

Q10 – the field has been used as a parking/loading area since before 2006. At that time the owners, for operational reasons, decided to use the whole of the eastern field to accommodate HGVs and for the loading and unloading of the HGVs.

However, the HGVs often became stuck in mud and it was clear that some form of stability needed to be provided. In 2006 it was decided that the northern portion of the site, where HGVs were typically parked, should be covered in grasscrete, with a sub-base, whereas the matting was laid on the remainder of the field.

The matting was laid at the same time and by the same contractor, GM Technical Services, as the grasscrete was laid in the northern portion of the site. In the attached statutory declaration from Tony Heathfield of GM Technical Services (submitted with the recent appeal) confirmation was provided that the grasscrete works were carried out in 2006 in response to the problem of HGV's sinking on site. The matting was installed at the same time and in response to same issue – namely to prevent HGV sinking in mud. The matting was laid with the assistance of a number of contractors.

Access to the field was not from the current access in the north-west corner of the site but from an access (now closed) approximately half-way along the site boundary.

Not least due to the fact that the grasscrete provides a more durable surface HGV vehicles were typically located in this area (i.e. in the northern portion of the field) and, when required, HGVs have been parked in the to the immediate south of this area.

Whilst the matting is durable it is subject to wear and tear by HGVs, particularly where manoeuvring is required. As such it is necessary to undertake maintenance works on a sporadic basis. However, such maintenance is undertaken only in the areas of wear and tear – typically to the immediate south of the grasscrete area. There are therefore various types of matting throughout the site. The reason for the variety of matting types is due to the fact that matting evolves over time – the latest, or available, version is selected which may be provided by different manufacturers.

At a site visit on the 12th August 2024 three distinct matting types were identified.

1. Interlocking tiles located to the immediate south of the grasscrete area



2. Matting laid some years ago on site – proved not to be durable by reason of the impact of the manoeuvring of HGVs and located in the north-west corner of the field (to the south of the grasscrete area)



3. Interlocking tiles (of distinctly different size and type to those shown in 1 above), located to in the western portion of the field by the former access. These tiles were laid in 2006 and have not been replaced.



The presence of a variety of matting on site demonstrates that the original matting has been in-situ for a considerable period of time and underlines the owners' contention that it was installed in 2006. This can be backed up by statutory declarations by the owners, the installers, to include contractors and third parties.

Reference is also drawn to a letter of comment submitted by the occupants of Mallow Cottage, to the immediate south of the site – which acknowledges that CCW Services expanded into the *strategic gap land and became considerably more intrusive since 2008*.

This third party comment is consistent with the laying of the matting in 2006 and use of the eastern field for the parking loading and unloading of HGVs.

Reference is also drawn to aerial photographs of the site that clearly show the use of the site by HGVs.

The following image has been independently provided by Getmapping and the image is dated May 2005 – i.e. before the laying of the matting.



The vehicular access to the field was formerly provided (until 2020) via the existing car parking area and included two access points. This image shows the trail created by the HGVs from the access and on the grass.

The following Getmapping image shows a similar image dated 4th June 2013.



These images show the trail created by the HGVs on the grass and clearly shows the two access points.

These images show that the field was used by HGVs, not least to access the northern portion of the site, in 2013. The matting has been provided to facilitate the use of the field and the image supports the owners contention that the matting was laid in 2006.

The following Getmapping image shows a similar image dated 21st June 2017 which is relevant in that the turning circles for the HGVs are clearly visible in addition to the access. A number of HGVs are clearly visible. It should be acknowledged that these images represent a snapshot in time and whilst a number of HGVs are clearly visible in 2017 image whereas none are apparent in the 2013 image can be explained by reason of the fact that HGVs are often off-site transporting goods.



Reference is also drawn to a number of photographs that are dated from August 2016 that show HGV trailers parked on the field and show the tracks in the field confirming turning circles for the HGVs, to include the following:



Attached this submission are the following:

1. Statutory declaration from Tony Heathfield of GM Technical Services in respect of the laying of the grasscrete. A revised declaration confirming that the matting was laid at the same time can be provided.
2. Letter from the owners of Mallow Cottage confirming the intensification of use of the field from 2008.
3. Getmapping aerial photographs of the site
4. Site photographs from 2016-2017.