three from statutory consultees (WSCC, Southern Water and Storrington & Sullington Parish Council). Two local community organisations also responded.
- 3.6 A key concern raised in response to this site was the amenity of any residents due to the proximity of the sewage works to the site. This was considered to have adverse impacts on any residents, who would be affected by noise and odour from the water treatment works. Some respondents highlighted that residents of caravans would be more susceptible to these impacts than residents of bricks and mortar accommodation, and that similar consideration should apply to all types of residential use. Southern Water highlighted that this would be contrary to planning policy including paragraph 109 of the NPPF.
- 3.7 Many respondents were concerned that development of this site would have an adverse impact on landscape character given the rural location and open nature of the site although some respondents including Storrington and Sullington Parish Council recognised that the site is brownfield. Despite this, respondents considered that the residential use would have an adverse impact on the character of the area.
- 3.8 The potential for the site to be affected by flooding was raised by a few respondents, however as noted by WSCC the site is outside floodzones 2 and 3 and no risk of surface water flooding has been raised.
- 3.9 The main issue raised in relation to this site was site access. It was highlighted by the majority of respondents that the site has a narrow access which would conflict with other users of the area and be unsuitable for large vehicles. The lack of a pavement was also highlighted as a potential concern. WSCC stated that gaining access to the site would require widening of the access track with a minimum of an additional passing place required. Southern Water in their response indicated that the land used to access the site is in their ownership and that the WWTW operates 24 hours a day, 365 days a year with essential equipment such as pumps and compressors running continually. Furthermore, heavy goods and other vehicles operating on behalf of Southern Water require frequent and unhindered access to the site to enable employees/contractors to undertake routine or emergency maintenance work. The access to the site cannot be resolved and the site description has been updated to reflect this point. This together with the potential environmental

impact on residents has led to this site no longer being proposed as a potential Gypsy and Traveller site allocation.

Smithers Rough

- 3.10 A total of 104 representations were submitted in relation to this site. The vast majority were received by local residents, but comments were also received from the Environment Agency, WSCC and the Parish Council. Two local community groups also submitted further comments.
- 3.11 The main concern raised in response to the proposal of this site was access to the site, and the impact that this may have on road safety due to the road layout in this area. Both the Parish Council and residents stated that traffic in this area is fast moving, and that evidence indicates that volumes of traffic have increased by 20% in recent years which would therefore exacerbate any problems. West Sussex County Council made comments on the highways and access to this site, stating that safe vehicular access to the site is not currently present, although it was noted that the site has been accessed in the past from the east. It was stated that safe access will require significant clearance of trees for visibility splays and alignment of the carriageway. In response to these comments further work has been undertaken in discussion with WSCC to ensure that safe access to the site can be achieved.
- 3.12 The proximity of the site to the floodplain was raised by a number of respondents including the Environment Agency who stated it would be necessary to ensure that the sequential tests for flood risk were followed and that no development takes place on this part of the site. The consultation document has therefore been updated to clarify that this section of the site will not be developed. The Environment Agency and a small number of other respondents noted that the site has been subject to historic landfill and that there was potential for contamination on the site. It is recognised that further investigation is required in relation to this matter, but at this stage it is considered that any necessary mitigation could be achieved.
- 3.13 The wider sustainability of the site was also raised as a concern. Many respondents stated that there was no pedestrian access to the site and that the site is not close to existing services and facilities in the village. The lack of pedestrian access and a nearby bus stop was raised by WSCC as well as local residents. Although it is recognised that the site does not adjoin the BUAB boundary of Rudgwick, it is still relatively close to the settlement and the range of services and facilities that it contains. The site is therefore considered to meet the criteria set out in HDPF Policy 23.
- 3.14 The other comments submitted in relation to this site concerned the impact of this site on the rural character and environment on the area. The proximity of the site to adjoining ancient woodland was raised by some respondents. The designated ancient woodland is however opposite the site to the north of the A281 and is therefore not likely to be directly affected by these proposals. The impact of any development on the rural character is noted, and any allocation of this site would need to ensure that necessary landscaping is provided to mitigate this issue.

Oakdene, Blackgate Lane

- 3.15 Three representations were received on this site, two from members of the public and one from West Sussex County Council (WSSC). The public were concerned that this is a rural lane and as such is unsuitable for traffic. WSSC were concerned with the potential for surface water flooding. This issue has not been raised in previous planning applications. Whilst further investigations are ongoing it is considered that this matter can be resolved.

Greenacres, Hillside, Small Dole

- 3.16 Four representations were received on this site. These included submissions from the Environment Agency and WSSC. WSSC recognised that this is an existing allocated site and that there are already traffic movements site, and did not raise any further issues. It was however indicated that is surface water flooding to the north but not affecting the site. The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that this has been addressed in Policy 23 of the HDPF.
- 3.17 Comments from local residents raised concerns regarding the cumulative impact that this development would have, taking into account the total number of Gypsy and Traveller pitches in the area, and the pressure that this was placing on local services and facilities. This site is however an existing site (and HDPF allocation), and no new pitches are proposed. This proposal will not therefore have any additional impacts on services or facilities.

Greenfield Farm, Valewood Lane, Barns Green

- 3.18 Four representations were received in relation to this site – including one from WSSC and the other from Itchingfield Parish Council. WSSC indicated that there was a low risk of surface water flooding on the site. It was also stated that as the site is already in existence no additional trips would be generated by this proposal.
- 3.19 Itchingfield Parish Council raised concerns that this site would, cumulatively with Kingfisher Farm, have an unacceptable impact on the landscape and visibility area. The cumulative impact of this development was also raised by local residents who stated that it was placing pressure on services and facilities in the Barns Green.
- 3.20 Although the cumulative impact of the site with Kingfisher Farm is noted, the sites set out in the consultation document are already in existence and this proposal will not have any additional impacts on services and facilities.

Kingfisher Farm, Barns Green

- 3.21 Six representations were received in relation to this site. Three responses were from local residents and the others were from WSSC, the Environment Agency and Itchingfield Parish Council.
- 3.22 Itchingfield Parish Council, stated that this site would have an unacceptable impact on landscape, would concentrate the Gypsy and Traveller community in one location, and moreover, the Council should consider a more distributive strategy for Gypsy

and Traveller accommodation. The Parish and community comments also raised the cumulation of impacts with the nearby Gypsy site in Valewood Lane to the south. The cumulative impact of this development was also raised by local residents who stated that it was placing pressure on services and facilities in the Barns Green. Although the cumulative impact of the site with Greenfield Farm is noted, the sites set out in the consultation document are already in existence and this proposal will not have any additional impacts on services and facilities.

- 3.23 WSCC noted that this proposal was seeking to formalise an existing activity meaning existing trips would not increase, albeit most would be by car. Improvements to the visibility out on to West Chiltington Lane were suggested should the site be allocated. This has been reflected in the updated site information.
- 3.24 The Environment Agency raised the need for adequate foul drainage to be provided on the site, but recognised that the need for such provision is set out in policy 23 of the HDPF. This has been reflected in the updated site information.

Lane Top, Pulborough

- 3.25 Three representations were submitted in relation to this site. One comment came from a local resident with the other two from WSCC and the Wiggonholt Residents Association.
- 3.26 The response from the Wiggonholt Residents Association expressed support for this proposal as the removal of personal occupancy conditions would not result in any further material changes to the site.
- 3.27 Some confusion was raised in the responses to this site as to whether the proposal was for three additional pitches or for the existing personal permissions to be fully authorised. This was noted and the report has been updated to clarify that the proposal is for the full authorisation of the existing pitches.
- 3.28 WSCC confirmed that the site has no identified flood risk. It also stated that although the site was not close to sustainable modes of transport that the site is allocated in the HDPF and that impacts from this site have therefore already been considered.

Parson's Field, Pickhurst Lane, Pulborough

- 3.29 A total of 58 representations were made on this site. The vast majority were from local residents, but three representations were made by local community organisations and a further two were from statutory consultees.
- 3.30 WSCC confirmed that there was no surface water flood risk to the site and the Environment Agency raised no risk of fluvial flooding. The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by Policy 23 of the HDPF.
- 3.31 The majority of the remaining comments raised road safety and the narrow access to the site as a concern. The junction of Blackgate Lane with the A29 was identified as a location of a number of road accidents. In addition, the potential for vehicles on this lane to conflict with other road users, including walkers and horse riders was

highlighted. Although these concerns are noted, WSCC noted in their response that the site has already been subject to planning applications where the impact on the road network was considered and no severe impacts had been identified as a result. The site description in the revised consultation document has therefore been updated to reflect this point.

- 3.32 The other comments submitted on this site related primarily to impacts on landscape and heritage. It was highlighted that previous appeal decisions on the site had identified negative impacts on the countryside and local heritage, including the setting of a nearby listed building. A number of comments stated that whilst the current permission was temporary, the landscape and heritage impacts which had been identified would then become permanent. Having undertaken further review of the site taking into account the long term nature of any impacts if the site becomes permanent, the site is not being proposed for allocation.

Northside Farm, Burnhouse Lane, Rusper

- 3.33 25 comments were submitted in relation to this site. 22 were from members of the public and three from statutory consultees. Rusper Parish Council stated that the site has never been used as a genuine traveller site but as a residency for a single family and that it is not suitable for additional pitches due to its rural location. This site is not however being proposed for additional pitches and this has been clarified in the site description set out in the updated consultation document.
- 3.34 West Sussex County Council noted that there was surface water flood risk across much of the site and areas of ponding in the north east corner. Given that this would have been a consideration when granting personal occupancy, the removal of the personal occupancy condition is not considered to result in a material change of the use of the site in either flood risk or highway terms.
- 3.35 The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by Policy 23 of the HDPF.
- 3.36 The public comments largely centred on the impact on the natural environment and the landscape characteristics of the site; there were also concerns relating to the vehicular access and the remoteness of its location. As set out above, this site is not being proposed for additional pitches and there will be no additional impacts which would arise from the allocation of this site.

Rowfold Nurseries, Coneyhurst Road Billingshurst

- 3.37 Three comments were submitted in relation to this site, from Billingshurst Parish Council, WSCC and the Environment Agency.
- 3.38 WSCC confirmed that there was no flood risk on the site, and the Environment Agency raised no risk of fluvial flooding. The Environment Agency stated that adequate foul water drainage would need to be provided, but recognised that this matter is covered by policy 23 of the HDPF.

- 3.39 The other key issue raised in relation to this site was lack of a pedestrian footway to the site, and the reliance any occupants would therefore have on the private car to reach services and facilities.
- 3.40 These comments are reflected in the site summary, but the site is no longer available for Gypsy and Traveller accommodation following the grant of a Certificate of Lawful Use on the site, and the site is no longer proposed for allocation as Gypsy and Traveller accommodation.

Southview, The Haven, Slinfold

- 3.41 Two comments were received on this site from Slinfold Parish Council and West Sussex County Council. Slinfold PC had no objection to the proposal and WSCC had minor concerns in relation to highway visibility to the north of the site due to a large oak tree, but recognised the existing use of the site.

Southside, Honeybridge Lane, Dial Post

- 3.42 Seven representations were received on the site in total. Five objections were from members of the public, largely in relation to the narrow access to the site and potential safety concerns. Two comments came from statutory consultees. WSCC indicated there was significant surface water flooding to the north and east of the site and that further information would be required as part of the current planning application in terms of access arrangements.
- 3.43 West Grinstead PC expressed concerns in terms of access and the particular needs of Travelling Showpeople in terms of Heavy Goods Vehicles. The outcome of the planning application and the need for Travelling Showpeople accommodation will be kept under review moving forwards.

4.0 COMMENTS ON ALTERNATIVE SITES

Deer Park Farm, Hampers Lane, Horsham

- 4.1 A single representation was submitted on this site from the High Weald AONB in which the site is located. The response requested that certain factual matters be incorporated into the site description. This has been undertaken.

Denver Storage, Oakhurst Lane, Billingshurst

- 4.2 One comment was submitted in relation to this site, which stated that the site was considered to perform better in sustainability terms than the site at Parsons Field, and would be a better site for allocation than the site (Parson's Field) which had been proposed. The Sustainability Appraisal has been updated in response to this consultation and has taken these comments into consideration.

Oaklands, Honeybridge Lane, Dial Post

- 4.3 Four comments were received in relation to this site. Storrington Parish Council noted that the site is outside the BUAB and should not be expanded. Three comments from the public suggested no additional gypsy sites were required in Storrington.

Oldfield Stables, Fryern Road, Storrington

- 4.4 Four public comments were received in relation to this site, with the main concerns being in relation to access and the rural nature of the site.

Sussex Showground, Grinders Lane, Dial Post

- 4.5 Four public comments were received in relation to this site, with the main concerns being in relation to access and the rural nature of the site.

Sussex Topiary, Naldretts Lane, Rudgwick

- 4.6 No site specific comments were made in relation to this site.

APPENDIX 1 – STATUTORY CONSULTEE COMMENTS IN FULL

Organisation	Section of Document	Summary
Storrington & Sullington Parish Council	Fryern Park Farm (Section 7.0)	<p>One of the criteria used to assess the sites is “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”.</p> <p>We would contend that the Fryern Park Farm site would have an unacceptable impact. The site is located outside the BUAB, in open countryside and is therefore contrary to Policy 26 of the HDPF as the development does not;</p> <ol style="list-style-type: none"> 1. Support the needs of agriculture or forestry; 2. Enable the extraction of minerals or the disposal of waste; 3. Provide for quiet informal recreational use; or 4. Enable the sustainable development of rural areas. <p>The SA itself points out that access to the site is along a designated Private Right of Way (PROW).</p> <p>This PROW is very well used and this would therefore result in a danger to the many walkers, cyclists, runners and horse-riders who regularly use it. There have been several attempts in the past to get residential permission on this site and we feel that this is simply another route for trying to achieve this. Allowing this would set a dangerous precedent for the remaining surrounding fields. The proposal is therefore unacceptable.</p>

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Storrington & Sullington Parish Council	Hurston Lane Depot (Section 7.0)	<p>The Hurston Lane site has poor access, along a single-track country lane, again used by many walkers and riders. The site is also adjacent to the sewage treatment plant as pointed out. However, it should be possible to take measures to mitigate any nuisance from that site.</p> <p>Although preferred as it is a brownfield site, it too lies outside the built-up area boundary and is therefore in a countryside location.</p> <p>Consequently, the same policy applies as above, Policy 26, with which it does not comply. The site is therefore unacceptable.</p>
Storrington & Sullington Parish Council	Oldfield Stable (Section 8.0) and General	<p>This site was granted permission at appeal for 3 mobile homes and a day room. Again, the site is outside the built-up area boundary and was opposed by the Parish Council. Since it now has permission it will obviously remain but should not be expanded.</p> <p>As a general comment, it is unacceptable that travellers should be granted permission on sites that would not normally obtain permission. The same rules should be applied to all applicants.</p> <p>We would support the suggestion in the report that all existing sites should be regularised and included in the numbers required, thus reducing the need for new sites.</p> <p>Any sites that may be included should have a condition imposed requiring the site to be returned to its original state and use if that site is no longer required in future.</p> <p>Whilst this is not strictly a planning issue, members are concerned that there are no natural boundaries; sites can easily be enlarged, not just for legitimate approved development, but also for adjacent unauthorised non-residential activities.</p>
Surrey County Council	General	Thank you for consulting Surrey county Council on the above document. We do not have any comments.

Organisation	Section of Document	Summary
Billingshurst Parish Council	Rowfold Nursery Site (Section 7.0) and General	<p>The Parish Council is disappointed to note that there were no sites to be allocated in either Horsham or Southwater.</p> <p>The proposed site on East Street, Billingshurst is an unsustainable site as there is no footway to the village centre and local facilities, thus necessitating a total reliance on the use of motor vehicles.</p> <p>Parish Councillors felt that Horsham District Council should purchase and manage its own sites.</p>
Environment Agency	Smithers Rough Site (Section 7.0)	<p>The southern boundary of the proposed site at Smithers Rough, Guildford Road (A281), Rudgwick lies within Flood Zone 2 and 3 according to our Flood Map for Planning. We would wish to see a sequential approach should be taken on this site to ensure that no development takes place in this part of the site. This site is also located on a historic landfill and consideration should be given to potential ground contamination.</p>
Environment Agency	Greenacres Site (Section 7.0)	<p>A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.</p>
Environment Agency	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	<p>A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework</p>

Organisation	Section of Document	Summary
		requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Kingfisher Farm, West Chiltington Lane (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Northside Farm, Burnthouse Lane (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Environment Agency	Parsons Field Stables, Pickhurst Lane, Pulborough (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.

Organisation	Section of Document	Summary
Environment Agency	Rowfold Nurseries, Coneyhurst Road, Billingshurst (Section 7.0)	A large number of the sites are based in areas with no mains drainage for foul water. We would wish to ensure that full consideration is given to how the foul sewage arising from these sites would be dealt with and ensure that there is no deterioration of the water environment. We recognise that policy 23 of the Horsham District Planning Framework requires that the site be properly serviced for sewerage and drainage but we would want to ensure that formal arrangements are put in place for this. Depending on the method chosen a permit from the Environment Agency may be required.
Arun District Council	General Comment	<p>The pitch targets for private Gypsy and Travellers pitches between 2012 and 2017 have been met, with an overall net gain of one private pitch since April 2013. However, a further four pitches are required up to 2027. There has been no gain in public pitch provision since April 2013.</p> <p>Arun District Council Local Plan Sub Committee of 30th June 2016 approved the update of the methodology for use by officers in the assessment of potential sites for Gypsy and Traveller and Travelling Showpeople. This report presents an update of the methodology for assessing potential Gypsy and Traveller and Travelling Show people sites, to meet the need for pitches as identified in the Gypsy and Traveller Accommodation Assessment study (published in 2013 and updated in May 2015). A clear site assessment methodology has been developed in order to appraise the relative suitability of sites and to inform the identification of preferred sites which will then progress into The Gypsy, Traveller and Travelling Showpeople Site Allocation Document (DPD). The DPD will identify land for permanent pitches to meet the need identified to 2027. The need for the sites results from the Coastal West Sussex Gypsy, Traveller and Travelling Showpeople Assessment (GTTA) (phase 1), which identified a need in Arun District for 9 pitches for Gypsy and Travellers and no plots for Travelling Showpeople in the plan period because the need has been met through planning applications.</p>

Organisation	Section of Document	Summary
		<p>Policy H SP5 Traveller and Travelling Showpeople accommodation in the emerging Arun District Council Local Plan outlines the policy approach for the Council to provide for adequate Traveller accommodation at appropriate locations throughout the District and sets out a range of criteria against which sites can be assessed.</p> <p>In order to progress this, we are currently seeking to start work on a new GTAA, which will update the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (April 2013) and the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment: Update Report (December 2014). The document Planning Policy for Traveller Sites (August 2015) indicates that in assembling the evidence base local authorities should work collaboratively with neighbouring local planning authorities. In addition the Duty to Cooperate also requires local planning authorities to work together from the start of the local plan process including plan scoping and evidence gathering. As such we will be undertaking this work in collaboration with our neighbours as per the original study.</p>
Reigate & Banstead Borough Council	General Comment	We fully appreciate the difficulty in identifying the accommodation needs of travellers and we hope the following comments are useful and taken in the spirit they are intended:
Reigate & Banstead Borough Council	Paragraphs 3.7/3.8 and Annex	We could not see information on whether there were a set number of revisits to pitches/plots if occupants were not in /unavailable?
Reigate & Banstead Borough Council	Paragraph 5.2	We would suggest that these discussions are held before the document is finalised, as well as any outstanding traveller interviews as per table A6. If discussions with the existing households cannot be undertaken then perhaps growth rates can be applied to known numbers, depending on what is known about demographics.

Organisation	Section of Document	Summary
Reigate & Banstead Borough Council	Appendix 1	It is not clear to what extent the needs of gypsies and travellers living in bricks and mortar have been taken into account and to what extent you have tried to engage with people living in bricks and mortar. We note you mention you had interrogated the housing register but there does not appear to be anything over and above this done for bricks and mortar - a thorough assessment of bricks and mortar should form part of the robust evidence base as required by PPTS 2015.
Reigate & Banstead Borough Council	Paragraph A1.35	The figure of 3% as a standard average growth rate has been challenged and recent findings is that 3% may be too high and growth figures should be connected more closely with the age profile of the borough - a letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) confirmed the Government do not endorse or support the 3% growth rate figure. I would direct you to para 7.16 of the RBBC GTAA for further information on this.
Reigate & Banstead Borough Council	Paragraph A1.30/A1.31	The calculation of known need does not acknowledge that there could be in migration, it only seems to assume out migration. Question 11 of the questionnaire also asked for those that are likely to require their own pitch/plot in the next 5 years, it may have been useful to extend this to those likely to require it in years 6 – 15 as well to inform assumptions in Table A7.
Reigate & Banstead Borough Council	General Comment	PPTS 2015 definition: As a general comment on approach, our recently completed Gypsy and Traveller Accommodation Assessment took account of the new definition of a Traveller in PPTS 2015 and as such the report identified where households do not meet the planning definition. Those not considered as travellers (under the new definition) will form part of the assessment under the new requirements in the Housing and Planning Act (2016) which requires local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.

Organisation	Section of Document	Summary
		<p>Migration in/out of study area: cannot see any specific comments on movement to and from sites outside the study area or conversations that have occurred with neighbouring authorities to understand their context.</p> <p>Timing of interviews - cannot see any information on timing on interviews. Questionnaires and interviews should be carried out outside the travelling season.</p> <p>Concealed households / overcrowding / doubling-up: does not appear to be clear acknowledgement of following issues which can impact on numbers:</p> <ul style="list-style-type: none"> • concealed families, where a couple or lone parent with children are living within a primary family or adult children (aged 18 and over) living at home (although acknowledge this is touched on in A1.30) • Doubling up - which may be brought about with the same households being identified on more than one waiting list (although again touched on in A1.13)
Reigate & Banstead Borough Council	General Comment: Site Allocations	Given the high need that exists within the South East we would expect that all councils seek to maximise opportunities to meet their own need by identifying suitable and deliverable traveller sites, and be able to robustly justify any shortfall in provision.
High Weald Area of Outstanding Natural Beauty (AONB) Unit	Deer Park Farm, Hampers Lane, Horsham (Section 8.0)	The description of the site should include the following additional information. Hampers Lane is a historic route way shown on the earliest comprehensive maps (Ordnance Surveyors Draft 1800) and the High Weald AONB Management Plan seeks to maintain the historic pattern and features and ecological function of route ways (Objectives R1 and R2). Any physical alterations to this route way to accommodate additional traffic are likely to have a significant impact on this character component of the AONB. The site itself was part of St

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		Leonards Park and is described in the Historic Landscape Characterisation as 'regular piecemeal enclosure' probably enclosed post 1845.
Highways England	General Comment	Having reviewed the published documentation, we do not have any comments on the Gypsy, Traveller and Travelling Showpeople Draft Site Allocations Development Plan Document (DPD) – Preferred Strategy; however, please continue to consult us.
Rudgwick Parish Council	Smithers Rough, Guildford Road (A281), Rudgwick (Section 7.0)	<p>Rudgwick Parish Council objects to the proposal to include the Smithers Rough site in the Site Allocations Document.</p> <p>In the 2012 review the site was considered to be undeliverable due to Highway concerns. WSCC did not support the proposal due to Highway safety reasons. The road is significantly more dangerous than five years ago, with an increased volume of traffic from developments in Horsham and Broadbridge Heath.</p> <p>There are no pedestrian links serving the site and there will be a total reliance on private motor vehicles and no safe pedestrian access.</p>
West Sussex County Council	General Comment	The Horsham District Planning Framework (HDPF) sets out how the housing needs for Gypsies and Travellers will be met in the plan period. This included the allocation of land for 39 net additional permanent residential pitches for Gypsies and Travellers within the period 2011 - 2017 and a policy setting out criteria by which any applications for non-allocated sites would be considered. As the HDPF only provided allocations for Gypsy and Traveller sites until 2017 the Consultation Draft of the Gypsy, Traveller and Travelling Showpeople Sites Allocations Development Plan Document (DPD), has been prepared to set out how Horsham District Council is proposing to meet the future needs for permanent Gypsy, Traveller and Travelling Showpeople accommodation for the period 2031. It is also intended to satisfy the requirements of the Government's Planning Policy for Traveller Sites.

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		<p>The overall need for Gypsy and Traveller pitches in the Horsham District equates to a total of 93 pitches over the next 15 years. This comprises an existing need of 47 pitches which have been identified as the 'backlog' of existing unauthorised sites, personal or temporary planning permissions. In addition, there is also a future accommodation need of 46 pitches in the next 15 year period.</p> <p>The document identifies 12 sites (with one possible further site), considered to have the greatest prospect of contributing to meeting Gypsy and Traveller site needs. The document also states that, at this stage, no transit site is required within the District.</p> <p>This note sets out West Sussex County Council's officer response to the Gypsy, Traveller and Travelling Showpeople Draft Site Allocations Development Plan Document. It highlights key issues to which Horsham District Council is requested to give consideration.</p>
West Sussex County Council	Fryern Park Farm, Fryern Road, Storrington (Section 7.0)	<p>The site is located outside Flood Zone 2 and 3, no identified surface water flood risk.</p> <p>Access to the site from the public highway (Fryern Road) is narrow. Improvements to width over the initial 10 metres from the public highway to enable two opposing vehicles to pass would be required. The access track is however outside the red edging within the draft allocation. Confirmation would be required that improvements can be achieved by the applicant.</p> <p>Visibility at the existing access is also poor to the south. Improvements to this appear possible within the existing highway. If this site is allocated, this should include a requirement to increase the private access road width from its junction with Fryern Road to enable two opposing vehicles to pass and improve visibility at the Fryern Road junction.</p>

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West Sussex County Council	Smithers Rough, Guildford Road (A281), Rudgwick (Section 7.0)	<p>Flood risk (zones 2 and 3) is present at the southern boundary of the site. There is also evidence of some surface water flows towards the western boundary of the site and evidence of ponding. These risks would need to be carefully managed in site design.</p> <p>Although the site has a long frontage onto the A281, given the heavily vegetated nature of the site, the vertical alignment of the carriageway, and the limited extent of highway verge on the southern side of the carriageway, there are obvious constraints to securing vehicular access. In saying this, it is understood that an access has previously been taken into the site from the east. If this site is allocated, further consideration must be given to the ability to secure a safe and suitable vehicle access onto the A281. As noted above, WSCC would in principle raise concerns as to whether a suitable access arrangement can be achieved. The particular concern would be the ability to secure the necessary length visibility splays within land forming part of the public highway and/or under the control of the applicant. To ensure that visibility is retained at all times, there would need to be significant clearing of vegetation along the site frontage. There is also the matter of forward visibility for eastbound vehicles to a vehicle waiting to turn into the site; this would be greatly constrained by the vertical carriageway alignment.</p> <p>Notwithstanding all of the above, serious consideration should be given to access by sustainable modes to services in Rudgwick. There are no footways or public rights of way that could enable access, nor any connections to nearby bus stops. WSCC would not support pedestrians having to walk alongside the A281 to reach Rudgwick. In these respects, it is considered that there is a conflict with paragraph 32 of the NPPF.</p> <p>On highway grounds, WSCC would have significant concerns with this proposed allocation.</p>

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West Sussex County Council	Horsham District Council Depot, Hurston Lane, Storrington (Section 7.0)	<p>The site is located only 60 metres away from a designated flood zone (2 and 3) to the southwest of the site.</p> <p>Access to the site from Hurston Lane is narrow although this is straight allowing for good forward visibility between opposing vehicles. There is an informal passing place at a field gate part way along the access road. A further passing place would ideally be provided further west from the existing informal passing place. If this site is allocated, this should include a requirement to provide at least a further passing place along the private access road leading from Hurston Lane.</p>
West Sussex County Council	Greenacres, Hillside Lane, Small Dole, Upper Beeding (Section 7.0)	<p>Surface water flood risk is identified to the north of the site, but nothing affecting the proposed site.</p> <p>It's understood that the pitches are already in place and occupied and have been generating activity for some time. In light of this, no issues would be raised with the continued use of the A2031/Hillside Lane junction. It's noted that this site is allocated in the adopted Horsham District Planning Framework for 12 traveller pitches; matters relating to the acceptability of the site would have been reviewed and accepted.</p> <p>There would still be benefit for improvements to visibility onto the A2031 from Hillside Lane to the north. It is considered that this could be achieved but cutting back vegetation. The accessibility of the site to existing services is poor with there being no footways alongside the A2031.</p>
West Sussex County Council	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	<p>Low risk of surface water flooding identified (0.1% Annual Exceedance Probability affecting western part of site), land is on a relatively high elevation with gradient falling away to the west/south.</p>

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		<p>The site already has a number of existing pitches with access from Valewood Lane and West Chiltington Lane. It is understood that the proposal seeks only to remove personal occupancy conditions and permit a single existing unauthorised pitch. No additional pitches are proposed. In highway terms, the proposed changes are not anticipated to result in any significant intensification of use of the site or accesses, which has previously been considered and accepted the most recent by way of DC/13/2457.</p> <p>For this and Kingfisher Farm sites, although these are close to Barns Green, accessibility of the site to existing services is poor, there are no footways or public rights of way to the village. This will affect how residents choose to travel with it more likely that trips will take place by car.</p>
West Sussex County Council	Kingfisher Farm, West Chiltington Lane, Itchingfield (Section 7.0)	<p>There is no significant flood risk identified for the site.</p> <p>It's recognised that there is an on-going enforcement appeal relating to this site. It's understood that the proposed allocation would only seek to formalise existing activity rather than necessarily increase it. If the site is allocated, improvements should be secured to formalise the existing access arrangement onto West Chiltington Lane. This should include the securing of improvements to visibility.</p> <p>For this and Greenfield Farm sites, although these are close to Barns Green, the accessibility of the site to existing services is poor, there are no footways or public rights of way to the village. This will affect how residents choose to travel with it more likely that trips will take place by car.</p>

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West Sussex County Council	Lane Top, Nutbourne, Pulborough (Section 7.0)	<p>There is no significant flood risk identified for the site.</p> <p>Other than poor accessibility by sustainable modes, there are no other significant constraints. Matters relating to the suitability of the vehicular access have already been reviewed and accepted as part of DC/10/0586. This allowed for a further two pitches, in addition to another that was permitted in 2004. It's noted that this site is allocated in the adopted HDPF; matters relating to the acceptability of the site would have been reviewed and accepted.</p>
West Sussex County Council	Northside Farm, Burnthouse Lane, Rusper (Section 7.0)	<p>Surface water flood risk is indicated at 0.1% Annual Exceedance Probability across much of the site, there are also areas of ponding indicated particularly towards the north east corner.</p> <p>The site is occupied with the proposal only to remove the personal occupancy restriction. In highway terms, the removal of this restriction would not be expected to result in any material change of use of the site.</p>
West Sussex County Council	Oakdene, Blackgate Lane, Codmore Hill, Pulborough (Section 7.0)	<p>The site appears to be at significant risk to surface water flooding.</p> <p>The site has an existing access onto Blackgate Lane. In light of the existing access, there are no apparent issues with the more intensive use of this site and existing access.</p> <p>The site is not well located to nearby facilities to encourage access by non-motorised modes. There is still a footway alongside the A29 that leads into Pulborough.</p>
West Sussex County Council	Parsons Field, Pickhurst Lane, Pulborough (Section 7.0)	<p>There is no significant flood risk to the site itself except along the eastern boundary close to the watercourse.</p>

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		<p>The site is already occupied albeit on a temporary basis until 2019. In highways terms, the impacts of this were considered by way of planning application DC/16/2388 with no severe issues raised. No concerns would be raised if the temporary permission was made permanent.</p>
West Sussex County Council	Rowfold Nurseries, Coneyhurst Road, Billingshurst (Section 7.0) and Sustainability Appraisal	<p>There is no significant surface water flood risk to the site; site is in Flood Zone 1.</p> <p>Objective 2 of the Sustainability Appraisal suggests site occupants could choose to walk to Billingshurst, there is no footway along this section of the A272, nor a crossing point for safe crossing of the A272 linking to the nearest public footpath. It is not considered that a neutral impact for access to community and retail facilities is appropriate.</p> <p>It's noted that this site is allocated in the adopted Horsham District Planning Framework for 10 traveller pitches; matters relating to the acceptability of the site would have been reviewed and accepted.</p> <p>The site has an existing in/out type access onto the A272 Coneyhurst Road. Visibility from the more southerly access point is considered acceptable. Visibility from the north is very poor viewed against current design standards. Ideally the existing arrangements would be formalised with an only single access to the site located on the southern edge of the site. This would then allow for the more northerly access permanently closed. It's unclear if the applicant has sufficient ownership to enable this.</p>
West Sussex County Council	Southview, The Haven, Slinfold (Section 7.0)	<p>No significant surface water flood risk to the site; site is in Flood Zone 1.</p> <p>It is noted that this site is allocated in the adopted Horsham District Planning Framework for 4 pitches; matters relating to the acceptability of the site would have been reviewed and accepted. The site benefits from an existing access. Although, visibility to the north is restricted by a large tree and the horizontal alignment of the carriageway, it is apparent that this is already in use.</p>

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West Sussex County Council	Southside, Honeybridge Lane, Dial Post (Section 7.0)	<p>Significant surface water flood risk indicated, particularly towards the north and east areas of the site. These risks would need to be carefully managed in site design.</p> <p>The site is the subject of a current planning application. Further information has been requested through this process. Highway matters relating to the suitability of the site are best considered as part of the current planning application.</p> <p>As a key principle, it's noted that this site is to be used by travelling showpeople. The requirements for showpeople, and more specifically the vehicles (potentially long HGVs) associated with their trade, is more onerous. The fact is not recognised within the proposed allocation. Consideration must be given to the potential and suitability for long vehicles to operate from the site. This includes turning on-site.</p> <p>The site is not well located in terms of access to day-to-day services to encourage access by non-motorised modes.</p>
West Sussex County Council	Alternative Sites (Section 8.0)	<p>These sites have not been considered, as they are not been identified for allocation. If, at a later date, these sites are considered to be allocated the County Council request the opportunity to consider the sites and whether comments should be submitted.</p>
West Sussex County Council	General Comment (West Sussex Joint Minerals Local Plan)	<p>Policy M9 (Safeguarding Mineral Resources), of the Submitted West Sussex Joint Minerals, sets out that sand (sharp, soft and silica) and gravel, brick, making clay, building stone (sandstone) and chalk are regarded as economically important minerals in West Sussex and so it is important they are protected from sterilisation by surface development. The extent of the resources of these minerals that are to be safeguarded is shown as Mineral Safeguarding Areas (MSA) on the policy maps in the Submitted West Sussex Joint Minerals Local Plan.</p>

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		<p>Sites considered for allocation, if they do not meet the exceptions criteria set out in the Draft Minerals Safeguarding Guidance, should be considered against the MSAs and the potential for the unnecessary sterilisation by non-mineral development assessed.</p>
Natural England	General Comment	<p>Natural England does not consider that this Gypsy, Traveller and Travelling Showpeople Site Allocations DPD poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p> <p>If you disagree with our assessment of this proposal as low risk, or should proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>
Southern Water	Horsham District Council Depot, Hurston Lane, Storrington (Section 7.0)	<p>Southern Water own and operate Storrington Wastewater Treatment Works (WTW), which processes wastewater arising from the village of Storrington. The WTW is located immediately adjacent to the proposed site, and whilst we endeavour to operate our works efficiently and in accordance with best practice to prevent pollution, unpleasant odours inevitably arise as a result of the treatment processes that occur. Our concern is that the proximity of any 'sensitive' development to the WTW, such as residential and recreational areas, would have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. Such impacts include odour and noise generated by wastewater processing.</p> <p>This planning principle is established in the document <i>Planning policy for traveller sites</i>,</p>

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		<p>published by the Department for Communities and Local Government (DCLG) in August 2015. Paragraph 13 e) requires local planning authorities to ensure that their policies properly consider the effect of local environmental quality, such as noise and air quality, on the health and well-being of travellers.</p> <p>Paragraph 109 of the National Planning Policy Framework (NPPF) requires the planning system to prevent new development from being put at unacceptable risk from, or being adversely affected by, unacceptable pollution. Annex 2 of the NPPF establishes that pollution includes odour and noise.</p> <p>Furthermore, it should be noted that Southern Water owns the strip of land used as the site's access track, and there are access rights currently in place for the Council's use of the Depot. The WTW operates 24 hours a day, 365 days a year with essential equipment such as pumps and compressors running continually. Furthermore, Heavy Goods and other vehicles frequent the site, therefore unhindered access by Southern Water employees/contractors is required at all times either for routine or emergency maintenance work.</p> <p>Paragraph 6.3.5 of the West Sussex Waste Local Plan 2014 (p42) states that '<i>existing waste sites and infrastructure will be protected from the inappropriate neighbouring developments that may prejudice their continuing efficient operation</i>' and that 'sensitive' uses need to consider a buffer that will depend on the '<i>nature of the proposed 'sensitive' use and on the specific impacts of the current waste operation</i>'.</p> <p>Having regard to the potential impacts of the above on future residents of the proposed site, we are concerned that the allocation of the Horsham Council Depot site may constitute a conflict between land uses, unless effective mitigation can be found and agreed between the relevant site owners/operators.</p>

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Slinfold Parish Council	Southview, The Haven, Slinfold (Section 7.0)	Slinfold Parish Council confirms its previous no objection to the proposals for the Haven subject to planning permission being given as required.
Itchingfield Parish Council	Greenfield Farm, Valewood Lane, Barns Green (Section 7.0)	<p>The Council seeks the deletion of the proposed allocation for 6 pitches at Greenfield Farm, Valewood Lane, Barns Green, Itchingfield on the basis that it is not sound nor based on a sustainability appraisal which meets the legislative criteria.</p> <p>The Council does not agree that such an allocation would have an acceptable cumulative landscape and visual effect with the allocation for 11 pitches at Kingfisher Farm to the north. Contrary to what is suggested in the policy and sustainability appraisal, the sites are only around 100m from one another, not 1-2km. Accordingly, the Parish Council is of the view this allocation would conflict with policy 30 of the Horsham District Planning Framework (2015).</p> <p>Any further allocation within the Parish would be unacceptable due to concentration issues. Even at the current level the small Parish of Itchingfield hosts a large percentage of the current allocation. Even more density/concentration would be unacceptable.</p> <p>The sustainability appraisal fails to consider whether the site forms a part of the setting of Grade II listed Peartree Farm and the extent to which it contributes to the heritage significance of that asset. The sustainability appraisal simply asserts that there will be a neutral impact as it is 'not very close'. That falls well short of an assessment of heritage impact in line with policy 34 of the Horsham District Planning Framework (2015) and NPPF.</p> <p>There is no assessment against the criteria in policy 40 Horsham District Planning Framework (2015) with respects to sustainable transport.</p>

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		<p>Contrary to Regulation 12(1) Environmental Assessment of Plans and Programmes Regulations 2012 the Council have failed to assess the reasonable alternatives to the preferred options for allocation. In particular, the Council have failed to consider a more balanced distribution strategy which avoids a cluster of pitches in Itchingfield Parish and neighbouring parishes in the east of the Council's District. As such, the Council have failed to demonstrate that such a distribution strategy creates a 'socially inclusive and adaptable environment ... for gypsies and travellers' contrary to policy 42 Horsham District Planning Framework (2015).</p> <p>Finally, the Council have failed to consider the effects which arise from unrestricted residential use of the pitches as opposed to the present personal planning permissions.</p>
Itchingfield Parish Council	Kingfisher Farm, West Chiltonton Lane, Itchingfield (Section 7.0)	<p>The Parish Council seeks the deletion of the proposed allocation for 11 pitches at Kingfisher Farm, West Chiltonton, Barn Green, Itchingfield Parish on the basis that it is not sound nor based on a sustainability appraisal which meets the legislative criteria.</p> <p>The Parish Council notes that it is recorded that the principle of the development has already been established under a planning appeal (APP/Z3825/A/11/2150329) in 2011 for 11 pitches comprising 11 'residential caravans' and ancillary day-rooms. However, planning permission was not implemented in accordance with the pre-commencement conditions or approved plans and has therefore lapsed. Notwithstanding the current appeal against enforcement proceedings and High Court injunction in place, it is to be noted that in relation to a variation sought to be made to the previously approved appeal (DC/17/1184) and a further application relating to the site (DC/17/1185), the applicant at Kingfisher Farm has stated that the current usage comprises only 6 touring caravans and no ancillary day-rooms (document reference 'existing site: 16_786_002'). This would imply that there is no need at this location for any more than the current disclosed usage by the applicant as the planning permission on appeal was granted 6 years ago and has not been taken up in that extended period of time.</p>

Organisation	Section of Document	Summary
		<p>The Council does not agree that the proposed allocation would have an acceptable cumulative landscape and visual effect when taken together with the proposed adjacent allocation for pitches at Greenfield Farm to the south. Accordingly, the Parish Council is of the view this allocation would conflict with policy 30 of Horsham District Planning Framework (2015).</p> <p>Any further allocation within this Parish would be unacceptable due to concentration issues. Even at the current level the small Parish of Itchingfield hosts a large percentage of the current proposed District Council allocation. Even more density / concentration would be unacceptable.</p> <p>The sustainability appraisal fails to consider whether the site forms a part of the setting of Grade II listed Peartree Farm and the extent to which it contributes to the heritage significance of that asset. The sustainability appraisal simply asserts that there will be a neutral impact as it is 'not very close'. That falls well short of an assessment of heritage impact in line with policy 34 of the Horsham District Planning Framework (2015) and NPPF.</p> <p>There is no assessment against the criteria to be found in policy 40 of the Horsham District Planning Framework (2015) with respects to sustainable transport.</p> <p>Contrary to Regulation 12(1) Environmental Assessment of Plans and Programmes Regulations 2012 the Horsham District Council have failed to assess the reasonable alternatives to the preferred options for allocation. In particular, they have failed to consider a more balanced distribution strategy which avoids a cluster of pitches in Itchingfield Parish and neighbouring parishes in the east of the Council's District. As such, the Council have failed demonstrate that such a distribution strategy creates a 'socially inclusive and adaptable environment ... for Gypsies and Travellers' contrary to policy 42 Horsham District Planning Framework (2015).</p>

Organisation	Section of Document	Summary
		<p>Finally, the District Council has failed to consider the effects which arise from unrestricted residential use of the pitches.</p>
Rusper Parish Council	Northside Farm	<p>Objection to the site as it has never been used as a genuine traveller site and only as a residency for a single family. Concern that the access is not suitable for additional pitches due to the countryside location and access along country lanes. They therefore, we would ask that this site is removed from the site allocation, and that the personal occupancy condition is retained.</p>
West Grinstead PC	Southside	<p>The site is accessed off the A24 which is a dual carriageway with a gap in the central reservation. That access already serves Old Barn Nursery, the Honeybridge Lane Caravan Park and a Penfold Verrall depot/ crusher facility, as well as local residents. The access cannot take long, very slow moving vehicles, such as those required by travelling showpeople, without unacceptable risk of serious accident.</p> <p>There is a current planning application for this use. WSCC have already expressed strong reservations about the access. Grinders Lane is a very narrow lane with no designated passing points and one sharp bend which would only be navigable by long vehicles with great difficulty, if at all. Verge damage undermining the edges of the road would occur. With reference to the Sussex Show Ground HDC's recommendation is, 'it is considered this site is not suitable for the allocation of gypsy and traveller pitches due to its rural location, impact upon the character of the area and potentially the setting of a listed building, Thistleworth Farmhouse. 'We cannot understand why HDC have not expressed similar concerns about this site, as it directly abuts the A24 and is even closer to a listed building, Platts Green Cottage</p>