

SCHEDULE A: Applications with Recommendation

21/0893

Item No: 08

Date of Committee:

Appn Ref No:
21/0893

Applicant:
Mr J.D Lowe

Parish:
Multiple Parishes

Agent:
Jock Gordon Architectural
SVS Ltd

Ward:
Wetheral & Corby

Location: Mannory, Broomfallen Road, Scotby, Carlisle, CA4 8DE

Proposal: Change Of Use Of Land From Agricultural Use To 1no. Gypsy Pitch
Comprising The Siting Of 4no. Mobile Homes, 1no. Utility Block, 2no.
Toilet Blocks & 2no. Touring Caravans Together With The Formation Of
An Area Of Hard Standing & Installation Of A Treatment Plant (Part
Retrospective)

Date of Receipt:
20/09/2021

Statutory Expiry Date
15/11/2021

26 Week Determination

REPORT

Case Officer: Christopher Hardman

1. Recommendation

1.1 It is recommended that this application is refused.

2. Main Issues

- 2.1 Whether the principle of development is acceptable
- 2.2 Detailed Matters
- 2.3 Drainage
- 2.4 Biodiversity
- 2.5 Accommodation Needs
- 2.6 Other Matters

3. Application Details

The Site

3.1 Broomfallen Road is the main road leading north into the village of Scotby.

At the southern margins of the linear housing form along Broomfallen Road, a bridleway (number 138037) leads west and then south-west towards the M6 motorway and to The Garlands beyond.

- 3.2 This site is located to the south of the bridleway and is bounded to the north-east by a tree line/fence boundary with land the subject of application 21/0878 to the south leading to countryside. On the opposite side of the bridleway, to the north, is a Gypsy/traveller site. A further application for Gypsy/traveller pitches (21/1117) to the west is separated from this site by a new access road. Further west the bridleway continues alongside the M6 motorway.
- 3.3 The overall site area measures 0.24 hectares.
- 3.4 The site is not within any landscape designations and the site is also located wholly within Flood Zone 1, the area with the lowest flood risk probability.

Background

- 3.5 Works were undertaken to remove the hedgerow on the northern boundary of this site alongside sites for applications 21/0878 and 21/1117. During these works the bridleway was the subject of considerable damage resulting in its closure by the County Council. Other works also took place including the deposit of road planings and erection of fencing. The City Council sought an injunction to prevent the development continuing and reparation of the bridleway. The bridleway has since re-opened. Two sites became occupied following on from last year's Appleby fair. As part of the injunction was based on a lack of identified need and no planning permission in place, the next stage is to give consideration to all three applications affecting the land.

The Proposal

- 3.6 Planning permission is sought for the change of use of the land from agricultural use to 1no. gypsy pitch comprising the siting of 4no. mobile homes, 1no. utility block, 2no. toilet blocks & 2no. touring caravans together with the formation of an area of hard standing & installation of a treatment plant (part retrospective). This larger pitch is an extended family pitch indicated by the number of mobile homes.

4. Summary of Representations

- 4.1 This application was advertised by the posting of 3 site notices and direct notification to 2 neighbouring properties. In response, 34 representations of objection and two comments have been received. The responses are summarised as follows:

Why are we allowing additional planning permission time and time again when there is still a court injunction to return existing work to natural order. This site has grown significantly over the last 12 months. Traffic has

increased with cars driving unsafely at high speeds creating a lot of noise for the village. Parking on Broomfallen Road has become a nightmare. We are losing our village
Please no more! I strongly object!

This will block off the public right of way footpath linking Scotby over to The Garlands. Scotby is already becoming overpopulated, there are not enough local amenities to cater for so many people! This is a village and it's getting too big.

There is no reason to develop any of the land further in this location. It has already become way too big for what should be agricultural land. The traffic of caravans, commercial vehicles and wagons is too high and very dangerous considering where the entrance to this is on Broomfallen road. I know there's been a number of complaints regarding this area so I think any further planning should be stopped until a full review of what work has been carried out and if it's suitable for the area.

There is already a court injunction on this land for it to be turned back into agricultural land, the development is quite big now and there is increased traffic on what is already a small bridleway which was being used for the general public but which now feels very much out of bounds.

I object to this application as it relates to an area where there is a court injunction in place requiring the return of the land in question to its original state. It should not be possible for the injunction to be ignored and the council should enforce it. How can further planning applications, such as this one, be considered since the injunction has not been complied with? The siting of further caravans and mobile homes, plus related services, is opposed by local residents including myself.

We wish to strongly object to this planning application on the following grounds: Proposed development on land which has a court injunction on it. Any application should never have even been accepted for consideration. Increased traffic on the public footpath/Bridleway 138037 - from Broomfallen road to the Garlands Footbridge. Motor vehicles are legally banned from Bridleways A traveller caravan site in the village which will continue to grow and/or become official. There are already three official traveller sites in the Carlisle area. Fear of walking or cycling on the Bridleway because of more and more vehicles using it, intimidation by travellers and being bitten by their dogs

I wish to object to this planning application on the following grounds: The land subject to this planning application has had a court injunction served which requires the existing unauthorised development to be removed and the land reinstated to its former agricultural status. There is clearly no intent to comply with this injunction. There is already significant unauthorised vehicular traffic on the access route which is a bridleway yet no action appears to be taken to stop the vehicular movements. Broomfallen Road has been subject to significant increase in traffic movements and on road parking due to the recent Story Development and other smaller developments in the close

vicinity. To the extent that there is already "an accident waiting to happen", the scale and nature of these proposals will exacerbate the situation. Traditionally, local residents used to frequent the bridleway for leisure and exercise purposes but since the current unauthorised development was established this is now avoided because of unpleasant interactions with the occupants of the development. I do not understand why action has not been taken to remedy the court injunction

The land subject to this planning application has had a court injunction served which requires the existing unauthorised development to be removed and the land reinstated to its former agricultural status. There is clearly no intent to comply with this injunction. There is already significant unauthorised vehicular traffic on the access route which is a bridleway yet no action appears to be taken to stop the vehicular movements. Broomfallen Road has been subject to significant increase in traffic movements and on road parking due to the recent Story Development and other smaller developments in the close vicinity. To the extent that there is already "an accident waiting to happen", the scale and nature of these proposals will exacerbate the situation. Historically, villagers always used to use the bridleway as a popular walk for leisure and recreation purposes but since the current unauthorised development was established this route is avoided because of the risk of unpleasant interactions with the occupants of the development. The planning rules apply to everyone and should be adhered to

A traveller caravan site in the village which could continue to grow, and or become more official. Fear of walking as the dogs are left to run loose.

I want to object as the site itself is not officially allowed in the first place. I am bewildered as to how this site has been allowed to exist to the point whereby they are putting in planning permission, and at this point find it insulting. I was previously able to walk through the area to see my parents in the garlands area however this is now not possible as I feel it unsafe to walk through here due to the out of control dogs and verbal abuse from residents. I feel it would drive householders away from the village and turn it from a peaceful well-respected village and turn it into a traveller site, of which there are already 3 in Carlisle.

Proposed development on land which has a court injunction on it. Any application should not have even been considered. Increased traffic on the public footpath/bridleway 138037 which runs from Broomfallen Road to Garlands footbridge. Motor vehicles are legally banned from bridleways. A traveller caravan site in the village which would continue to grow. There are already a number of official traveller sites in Carlisle area. The footpath would become a no-go area because of fear of intimidation by travellers and attack by dogs. Also, more vehicles using bridleways. The village is already being slowly destroyed by excessive development.

The land for development already has a Court Injunction on it. The bridleway which I often walked in the past has become unusable as there are many vehicles driving fast along it. You are made to feel unwelcome when walking through the site, as though it's out of bounds for the general public. The

traffic of caravans, commercial vehicles and wagons is too high and very dangerous considering where the entrance to this is on Broomfallen road. I would be most grateful if you can take these objections in to consideration.

The land it related to has a court injunction on it, so it is protected by law. Also, the development will increase traffic on a public footpath which will prevent a legal right of way footpath being used. Scotby is a little village on the outskirts of Carlisle which already has three travellers' sites so based on demand a fourth cannot be justified on such land that is subject to the two legal justifications above. It is already intimidating walking up Ghyll road lonning with the number of dogs barking and other animals do we really want all bridle ways in Scotby inaccessible to the public walking.

The amount of development already in place at this site is detrimental to the landscape of a rural village. The infrastructure/school cannot cope with anymore developments in Scotby. Scotby is still a village and only due to the motorway has it been prevented it being absorbed into something bigger. Please can we conserve the village as it is to stop development to the green fields that have protected Scotby village status that we know today.

We don't need the village growing anymore as it's already now becoming overcrowded having lived in the village for the last 15 years.

Object to this application on land which is the subject of a court injunction. As such no application should even have been accepted yet alone registered, and the Planning Committee are duty bound by law to firmly reject it. This site has steadily grown during the more than 8 years that we have been residents of Scotby and this growth has accelerated over the last 2 years or so. We used to regularly use the Bridleway for exercise during the early pandemic lockdowns but have now stopped because: a) The area is no longer a pleasant country walk but has become a small housing estate with motor vehicles regularly (and illegally) using the tarmac Bridleway. b) My wife was bitten by a dog in an unprovoked attack which has made her very nervous of going anywhere near the development. I am left wondering whether the Committee is ever aware of what they are being asked to approve and would strongly recommend that a site visit be arranged to ensure they are fully aware of the nature and scale of the current development.

I understand that this application relates to land under court injunction. If this is so, the application should not be considered and I object to it on those grounds. In my view, a more established traveller site would be detrimental to the nature of this village. If this application is passed, it would be a move towards a more permanent site to which I am opposed. Expansion of the current site will inevitably lead to more vehicles using the bridleway, which is in itself illegal. Like others I have spoken to locally, I no longer use this bridleway for my local walks and I know personally of residents who have been challenged by travellers when they have walked in this area, suggesting they have no right to walk on the public bridleway as if it were private property. I find their dogs intimidating and have been verbally abused in the vicinity. I object to the proposal on the grounds that my freedom to walk and enjoy the local area has been infringed already by the presence of this site and I do not wish that threat to be increased.

I have felt threatened walking on the lane from Broomfallen road up to the bridleway joining with Langley bank. Our village does not have many circular walls and during the summer months we like to walk this loop. I also think an increase in traffic on this lane discourages walkers.

1. Vehicle access. With the existing properties and the proposed dwellings, there is now significant vehicle access on this public bridleway (Prow 138037). On a recent visit, there were 15 motor vehicles along both the existing properties and the now completed development within this application. Of these 15 vehicles there were 7 commercial vans that appeared to belong to residents there, and in just a 10 minute period 3 vehicles drove along the bridleway. The application states that there is parking for 10 vehicles which is clearly insufficient as the recent visit has confirmed This is a public bridleway and is therefore cars, vans and pick-ups are prohibited from using it, but it seems that the purpose of the application must assume regular vehicular use. This is not occasional use for dragging the caravans into place - this is becoming a busy thoroughfare and is completely contrary to the statutory restrictions on the use of public bridleways. Furthermore, the choice of a water treatment plant will require an HGV de-sludger at least annually of which the only access is the bridleway

2. Trees and hedges. The answer to Q15 of the planning application is incorrect. There are mature woodland and hedgerow bordering and immediately adjacent to the proposed site. In fact stretches of hedgerow have already been removed to create access which may have breached the law protecting hedgerows. The missing hedgerow is evident from Google Maps satellite imagery. In the application, there was no 'trees and development' supplementary documentation submitted as required. With the hedgerows, rough grass and trees this is classic owl territory which has now been covered in hardcore because the right surveys and planning permissions were not sought. This is also more generally likely to have had an impact on other rare farmland birds. The recent practice in this locality of proceeding with works, damaging the environment and then seeking retrospective planning permission will have damaged a number of fields and made it almost impossible to establish the level of environmental damage being done.

3. Biodiversity. Question 13 does not seem to have considered that the proposed site is within a few metres of two areas of deciduous woodland which are on the Priority Habitat Inventory (as per the Magic map). This should require further investigation as to potential impact.

4. Wastewater disposal (Tricel Novo) - the application doesn't state the model of wastewater plant to be installed. The effluent discharge from such plant is safe only if the size of plant is sufficient for the number of users. With 4 static caravans and 2 touring vans this could comfortably reach 20 people which will require one of the large models in the Tricel Novo range and will be significantly larger and more expensive than the entry models. It is therefore critical that this is established. 5. With the number of properties in this area now all using treatment plants, it is likely that the combined effluent could be impacting Wash Beck where its discharged. This combined impact would warrant further expert review as Wash Beck is a small shallow stream and would quickly suffer detrimental impact should the combined impact of effluent from numerous properties and residents not be appropriately

managed. If the community used a single treatment plant it is likely it would require a permit from the environment agency. The number of dwellings on this site is 6 and is part of a close community of other dwellings so the total number probably meets the requirement to connect to the mains sewage should it be available nearby and with a new development of homes less than 100m west of the boundary, but this does not appear to have been considered.

6. Answer to section 12 appears incorrect - the site is close to Wash beck. There appears to be no report to evaluate the impact of this.

The land in question has a court injunction on it and therefore any application should not have been accepted for consideration in the first place. Vehicles are banned on bridleways and there is already too much traffic using the bridleway. As part of the planning application is retrospective many changes have already been made to this site without consent. If this planning application is allowed what is to stop further alterations taking place, without planning permission, by the same people. Should this planning application go ahead it sends wrong messages encouraging people to break the law by using land as and when they feel like it.

There is a court injunction on the proposed planning area which states the land is to be restored to its original state an agricultural field. The land has not been restored to its original state. This application ignores this legal directive. You as planners have a duty to maintain the legal directive and refuse this application.

This application is for 4no. mobile homes and 2no. caravan pitches plus other utility blocks in other words a caravan park. This application cannot be for a personal need but for a profit making activity. You would be failing in your duty as planners if you allow this application.

Access to this proposed development will be off Broomfallen Road along the Bridleway (138037) for an approx. distance of 640 metres. The first 90 metres from Broomfallen Road has legal right of access (for motor vehicles) due to the existing property (The Cattery) being built and occupied before the access was designated a Bridleway (in the 1970s). There are currently 11 separate gypsy developments already in occupation. Each generates numerous vehicle journeys along this Bridleway. The definition of a bridleway, which this one is, does not allow the use of motorised vehicles i.e. motorbikes, cars, vans, wagons, etc. are not permitted to travel on a bridleway. Cumbria Highways appears silent on this application and has a duty to not approve this application.

Access to the proposed development is a material consideration. As mentioned above, access to the development from the public highway (Broomfallen Road) is via a Bridleway which, to repeat, is by definition does not permit motorised vehicles. This application cannot rely on earlier planning applications for the Washbeck area. There is no information in the planning application to address access to the site and is therefore an invalid application.

As stated above, the access to the proposed development is by Bridleway 138037 and a bridleway should only be used by walkers, cyclists and horses. Beyond The Cattery, there are 3 sharp and blind bends along the route. Therefore with the increased vehicle usage that this commercial development will generate, the safety of walkers, cyclists and horses will be substantially diminished.

The area of this application has had many hundreds of tonnes of road planings delivered, tipped and spread on the subsoil or mixed in with the tipped hardcore. These road planings are a waste product and if they contain tar, which is likely, then the material is hazardous and a contaminant. Being a waste product, there is a requirement for a licence for both transfer and deposition as well as planning permission before placing this material. By placing the road planings in this area, it will now be a waste site and should be licenced by the Environment Agency. By allowing (retrospective) planning for this site, you will be failing in your duty in reinstating/preserving the original state of the land.

I am very concerned over this application. My understanding is that it will double the size of the encampment and cannot in any way be considered as the home of a family. I think the original encampment was only allowed under appeal. The track to the site is a bridle way so should not be used by vehicular traffic at all. It is meant for horses and people not cars or lorries. How is the site rubbish dealt with? And sewage? I also feel that if someone wished to build a housing development of 10-12 houses here this would not be allowed so why is the travelling community any different? I also object as it is outside the local plan for Scotby.

The proposed land has been subject to previous planning applications and is currently subject to an injunction for the land to be returned to agricultural use. It baffles me that the planning department are even considering a further application which this injunction is being flagrantly ignored. Surely the injunction should be enforced before any further consideration.

The site does not have vehicular access and is currently being reached using a public bridleway. The bridleway is unsuitable for the level and size of traffic currently using it again in breach of the current injunction. Regular deliveries of building materials are being delivered using the bridleway. I am unaware of any plans to upgrade the bridleway to a road in support of this planning application.

Please reject this application and ensure the previously enacted injunction.

I object because the travellers that are already there have stolen land, threatened the farmer (land owner) with violence, stealing from the village shop, fly-tipping on the bridleway, out of control dogs biting pedestrians and other pedestrians being told they're not allowed to use the bridleway. More travellers would mean more problems. More travellers means more motorists speeding over the 30mph limit on Broomfallen Road. Crushing agricultural land, building accommodation blocks and then applying for retrospective planning is not how law abiding citizens go about making planning applications. Why is yet another camp needed? Hadrian's camp is virtually empty now, there's plenty of space up there for them.

I object to this planning application. There will be an increase of traffic traveling the Bridleway. Bridleway laws should be applied for the traffic that travels the Bridleway. It is a Bridleway and not an access road. How can a planning application be submitted when there has been a court injunction on the land which stated it must be restored to agriculture land which it has not. The application for that number of static homes and toilet block is turning the site into a caravan park, and if granted more applications for planning will follow. The site has been contaminated by the tipping of road planings (tar)

Increased traffic on the public footpath/bridleway 138037 from Broomfallen Road to Garlands footbridge. Motor vehicles are legally banned from Bridleways. Fear of walking or cycling on the Bridleway because of more and more vehicles using it, intimidation by travellers and being bitten by dogs. Rubbish being dumped.

- 1) Static homes and caravans are already in situ on the bridleway and have been built/parked there without permission or planning.
- 2) Due to the amount of static homes and caravans already on the bridleway, it has now increased fear of walking or cycling on the bridleway due to intimidation from the amount of people and animals around this area.
- 3) Dogs have been running free in/out of the gates leading to the static homes and caravans and chased my child's bike causing anxiety and stress to him and making this route difficult to use due to this.
- 4) Dogs mentioned in point 3 have bitten a work colleague when she has been walking the bridleway on an evening. She was alone with no other animal herself and therefore is now scared to walk along this route following the unprovoked attack.
- 5) Disruption has already been caused by the bridleway been closed for a significant amount of time this year. This was due to illegal development work following the first build of static homes and caravans causing the bridleway to be unsafe to use. This work should never have been allowed and has a court injunction on it.

I would like to object on the grounds firstly the traffic on Broomfallen Road as it is difficult to get onto and has got worse since the new estate was built and will be even worse if this planning goes ahead, secondly it is now impossible to walk on the Bridleway if it is not children shouting and saying you have no right to be there or the dogs let out to frighten you.

I wish to make an objection to the recent application plan for an additional 4 pitches. Based on the traffic being used by the applicants on what is a bridleway.

Our understanding is that this land has a court order to reinstate back to agricultural land (following legal injunction against the applicant). We believe that, as any court order, this should be enforced. If the current application is granted, it will retrospectively approve some of the changes that have already occurred. It will also strongly indicate that this is an acceptable way to proceed for the future i.e. may encourage even further developments on / around this site. Our understanding is that the only one access to this area is

via a Public Bridleway which by definition should be only used by walkers, horses and cyclists. It is already being heavily used by a large number of vehicles. This planning application would imply even more traffic and this will be at the risk of the walkers and other users.

Have the implications of this development on the existing hedgerow, environment and biodiversity been considered? What will be impact on Wash Beck of the sewage treatment possible discharge?

It seems the work may already have been done in advance of this planning application. It is of great concern that this site is clearly not been monitored by the Council and is out of control. Objection on the following grounds: - Development of land which already has a court injunction stating the land should be restored to its original state - which is agricultural land. - There is increased vehicular traffic on a public bridleway. By definition a bridleway is not for primary use by vehicular traffic. It is noted that the bridleway has now been fully tarmacked from its access/egress point from Broomfallen Road, clearly to allow vehicular access/egress including fully laden heavy goods vehicles. This in turn presents safety issues to horse riders, walkers and cyclists trying to use the bridleway for its intended purpose. There is an increased risk of collision between bridleway users and vehicular traffic due to the narrow width of the bridleway and blind bends. - Static caravans are being transported on articulated low loader vehicles on the bridleway and becoming stuck due to the bridleway having sharp bends, being narrow and trees lining it. This has resulted in blocking the bridleway temporarily restricting horse riders passing through. Oak tree branches have been cut to facilitate the passage of the vehicle. - There is increased litter on the bridleway being thrown from vehicles

The size the gypsy site is now growing to and the fact that the current dwellers are blocking roads and letting their dogs run loose is causing intimidation and spoiling an enjoyable walk. I no longer feel safe walking by and the dogs cause fear.

I have been retired for some years now and live alone. As it is the number of cold callers in our road has increased significantly and I find this very daunting.

I used to enjoy the walk leading to Garlands footbridge but as it is I am unnerved walking as far as that so what would it be like if this application was approved with more Gypsies/Travellers and dogs to contend with.

I notice from aerial photos that the site has already expanded. Where did the planning permission come from for this extension? Is the Planning Office policing this? The Gypsy Traveller community should not be a law unto themselves.

This is a much loved footpath and Bridleway; it was built to take farm traffic. It was a shame the council allowed the path to be surfaced with tarmac. (the tarmac would have been better laid on the road from Broomfallen Road to the A69!)

I feel that Carlisle Council has already let this go too far. What will the proposed development cost the council and the taxpayer? What are the benefits to our council? Gypsies/Travellers bring no benefits to the community. Indeed crime rates go up - fly tipping increases and they pester

residents to - tarmac the drive -re roof the house or try to sell you something you don't necessarily want!

And finally, there is the fact that having invested through hard work during your lifetime, the house which is finally yours has now devalued in price. If this planning proposal goes ahead, it will invite more Gypsy/Travellers to the site and Carlisle in general.

I doubt you will find a single rate payer in Scotby who will support this application.

5. Summary of Consultation Responses

Cumbria County Council - (Highways & Lead Local Flood Authority): - *Local Highway Authority response: (11/10/21)*

It is noted that as part of the planning approval 20/0548 for 4 caravans being accessed from the same unclassified road, which was granted at appeal, the planning inspector concluded that the level of use proposed would not cause unacceptable harm to the safety and recreational experience of bridle way users.

The Highways Authority have assessed the current application against the precedent determined by the Planning Inspector and have concluded that the proposed erection of 4 mobile homes, a utility block, 2 toilet blocks and 2 touring caravans would not cause unacceptable harm to bridle way users. As such, I can confirm that the Highways Authority have no objections to the proposal.

However, a PROW (bridleway) number 138037 lies adjacent to the site, the Applicant must ensure that no obstruction to the footpath occurs during, or after the completion of the site works.

Reason: To support Local Transport Plan Policy W1, W2.

Lead Local Flood Authority response:

This is a minor development which is below the Lead Local Flood Authority (LLFA) threshold for comment. As such the drainage arrangements for this development are to be scrutinised by Building Control. It should be noted that the surface water discharge rate should not be greater than the existing, and If installing a soakaway we would advise it is not positioned within 5m highway or property.

Wetheral Parish Council, Wetheral Community Centre: -

Unacceptable number of vehicle movements, as stated in the appeal decision App/E0915/W/18/3202754

The Highway Authority objected to the scheme as it would increase the track's use significantly and cause a danger to other users of the bridleway. Based on the number of dwellings in 2016 (6), the inspector felt that those schemes were at the very upper limit of what would be acceptable. With the additional applications, the pitches would increase to 11. In addition to disregarding the High Court order to reinstate the land and bridleway

St Cuthberts Without Parish Council: -

St Cuthbert Without Parish Council object strongly to the development, which is in open countryside, is unplanned, almost complete and will lead to people as well as horses living directly under the high voltage national grid power lines. The impact on the wash beck and the communities living downstream

has not be fully appraised and will need Environment Agency approval under the general binding rules. The local planning authority should resist unplanned development in open countryside as this will set a precedent which will see a free for all.

Local Environment - Environmental Protection: -

If planning consent was granted to the owner of the above site would be required to make an application to this Council under the Mobile Homes Act 2013 for the residential pitches, an initial application would attract a fee. The site would be considered a protected family site if it was owned and resided in by the same family. If the land was let out commercially or tenanted the owner would be required to comply with the updates to the Mobile Homes Act and apply to be on the Fit and Proper person register. The site would also attract an annual fee in relation to the Authority responsibility to inspect any licensed caravan site.

The site owner would be required to comply with any site conditions placed on them under the legislation under the Mobile Homes Act 2013 and the Control of Development Act 1960. The owner is required to produce documentation relating to the electrical safety and maintenance of fire safety on the site. The site owner must produce a Fire Safety Risk assessment for audit by the Local Authority, under the Regulatory Reform Fire Safety Order, as part of the site conditions.

The proposed site is located next to other smaller residential family sites, with a total of 20 plus caravans. The location of the site and the continued development is now akin to a larger development and a commercial caravan site. The access to the site which is public bridle way has been raised as a concern for other applications and still remains a concern. Caravan site owners are required to comply with the mandatory condition placed on them by the licence, the current access to the site would not allow this and puts others at risk as well should emergency services be required.

To further highlight the following should be achieved for a licence caravan site under the model standards.

3. Roads, Gateways and Overhead Cables

- (i) Roads shall be designed to provide adequate access for emergency vehicles and routes within the site for such vehicles must be kept clear of obstruction at all times.*
- (ii) New roads shall be constructed and laid of suitable bitumen macadem or concrete with a suitable compacted base.*
- (iii) All roads shall have adequate surface water/storm drainage.*
- (iv) New two way roads shall not be less than 3.7 metres wide, or if they are designed for and used by one way traffic, not less than 3 metres wide.*
- (v) One-way systems shall be clearly signposted.*
- (vi) Where existing two way roads are not 3.7 metres wide, passing places shall be provided where practical.*
- (vii) Vehicular access and all gateways to the site must be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres.*
- (viii) Roads shall be maintained in a good condition.*
- (ix) Cable overhangs must meet the statutory requirements.*

Concerns have been raised through the multi-agency HUB about the public

bridle way that runs through the sites and the number of community complaints about the perceived lack of control of any dogs from the site owners. The model standard includes a condition on cooperating with the Local Authority and Police on any matters concerning anti-social behaviour. An additional condition will be applied as part of the caravan site licence to include a condition that requires any animals to be kept in such a manner as to not disturb any occupiers of any adjoining property. This will also include persons using the public bridle way which passes through the site, to enable the use and enjoyment of the land and to prevent a public nuisance.

6. Officer's Report

Assessment

- 6.1 Section 70(2) of the Town and Country Planning Act 1990/ Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires that an application for planning permission is determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 6.2 The relevant planning policies against which the application is required to be assessed is the National Planning Policy Framework (NPPF), Planning Policy for Traveller Sites (PPTS) (which must be read in conjunction with the NPPF), National Planning Practice Guidance and the Cumbria Gypsy and Traveller Needs Assessment (GTAA) Final Report January 2022 together with Policies SP2, SP6, HO11, IP3, IP6, CC5, CM5, GI1, GI3, GI5 of the Carlisle District Local Plan 2015-2030. The proposal raises the following planning issues.

1. Whether The Principle Of Development Is Acceptable

- 6.3 Specific advice on Traveller sites is contained in PPTS which seeks, amongst other things, to create sustainable communities where Gypsies have fair access to suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure. It advises that local plans must identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets. Locally set targets are contained within Policy HO11 of the local plan which draws upon the most up to date evidence on need in the form of the GTAA.
- 6.4 Policy HO11 of the local plan requires that where there is an identified need the city council will consider the provision of Gypsy and Traveller sites and that they will be acceptable providing that they meet a number of detailed criteria.
- 6.5 Importantly Policy HO11 must be read in conjunction with Policy SP2 which sets out a settlement hierarchy as a means of securing sustainable development. This approach accords entirely with the NPPF and should therefore continue to be afforded full weight in the decision making process. Policy SP2 identifies that *"outside of the locations specified (i.e. in open countryside) development will be assessed against the need to be in the location specified"*.

- 6.6 Policy HO11 of the local plan amplifies this stance with specific regards to proposals for Traveller pitches, identifying that such proposals will be considered favourably providing they comply with a number of criteria including, at criterion 1, that *“The site is physically connected, and integrates with, an existing settlement, and does not lead to an unacceptable intrusion into open countryside”*.
- 6.7 A further 5 pitches were allowed on appeal on land to the east of the bridleway under appeal references 3127905, 3127903, 3130384 and 3127907. In addressing the principle of development in this location, in paragraph 32 the Inspector confirms that *“this is a sustainable location for a gypsy site.”* As such, the location is not considered to be unsustainable and the council has not raised this as an issue in the defence of recent planning appeals. Policy HO11 adopts, alongside making a specific allocation, a criteria based approach to assessing proposals for the provision of sites for Travellers.
- 6.8 The Cumbria wide GTAA considers the overall need throughout Cumbria and has looked at the situation in each of the districts. For the Carlisle City Council area it identifies that there is a need for additional pitches and this is explored later in this report. It does not however comment on the sustainability of any of the existing sites which is a judgement for the Local Plan and associated planning policies.
- 6.9 Beyond the requirements of the GTAA and Policy HO11, regard has also been had to the following detailed matters.

2. Detailed Matters

- 6.10 Policy HO11 of the local plan states that proposals for Gypsy and Traveller sites will be acceptable providing that they meet eight criteria. These are:
- i) the location, scale and design would allow for integration with, whilst not dominating or unacceptably harming, the closest settled community to enable the prospect of a peaceful co-existence between the site and the local community;
 - ii) the site has reasonable access to key services and facilities including schools, shops, doctors' surgeries and health care and other community facilities;
 - iii) there are opportunities to access these facilities by public transport, walking or cycling;
 - iv) adequate utilities can be provided or are already available;
 - v) the site is well planned to be contained within existing landscape features, or can be appropriately landscaped to minimise any impact on the surrounding area;
 - vi) satisfactory living conditions can be achieved on the site and there would be no unacceptable impact on the amenity of adjacent land uses including residential uses;
 - vii) any ancillary business uses that are intended to be carried out on the site will not have an unacceptable impact on the residential use of the site,

any adjacent land uses or the visual amenity of the area; and
viii) the site should have, or be able to provide, adequate access and turning space for large vehicles and caravans.

6.11 Each of these is considered in turn.

i) The Location, Scale And Design Would Allow For Integration With, Whilst Not Dominating Or Unacceptably Harming, The Closest Settled Community To Enable The Prospect Of A Peaceful Co-Existence Between The Site And The Local Community

6.12 The site is approximately 475 metres south-west from the fringe of the village of Scotby and 500 metres north-east of the Garlands estate. As such, the physical relationship of the site to the settled community is acceptable in this instance.

ii) The Site Has Reasonable Access To Key Services And Facilities Including Schools, Shops, Doctors' Surgeries And Health Care And Other Community Facilities

6.13 The site is over 1 kilometre (about $\frac{3}{4}$ mile) south-west of the centre of the village which has local facilities in the form of a shop, public house, school and church. Carlisle is only a short distance further to the east and in this instance, the accessibility of the site to local services and infrastructure is deemed acceptable.

iii) There Are Opportunities To Access These Facilities By Public Transport, Walking Or Cycling

6.14 Access to the facilities outlined in ii) can be achieved by means of walking or cycling. Once over, there was a bus service with a bus stop on Broomfallen Road but this service has been withdrawn and there is currently no replacement.

6.15 There is pedestrian access via the bridge over the M6 motorway leading to the Garlands estate from through which a bus service continues to operate. As such, the proposal is acceptable in this regard.

iv) Adequate Utilities Can Be Provided Or Are Already Available

6.16 There is no information in the application details regarding the provision of services; however, as the site has already been developed, it is assumed that adequate provision has been made on site. In any event, the site is adjacent to other developed pitches where adequate services have been provided and as such, there would be no conflict with this criterion of the policy.

v) The Site Is Well Planned To Be Contained Within Existing Landscape Features, Or Can Be Appropriately Landscaped To Minimise Any Impact On The Surrounding Area

6.17 When considering the impact of the proposal on the character and

appearance of the area, the topography of the surrounding land and the existing landscaping would be taken into account. This application is retrospective and hedgerows which contained the site were removed several months ago which prompted action by the Council. These hedgerows have not been reinstated and were a feature of the landscape along the bridleway. The larger site area subject of three applications was contained by natural hedging which had surrounded the agricultural field. This provided a natural sense of enclosure which has now been replaced by wooden fencing. Although from the Broomfallen Road direction the trees at the rear of the site have been retained which obscure views from that direction, the removal of the hedging results in the site giving a stark contrast to natural landscape features when viewed from the bridleway, Carleton/Garlands area or the M6. The height of the mobile homes and ancillary units are not screened and would have still appeared above the height of the hedging if it had been retained. The applicants have offered to install additional hedging particularly in front of post/fence boundary along the lane, however this will not satisfactorily screen the development which remains prominent in the landscape. Given the tight boundaries of the site it would require tree planting to screen the development developing a further tree line in the landscape which could be accommodated however there is insufficient space to provide a screen of sufficient scale to adequately screen the development. The proposed site is located east of a strong tree line boundary and whilst this has been reduced in height still acts as a definable landscape feature which has now been breached.

6.18 The guidance in the PPTS states that:

“Local planning authorities should strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities 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.”

6.19 Given the above consideration in the PPTS and the location of this site in a former agricultural field which extends the existing traveller pitches further into the open countryside the siting has significant impact on the landscape character. In conclusion it is considered that the impacts of the proposal on landscape character and on the views of users of the public bridleway would be considered unacceptable.

vi) Satisfactory Living Conditions Can Be Achieved On The Site And There Would Be No Unacceptable Impact On The Amenity Of Adjacent Land Uses Including Residential Uses

6.20 There are other Gypsy and Traveller pitches in the locality, most notably adjacent to the north and east. A planning application for an additional Gypsy and Traveller pitch adjacent to the west of the site currently remains undetermined. Environmental Health have commented on the application regarding the combined applications as equivalent to a larger site. The distance between pitches would satisfy a site licence however individually

they may need adjustment within the site. The site is adequately sized with appropriate amenity and parking facilities. As such the proposal is acceptable in this regard.

vii) Any Ancillary Business Uses That Are Intended To Be Carried Out On The Site Will Not Have An Unacceptable Impact On The Residential Use Of The Site, Any Adjacent Land Uses Or The Visual Amenity Of The Area

6.21 Broomfallen Road lies to the south of the centre of the village of Scotby and is characterised by linear development along the road frontage. Further south, beyond the settlement, the properties remain linear but are more sporadic in their location. There is also a farm close to the site. Whilst there are no properties immediately adjacent to the site, the living conditions of the occupiers of these properties has to be taken into account.

6.22 There is the potential that the level of use and the activities from the site could be detrimental to the occupiers of local properties and objectors have raised a number of concerns about the volume of use in the area. The use of the land would be occupied as a traveller site and any business use could be limited by condition to prevent nuisance from noise of over-intensification of use. Whilst not adjacent land users in the context of the policy, objectors consider that the number of pitches in the area has increased to such an extent that it now impacting on the village and the wider community. The traffic issues related to the use are considered separately in this report.

viii) The Site Should Have, Or Be Able To Provide, Adequate Access And Turning Space For Large Vehicles And Caravans

6.23 Cumbria County Council as the local highway authority has not raised objections with regard to this application. Their reason for not doing so is related to the longer term situation and the previous permissions which have been granted along the bridleway. A number of objectors have raised concerns about the impact that extra vehicular users of the bridleway will bring preventing those on foot/horse from using it more widely.

6.24 The highway authority response states:

"It is noted that as part of the planning approval 20/0548 for 4 caravans being accessed from the same unclassified road, which was granted at appeal, the planning inspector concluded that the level of use proposed would not cause unacceptable harm to the safety and recreational experience of bridle way users.

The Highways Authority have assessed the current application against the precedent determined by the Planning Inspector and have concluded that the proposed erection of 4 mobile homes, a utility block, 2 toilet blocks and 2 touring caravans would not cause unacceptable harm to bridle way users."

6.25 The local highway authority make reference to the cumulative impact which, in their opinion, has occurred on the bridleway. In 2012, an application was submitted for planning permission for a single Gypsy and Traveller pitch. The application was refused and one of the reasons being that of the impact on

the public right of way. As a single Gypsy pitch, the Inspector saw no conflict.

- 6.26 In 2014, four planning applications were submitted to the council for the formation of five pitches for Gypsies and Travellers. These applications were refused on the lack of need and the impact on highway issues, including the use of the bridleway. The appeal was allowed and in his paragraph 23 of his decision letter, the Inspector states:

“Perhaps more importantly the number of dwellings, or in this case gypsy pitches, served by the track and which would involve negotiating the section around the S-bend would be six. The appellants argue that gypsy sites are often on unmade tracks but it is the interests of bridleway users not those of the appellants that are the concern here. However, this number does not greatly exceed the highway authority rule of thumb and once beyond the S-bend there would in practice be little pedestrian/vehicle conflict. In this instance, although at the very upper limit of what would be acceptable, I conclude that the level of use proposed would not cause significant harm to the safety and the recreational experience of bridleway users. There would therefore be no conflict with the relevant criteria in LP Policy H14 and in emerging Policy HO11 or with the provisions of NPPF paragraph 32.”

- 6.27 Following on from this decision, a further application for planning permission for a single Gypsy and Traveller pitch was submitted on land known as Oak Meadows. A similar objection was submitted by the local highway authority and to assist in the consideration of the application, the council employed an independent highway consultant. The application was ultimately refused for the following reason:

“The development increases the size of vehicles and the frequency upon which they use the public right of way to the detriment of other users. Sustained use would be likely to increase the conflict of traffic movements on the public right of way which has restricted width, resulting in additional danger and inconvenience to all users. In this context, the proposal is unacceptable and contrary to paragraph 32 of the National Planning Policy Framework, to criterion 8 of Policy HO11 (Gypsy, Traveller and Travelling Showpeople Provision) and criterion 5 of Policy SP6 (Securing Good Design) of the Carlisle District Local Plan 2015-2030.”

- 6.28 In relation to the appeal decision at Oak Meadows, the Inspector concludes in paragraph 24 that:

“Overall, the merits of the appeal scheme are finely balanced. Based on the evidence presented, the width, surface, topography, alignment and use of the bridleway, leads me to consider that the modest increase in its use would mean that the proposal is just about acceptable. As a result, the proposal would not lead to an unacceptable impact on highway safety, or severe residual cumulative impacts. Also, the recreational experience of bridleway users does not appear to have been harmed by the proposal. Nor would a small uplift in vehicular movements of the scale set out cause harm.”

- 6.29 Each application has considered the highway issues with different Inspectors

noting that the various proposals are “*at the very upper limit of what would be acceptable*” and that “*the proposal is just about acceptable*” implying that each permission seemingly being closer to the point of unacceptability.

- 6.30 The cumulative impact of the current proposal together with the total number of pitches that have been granted planning permission with access from the bridleway has grown significantly in recent months taking account of the unauthorised activity subject of current planning applications. In relation to other applications for similar usage on this agenda, the highway authority states that the bridleway (whilst permitting a degree of motorised use) is mainly meant for other usage, with their enjoyment being greatly affected by further motorised usage and any further development would have a detrimental impact on the safety of the users of the public right of way.
- 6.31 It therefore follows that, whilst not objecting to this application it is only based on the unsuccessful appeals which have resulted in the existing number of users. The history above indicates that differing planning inspectors have differing degrees of interpretation as to when the usage is likely to cause an issue. Given the level of objections based on the level of use it is clear that safe passage along the bridleway is being significantly impacted and this proposal will just compound that problem. In addition, Environmental Health who licence caravan sites have also commented that the access route to this site along the bridleway is unsatisfactory as it is a two-way route with limited passing bays or road width especially if emergency vehicles require access.
- 6.32 As the development is adjacent to a bridleway, the county council has advised that the bridleway must not be altered or obstructed before or after the development has been completed and that the developer of the site must ensure they have a private vehicular right of access to use the bridleway with vehicles. It is noted that works on this site did cause damage to the bridleway resulting in its closure for several weeks. Restoration of the bridleway has now taken place at the expense of those causing the damage.

3. Drainage

- 6.33 In accordance with the NPPF and the NPPG, the site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way. The NPPG clearly outlines the hierarchy to be investigated by the developer when considering a surface water drainage strategy which should be considered in the following order of priority:
1. into the ground (infiltration);
 2. to a surface water body;
 3. to a surface water sewer, highway drain, or another drainage system;
 4. to a combined sewer.
- 6.34 In order to protect against pollution, Policies IP6 and CC5 of the local plan seek to ensure that development proposals have adequate provision for the disposal of foul and surface water. No details of surface water drainage have been provided and the site has been covered with road planings as well as the positioning of several units. Surface water drainage should not cause

increased flows to the beck. In addition, concerns about contamination from the planings has been raised and some form of filtered attenuation may be required. In the absence of details, these matters could be dealt with through the imposition of planning conditions. Foul water disposal is being dealt with by the installation of a package treatment plant which is acceptable.

4. Biodiversity

- 6.35 The authority should consider securing measures to enhance the biodiversity of a site from the applicant, if it is minded to grant permission for an application in accordance with paragraph 180 of the NPPF. This is reflected in Section 40 of the Natural Environment and Rural Communities Act (2006) which states that every public authority must have regard to the purpose of conserving biodiversity. Local planning authorities must also have regard to the requirements of the EC Habitats Directive (92/43/EEC) when determining a planning application as prescribed by regulation 3 (4) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended), and Article 16 of the Habitats Directive before planning permission is granted.
- 6.36 Planning Authorities in exercising their planning and other functions must have regard to the requirements of the EC Habitats Directive (92/43/EEC) when determining a planning application as prescribed by regulation 3 (4) of the Conservation (Natural Habitats, cc.) Regulations 1994 (as amended). Such due regard means that Planning Authorities must determine whether the proposed development meets the requirements of Article 16 of the Habitats Directive before planning permission is granted. Article 16 of the Directive indicates that if there is reasonable likelihood of a European protected species being present then derogation may be sought when there is no satisfactory alternative and that the proposal will not harm the favourable conservation of the protected species and their habitat.
- 6.37 The council's GIS layer did identify the potential for protected species to be present on the site or within the immediate vicinity. Given that the proposal involved what was a small piece of agricultural land, it is unlikely that the proposal would affect any species identified. However to ensure that there are no longer term impacts on species using the beck a planning condition would be appropriate to ensure surface water is not contaminated. In addition, external lights are proposed and it can be seen that there are bright lights across the site, this can have an impact on nocturnal species in the area and the timing/brightness and operation of external lighting should be controlled in the interests of local wildlife.

5. Accommodation Needs

- 6.38 Paragraph 9 of the PPTS also requires that when planning for Traveller sites:

“Local planning authorities should, in producing their Local Plan:

- *identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets*

- *identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15*
- *consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)*
- *relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density*
- *protect local amenity and environment."*

6.39 The recently published GTAA covers all authorities in Cumbria and provides and in paragraph 1.2 describes its purpose:

"The GTAA provides a credible evidence base which can be used toward the preparation and implementation of Local Plan policies and provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the 15 year period up to 2035, as required by the PPTS, and 2040 to meet Local Plan Periods. The outcomes of this study supersede the need figures of any previous Gypsy, Traveller and Travelling Showpeople accommodation needs assessment completed in the study area."

6.40 In summary, page 64 of the report concludes the need for 33 pitches in Carlisle up to 2040 (with a possible further 6 depending on whether they satisfy the planning definition). The report sets out a number of approaches, bearing in mind that the total need is up to 2040 but that there is also some immediate need within the next 5 years. The approaches suggested in the report include additional touring caravans on existing sites; sites occupied by larger extended family groups; or, vacant pitches on larger commercial sites. Paragraph 9.48 recommends that need is met through new pitch allocations and intensification or expansion of existing sites. It also recommends that consideration could also be given to granting planning permission for unauthorised sites.

6.41 In order to deal with the identified need, the report recommends a Pitch Delivery Assessment is undertaken to determine what proportion of the identified need can be met through intensification, reconfiguration of changes to planning conditions on existing sites. This work is currently underway.

6.42 This application is not supported by a specific justification of need and no supporting evidence has been provided that the applicants comply with the planning definition in the PPTS although discussions with the applicants would suggest that they do comply and are part of the currently unmet need which is being met by their unauthorised site. They are therefore likely to meet the need requirements identified in the GTAA.

6. Other Matters

6.43 Reference is made in some of representations that the land is subject to a court injunction. An injunction was put in place on this site as works had

commenced without permission being in place. Work halted for some time and damage to the adjacent bridleway was repaired however the applicant moved onto the site despite the injunction. Having taken further advice, the injunction remains in place and it is necessary to determine the planning application before any further action is considered.

- 6.44 A number of objectors to this application have referred to matters of anti-social behaviour. To a great extent this is outside the remit of planning and through the hub other agencies including the police have been involved in incidents in the area. Whilst the fear of crime can be a planning consideration it is difficult to determine that the use of this site would specifically worsen the current situation and people's enjoyment of the bridleway although the cumulative impact of more people using the bridleway appears to be having a negative effect on long term users of the path.

Conclusion

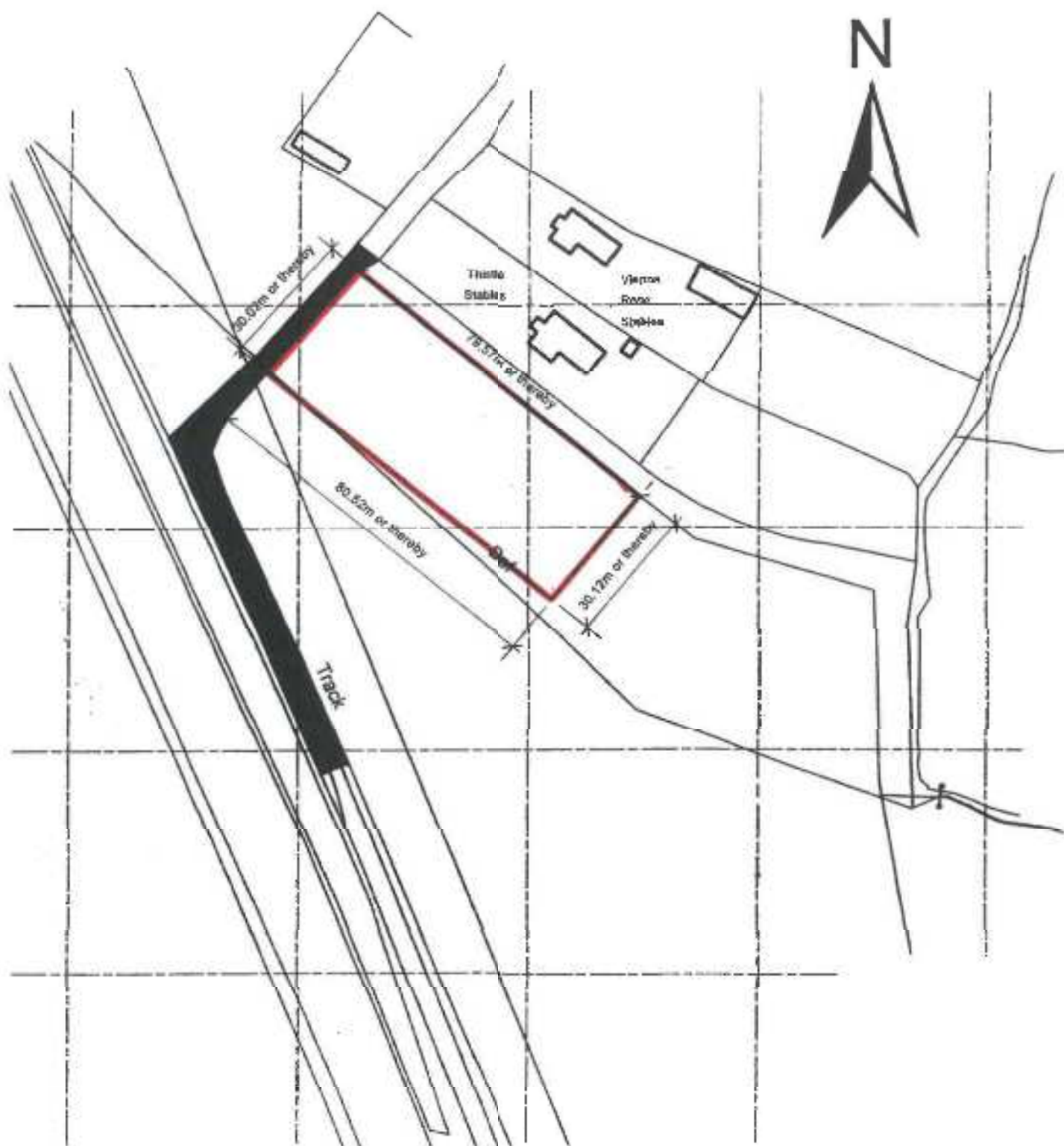
- 6.45 In overall terms, whilst it is noted that the adjacent site and land within the locality have been developed to provide pitches for accommodation by Gypsies and Travellers, there is still a further need identified in the most recent and up-date GTAA for more pitches up until 2040. As such, the principle of development would be acceptable subject to compliance with the relevant policy criteria.
- 6.46 In the case that the principle is acceptable, development both individually and in concert with development and proposals on the adjacent land, the character and appearance of the area particularly when viewed from the public right of way is significantly altered sufficiently to warrant refusal of the application on this matter.
- 6.47 The number and size of vehicles has increased along the public right of way over the last seven years. The issue of the continued use of the bridleway has been considered by Planning Inspectors in recent planning appeal decisions, and has been found to be acceptable, albeit with caveats about the 'upper limit' of the capacity of the bridleway being reached. Additional vehicles from these pitches is likely to be significant and therefore given the frequency or size of vehicles driving along the bridleway, the development would be detrimental and potentially affect the safety of other users.
- 6.48 As such, the proposal fails to accord with the objectives of the NPPF, PPG and relevant local plan policies.

7. Planning History

- 7.1 There are no previous planning applications on this land
- 7.2 Enforcement proceedings commenced against the change of use of the land and an injunction remains in place preventing occupation of the land without the correct planning permissions in place.

8. Recommendation: Refuse Permission

- 1. Reason:** The development increases the number of vehicles and the frequency upon which they use the public right of way to the detriment of other users. Sustained use would be likely to increase the conflict of traffic movements on the public right of way which has restricted width, resulting in additional danger and inconvenience to all users. In this context, the proposal is unacceptable and contrary to criterion 8 of Policy HO11 (Gypsy, Traveller and Travelling Showpeople Provision) and criterion 5 of Policy SP6 (Securing Good Design) of the Carlisle District Local Plan 2015-2030.
 - 2. Reason:** Planning policies require good design in any development proposals particularly ensuring that development integrates well into the surroundings. The development has removed elements of local landscape character without adequate mitigation or integration of existing features which is contrary to criteria 2, 8 and 9 of Policy SP6 (Securing Good Design) and Policy G16 (Trees and Hedgerows).
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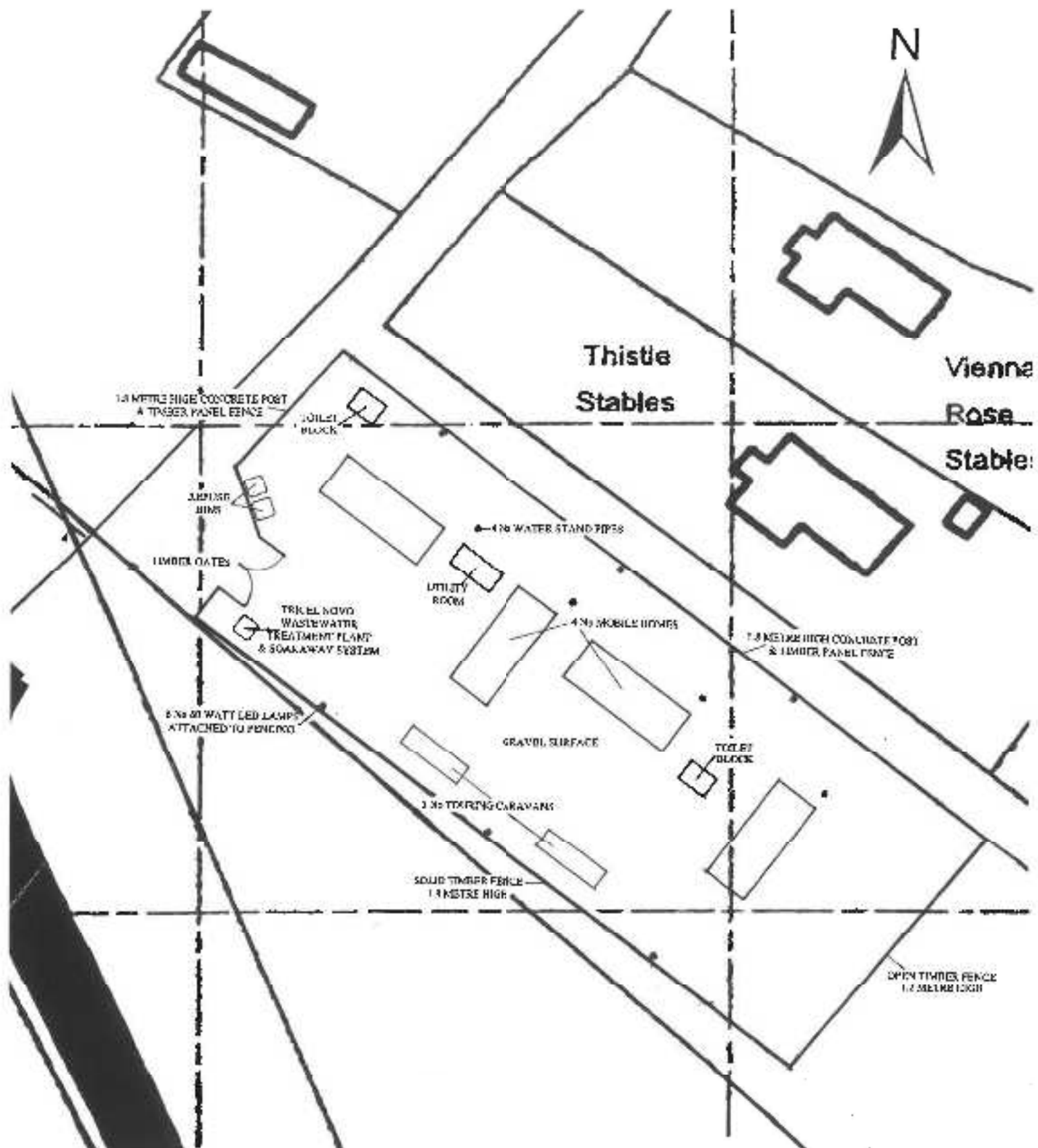
PROPOSED RESIDENTIAL CARAVAN SITE

MANNORY - BROOMFALLEN ROAD - SCOTBY - CARLISLE

LOCATION PLAN

DRG. NO. 3298/1

SCALE : 1-1250



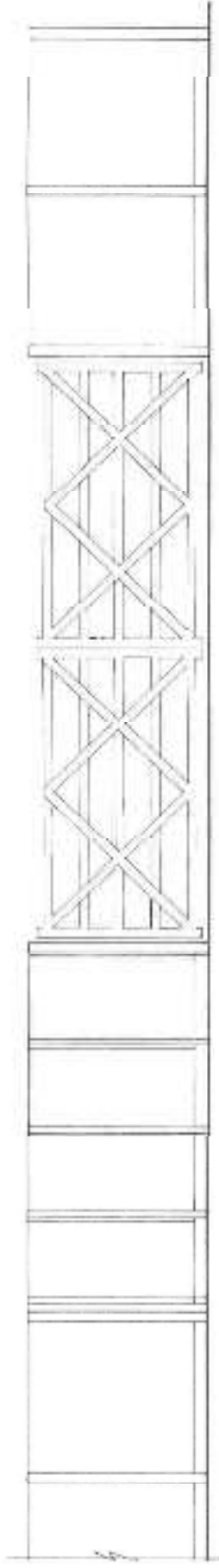
PROPOSED RESIDENTIAL CARAVAN SITE

MANNORY - BROOMFALLEN ROAD - SCOTBY - CARLISLE

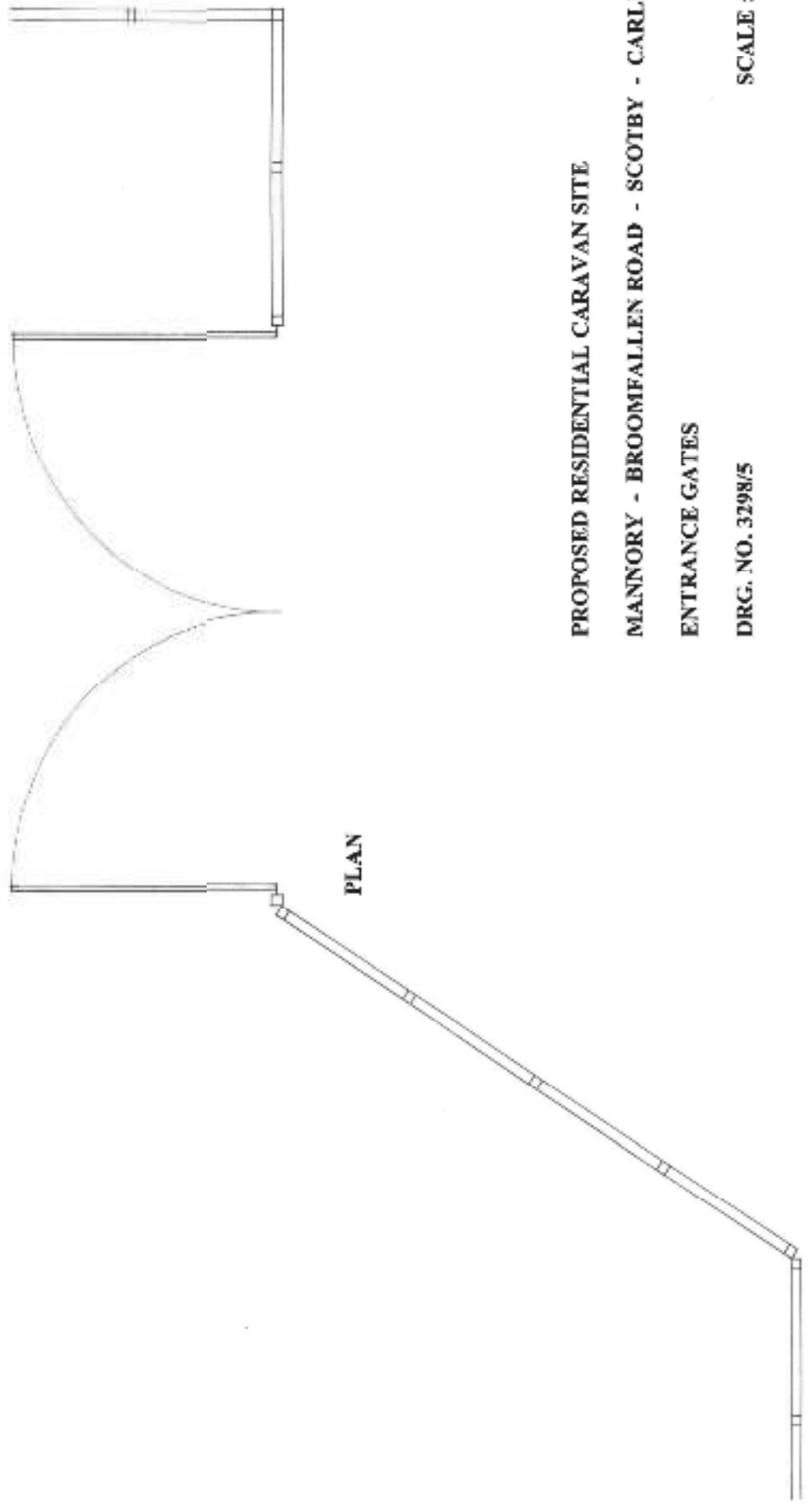
BLOCK PLAN

DRG. NO. 3298/2

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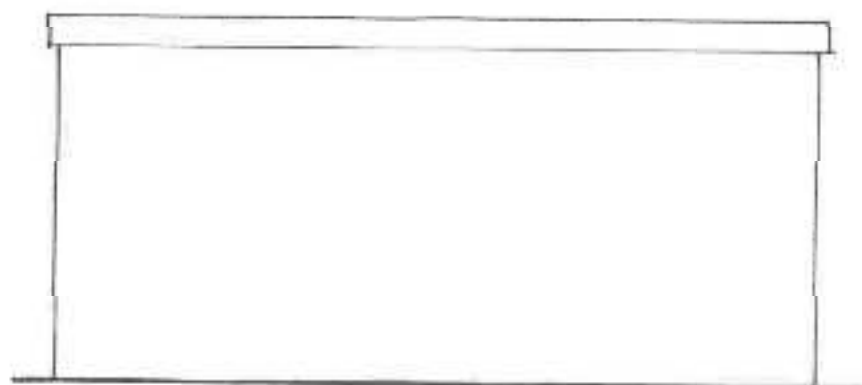


ELEVATION

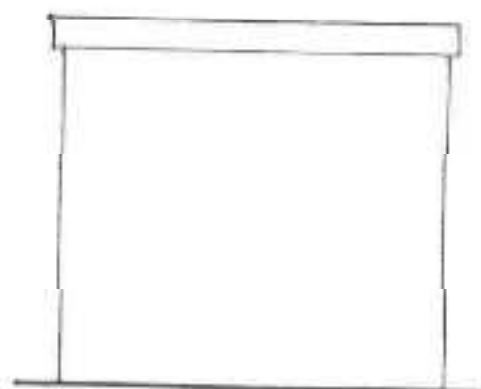


PLAN

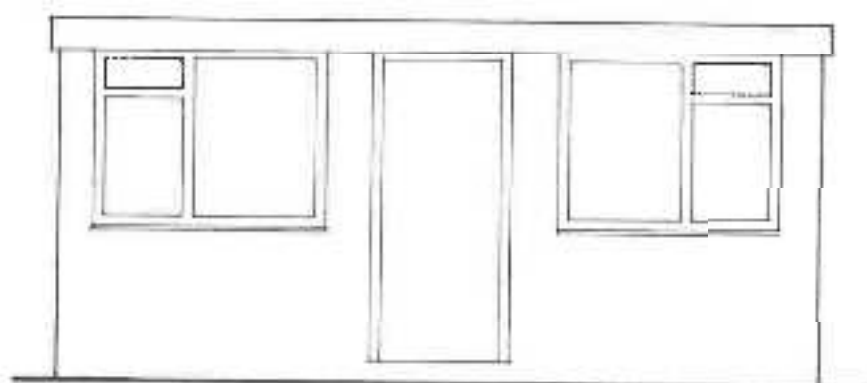
PROPOSED RESIDENTIAL CARAVAN SITE
MANNORY - BROOMFALLEN ROAD - SCOTBY - CARLISLE
ENTRANCE GATES
DRG. NO. 3298/5
SCALE : 1-50



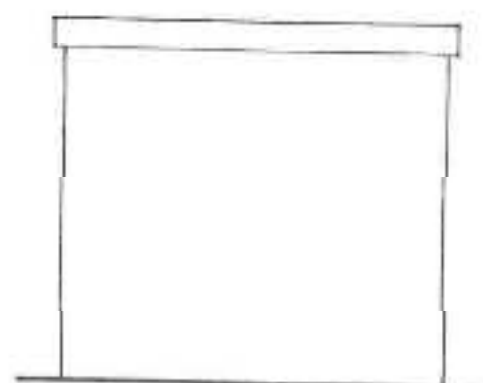
REAR ELEVATION



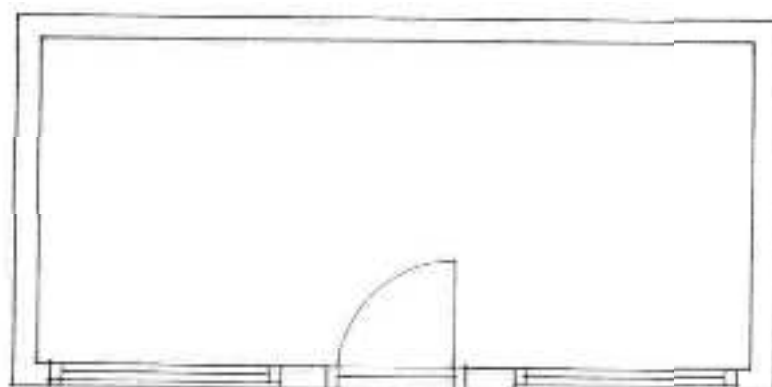
SIDE ELEVATION



FRONT ELEVATION



SIDE ELEVATION



FLOOR PLAN

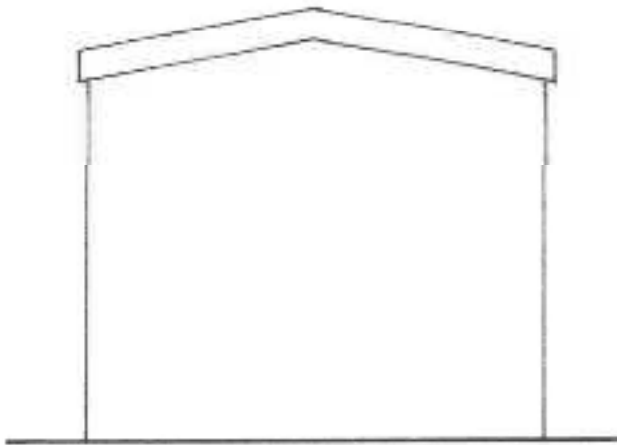
PROPOSED RESIDENTIAL CARAVAN SITE

MANNORY - BROOMFALLEN ROAD - SCOTBY - CARLISLE

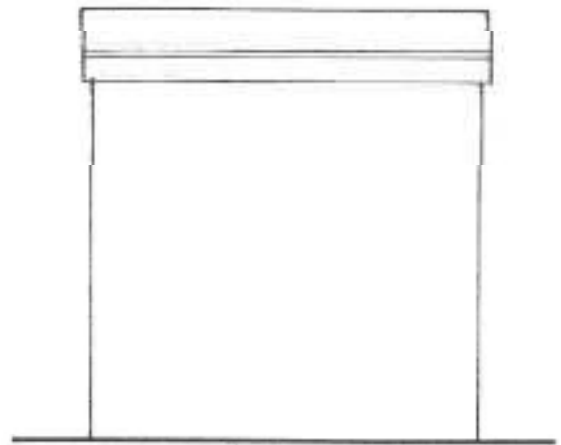
UTILITY ROOM

DRG. NO. 3298/3

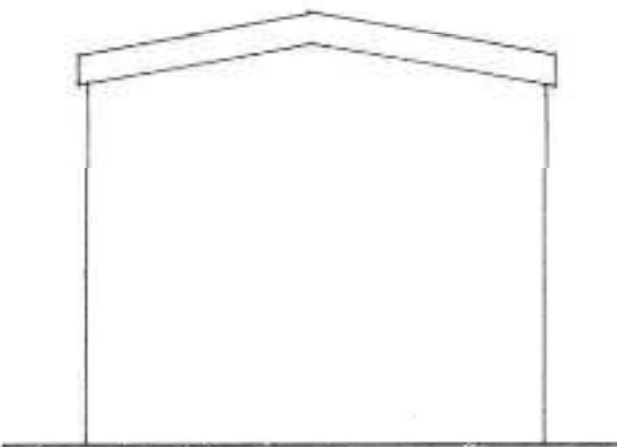
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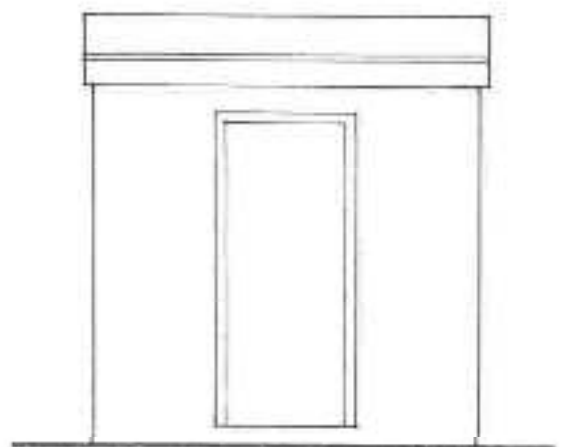
SIDE ELEVATION



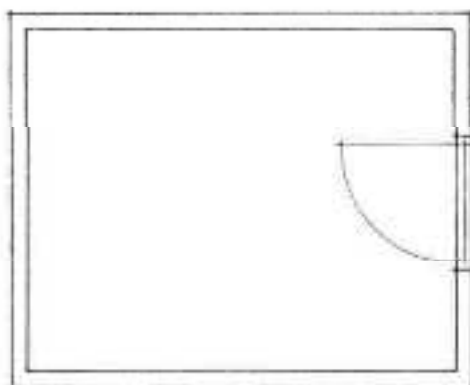
REAR ELEVATION



SIDE ELEVATION



FRONT ELEVATION



FLOOR PLAN

PROPOSED RESIDENTIAL CARAVAN SITE

MANNORY - BROOMFALLEN ROAD - SCOTBY - CARLISLE

TOILET BLOCKS

DRG. NO. 3298/4

SCALE : 1-50