

Mr G Johnston
Blackpool Council
Planning Division
PO Box 17
Corporation Street
Blackpool
FY1 1LZ

18 November 2014

Dear Mr Johnston,

**RE: APPLICATION No. 14/0721
LAND ADJ. 39 SCHOOL ROAD, BLACKPOOL.**

I refer to your letter dated 07 November 2014 concerning the above-mentioned planning application.

The applicant has been known to me for many years, and I have assisted him in trying to locate a settled base for his family. Mr Jenkins and his brother carry out tree surgery/gardening work mainly in the Preston/Blackpool/Lytham areas, and also trade in horses: travelling to horse fairs at Appleby and Stow-on-the-Wold, amongst others. The applicant currently grazes horses on rented land in Fylde. In my opinion, the site occupants are Romany Gypsies falling within the definition contained in Annex A of *Planning policy for traveller sites*.

The site is intended as a settled base, whereby occupants may be present throughout the year. Mr Jenkins would travel away for 3-4 months each year, but this will vary according to how much work he can find locally.

The applicant has uncles, aunts and cousins on pitches at Bambers Lane, and he and his brother have stopped on their cousin's site in Bambers Lane from time to time. Their cousin, John Ireland is the registered owner of the application site until the land is transferred to Mr Jenkins: hence submission of Certificate B.

Two amenity buildings are proposed: one for the applicant, and one for his brother. The applicant will have a static caravan/mobile home and tourer; his mother will have separate bedroom accommodation in a further tourer; and his brother would have two tourers.

The site will be occupied by Brian and Bernadette Jenkins, together with their 5 children: Elora (born 20.04.02); Peter (b. 15.05.03); Brian (b. 26.03.06); Bernard (b. 10.03.08); and Noah (b. 19.11.11). Brian will be looking after his mother, Elizabeth Jenkins. In addition Mark and Emma Jenkins will be living on the site with their children: Mercedes (13 years old); Mary (11); Demarco (10); Emma (5); and Angel (3). Of these children, Brian attends St Nicholas School, and Elora and Peter are home tutored.

Traffic movements associated with gypsy pitches are little different from any other residential property: 8-10 vehicle movements per day, per pitch. No business activity would take place on site, other than for over-night parking of work vehicles: one per family. These vehicles would be no larger than a transit van. I have indicated on the attached plan how such vehicles could enter and leave the site in a forward gear. Normally, planning conditions are imposed on gypsy sites to prevent commercial activity, including the external storage of materials, and to limit the size of vehicles to no greater than 3.5 tonnes.

The static caravan would be 10m x 4m. Tourers are typically no larger than 7m x 2.4m.

The circles shown on the site layout plan are intended to show the maximum canopy spread of existing trees situated along the northern boundary.

I am informed by the applicant that the site is well drained, but that there is a main drain into which he could direct surface water run-off. Notwithstanding this, surface water run-off could be attenuated by the provision of 210 litre water butts for the mobile homes and amenity buildings, fed by a diverter in line with the rainwater downspout. They would reduce the rate of surface water run-off, whilst also providing a source of non-potable water for use by the site occupants, i.e. for watering plants and washing vehicles.

The disposal of domestic waste would be the same as for any other residential property and, if required, bin storage could be provided adjacent to the amenity buildings, where they would be screened from public view.

There is no intention to raise the level of the land.

As far as your queries concerning draft policies CS16 and CS26 are concerned, these are only draft policies; they have not been submitted for examination, and they have not therefore been subject to scrutiny. Very little weight can be attributed to these policies. On the other hand, substantial weight can be given to the Fylde Coast Authorities GTAA, published in September 2014, which estimates that there is an immediate unmet need for an additional 42 pitches across the sub-region, and that household growth during the period 2014-2031 will result in a need for the provision of a further 39 residential pitches. Much of this need derives from Blackpool.

I do not understand quite how the Council believes that it can meet the identified need for sites without using land within Marton Moss.

Notwithstanding this, development of the application site would not affect the qualities of Marton Moss which Policy CS26 is intended to protect.

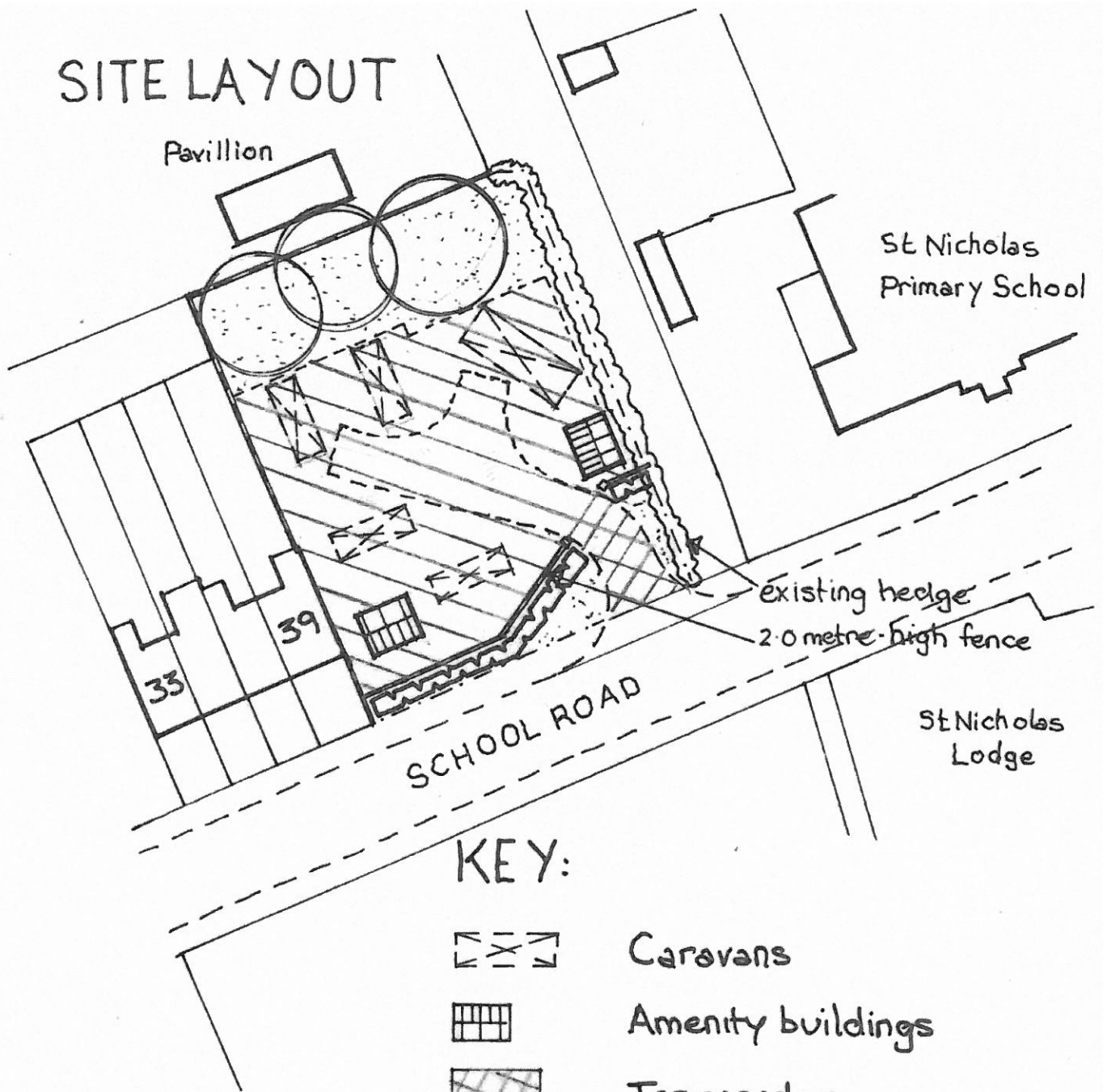
As far as the criteria set out in Policy CS16 are concerned, criteria a-e would clearly be satisfied by this small site set within a primarily residential area, on the edge of Blackpool. I have already addressed highway safety in the Design and Access Statement, and shown on the attached plan how vehicles can enter and leave in a forward gear (criterion f). The development is for a family site which, unlike a public site (to which the Government's Design Guidance is directed), does not need landscaping between pitches. Caravans are single storey structures, and the existing boundary fencing provides privacy, and freedom from over-looking for the site occupants and neighbours. If required, sufficient space exists for the planting of a hedgerow along the western boundary (criterion g). Lastly, the proposals already include the planting of a hedgerow along the site frontage, and provision of communal amenity space at the rear of the site (criterion h). In my opinion, the proposed development would satisfy the requirements of Policy CS16, even if it were part of the development plan.

I trust that the information set out in this letter will be of assistance to you, and look forward to receiving the Council's decision in due course.

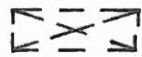
Yours sincerely,

PHILIP BROWN BA (HONS) MRTPI

SITE LAYOUT



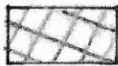
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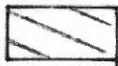
Caravans



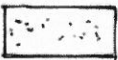
Amenity buildings



Tarmacadam



Road planings



Grass



Proposed hedgerow

SCALE 1:500

