

Application Number: DM/2019/01480

Proposal: Change of use of land to accommodate two park homes and up to four touring caravans - Traveller needs (private family site only)

Address: Land Adjacent Sunnybank, A48 Crick to Parkwall Roundabout, Crick, Monmouthshire

Applicant: Mr. Martin Flynn

Plans: Location Plan - , Site Layout - , All Proposed Plans Utility and shower - , All Proposed Plans 3 bed unit - , All Proposed Plans 2 bed unit

RECOMMENDATION: Approve

Case Officer: Mrs. Helen Hinton
Date Valid: 03.12.2019

This application is presented to Planning Committee due to the number of public objections and a call in request from the Ward Member to allow for assessment with regards to policy and highway safety

1.0 APPLICATION DETAILS

1.1 The application seeks full planning permission for the change of use of land to accommodate two park homes and up to four touring caravans – for Traveller needs (private family site only). The details submitted indicate that the park homes would be used by the applicant and his young family occupying the three bedroom unit and his elder son and young family accommodating the two bedroom unit. The touring pitches would be for use by travelling members of the wider family visiting the area and would not be open to the general travelling community.

1.2 The land the subject of the application has a frontage with the A48 of approximately 72m and a depth of approximately 42m.

1.3 In October 2019, planning permission was granted for the change of use of the land for the keeping of horses and erection of stables (application DM/2019/01149 refers). As part of that application an area of fenced hardstanding to accommodate the stables and a hard surfaced turn out area was approved in the northern part of the site.

1.4 Also as part of this current application the approved stables would be used to provide shower rooms, toilets and day room facilities, with the park homes provided to the east of the approved building. The intervening space between the approved building and the park homes would be used to accommodate the touring caravans.

1.5 With regards to the park homes, unit one would comprise a three bedroom unit measuring 13.5m wide 6m deep with a maximum height of 3.8m. This would be positioned parallel to the eastern boundary of the site. Unit two would comprise a two bedroom unit measuring 11m wide and 3.6m deep with a maximum height of 3.6m positioned next to the end elevation of the wash room building, adjacent to the northern boundary. Both units would contain various openings in the elevations. As both structures are less than 20m wide and long and 6.8m deep wide they are compliant with the definition of a mobile home as defined by the Mobile Homes Act 1983.

1.6 In accordance with the approved details the wash room facilities building would be positioned at the western end of the yard adjacent to the existing embankment and would measure 12.6m wide, 4.2m deep with a lean to roof with a maximum height of 3m falling to 2.5m. A detached building to be used as utility room, measuring 4.2m wide, 4.2m deep with a lean-to roof with a maximum height of 3m falling to 2.5m would be provided to the south of the main building. Externally the buildings would be finished with concrete block walls and a sheeted roof. Three doors would be provided in the southern elevation with three windows proposed in the northern (rear) elevation.

1.7 As specified above, the intervening space between the wash room and utility building and the park homes would be used for the accommodation of up to four touring caravans for visiting members of the family. It is of the applicant's opinion that the space would be capable of accommodating four 5.5m x 2.3m touring caravans. Following discussions the applicant has indicated that on-site parking would be provided adjacent to the driveway and to the south-west of the enclosed area.

1.8 A cesspit /septic tank would be provided on the land to the south-west of the enclosed area.

1.9 The site layout plan submitted indicates that a 2m high mesh security fence would be provided along the southern boundary of the site, adjacent to the A48, with a 2m high closed boarded fence provided along the southern boundary of the hardcore area. A hedge is also indicated as being provided adjacent to the western part of the close boarded fence.

1.10 The remainder of the land, to the south-east of the enclosed hardstanding would be re-sown with grass seed and used as an area of amenity space.

1.11 The applicant has actively participated in the last and most recent Gypsy, Traveller Accommodation Assessment. Details of the applicant's personal circumstances and subsequent need is set out in the documents submitted in support of the application.

Site appraisal

1.12 The application site comprises a modest parcel of land positioned to the north of the A48, to the east of M48 and to the west of a residential property known as Sunnybank. The land is positioned on a gradient falling from north to south and is defined by an embankment covered with trees and vegetation to the north and along part of the western boundary and a mature hedge to the east. At the time of inspection the area had been cleared of vegetation and a post and rail fence along the southern boundary erected on top of a small earth bund. Access is gained via an existing driveway leading from the A48 in the south-western corner of the plot.

2.0 RELEVANT PLANNING HISTORY (if any)

Reference Number	Description	Decision	Decision Date
DM/2019/01149	Change of use of land for the keeping of horses and erection of stables.	Approved	08.10.2019
DM/2019/01480	Change of use of land to accommodate two park homes and up to 4 touring caravans- Traveller needs (private family site only).	Pending Determination	

3.0 LOCAL DEVELOPMENT PLAN POLICIES

Strategic Policies

S1 LDP The Spatial Distribution of New Housing Provision
S12 LDP Efficient Resource Use and Flood Risk
S13 LDP Landscape, Green Infrastructure and the Natural Environment
S16 LDP Transport
S17 LDP Place Making and Design

Development Management Policies

MV1 LDP Proposed Developments and Highway Considerations
DES1 LDP General Design Considerations
H1 LDP Residential Development in Main Towns, Severnside Settlements and Rural Secondary Settlements
H3 LDP Residential Development in Minor Villages
H8 LDP Gypsy, Traveller and Travelling Showpeople Sites
SD3 LDP Flood Risk
SD4 LDP Sustainable Drainage
LC1 LDP New Built Development in the Open Countryside
LC5 LDP Protection and Enhancement of Landscape Character
GI1 LDP Green Infrastructure
NE1 LDP Nature Conservation and Development
EP1 LDP Amenity and Environmental Protection

Other Policy Considerations

Monmouthshire County Council Gypsy and Traveller Accommodation Assessment 2016-2021
Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Sites June 2018
Welsh Government Enabling Gypsies, Roma and Travellers plan June 2018

4.0 NATIONAL PLANNING POLICY

Planning Policy Wales (PPW) Edition 10

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well being, creating prosperity for all.

5.0 REPRESENTATIONS

5.1 Consultation Replies

Planning Policy

The policy framework against which the proposal should be assessed is set out in the Adopted Monmouthshire Local Development Plan, PPW (Edition 10, December 2018) and WAG Circular 005/2018 Planning for Gypsy Traveller and Showpeople Sites.

LDP Policies

The proposed application site is a parcel of land on the edge of Crick village, in the open countryside located some distance outside the development boundary of the nearest established

settlement of Caerwent and Caldicot. Under Policy S1, Crick is identified as a minor village and therefore lacks a development boundary.

The development would represent new build development in the open countryside and as such would be contrary to Strategic Policy S1 of the LDP (Spatial Distribution of New Housing Provision). This policy advises that new residential development in the open countryside is only justified for the purposes of agricultural/forestry, rural enterprise dwellings or one planet development. This approach is supported by national planning policy as set out in PPW (paragraphs 4.7.8/9.3.6).

Policy LC1 which relates specifically to new built development in the open countryside is also applicable. The policy contains a presumption against new build development in the open countryside although it does identify a number of exceptional circumstances involving new built development that might be acceptable (subject to policies S10, RE3, RE4, RE5, RE6, T2 and T3). It is considered that these exceptional circumstances would not apply to the proposal and as a consequence it would be contrary to this policy.

Given the site's location in open countryside, consideration should also be given to LDP policies LC5 Protection and Enhancement of Landscape Character, NE1 Nature Conservation and Development and GI1 Green Infrastructure and the associated GI SPG.

The LDP does not provide a specific site allocation for gypsies and travellers. It does, however, contain a criteria based policy H8 relating to the development of gypsy and traveller sites. This provides the framework for assessing proposals and should be considered accordingly.

The following LDP Policies are also of relevance and should be taken into account:

S13 - Landscape, Green Infrastructure and the Natural Environment

DES1 - General Design Considerations

EP1 - Amenity and Environmental Protection

MV1 - Proposed Developments and Highway Considerations

In the context of these policies the site is not considered to be a suitable sustainable location for a permanent gypsy site. The proposal is for development in the open countryside and is some distance from the nearest established settlement. The closest essential services and facilities are located in Caldicot and are not easily accessible in a sustainable manner, although it is noted that Crick does benefit from public transport connections. Accessing such services would likely to be by car, contrary to local and national policy on sustainability. Circular 005/22018, however, does recognise that the consideration of sustainable access to local facilities can be relaxed in the assessment of rural site provision.

Circular 005/2018

Welsh Government guidance on planning for Gypsy and Traveller caravan sites is provided in WG Circular 005/2018. In identifying sites for Gypsy and Traveller caravans, the Circular advises local planning authorities to consider locations in or near existing settlement with access to local services such as schools, health services and shops (para 36). The Circular identifies the issue of site sustainability as being important for the health and well-being of Gypsies and Travellers in terms of environmental issues and for the maintenance /support of family and social networks. It advises that this should be considered not only in terms of transport mode, pedestrian access, safety and distances from services but that consideration should also be given to a range of other issues, including:

- Promotion of peaceful and integrated co-existence between the site and the local community;
- Wider benefits of easier access to GP and health services;
- Access to utilities;
- Children attending school on a regular basis;

The Circular provides further advice in relation to rural sites which is applicable to the proposed application. It advises that rural settings may be acceptable in principle subject to planning or other constraints where there is a lack of suitable sustainable locations within or adjacent to existing

settlements. In assessing the suitability of rural sites it advises LPAs to be 'realistic about the availability, or likely availability, of alternatives to the car in accessing local services' (para 39). While it does not advise the over rigid application of national and local policies that seek a reduction in car borne travel given that they could be used to effectively block proposals for gypsy/traveller sites in a rural location, site sustainability is a factor which should be taken into account.

Paragraph 40 of the Circular sets out other considerations, in addition to the development plan, which may be taken into account in the determination of planning applications for Gypsy/Traveller sites. These include 'the impact on the surrounding area, existing level of provision and need for sites in the area, availability of alternative accommodation for the applicants and their specific requirements'.

Mathern Community Council - Recommend the application be refused.

We have structured our comments round the criteria set for considering such sites as noted in policy H8 (Policy for Gypsy and Traveller sites).

"a) Would enable the established need to be met at a location that is accessible to schools, shops and health care, by public transport, on foot or by cycle"

Assuming a need has been established in this location, the site is well connected to local amenities and transport routes.

"b) Have a safe and convenient access to the highway network and will not cause traffic congestion or safety problems"

We do not believe that safe and convenient access to the site can be afforded and that extended vehicles accessing and egressing the site will pose safety problems.

Large and long vehicles will have to slow down completely to access the site and will similarly have to leave the site at very low speed, entering or exiting onto a 60mph stretch of road, potentially crossing the line of traffic.

Due to the scale of the development proposed on such a small site and based upon the layout drawings contained in the application there is no available, allocated area on site to turn long vehicles to ensure that they can enter and leave the site in forward gear. This may force vehicles to have to reverse onto the main road with obvious severe safety implications.

It should be noted that a number of years ago a fatal accident occurred just up the hill from this site, in the 60mph zone, where a motorcycle collided with a tractor and trailer. The tractor and trailer at that time were turning across the flow of traffic.

On the basis of the above we believe that safe access both on and off the site is not possible for extended vehicles.

"c) Are of a suitable size to allow for the planned number of caravans, amenity blocks, play area (for children on sites housing multiple families), the access road and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the curtilage of the site"

The information supplied with the application notes the location of the Park House units and amenity blocks. These are located on the relatively flat plateau area of the site. As the site overall falls sharply to the A48, the area above the proposed Park Homes is not developable and the grass area noted to the lower section of the site is very steep and not suitable for housing 4 visiting caravan pitches. At wet times of the year this grassed area of land would not be accessible by vehicles as it becomes very wet and would just cut up. Caravans would not be able to be levelled or accessed on this site without hardstanding and terracing works.

The site overall is not large enough to house the proposed two Park Homes, two amenity blocks, 4 traveller pitches plus the necessary vehicle parking and circulation/turning areas. On this basis we believe that the proposal represents a complete overdevelopment of the site posing associated health and safety and visual amenity issues.

"d) Do not occupy a prominent location and are consistent with the LDP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping"

The current land use is agricultural/stabling. The reference in the application to the use of the site as a quarry was not a permitted/authorised land use.

The site is in a very prominent position at the entrance to (or exit from) the village of Crick. It commands an elevated position clearly visible from the A48. The proposed development would not be in keeping with the vernacular of houses within the village, many of which are of a significant age and heritage. The mix of modern Park Homes, masonry utility blocks and caravans would significantly impact the visual amenity of the village especially in such a rural setting in a prominent location

The proposed buildings and caravans are out of context and would have a significant impact on the character and distinctiveness of the village of Crick.

"e) Avoid areas at high risk of flooding and proximity to uses with potential sources of pollution or emissions"

The land is not at risk of flooding but the lower grassed area of the site does experience significant water run off from the upper sections of the site, restricting its use in wet periods.

"f). Are of an appropriate scale to their location and do not have an unacceptable impact on the amenities of neighbouring land uses"

As noted under headings c) and d) above this Council believe that there will be a significant visual impact on the village in general and neighbouring properties. This Council believes the proposal represents an overdevelopment of the site and poses a safety risk to road users.

"g) Are served, or can be served, by adequate on site services for water supply, power, drainage, sewer disposal, and waste disposal (storage and collection), and for travelling show people that there is a level area for outdoor storage and maintenance of equipment"

We are not aware of any services issues regarding the site.

We would note that on the basis of the information contained within the application, there is not any level area allocated for the outdoor storage and maintenance of equipment. Again any such area could have a detrimental effect on the visual impact of the site if provided. There are similarly no level, accessible areas identified for visiting caravans.

Should Monmouthshire County Council have a commitment to meet the accommodation needs of the Gypsy and Traveller community, a more suitable and appropriate site should be sought.

Environmental Health - If the site has planning permission approved for permanent residential mobile homes they will need to obtain a site licence under the Mobile Homes (Wales) Act 2013 from the Environmental Health department.

Housing Strategy and Policy Officer - The applicants have participated in the adopted and most recent Gypsy Traveller Accommodation Assessment (GTAA) which is currently under review.

The adopted GTAA found evidence of need for 8 sites within the authority with none currently indicated or allocated as part of the Local Development Plan. As part of this process, the applicant was identified as being in housing as a result of a cultural aversion to conventional housing.

The Council are currently reviewing the GTAA. At this time the projections indicate an increase in demand in the Authority. The applicant has again participated in the study and although housed in a dwelling, has been identified as being in housing need as a result of ongoing cultural aversion.

SEWBREC Search Results - priority species have been identified within 48m of the site.

5.2 Neighbour Notification

The application has been advertised by direct neighbour notification and the erection of a site notice. 21 letters of representation have been received and are summarised as follows:

Support

- Proposal would be an improvement to the local area.
- Park homes would make a change from looking at a bare piece of land.

Objections

- Conflict with local plan
- Inadequate access
- Inadequate parking provision
- Increase in traffic
- Increase of pollution
- Information missing from plans/ not enough information given
- Out of keeping with character of area
- Close to adjoining properties
- Strain on existing community facilities
- Increased danger of flooding
- Noise nuisance
- Potentially contaminated land
- General dislike of proposal

Application

- Under Policy H8 Gypsy Traveller and Travelling Showpeople Sites a more suitable location should be found.

Site and Design

- No information relating to dimensions of the site and Park Homes / Amenity Block / Tourers.
- Insufficient space for the Tourers and associated vehicles.
- The elevated position with caravans and concrete amenity block and the lower mesh fence will be out of keeping with the visual harmony of the locality.
- Development out of keeping with surrounding dwellings.
- The proposed 2m high mesh security fence would have greater impact than stables proposal.
- Not in keeping with other buildings in the village, the exterior finish of buildings should be stone faced or rendered.
- There are a number of buildings adjacent to the A48 in Crick (near the proposed site) that are listed, including The Archery, St Nyvern's Chapel and The Old Toll House. As such and in keeping, natural stone building material is commonplace in the immediate area.
- There are no local amenities to support this development - the village has no shop, garage, or any other amenity which could be accessed by temporary or permanent residents on the site.

Highway Safety

- Access to and from the highway is a serious concern for long towed vehicles given the speeds along this stretch of road. There has been a previous fatality on this stretch of road.
- The site lacks a safe and suitable access (visibility from and of
- Concern about monitoring of travellers using the site, both in number and relationship to applicant.

Utilities

- Water pressure in the Crick area regularly fluctuates. Creating additional demand by supplying the proposed site is likely to exacerbate the situation.
- There is no mains drainage in this area of Crick and nearby properties all have septic tanks. My understanding is that local properties are currently classified as being within the 'red zone' as there have already been water pollution incidents impacting the Crick brook.
- Concern regarding sewage and drainage soak away given the density of the development.
- The plans do not show services - other than foul sewage which is marked for both Cess Pit/ Septic tank. It is likely that a cess-pit is the most appropriate (less likely to lead to ground water contamination). If power is by generator then noise and air pollution is a consideration.

Ecology

- Until recently, the site was part of a contiguous species rich scrubland (as can clearly be seen in google maps) which was cleared of trees, shrubs and native hedges during an ecologically sensitive period. Under: Biodiversity and Geological Conservation the land sits 25m north and 50m west of National Forestry designated woodland (ref: magic.defra.gov.uk) an ecological survey should have been submitted prior to the area being cleared, to ensure that there was no species adversely affected.
- There will be an increase in pollution and an adverse effect on the ecology of the area.
- After clearance land modelling has created terracing. The new terracing changes original ground levels and is not retained (likely to subside) - therefore piling is inevitable, to ensure the stability for the proposed structures and vehicle parking.

Other

- SUDs should be considered for all development and hard surfaces.

5.3 Other Representations

Shirenewton Community Council

Council questions the suitability of this site, its size and its access. The speed limit on the A48 at this point is derestricted two lanes with double white lines so there is the question of safety on this stretch of road due to caravans slowing for access to the site, and the hazard of possibly parking on the carriageway under the M48 bridge before gaining access.

This Council recommends that a Highways report be sought. Also that as Mon CC has a commitment to meet the accommodation needs of the Gypsy and Traveller community, that a more suitable location be offered.

Caerwent Community Council

The appearance of the site will be out of keeping with the character of Crick's small village which has several listed buildings. You will primarily see from the pavement/road high security mesh fencing and boarded fencing with a small section of hedging which will look quite industrial.

The application details that the 3 metre high shower block is constructed of concrete block with insulated roof. Other buildings in Crick have had to either be stone clad or rendered - no external finish is detailed in the plan for this.

Query if there is sufficient space on the proposed area for the mobile caravans, parking and movement of all of the vehicles (as well as service/delivery vehicles)

Nothing on the site plan to address (surface water) drainage issues that arose as a condition on the original planning application for stables DM/2019/01149.

The park homes and the permanent buildings will still require drainage and there is no clear indication of how grey water will be collected and disposed of.

Concern regarding highway safety as caravans enter and leave the site on stretch of road with

speed limits of 50 or 60 mph. There has been a previous fatality on this stretch of road. Recommend a Highways inspection and report.

Under 'Policy H8 Gypsy Traveller and Travelling Showpeople Sites' a more suitable location should be found.

5.4 Local Member Representations

The Ward Member was notified of the application on 21st November 2019. Following consideration the Member has requested the application be presented to Committee to allow for considerations with regards to planning policy and highway safety.

6.0 EVALUATION

6.0.1 A survey in March 2009 from the Equality and Human Rights Commission (EHRC) highlighted the urgent need to provide lasting solutions to Gypsy and Traveller accommodation under-provision. It notes that the majority of the 300,000 Gypsies and Travellers in the UK are conventionally housed; a further 17,900 caravans are recorded in England and Wales but about a quarter are not on authorised sites. Previously, local authorities had a duty to provide sites for Gypsies and Travellers but this was repealed in 1994, a situation which apparently led to a rise in unauthorised encampments.

6.0.2 The requirements of the Housing Act 2004 and (in Wales) a Circular in 2018 ("Planning for Gypsy, Traveller and Showpeople Sites") requires LPAs to undertake an initial assessment of needs followed by the selection of sites if that is required. The planning system is largely land-use based, but the consideration of Gypsy caravan sites requires a wider perspective to be taken - an approach reflected in appeal decisions and case law which has identified the need to maintain the lifestyle of a section of the community as a factor in decision making, along with the right to a proper education. The courts have held that a balancing exercise must be undertaken weighing the harm arising to the public interest against the rights and personal circumstances of the appellants, with the availability of accommodation provision also being a material consideration.

6.0.3 Circular 05/2018 sets out guidance on the planning aspects of finding sustainable sites for 'Gypsies and Travellers' who are defined in the Circular as:

- "(a) persons of nomadic habit of life whatever their race or origin, including
- (i) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age have ceased to travel temporarily or permanently, and
 - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such) and
- (b) All other persons with a cultural tradition of nomadism or of living in a mobile home."

6.0.4 Paragraph 12, of Circular 005/2018 identifies that some Gypsies and Travellers may wish to find and buy their own sites to develop and manage them themselves (rather than having sites provided and run by the Local Authority). This appears to be the case in this instance. The applicant owns this land and wishes to develop it himself to provide two permanent units (although still compliant with the definition of a caravan under the Mobile Homes Act 1983) and four touring pitch sites.

6.0.5 Paragraph 10 states: a lack of appropriate sites and insufficient provision exists within local authority areas, has a significant detrimental impact on the lives of Gypsies and Travellers. The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and the identified need for pitches is met. Under the latest GTTA it has been identified that Monmouthshire has a need to provide 8 pitches with increasing need projected as part of the GTAA review.

6.0.6 Although aimed at the identification of sites through the LDP process, the advice in paragraph 37 of the Circular is relevant in general terms in identifying aspects of site sustainability in terms of issues including:

- Opportunities for growth within family units;
- Access to health and education services
- Access to utilities including waste recovery and disposal

- Safe play area
- Regard for areas designated as being of international, national and local importance for biodiversity and landscape.

6.0.7 Although it can often be the case that urban sites might be considered more sustainable, paragraph 39 of the Circular states sites in the countryside, away from settlements can be considered if there is a lack of suitable sustainable locations within or adjacent to existing settlements and advises against the over-rigid application of development plan policies seeking to reduce car-borne travel.

6.0.8 Paragraph 58 of the Circular refers to the statutory duty of local planning authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. It continues to say that other considerations for Gypsy and Traveller site applications will usually include the impact on the surrounding area, the existing level of provision and need for sites which is evidenced as part of the GTAA for the area. Consideration also need to be given to the availability (or lack of) alternative accommodation for the applicants and their specific personal circumstances. Ensuing paragraphs set out general advice aimed at encouraging a dialogue.

Evidence of Need

6.0.9 The Adopted Gypsy and Traveller Accommodation Assessment (GTAA) for 2016-2021 identifies that Monmouthshire has a higher number of Gypsy and Traveller households living in the County than had been previously identified through the 2011 census, with an estimated unmet need for eight pitches, based on overcrowding, unauthorised occupation and likelihood of cultural aversion to conventional housing. However, there is no need for a transit site due to the low number of unauthorised encampments in the County. At this time the Council has no allocated or suitable sites available for the accommodation of Gypsy/ Traveller/ Showpeople, with an aspiration within much of the Gypsy, Traveller community for private site provision.

6.0.10 The GTAA currently under review predicts an increase in demand.

6.0.11 In this case, the applicants were involved in the Council's previous and most recent Gypsy and Traveller Assessment and identified that they require a site within the County. Although currently housed in a two storey dwelling in Caldicot, the applicant was identified as being in housing need as part of the adopted and pending GTAA as a result of cultural aversion to conventional housing.

6.0.12 As part of the current proposal and following discussions the applicant has provided information relating to the family's needs for this site and which has been confirmed as part of the GTAA. The applicant has advised the family's current accommodation is contrary to their cultural beliefs and traditional way of life, which in turn is having a detrimental impact on his and his family's health and well being. Although the applicant is currently unable to travel as a result of health issues, the family have expressed as desire to travel again in the future. As a result of the travelling status of the wider family there is a desire to provide a number of touring pitches on the application site to allow the family to gather together at certain times,

6.0.13 Circular 005/2018 makes it clear that LPA's should use the Accommodation Assessments when determining planning applications for Gypsy Sites including Private Sites.

6.1 Strategic & Spatial Choices

6.1.1 Strategic Planning/ Development Plan context/ Principle of Development

Paragraph 58 of Circular 005/2018 refers to the statutory duty of local planning authorities to determine planning applications in accordance with the development plan unless material considerations indicate otherwise. It says that other considerations for Gypsy and Traveller site applications will usually include the impact on the surrounding area, the existing level of provision and need for sites in the area, the availability (or lack of) alternative accommodation for the applicants and their specific personal circumstances.

Although located in close proximity to the village of Crick, the site is located outside of any settlement development limit as shown on the Proposals Map of the LDP. This means the site is

regarded as being in the open countryside where there is a general presumption against development unless the proposal accords with national planning policy or specific policies in the Monmouthshire County Council Local Development Plan (LDP).

Policy S1 of the LDP only allows for new residential development in exceptional circumstances, these being conversions, sub-division and dwellings necessary for rural enterprise. No such justification has been put forward for this application. Policy S1 reflects government guidance that new dwellings in the open countryside should not normally be allowed. The policy refers to new residential development which this application for two new residential units in the open countryside would be considered against.

Policy LC1 states that there is a presumption against new build development in the open countryside unless justified under national policy for rural enterprise, agricultural purposes, recreation or tourism purposes. In this case no justification has been put forward that the site is needed for any of these specific purposes so that the development is considered to be new built development in the open countryside without justification and therefore contrary to Policy LC1. However, the site does benefit from planning permission for the development of a stable block, store, hardstanding and various enclosure details, granted as part of application DM/2019/01149. The previous application was approved following consideration in relation to the requirements of Policy RE6. The consent is extant and could be developed subject to compliance with the associated conditions.

As stated above LPAs are required to assess the accommodation needs of Gypsies as part of the LDP process and should include policies for the provision of Gypsy sites. The Council commissioned a Gypsy and Travellers Needs and Sites Study in 2009 to inform the LDP. The Study found that Monmouthshire had a very low Gypsy and Traveller population with only one authorised private site containing one caravan. Since then permission has been granted on appeal for two Gypsy pitches on Maerdy Farm, near Usk. As a result of a lack of need no specific Gypsy sites were allocated in the LDP however, it was considered that there was a need to guide future applications for Gypsy sites. Subsequently Policy H8 of the LDP provided a framework against which proposals for Gypsy, Traveller and Travelling Showpeople sites will be assessed.

"Policy H8 - Gypsy, Traveller and Travelling Showpeople Sites

Where a need is identified for transit or permanent pitches/ plots for the accommodation needs of Gypsies, Travellers and Travelling Showpeople, they will be permitted provided they:

- a) Would enable the established need to be met at a location that is accessible to schools, shops and health care, by public transport, on foot or by cycle;
- b) Have a safe and convenient access to the highway network and will not cause traffic congestion or safety problems;
- c) Are of a suitable size to allow for the planned number of caravans, amenity blocks, a play area (for children on sites housing multiple families), the access road and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the site curtilage;
- d) Do not occupy a prominent location and are consistent with LDP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping;
- e) Avoid areas at high risk of flooding and proximity to uses with potential sources of pollution or emissions;
- f) Are of an appropriate scale to their location and do not have an unacceptable impact on the amenities of neighbouring land uses;
- g) Are served, or can be served, by adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal (storage and collection), and for Travelling Showpeople that there is a level area for outdoor storage and maintenance of equipment.

Proposals for the use of land for emergency pitches to meet proven need for use by Gypsies and Travellers will provide basic facilities, meet criteria b, d, e and f of this policy, and the location should be within reasonable travelling distance of a settlement with services and community facilities, including health and education."

Whilst located well beyond any defined settlement development boundary the site is positioned to the east of the settlement of Crick. Policy S1 sets out this settlement hierarchy where new housing will be provided while Policy H3 specifically considers housing development within minor villages:

"In Minor Villages planning permission will be granted for minor infill of no more than 1 or 2 dwellings resulting from the filling in of a small gap between existing dwellings, or residential redevelopment, or conversion to residential or sub-division of large dwellings, subject to detailed planning considerations, including no unacceptable adverse impact on village form and character and surrounding landscape, and other policies of the LDP that seek to protect existing retail, employment and community uses.

Exceptionally planning permission may be granted for up to 4 dwellings on an infill site that demonstrably fits in with village form (including not resulting in the loss of an open space that forms an important gap or open area) and is not prominent in the landscape."

This site is outside of the principle envelope of the village and would therefore be resisted for the development of open market housing under Policy H3. Notwithstanding this, the position of the site between the M48 bridge and a dwelling to the east of the site as well as its close proximity to the village means that the site does not appear as prime open countryside.

Whilst the GTAA has identified that there is a need for provision within the County, at this time the Council do not have any allocated sites within the LDP. Therefore there are no viable alternative locations available for immediate occupation, other than private provision as proposed.

Although Crick lacks services, the site is within 1.5km Caldicot, where there is a primary school, shops and health care facilities which are currently used by the applicant and his family. The applicant has expressed a desire to maintain their children's education within the existing school. Whilst not readily accessible by foot, access to larger conurbations and services could be gained via public transport and by cycling with the emphasis of paragraph 39 of Circular 005/2018 being against the over-rigid application of development plan policies seeking to reduce car-borne travel. Given the results of the GTAA with regard to need, the lack of Council provision, the identified need of the applicant and the development allowances for Crick village granted by way of Policy H3 (as opposed to areas of prime open countryside) on balance it is considered that subject to the application satisfying a number of key material considerations, the principle of development is acceptable.

6.1.2 Good Design/ Place making

Criterion c) of Policy H8 specifies that sites should be of a suitable size to allow for the planned number of caravans, amenity blocks, a play area (for children on sites housing multiple families), access and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the site curtilage.

The scale of the site relative to the level of use and the visual impact of potential overdevelopment has raised significant concerns for the community councils and members of the public. The applicant has provided a plan indicating, in their opinion, that the site can accommodate all the aspects of the application, although this would result in vehicles being parked on other parts of the site when all touring pitches are in use. Whilst Officers do echo concerns that the full use of the site would appear cramped, the use of the central/ touring caravan area would be intermittent and as such would not have a permanent impact. Being mindful of the single storey nature of all the structures on site, the fluctuating levels of use with regard to the touring units, the site's context with raised levels of screening provided to the north and west and increased screening and mitigation that could be provided, it is considered that the impact generated would not be so significant to the overall character and appearance of the area to warrant refusal of the application.

Documents issued by Welsh Government provide guidance with regards to the standards, sizes and facilities to be provided as part of Council provided sites. Following consideration of this document by the Housing Strategy and Policy Officer it has been determined that the requirements are not applicable to private developments such as this proposal.

Following consultation, the Council Environmental Health Officer has confirmed that the granting of permanent residential units on the site will require the applicant to obtain a site licence under the Mobile Homes (Wales) Act 2013. This may have further implications on the number of touring pitches that can be provided at the site. However, such matters are regulated and controlled by legislation beyond the remit of planning legislation and can be

sought independently from the current planning application. There is no requirement as part of the planning process for the applicant to provide evidence of a site licence prior to the determination of the planning application.

As part of the public consultation response, the community councils and a number of objectors have identified that the external finish of the development as a whole would be out of keeping with the area and that render or stoned elevations should be required to be more in keeping with the buildings in the village.

The plans submitted detail that the park homes would be finished with painted, sheeted elevations on the two bed and rendered type panels on the three bed. The utility block would be finished with concrete block walls with a sheeted roof above. Whilst there is no potential to alter the external appearance of the park homes, the walls of the utility building could be clad with timber to provide a more finished look. Although the external elevations of the residential properties in the area are predominantly stoned or rendered it is felt that adding such materials to the utility block would add to its visual presence and prominence. However, it is considered that the use of a secondary material such as timber panelling would improve its visual appearance and help identify the building as an ancillary and secondary structure. The provision of cladding on the external face of the building could be secured by condition.

The site layout plan submitted indicates the development of a 2m high mesh fence along the southern boundary of the site. The applicant has specified that this is needed to keep the site secure and to prevent children climbing onto the pavement. Members of the public have raised concerns that this in association with the close boarded fence in the centre of the site would create an unacceptable level of enclosure and form the appearance of an industrial site. These concerns are echoed by Officers. Whilst the need to provide security and screening for privacy of site users is recognised, it is considered that the provision of additional soft landscaping and hedging along the site boundaries would help soften the visual impact of the development and assimilate the development with the wider countryside context. These details could be secured by condition on any grant of consent.

On the basis of the above and subject to the imposition of conditions, the application is considered compliant with the requirements of policies S13, S17, DES1 and criteria c) of Policy H8 of the LDP.

6.1.3 Impact on Amenity/ Promoting Healthier Places

Criterion f) of Policy H8 specified that developments should be of an appropriate scale to their location and not have an unacceptable impact on the amenities of neighbouring land uses.

Impact with regards to neighbouring amenity is a concern for the local community councils. As specified above the application site is located to the east of the main village of Crick and is positioned between the bridge of the M48 to the west and Sunnybank Bungalow to the east. Although the proposed three-bedroom unit would be positioned parallel with the eastern boundary with Sunnybank, the principal outlook would be over the yard area to the west. Based on the plans submitted the proposal would maintain a 32m distance between the three-bedroom unit and the bungalow and approximately 10m between the proposed unit and the existing static caravan in the front garden of Sunnybank to the south-east of the site. While the proposed development would allow for increased overlooking of the garden of Sunnybank, given the single storey nature of the proposed park home, it is considered that the impact generated could be appropriately mitigated by the provision of supplementary planting along the eastern boundary and the provision of fencing on the development site between the proposed park home and the hedge.

Although an objector has raised concerns with regards to noise generation arising as result of the use and potential generator, given the ambient noise level arising from the M48 and the A48, it is considered that the occupation of the site would not generate such an increase in noise level to warrant refusal of the application. Following consultation the applicant has advised that they intend to provide mains electricity to the site for the park homes and provide hook-ups for the touring caravans, which would help reduce dependency and noise from generators etc.

On the basis of the above, the application is considered compliant with the requirements of policies S17, EP1 and criterion f) of Policy H8 of the LDP.

6.2 Active and Social Places

6.2.1 Access / Highway Safety

Criterion b) of LDP Policy H8 requires developments to have a safe and convenient access to the highway network and not cause traffic congestion or safety problems.

Access to the site would be gained via the existing driveway in the south-eastern corner which is shared with the former Border Waste site. The site layout plan submitted indicates the provision of a driveway to allow all vehicles accessing the site to pull off the road prior to opening the gates and entering the land.

Highway safety and use of the access is also a significant concern for the community councils and objectors who have raised concerns that the access is largely concealed from approaching traffic and that the use proposed could result in conflict between towed vehicles accessing the site and vehicles on the A48 which is immediately adjacent to the 60mph speed limit sign.

Following consultation the Council's Highways Team have raised no objection to the proposal and provided the following comments:

"The applicant has provided supporting drawings that generally depict the layout of the proposal but are considered to be lacking in information to clearly demonstrate how the site will be laid out. The applicant has not provided details of the numbers and layout of the required level of parking associated with the proposal, the applicant has not indicated how the proposed touring caravan will be sited, no turning area has been indicated for the turning of cars and towed touring caravans etc.

The development will be accessed indirectly off the A48 via an existing substantial drive that currently serves a former quarry, the existing access off the A48 is located just within the 50mph speed limit and has adequate visibility for the classification and speed of the road. Although the applicant has not provided any supporting information the highway authority has reviewed the casualty records for the area and only 3 reportable incidents in the vicinity of the access have been recorded in the last 20 years and none since 2009, none of the accidents were attributable to turning manoeuvres associated with the existing quarry access.

The highway authority has considered the proposed change of use and although have concerns with the layout and management of the site, which can be addressed by amendments or conditions, offer no objections to the proposal in principle. The development would not generate traffic manoeuvres that would be detrimental to highway safety or capacity on the local network.

The highway authority would request that if the planning authority are minded to approve the application then suitably worded conditions are provided to control the safe operation of the access, the layout and number of parking spaces, a minimum of 5 car parking spaces based on the council's adopted parking standards, 1 space per bedroom parking for 4 touring caravans and visitors and a turning area suitable to accommodate the turning of towed touring caravans."

It is acknowledged that the national speed limit sign for the A48 is positioned immediately adjacent to the top site of the current access. This results in drivers increasing in speed as they approach and pass the sign. Whilst the implications of this and slow moving vehicles exiting the site upon the safety of the access have been raised by members of the public, it is noted that the access does benefit from sufficient sight stopping distance for the national speed limit. As with all junctions it is the responsibility of the individual accessing the carriage to ensure the highway is suitably clear before undertaking any manoeuvre.

Whilst further concerns have been raised by the public with regards to the safety implications arising as a result of the access being adjacent to the bridge of the M48 and the resulting shadow this generates, concealing the entrance during the darkest times of day it must be acknowledged that the access is existing and could be used by without the need for further planning permission. Furthermore, vehicles accessing the site would be well lit and therefore visible during darker hours.

Although the development proposed would inevitably increase the number of vehicle movements generated, relative to the existing arrangement and extant consent it must be

acknowledged that the touring caravan pitches would be used on an intermittent basis by transiting members of the wider family. It is considered that the scale of the development proposed (two permanent residential units), the resulting trip generation, the visibility available from the access and the illumination that would be provided from the headlights of vehicles using the access, would prevent the proposal from being so detrimental to the overall highway safety and free flow of traffic in the area to warrant refusal of the application.

With regards to on site parking and turning, it is noted that when not in use by caravans, the proposed yard area could be used for the parking of permanent residents' vehicles. When the touring pitches are in use, it is considered that the bell-mouth of the junction and driveway in the south-western corner and the wider site could be used to provide parking and on site turning. However, in association with the Highway Officer comments, it is acknowledged that this is currently missing from the application submission. Details and requirements to provide such facilities can be secured by condition prior to the beneficial use of the touring pitches.

It is considered that the site benefits from sufficient visibility leading onto the A48. In addition, the proposal would not generate a number of vehicle movements significantly detrimental to highway safety and sufficient provision can be secured to ensure that vehicles can enter and leave the site in a forward gear. It is therefore considered that the proposal would not be so detrimental to the overall highway safety and free flow of traffic in the area to warrant refusal of the proposal. The submission is considered compliant with the requirements of policies S16, MV1 and criterion b) of Policy H8 of the LDP.

6.3 Distinctive & Natural Places

6.3.1 Landscape/ Visual Impact

Criterion d) of LDP Policy H8 specifies that site should not occupy a prominent location and be consistent with LDP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping.

Although the site is largely undeveloped it is adjacent to the M48 bridge and the residential property known as Sunnybank. Objections with regards to visual impact have been raised by the local community councils and members of the public. Whilst the use of the site at maximum capacity would have an impact on the landscape and visual amenity of the area, this impact would be variable given the intermittent use of the site by the travelling members of the family. On the whole, it is considered that the development would be read in the landscape relative to the existing buildings and more urban infrastructure that exists as opposed to open countryside.

Whilst the development and use of the site as proposed would be apparent from the A48 immediately adjacent to the southern boundary and from the garden of Sunnybank to the east, it is considered that the relatively low lying position of the site and proposals, relative to the rising land and trees to the rear which would remain at a higher level would help screen the development when viewed from any wider public vantage points. It is also considered that the development of the site would reduce pressure to develop or encroach into the wider and more undeveloped areas of the open countryside.

Whilst the plans submitted indicate the installation of a hedge adjacent to part of the central fence, it is felt that the provision of additional soft landscaping along the full southern boundary between the pavement edge and the proposed mesh fence should also be secured. In addition, planting should be provided along the southern side of the centrally positioned fence and along the eastern boundary. This screen planting can be secured by condition and would help soften the visual impact of the site when viewed from the A48, assimilate the development into the landscape and prevent it from being so visually incongruous to warrant refusal of the application. The application is therefore considered compliant with the requirements of policies S13, S17, DES1, EP1 and criterion d) of Policy H8 of the LDP.

6.3.2 Green Infrastructure and Biodiversity

As part of their response an objector has identified that the site should have been the subject

of an Ecological appraisal. The application site has previously been the subject of tipping and was cleared of vegetation prior to the submission of the previous application for stables and change of use of the land.

Although the site was previously densely overgrown it does not form part of any ecological designation and the Council do not hold any records with regards to its ecological or biodiversity value prior to the clearing being undertaken. The Council are therefore unable to determine the impact such works may have had. Although the development would change the ecological composition and attributes of the site, the potential to provide additional hedgerows and green infrastructure of an appropriate species and mix and an area of managed and maintained grassland by way of condition, would provide biodiversity enhancements in compliance with the requirements of policies LC1, RE6 and NE1 of the LDP.

6.3.3 Flooding

Based on the Development Advice Maps associated with Technical Advice Note (TAN) 15: Development and Flood Risk the site is outside of any allocated flood zone and is therefore unlikely to flood. The application is therefore considered compliant with the requirements of LDP policies S12, SD3 and criterion e) of Policy H8

6.3.4 Water (including foul drainage / SuDS), Air, Soundscape & Light

Criterion g) of LDP Policy H8 specifies in order to be approved, sites should be or can be served, by adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal (storage and collection).

As part of the public consultation response concerns have been raised with regards to disposal of foul and grey water from the site and potential pollution arising from a soakaway in an area which is already identified as being under pressure from pollution. Based on the plans submitted the applicant has indicated that all services would drain into a cesspit or septic tank on site. Although cesspits require frequent emptying by a licensed waste disposal contractor, it would be possible to accommodate one on site. This would reduce opportunities for increased leachate contamination of local watercourses to the benefit of the ecology and biodiversity value of the area.

Following discussions with utility providers the applicant has advised that they are able to secure water and power to the site.

With regards to waste storage, it is considered that the utility building indicated would provide sufficient storage capacity with the council operating weekly and fortnightly kerb side collections within the area.

As the applicants consider themselves to be Travellers rather than Showpeople there is no requirement to provide further level areas for outdoor storage and maintenance of equipment.

As part of the public consultation process, concerns have been raised with regards to surface water drainage. As from 7th January 2019, all construction works with drainage implications, of 100m² or more are required to have a Sustainable Drainage System (SuDS) to manage on site surface water designed in accordance with the Welsh Government Standards to Sustainable Drainage.

Following consultation, the Council's SuDS Approving Body (SAB) have confirmed that the works require SuDS consent prior to the commencement of development. This information was forwarded direct to the applicant. The requirement to obtain SAB consent is regulated by other legislation outside of the planning process and the consents can be sought independently from each other.

On the basis of the above, the application is considered compliant with policies S12, SD4 and criterion g) of Policy H8 of the LDP.

6.3.5 De-risking (contamination issues)

Whilst a member of the public has raised concerns that as a result of a former use the land

could be the subject of contamination, another contends that the land was not used in association with the adjacent Border Waste site and should be considered greenfield land. Whilst Officers have witnessed evidence of tipping and spoil within the existing embankments this appeared to be inert waste such as scalplings/ road planings.

As the Council hold no records with regards to previous land contamination there is insufficient evidence or justification to request a land contamination study of the site.

6.4 Response to the Representations of Third Parties and/or Community/Town Council

Following consultation Crick, Caerwent and Shirenewton Community Councils have raised objections to the development. The application has also been the subject of public objections which are responded to below.

A number of the objections received have already been addressed in the preceding sections of this report and therefore shall not be repeated.

Whilst it is acknowledged that the documents submitted in support of the application are lacking in detail, it is considered sufficient information has been submitted to allow for the consideration and determination of the application.

Whilst concerns have been raised with regard to land re-modelling and landslip potential, matters in relation to land stability would normally be reviewed by the Surveyors and Engineers within Building Control. This application and matter have been forwarded to that department for consideration.

Should the site be used by a number of touring caravans in excess of the application description, action could be taken by the Council's Planning Enforcement Department. Whilst the use of the site by non family members would be impossible for the Council to regulate or control, given that the site would form the applicants primary family residence, it is considered unlikely that they would allow the site to be used by persons with whom they have no direct link.

Whilst the current application seeks full planning permission, further consents will need to be sought from the Sustainable Drainage Approving Body, and the relevant Environmental Health and Licensing departments prior to the beneficial occupation of the site. Details regarding such matters could be added as an informative note to any grant of planning permission.

6.5 Well-Being of Future Generations (Wales) Act 2015

The duty to improve the economic, social, environmental and cultural well-being of Wales has been considered, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (the WBFG Act). In reaching this recommendation, the ways of working set out at section 5 of the WBFG Act have been taken into account and it is considered that this recommendation is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers' well-being objectives set out in section 8 of the WBFG Act.

6.6 Conclusion

Although located in an area of open countryside, given the close proximity of the site relative to Crick, the identified need for provision as part of the Council's GTAA, the lack of Council site provision, the applicant's specific housing need and the family's human rights, relative to the emphasis provided as part of circular 005/2018, the principle of developing the site for the use proposed is considered acceptable.

While concerns have been raised with the regards to the visual impact of the development and its potential overdevelopment, given the context of the site, the irregular use of the touring pitches and the proposed mitigation, screening and material alterations that could be secured by condition, it is considered that the development would not have such a detrimental impact on the overall character and appearance of the area or the residential amenity of those living closest to the site to warrant refusal of the application.

Whilst the concerns regarding the highway safety are acknowledged, following consideration of the proposal by the Council's Highway Engineer, it is considered that the site benefits from

sufficient site stopping distances for the national speed limit and that the increased vehicle movements associated can be acceptably and sufficiently accommodated within the adjacent highway network.

It is considered that matters relating to foul drainage can be appropriately dealt on site and as part of any subsequent Building Regulations application with issues relating to surface water disposal being reviewed and assessed as part of the Sustainable Urban Drainage System process which is regulated by legislation outside of the planning process. Following consultation, the applicant has advised that they are able to secure appropriate utilities for the site such as electricity and water.

While the site should have been the subject of a preliminary Ecological Appraisal, in view that it was cleared prior to the submission of this and the previous application, as well the fact that it does not form part of any ecological designation, it would be unreasonable to request ecological studies of the site. Although the development would change the ecological composition and attributes of the site, the potential to provide additional hedgerows and green infrastructure of an appropriate species and mix and an area of managed and maintained grassland, by way of condition would provide biodiversity enhancements.

On the basis of the above, the application is considered compliant with the requirements of relevant local and national planning legislation and is recommended for approval subject to conditions.

7.0 RECOMMENDATION: APPROVE

Conditions:

1 This development shall be begun within 5 years from the date of this permission. REASON: To comply with Section 91 of the Town and Country Planning Act 1990.

2 The development shall be carried out in accordance with the list of approved plans set out in the table below.

REASON: To ensure the development is carried out in accordance with the approved drawings, for the avoidance of doubt.

3 Notwithstanding the details of the approved plan prior to the installation of the parkhomes on site, an amended soft landscaping scheme shall be submitted indicating the provision of additional and enhanced boundary hedges along the southern boundary of the site adjacent to the A48; to the south of the proposed fence within the centre of the site and along the eastern boundary of the plot.

REASON: In the interests of the visual amenity of the application site in accordance with LDP policies S13, S17, DES1, EP1, NE1 and GI1.

4 All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

REASON: To safeguard the landscape amenities of the area and to ensure compliance with LDP Policy GI1.

5 Prior to the first beneficial use of the utility block, details of timber cladding to be added to all external elevations of the building shall be submitted to and approved in writing by the

Local Planning Authority. The works shall be completed within 3 months of the first beneficial use of the building.

REASON: In the interests of the character, appearance and visual amenity of the application site and wider area, in accordance with LDP policies S17, DES1 and EP1.

6 Prior to the first beneficial use of the touring pitches, an amended site layout plan shall be submitted indicating the provision of areas of off street parking for not less than 5 cars and parking of 4 touring caravans and visitors and on site turning facilities to allow all vehicles (including any tanker lorry to service the cesspit/septic tank) to enter and leave the site in a forward gear. The development shall only proceed in accordance with the approved plans and shall be maintained as such thereafter.

REASON: In the interests of the highway safety and free flow of traffic in accordance with LDP policies S16 and MV1.

7 Notwithstanding the details of the approved plans, gates if provided will be set back 15 metres from the edge of carriageway and open inwards to accommodate the size and type of vehicles.

REASON: In the interests of the highway safety and free flow of traffic, in compliance with LDP policies S16 and MV1.