



## **Final Comments**

*On behalf of*

### **Winchester City Council**

("the Council")

Land at Carousel Park, Basingstoke Road, Micheldever, Winchester, Hampshire, SO21  
3BW

#### **EN1 (a, b, d, e, f, g).**

APP/L1765/C/22/3296767; 3296771; 3296773; 3296776; 3296778; 3296781; 3296783

Appeal by: Mr Freddie Loveridge, Mr Anthony O'Donnell, Mr Patrick Flynn, Mr Hughie Stokes,  
Mr Danny Carter, Mr Patrick Stokes, Mr Oliver Crumlish.

#### **EN2 (a, b, c, d, e, f, g).**

APP/L1765/C/22/3296768; 3296772; 3296774; 3296777; 3296779; 3296782; 3296784

Appeal by: Mr Freddie Loveridge, Mr Anthony O'Donnell, Mr Patrick Flynn, Mr Hughie Stokes,  
Mr Danny Carter, Mr Patrick Stokes, Mr Oliver Crumlish.

#### **EN4 (a, c, f, g).**

APP/L1765/C/22/3296503; 3296504

Appeal by: Mr Patrick Stokes, Mr Bernie Stokes.

## **INTRODUCTION**

1. These comments are not intending to respond exhaustively to the Appellants' Statements of Case. The Council maintains its position as set out in its Statement of Case and will present evidence pursuant to that Statement in due course. The Council makes the following comments at this stage:

### **EN1 / EN2**

2. The appellants allude to breaches of planning control, but are not specific about when or how such events occurred. They have not responded to PCNs and it is unreasonable that they should keep the Council and the Inspector guessing as to what their case might be.
3. In response to the appellants numbered paragraphs found within Green Planning Studio Ltd 09\_313A Statement of Case July 2022:

41/112. The nearest settlement is approximately 3 miles away, and there are no public services or footway access to the appeal site. Occupants would be dependent on private motor transport.

81. It is not clear which permitted development rights the Appellants are referring to but permitted development rights do not apply to unlawful uses in any event (Article 3(5) The Town and Country Planning (General Permitted Development) (England) Order 2015).

90. Limiting the occupation of the appeal site is necessary, relevant to planning and the development to be permitted, enforceable, and reasonable. Limiting occupation protects the standard of accommodation provided to current and future occupiers, the character and appearance of the area, and services.

### **EN4**

4. In response to the appellants numbered paragraphs found within WSPA Statement of Case July 2022:

Ground a)

- 5.1 The planning permission is for the change of use of agricultural land to a travelling showpeoples' site.

Ground f)

- 5.6 The planning permission is for the change of use of agricultural land to a travelling showpeoples' site.

Ground g)

- 5.7 The Appellants do not set out what type of accommodation the occupants require or produce evidence of any tenancy agreements that could justify an extension to the compliance period.

- 6.1 The character and appearance of the proposed development does have bearing on the Inspectors decision. The 2003 planning permission imposed conditions in part to protect the character and appearance of the area. The proposed development would harm the character and appearance of the area.

- 6.2 There is no identified need for a residential caravan site.