

The application seeks planning permission for the change of use of the land for the siting of caravans for residential purposes for 4 gypsy pitches involving the formation of hardsurfacing, the construction of 4 utility buildings and the installation of a package sewage treatment plant.

The site in question measures approximately 0.24 hectares, and has been associated with Blackbrook nurseries and contains a glasshouse.

The application site is located off Newcastle Road (A53) and is accessed via an existing field gate. The site is located in an area of Open Countryside and an Area of Landscape Enhancement as defined within the Local Development Framework Proposals Map.

The application has been called in to Committee by two Councillors as the application is effectively (for) a housing development and as such needs to be fully considered by the Planning Committee.

The statutory 8 week determination period for this application expires on 28th June 2019.

RECOMMENDATION

REFUSE for the following reasons;

- 1. The proposed development is in an unsuitable location within the open countryside away from services and facilities and without safe and convenient access to public transport. Whilst the Local Planning Authority recognises that there is an identified and unmet need for a further gypsy and traveller pitch in the period between 2014 and 2019, and a further 6 pitches in the period between 2019 and 2034 the benefits arising from the proposed development do not outweigh identified harm. The proposed development would therefore be contrary to Policy CSP7 of the Core Strategy and national policy within the Planning Policy for Traveller Sites, saved policy N20 of the Local Plan and the guidance of the National Planning Policy Framework.**
- 2. The applicant has failed to demonstrate that the existing access is suitable for the proposed development and that the existing visibility splays are appropriate for the speed of traffic and that the development will not, therefore, result in an adverse impact on highway safety. As such the proposal is contrary to the guidance of the National Planning Policy Framework.**
- 3. The applicant has failed to demonstrate that the residents of the site will not be adversely affected by the impact of noise from the A53 and the nearby pumping station and as such the proposal is contrary to the guidance of the National Planning Policy Framework.**
- 4. The applicant has failed to demonstrate that the proposed development will not have an adverse impact on Wellings, a critical groundwater source used for public water supply to the local area and is vulnerable to surface influences, contrary to the guidance of the National Planning Policy Framework.**

Reason for recommendation

The application site is not located in a sustainable location. The applicant has failed to demonstrate the proposed access would have sufficient access, the potential noise impact upon the future occupiers has not been fully considered, and the applicant has failed to demonstrate that the proposed development will not have an adverse impact on a groundwater source. The provision of gypsy and traveller pitches is a clear benefit of the proposal. However, whilst the requirement for sites and the current lack of alternatives weigh in favour of the proposal, they are not considered to outweigh the identified harm even when the personal need of the applicants for a residential site is taken into consideration.

Statement as to how the Local Planning Authority has worked in a positive and proactive manner in dealing with this application

It is considered that the proposals are unsustainable and do not conform to the core planning principles of the National Planning Policy Framework and it is considered that the applicant is unable to overcome the principal concerns in respect of the location of this development.

KEY ISSUES

The application is for full planning permission for the change of use of the land for the siting of 4 gypsy pitches, and facilitating development including hardstanding, package sewage treatment plan and utility buildings (measuring 4m by 5m, with a maximum height of 3.56m), on the site located on Newcastle Road.

The application site measures approximately 0.24 hectares and until recently has been used to support a small scale nursery business.

The application site is located in the open countryside, and an Area of Landscape Enhancement as indicated on the Local Development Framework Proposals Map.

Reference has been made, within representations and consultation responses, to conflict with the emerging Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan (NDP). The comments received refer to existing provision of a large, established caravan park within the NDP area, at nearby Stableford and the desire to preserve currently undeveloped parts of the unspoiled rural landscape by identifying sustainable future residential development area which this application site falls well outside of.

The relevant policies of the NDP are identified as follows:

- NE1, Natural Environment which indicates that new development will be supported that complements the landscape setting and character of the area, preserves or enhances and does not cause significant harm or degradation to the special rural character and ecological and environmental features of the area including the Principal Aquifer lying beneath the majority of the Neighbourhood Area.
- DC2, Sustainable Design which indicates that all new development will be supported provided that it, amongst other things, complements local landscape in terms of urban and built form and maintains and enhances the character and appearance of the landscape.
- HG1, New Housing, which indicates that new housing will be supported in sustainable locations within the village envelope of Baldwin's Gate; as part of conversions of non-designated heritage assets; and as replacement dwellings; limited infill housing or within a built frontage of existing dwellings. It indicates that to be in a sustainable location, development must:
 - Be supported by adequate infrastructure, or provide any necessary infrastructure improvements as part of the development;
 - Not encroach into the open countryside;
 - Not involve the loss of best and most versatile agricultural land;
 - Avoid encroaching onto or impacting on sensitive landscapes and habitats;
 - Not involve the loss of any important community facility

The proposal is not in compliance with any of these policies given its location in the open countryside and as it is not supported by adequate infrastructure.

An emerging neighbourhood plan may be a material consideration and Paragraph 48 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. It states as follows:

Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The NDP has now been submitted and the opportunity to submit representations has now passed, it is known that there have been objections/comments on all of the policies referred to above, and it is not possible yet to be absolutely certain whether or not any policy within the emerging Neighbourhood Plan will be viewed favourably by the Examiner, in terms of its compliance with what are termed the Basic Conditions and the other criteria the Examiner will need to consider. As such it remains that the policies cannot be given much weight.

Severn Trent Water has advised that the proposed development has a potential impact upon providing sustainable sources of groundwater due to the existence of an aquifer (Wellings) within 100m of the proposed development boundary. They advise that a risk assessment is required to consider the potential impacts to this groundwater source and adequate mitigation. They go on to say that control measures must be adhered to during construction and through the whole lifespan of the drainage scheme to ensure the protection of the sustainable groundwater source which should be secured by condition.

A risk assessment has not been provided and as such the applicant has not demonstrated what risks the development poses to this groundwater source and whether adequate mitigation can be secured to minimise any identified risks to an acceptable level.

Protected species surveys were submitted as part of the application, and offer mitigation with regard to protected species evident on site. Subject to the identified mitigation measures being implemented, which could be secured by condition, it is considered that the proposal would not have an unacceptable impact on protected species.

This report will address the following matters: -

- Relevant policy
- Need and supply
- Impact on Character and Appearance
- Residential Amenity
- Highway Safety
- Sustainability
- Human rights and safeguarding of children
- Planning balance

Relevant policy

National planning policy regarding traveller site is set out in Planning Policy for Traveller Sites (PPTS) which should be read in conjunction with the National Planning Policy Framework.

The NPPF, at paragraph 78, advises that housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

At paragraph 170 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things;

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.

- Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Paragraph 10(a) of Policy B of the PPTS (Planning Policy for Traveller Sites) says that local planning authorities (LPAs), in producing their Local Plan, should identify and update annually, a supply of deliverable sites sufficient to provide five years' worth of sites for gypsies, travellers and travelling showpeople against their locally set targets, and identify a supply of specific, developable sites or broad locations for growth for years six to ten and, where possible, for years 11-15.

Paragraph 13 of the Planning Policy for Traveller Sites (PPTS) states local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally, and that their planning policies should:

- a) Promote peaceful and integrated co-existence between the site and the local community;
- b) Promote, in collaboration with commissioners of health services, access to appropriate health services;
- c) Ensure that children can attend school on a regular basis;
- d) Provide a settled base that reduces the need for long distance travelling and possible environmental damage caused by unauthorised encampment
- e) Provide proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
- f) Avoid placing undue pressure on local infrastructure and services;
- g) Do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans;
- h) Reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

A number of paragraphs of policy H of the PPTS (Determining planning applications for traveller sites) are relevant to the determination of this application. Paragraph 22 indicates that planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. At paragraph 23 it says that applications should be assessed and determined in accordance with the presumption in favour of sustainable development and the application of specific policies in the NPPF as well as policy H of the PPTS.

Paragraph 24 says that local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

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

Paragraph 25 says that LPAs should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan.

LPAs should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure.

Paragraph 26 requires LPAs to attach weight to the following matters:

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

Policy CSP7 of the Core Strategy states that pitches will be provided on sites that provide good access to shops, education, healthcare facilities and other essential services. Safe and convenient access should also be provided to public transport and the highway network.

Saved Local Plan policy N20 seeks to ensure that development within areas of Landscape Enhancement will enhance the quality of the local landscape and would not act to erode its quality or appearance.

Need and Supply

As indicated above, the PPTS requires local authorities to identify and update annually, a five years' supply of sites for gypsies, travellers and travelling showpersons.

The Borough Council and Stoke-on-Trent City Council, together with Stafford Borough Council and Staffordshire Moorlands District Council, commissioned a Joint Gypsy and Traveller and Travelling Showperson Accommodation Assessment in 2015 (GTAA). The Assessment provides updated evidence to identify the future accommodation needs of gypsies and travellers and travelling showpersons across the four local authority areas. For Newcastle-under-Lyme, the study identifies a shortfall of one pitch between 2014 and 2019. A further six pitches are required between 2019 and 2034, bringing the total requirement to seven permanent pitches. In addition to the provision of permanent pitches, the study identifies the requirement for five transit pitches across Newcastle-under-Lyme between 2015/16 and 2018/19.

As no sites have, as yet, been identified or allocated to meet the identified need it has to be concluded that the Council does not have a five year supply. The shortfall is, however, limited.

Character and appearance

As referred to above, there is a very strict limitation on new traveller site development in the open countryside that is away from existing settlements as set out in Policy H of the PPTS (para 25). In addition, also referred to above, CSS Policy CSP7 seeks to ensure that the development would not adversely affect local landscapes and environments.

The site was granted planning consent in the 1990s for use as a wholesale nursery, however from visiting the site it is apparent that the built form in relation to this use was minimal. Part of the site that includes the greenhouse and 'portacabin' type structure could be argued to be previously developed land (PDL) although the planning history suggests that its use does not fall with the definition of PDL as set out in the Glossary to the 2019 NPPF. Moreover, the majority of the site remains open with no structures or hardsurfacing. It is noted that the proposed development would largely be located between and including where the existing structures are located.

The clearance of the dilapidated building and glasshouse will offer some visual improvement to the site; however the introduction of mobile homes and touring caravans on four pitches as proposed with the associated development including hardstanding for pitches and the access track will result in some visual harm to this relatively open rural area over and above that which presently exists on site.

The proposal is therefore considered to conflict with policies CSP7, saved NLP policy N20 and national policy in the PPTS and NPPF, particularly paragraph 170 given that it damages the intrinsic character and beauty of the countryside.

Residential Amenity

Having regard to the scale of the development and distance from neighbouring properties no significant amenity concerns are raised with regard to existing residents.

Environmental Health previously commented on the proposal noting that insufficient information has been submitted with the application relating to the impact to occupiers of the site arising from noise from the A53 and pumping station in close proximity of the site. The current application is not supported by any assessment of noise impact and as such their concerns have not been addressed.

As such, the proposal cannot be considered to be compliant with guidance within the NPPF as insufficient information has been submitted to date to enable such a conclusion to be reached.

Highways

The Highway Authority (HA) was consulted as part of the application process. They recommend that the application is refused on the basis that the application does not include a scaled drawing detailing the visibility splays at the access to the site. They indicate that this application, unlike the previously withdrawn application, includes a speed survey and the 85th percentile recorded speeds are 51mph southbound and 45mph northbound. They also note that the use of private vehicles is likely to be the preferred method of transport for the future occupiers of the site, and the absence of footways on the A53.

The applicant has been advised of the need to provide a drawing detailing the visibility splay and if such a plan is received it will be reported with the further comments of the HA if they are available.

Sustainability

The PPTS makes it clear that sustainability is important and should not only be considered in terms of transport mode and distance from services. Other factors such as economic and social considerations are also important material considerations. It is considered that authorised sites assist in the promotion of peaceful and integrated co-existence between the site and the local community. A settled base ensures easier access to a GP and other health services and that any children are able to attend school on a regular basis. In addition, a settled base can result in a reduction in the need for long distance travelling and the possible environmental damage caused by unauthorised encampments. Furthermore, the application site is not located in an area at high risk of flooding. These are all benefits to be considered in the round when considering issues of sustainability.

The application site is located in Blackbrook on Newcastle Road which is 3.7km from Baldwins Gate, the nearest established village with services and facilities service centre.

Newcastle Road (A53) is a national speed limit road, and there are no footpaths from the site to the nearest bus stop thereby making access to public transport safe and convenient. The A53 itself is a fast, busy road, and as such it is considered fair to assume that most movements to and from the site would be by private vehicle, however they are likely to be low in number due to the number of pitches proposed on site. Given the assessment, it is considered that the proposal would be in conflict of the PPTS and Policy CSP7 of the Core Strategy the site doesn't provide good access to shops, education, healthcare facilities and other essential services or safe and convenient access to public transport.

Human rights and safeguarding of children

Local Planning Authorities should consider the consequences of refusing or granting planning permission, or taking enforcement action, on the rights of the individuals concerned. Article 8 of the

Human Rights Act 1998 states that everyone has the right to respect for his private and family life, his home and his correspondence. It adds there shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals or the protection of the rights and freedoms of others.

Local Planning Authorities also have a duty to safeguard and promote the welfare of children under section 11 of the Children's Act 2004. In addition, the judgment of the Supreme Court in ZH (Tanzania) was that all local authorities are under a duty to consider the best interests of the children.

Section 11 of the Act states that Local Authorities must have regard to the need to safeguard and promote the welfare of children.

Further, Article 14 of the Human Rights Act states that the enjoyment of the rights and freedoms set forth in that Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.

The submission indicates that there are 11 children within the applicants' families one of which is physically disabled, and another being treated for leukaemia. The information provided does not, however, suggest, that the best interests of the children could not be met other than on this site and therefore it is considered the issues of human rights or the safeguarding of children should only be given limited weight in the determination of this application.

Planning balance

Having regard to the rural location of the site within the open countryside, the distance from facilities, and the absence of safe and convenient access to public transport, the site is not considered to be in a sustainable or suitable location for the proposed development. This would have some adverse implications in terms of use of natural resources and movement towards a low carbon economy.

Insufficient information has been submitted relating to the visibility of the existing access to the site, and potential noise impacts upon future occupiers caused by the A53 and nearby pumping station. There will also be an adverse impact upon the character and appearance of this rural area arising from the visual impact of the proposal.

The provision of gypsy and traveller pitches is a clear benefit of the proposal. However, whilst the requirement for sites and the current lack of alternatives weigh in favour of the proposal, they are not considered to outweigh the identified harm even when the personal need of the applicants for a residential site is taken into consideration.

Weighing the harm against the matters in favour of the proposal and the potential imposition of conditions the development would not be acceptable even for a temporary period. The proposal is therefore considered to be contrary to Policy CSP7 of the Core Strategy, Policy H of the Planning Policy for Traveller Sites, and the NPPF particularly paragraphs 78 and 170.

APPENDIX

Policies and Proposals in the approved Development Plan relevant to this decision:-

[Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy \(CSS\) 2006-2026](#)

Policy ASP6: Rural Area Spatial Strategy
Policy CSP1: Design Quality
Policy CSP7: Gypsy and Travellers

Newcastle-under-Lyme Local Plan 2011 (NLP)

Policy H1: Residential development: sustainable location and protection of the countryside
Policy N2: Development and nature conservation - site surveys
Policy N3: Development and nature conservation – protection and enhancement measures.
Policy N20: Areas of Landscape Enhancement

Other material considerations include:

[National Planning Policy Framework \(NPPF\) \(2019\)](#)

[Planning Practice Guidance \(PPG\) \(2018\)](#)

[Planning Policy for Traveller Sites \(August 2015\)](#)

[Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015](#)

[Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan](#)

Human Rights Act 1998

Relevant Planning History

N20697 - The erection of a wholesale nursery including the erection of polythene tunnel and implement shed, plus improving access to A53 and construction of hardstanding. Approved 1991

18/00491/FUL - Change of use of the land for the siting of caravans for residential purposes for 4 no. gypsy pitches. WITHDRAWN

Views of Consultees

Whitmore Parish Council objects to the application, which they have looked at as if it were for four permanent dwellings, on the following grounds;

- Greenfield site in a totally unsustainable location with inadequate service provision or safe footway access to public transport.
- The proposed access to the site is directly from the A53 at a point that has standing traffic for most of each day in close proximity to the heavily trafficked A51/53 junction which is already heavily congested that will only worsen with HS2 traffic.
- Does not accord with policy CSP7 of the Core Spatial Strategy
- No details of how foul sewerage or waste will be disposed of other than a package treatment plant
- Proposed domestic use is an unwarranted change of use

Maer and Aston Parish Council have considered the application on the basis that it involves 4 residential properties. They object to the application on the following grounds;

- Limited access to services such as schools and shops given its location distant from villages.

- Limited access to public transport and lack of pavement resulting in the need to walk on the roadside and cross a difficult and dangerous junction to access the bus stop Traffic exiting the site to turn right on the A53 would be dangerous.
- As such the site is unsustainable as demonstrated in a similar application for up to 8 houses in Hill Chorlton 14/00875/OUT which was dismissed at appeal
- Worsen traffic, particularly when considering the impact of HS2 vehicles.
- The submitted information suggesting that there is a lack of wildlife on the site is challenged.
- Site contains greenhouse, however it is a greenfield, not a brownfield, site
- The identified pitch shortfall within the Newcastle-under-Lyme, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015 is 1 with the total projection to 2029 being just 2.
- The statement mentions 'doubling up' as standard practice which suggests that there would be many more people on the site.
- There is already a caravan site just a couple of miles from the proposed site at Stableford.
- The application should be refused as it is contrary to policy CSP7 and many of the policies in the emerging Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan. The latest 5 year housing land supply also suggests this proposed development is not only not sustainable but unnecessary.
- Planning Committee should visit the site to view the inappropriateness of this site for the level of traffic, lack of services and unsustainability of this proposal.

Loggerheads Parish Council objects to the application on the following grounds;

- This is a greenfield site situated in the open countryside, remote from any available services and with no footway access to public transport and so is unsustainable.
- The proposed access to the site is directly from the A53 at a point that has standing traffic.
- Does not comply with policy CSP7

The **Landscape Development Section** makes the following comments:

- No detail of the planting to be carried out is provided. Permission should be subject to submission of a landscaping scheme incorporating existing planting and tree, shrub and hedge planting to provide screening to the development and to integrate the proposals with the surrounding countryside.
- The proposal to allow excavation works within Root Protection Areas (RPAs) is not acceptable. Any surfacing within RPAs should be of 'not dig' construction. All other recommendations of the tree report should be followed. Permission should be subject to submission of a detailed, dimensioned Tree Protection Plan and details for all special engineering within RPAs and other relevant construction details.

The **Highway Authority** that the application should be refused as there is insufficient information to determine the proposal at this stage from a transport and highway safety perspective. A scaled drawing detailing the visibility splays is required.

The views of the **Environmental Health Division** with regard to environmental constraints and loss of amenity to future occupiers have not been received. When commenting upon the previously withdrawn application they objected to the application as insufficient information has been submitted to assess the application and noise impact from the surrounding road network and pumping station and its effects on amenity and also the impact of any artificial lighting installed on the site.

The Waste Water section of **Severn Trent Water** has no objections. In respect of the potential impact upon providing sustainable sources of groundwater they advise that there is a lack of detail relating to how the package treatment plant works; lack of detail relating to waste water management; no proposed management of the surface water; and there is a need to decommission the observation boreholes. Given the Wellings is a critical groundwater source used for public water supply to the local area and its vulnerability to surface influences, they would expect a risk assessment that considers the potential impacts to this groundwater source. The request that conditions are attached to ensure that adequate mitigation and control measures are adhered to both during construction and through the whole lifespan of the drainage scheme for sustainable groundwater protection.

Cadent states that there is apparatus in the vicinity which may be affected so developers are required to contact their Plant protection Team for approval before carrying out any works on site.

The **Staffordshire Badger Conservation Group** has not responded but in commenting on the previously withdrawn application stated that they agreed with recommendations within the ecology report, and request this is made a planning condition. Would like to ensure lighting from the development is directed away from the sett on site.

The views of **Housing Strategy** and **Planning Policy** have been sought but have not responded by the due date and as such it is assumed that they have no comments.

Representations

62 representations, objecting to the application have been received. The concerns raised are summarised below

- The site is on the busy A53 close to the junction of two busy 'A' roads (A51/A53) with a history of accidents and queuing traffic.
- The applicant has failed to demonstrate that the existing access is suitable, that the existing visibility splays are appropriate for the speed of traffic, and that the development will not have an adverse impact on highway safety
- The site is an unsuitable location for residential development away from services and facilities, contrary to policy H1.
- There is no footpath access to the bus stop on the A51.
- The site is an inappropriate location for vulnerable young children.
- As such the proposal is contrary to policy CSP7 and national guidance
- Development of this largely greenfield site would be unsightly in this unspoilt area of countryside and would be contrary to policy N17 and N20.
- The applicant has failed to demonstrate that the residents will not be adversely affected by the impact of noise from the A53 and the nearby pumping station.
- Consideration should be given to the new Neighbourhood Development Plan (NDP) for the three local parishes. This recognises the existing provision of a large, established caravan park within the NDP area, at nearby Stableford. It also demonstrates the will of local communities to preserve currently undeveloped parts of the unspoiled rural landscape by identifying sustainable future residential development area which this application site falls well outside of.
- The site lies in the river valley on a major aquifer resulting in a risk of pollution which could be damaging to the dairy farms, pick your own fruit farms, and wildlife.
- There is no detail of the size, design of the proposed static caravans.
- There also seems to be a common practice to 'double up' during the winter period and there may be pressure to allow other caravans to park on the site.
- There is a limited shortfall in authorised pitches as identified in Newcastle-under-Lyme, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015.
- The personal circumstances of the applicant should not be taken into consideration.

Applicant/agent's submission

The application is supported by:

- Speed survey data
- Design and Access/Planning Statement
- Preliminary Ecological Appraisal
- Gypsy Status Report
- Tree Report.

All of the application documents can be viewed using the following link.

<http://publicaccess.newcastle-staffs.gov.uk/online-applications/PLAN/19/00332/FUL>

Background Papers

Planning File
Development Plan

Date report prepared

6th June 2019