

Further Objections to SMD/2014/0682

Further to the recent addition of 24 documents from Laver Leisure on their application SMD/2014/0682, I would like to make the following further objections in relation to their new documentation:

Consultation Response Statement **Highways**

Paragraph 1.6 states: "It is important to note that the scheme has been reviewed by the Highways Authority (Staffordshire County Council) and no objections have been raised subject to the imposition of appropriate conditions."

However, this is based on one transport assessment submitted by the applicants and is therefore not an independent assessment. A further transport assessment (Mew) has been made providing contrary evidence. In addition, the new documentation shows a significant change to the planned ingress and egress of the site, which has not been covered in this document. Therefore, Staffordshire County Council's (SCC) comments are biased and must not be taken at face value. Not to mention the fact that "no objections" does not equate to a "great idea". In fact, Laver Leisure acknowledge in paragraph 1.10 that "development hereby permitted shall not be commenced until an off-site traffic management scheme comprising, a 30mph speed limit on the A52 at the junction with C0165, Whiston Eaves Lane and a signage scheme detailing the permitted routing for all traffic accessing and leaving the Park has been submitted to and approved in writing by the Local Planning Authority", a suggestion I find difficult to see being policed. How will vehicles be limited to 30mph on such a short stretch of road? How will vehicles be made to ignore Sat Navs and follow signs? Certainly not just by putting up signs and telling them on the website. Farley Road, Oakamoor is a prime example of that, as is the recent coach visiting Alton Towers that followed it's Sat Nav down a small road in a nearby village and got stuck. How is this "negligible impact"?

Paragraph 1.7 states: "the traffic generation for 250 holiday lodges plus a 100 bed hotel on this site can be considered relatively low, and concluded that it would not lead to any notable congestion issues." Again, the Mew transport assessment directly contradicts this statement as do the local residents and even this document acknowledges there would be an impact due to the current nature of the road. How more than 110,000 vehicles a year down such a small road, with buildings abutting the road, can have such a small impact amazes me, a comment that I have made with my previous objections. This further information, to me, is just a regurgitation of previous information that has still failed to address the underlying problem.

Paragraphs 1.8 & 1.9 state: "the maximum traffic generation over a full weekday, Monday to Friday, would be 188 vehicles arriving to site and 182 vehicles departing site per day." And "The expected maximum traffic generation over a one hour period during the weekday morning and evening peak hours would be

103 arrivals and 52 departures during the morning peak hour (8am to 9am) and 52 arrivals and 103 departures during the evening peak hour (5pm to 6pm).”, making 310 arrivals and departures over a 2 hour period every day, worse at the weekends. “The proposed development would not have a material detrimental traffic impact on the A52/Whiston Eaves Lane junction”.

Considering that the local Primary School in Oakamoor starts at 9am with breakfast club at 8am, with both teachers and students commuting down from either Whiston or Moneystone, I cannot see how an additional 155 vehicles down this small lane, during that hour, would have “negligible impact” (paragraph 1.11). Another comment raised in my previous objection, but which has failed to be adequately answered in Laver Leisure’s response. I certainly would find it very difficult to access the road from my own poorly visualized drive with this number of additional vehicles. Also, what is happening to the other 6 vehicles that are arriving and not leaving (188 vs 182)? Finally, what evidence is there that there would be no “material detrimental traffic impact” on the A52/Whiston Eaves Lane junction. By suggesting a short section of 30mph on the A52, this is by definition admitting a detrimental impact on the junction. A solution I find difficult to see working, as very few vehicles will slow down to 30mph for such a short length of road, a comment also made by Mew, who suggest that it must be assumed that vehicles will travel 10mph over the suggested speed at a junction that they have concluded has unacceptable sight lines. Further to this, the whole report fails to address the rest of the road, which is little more than a tarmacked dirt track with no real underlying substrate, with buildings abutting the road preventing any widening of the road and a children’s play area and village hall only a few hundred yards from the aforementioned junction, without any kind of path. This (as I have mentioned in my previous objection) has not been adequately accounted for and is a serious safety issue, which must be addressed, particularly with the growing number of children in Whiston.

Paragraph 1.10 states: “the existing 7.5 tonne weight restriction, immediately south of the site on Eaves Lane will remain in place, meaning that coaches, busses and HGVs will not be able to turn right out of Moneystone Park.” Is this suggesting that coaches and busses will therefore be visiting the park? I assume so, especially as there is a plan for 5 coach parking places (Royal Haskoning DHV paragraph 9.7). In this case, where is the evidence that these large vehicles, visiting on a long-term basis, have been assessed in the transport plan? Are these going to be part of the 155 vehicles per hour travelling down Whiston Eaves Lane? How can these have no impact? Especially as large proportions of this lane are only wide enough for single vehicles so the traffic would have to suddenly slow down and stop in passing spaces. As for stating that “the system worked without any issues as regards HGV’s/traffic arriving or leaving the quarry” is nonsensical. Firstly, the HGV’s were regular vehicles to the quarry, so would have to follow the signage or not continue their work (unlike tourists to the proposed park); secondly, they performed the trip daily and so knew the road very well (again unlike the tourists to the proposed park) and have a completely different visual field (they are higher and further forward than cars), are generally slower and are more easily seen by other vehicles; thirdly, they certainly did not equate

to the number of visitors expected to visit the proposed park (approximately 80 vehicles a day compared with the applicants proposed 155 vehicles an hour); fourthly, they are highly trained drivers, unlike most of the visitors to the tourist facility and finally, the front of my house and porch would most certainly disagree with the “without any issues”, a comment I made to Laver Leisure when this proposal was first brought into the public domain, back in 2011. I am currently looking at £6000 in costs for damage to the soft stonework on the front of my house from the salty spray from the road, not to mention the number of times I’ve had to mend the porch when it was driven into by a tall vehicle and this was when the lorries who knew the road were driving it. Again, this goes back to my comment that the buildings abutting the road have not been taken into consideration.

Paragraph 1.12 discusses “accident statistics” and compares the proposed site with the previous quarry. Again, these are nonsensical comparisons due to the differing nature of the vehicles, not to mention the huge increase in proposed vehicle numbers compared with the quarry traffic. Despite this, the quarry had its last planning application rejected, before the cessation commenced and the traffic formed part of this objection. Accident statistics are also on the tip of the iceberg. Most accidents go completely unreported, as they are dealt with by vehicle insurance companies only or owners own pocket. Recent news about the accident at Alton Towers, suggested that there was a significant delay in getting ambulances to the victims of the Smiler ride accident, due to the overcrowded nature of the small lanes in the villages around Alton (BBC news). Safety, I feel has been largely overlooked with this application, and my request for a Major Incident plan earlier in the year has been met with deaf ears. However with a wooden complex in the middle of nowhere and already overcrowded small country lanes, this is a significant issue that must be addressed.

What about the rest of the road network that has not been commented on in this report? The amount of traffic from Alton Towers is already significant and has their peaks around similar times to this proposed development. As this new proposal is further away from the A50 (our nearest significant road), this can only add to the problems. Queues from Alton Towers to the A50 are not uncommon during peak hours. Where is this addressed in the traffic report?

And finally, where is the traffic assessment on the new proposed ingress/egress down Blakely lane for the 100 privately owned lodges? A lane that is narrower than Whiston Eaves Lane and again has buildings abutting the road on either side.

Ecology & Restoration

Paragraph 1.14 mentions a series of ecological surveys. Where is the Great Crested Newt survey suggested in Arne Swithenbank’s report on SMD/2015/0220, which is on the same site? Surely if they are in one they should be in both?

Paragraph 1.19 states: "a revised Restoration Masterplan was submitted to SCC by Laver Leisure and was approved at SCC's Planning Committee on 6 March 2014 (LPA ref. SM.96/935/122 M D4)".

This is untrue. An application was made, but the applicants failed to attend and this revised restoration plan was denied. Therefore the current edition of the restoration plan that is in existence states that the restoration time limit has now been significantly exceeded, despite agreed requests for alterations from the applicants. As it is this baseline in which all further applications are to be judged, it is about time that Laver Leisure were forced to complete the restoration plan which they submitted and SCC approved. The site itself certainly shows little in the way of visible evidence of such a restoration, which should already have been completed, even with the allowed time extensions. Please also explain what "environmental benefits, the proposed development would deliver above and beyond that proposed by the approved restoration plan" (paragraph 1.20)? I cannot see how any kind of tourist venture could be better than returning the site to its natural habitat, especially when a solar farm has already received planning permission for the same site. Paragraph 1.21 states "The proposed development will have an impact on flora and fauna within the site boundary." What are the mitigation techniques? How do we know they are not overlapping with the 0220 solar farm also on this site? And what about the effects outside the boundary? The inevitable increase in exhaust fumes in an area that already has above average CO₂ emissions? The effect on the grass verges, flora, fauna and local farms?

Solar Farm

Paragraph 1.22 states that the two proposals on the same site "are not linked". If this is the case, why are there 8 references in the original documentation of this application to the ecological and environmental benefits of the solar farm to this application? However, if this statement is true, then this application must be assessed as it is, without any prejudice from the solar farm application. This application must therefore be assessed on agricultural farmland with a number of SSI & SBI sites and rare flora & fauna, and with **no** green energy or social benefits (p.26) from the solar farm.

Oakamoor Parish Council (OPC) & Kingsley Parish Council Objections

Paragraph 3.3 attempts to respond to OPC's traffic concerns. Referring only to a highways document written by someone who obviously does not know the area, is in reality an insult on the appropriate and realistic objection. It has not responded to the specific concerns at all. The safety of drivers, cyclists, pedestrians, horse riders and horse & cart drivers is still a major concern and reason to object to this application. And I personally do not care what Paul Hurdas or Atkins have to say, they don't live here. Atkins is using city rather than countryside guidelines, which will give inappropriate advice. We, the residents, are by default the most qualified professionals on the state of the local road network, as it is us that lives with it, day in, day out. Paul Mew, an independent traffic consultant, has written a report that disagrees with Atkins and does not

think the problems with the Whiston Eaves Lane and A52 can be fixed. It is insurmountable. There is also a huge lack of acknowledgement of Black Lane (access for Whiston Golf Course & Hotel), which joins Whiston Eaves Lane only a few yards from the aforementioned junction (although they managed to place their trip recorder between the two, so although the figures are appropriate for the junction are not a realistic view of the traffic down Whiston Eaves Lane itself, especially as a further significant number drop off and pick up school children from the school bus which stops between the two junctions).

Paragraph 3.16 quotes a court case stating "a proposal does not have to accord with each and every policy within the development plan". However I would like to highlight that the Core Strategy is the overarching document compiled with significant input from many parties, including an independent inspector. This must therefore carry more weight than any of the supplementary documents which have been drafted entirely by SMDC with no independent review, possibly with pressure by the numerous discussions with large scale planning proposers (funny that the CVMP has exactly the number of lodges etc as this proposal). Therefore, whatever policy is overlooked, SS7 of the Core Strategy must not be one of them. The ethos of the Core Strategy is to protect the heritage and landscape of the Churnet Valley from inappropriate development, which this proposal is. Therefore, the policy point that should be overlooked is the inaccurate one relating to Moneystone Quarry only and not in keeping with the Core Strategy: "low impact holiday lodges in zones 1 & 2. Limited development in Zones 4 & 5. Maximum of 250 holiday lodges in total".

Paragraph 3.22 suggests "there is local support for the scheme in terms of job creation". Firstly, how can any job creation in this sort of industry benefit the area? There is only 4.1% unemployed persons within the Staffordshire Moorlands area (2013 figures). Alton Towers, a similar style of employer (large scale tourism with lodges etc) already has to bus employees in each day (seen daily going through Oakamoor). Not exactly local employment. And 125 full-time positions is not much considering the size of the proposal. Where does Laver Leisure suggest it's employees are coming from? Secondly, a protest walk last December produced over 100 supporters, ~20% of the population of Oakamoor, Moneystone & Whiston together. And this doesn't include those who were unable to join the walk for one reason or another. Whatever local support Laver Leisure may have, there is a huge opposition. I certainly conducted a door-to-door survey in 2011, which showed 53% against the proposal in concept. 82% thought the roads were unable to cope with the development, 78% thought it was too big, 76% didn't think they would get any benefit from it and 69% thought it would have an adverse impact on the beauty of the valley. I had an 80% response rate and have not been asked for a copy of the data. The survey was designed to match that of OPC, but with the residents of Whiston.

Paragraph 3.24 states "The CVMP was subject to significant public consultation and is based on a robust evidence base." This is not true. The CS was subject to public consultation and independent input from an inspector. The CVMP was pushed through on the back of the CS, without even a separate vote for the councilors. Public consultation involved being spoken to by Gavin Clarke and

being told that this was not a time for questions to be answered. Any comments then made in writing were completely ignored, unlike those obviously made by large scale businesses.

Paragraph 3.28 & 3.29 focuses on the economic benefits to the local economy. I do not know where this benefit is. Laver Leisure's estimation equates to ~£10 per person staying being spent locally (£1,000,000 spend divided by 100,000 visitors per year). Alton Towers being the nearest big attraction would seem the obvious place to spend money outside of Moneystone Quarry. Not exactly genuinely going to the local economy. Further to this, one local business that does truly bring benefit to the local economy is Crowtrees B&B, a small business already under threat from Laver Leisure. In reality, most of the money spent will be on site to Laver Leisure as it is a self-contained complex (paragraph 7.81) with no need to leave it and visit the surrounding area. Let's face it, with 100 of the 250 log cabins being privately owned, will equate to around 400 persons living on the site (albeit with an extended holiday once a year if the not 52 weeks a year principle is enforced). This is a 20-fold increase to the current population of Moneystone. In fact, this proposal is so large, that the resultant 1,000 residents would swamp Whiston (210 residents) and Oakamoor (590 residents) as well. The result would be the conglomerate town of Whiston, Moneystone & Oakamoor, rather than the separate small villages and hamlet.

Paragraph 3.33 states "There are no designated or non-designated heritage assets within the site". This again is untrue. There is a grade II listed stable block – see SCC's Archeologist comment on 25 June 15. And how can you say "the development would not result in any adverse noise or air quality impacts"? Surely the increase in traffic alone would make this statement untrue, let alone the site itself.

Paragraph 3.35 outlines a number of presumptions as to why their scheme should be given planning permission. However it is for SMDC councilors to make this judgment, not Laver Leisure (or their representatives – How planning). And I believe that it is for the comment in paragraph 3.34 that this proposal should be rejected – "granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework". And I believe that the adverse impacts of this proposal do significantly and demonstrably outweigh any benefits.

Paragraph 4.16 states "Whiston Eaves Lane can clearly accommodate an increase in traffic flows and is suitable for large vehicles, from the junction with the A52 to the site access." What evidence is there that this statement is true? With houses abutting the road on either side at the junction end of Whiston Eaves Lane, there is very limited room and certainly no room for expansion. Due to the angle of the gardens and age of the houses, many residents are unable to park off road, resulting in a narrow single carriageway and many of the drives that are used have poor vision of the road. Damage to houses and cars here, where there is barely enough room to pass, is already not unheard of. Yet apparently this is the road that can accommodate a huge increase traffic and is suitable for large vehicles.

CVCS comment

Paragraph 5.3 quotes "Natural England has a discretionary power which it will use if it is considered appropriate and desirable to designate an AONB. They have no plans to designate more at present." This statement is irrelevant. If a community and council have supported its application, then this is supported, whether the status has been yet granted or not. Otherwise all sorts of applications would be sneaking in to such a situation and making the application for AONB null and void. SMDC should stick to their correct first impressions for the area and continue to support the AONB and reject any planning applications that go against it. Further to this, the restoration as per its current legal obligation would enhance the quarry far more than any planned proposal, so paragraph 5.5 stating "Moneystone Park will enhance the potential for the Churnet Valley achieving AONB status by regenerating a former quarry" is nonsensical. The quarry is irrelevant. The plans should be based on the finished restoration - high quality agricultural land, which would enhance the valley's chances of achieving AONB much more.

Paragraph 5.15 states: "In broader terms, the proposed development of Moneystone Park could serve as a catalyst for further investment in the local area". Welcome to the city of Moneystone! Sorry, I thought we lived in the countryside.

Paragraph 5.19 states that "comparison with Alton Towers is inaccurate. The proposed development is an all year round offer which will cater to countrysiders". Alton Towers is now open all year round and have you told the visitors who will see the accommodation just round the corner from Alton Towers that this is not for them? Paragraph 7.66 even sites it's proximity to Alton Towers as a "key opportunity".

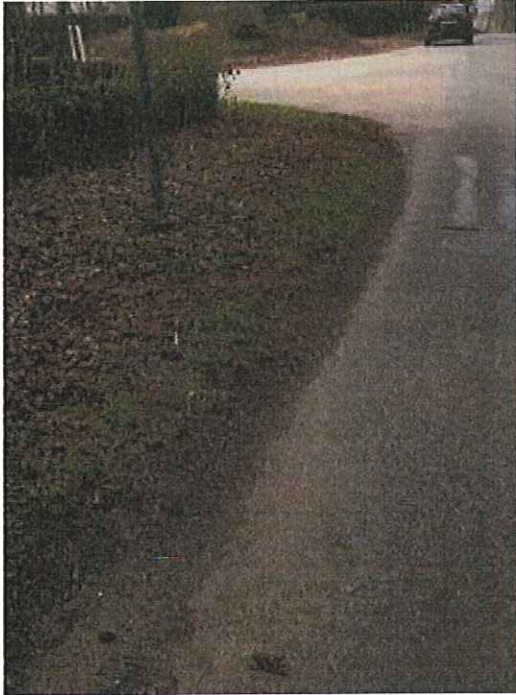
Paragraph 5.23 states "Whilst, CVCS presumes to understand Laver Leisure's commercial model it has no evidence to support its view that the site would need to be expanded in the future." This is untrue, the Christie report submitted 22 October 2014, states that the proposed development would only be economically viable if it increased to 250,000 visitors in 5 years.



Whiston Eaves Lane near the entrance to Moneystone Quarry



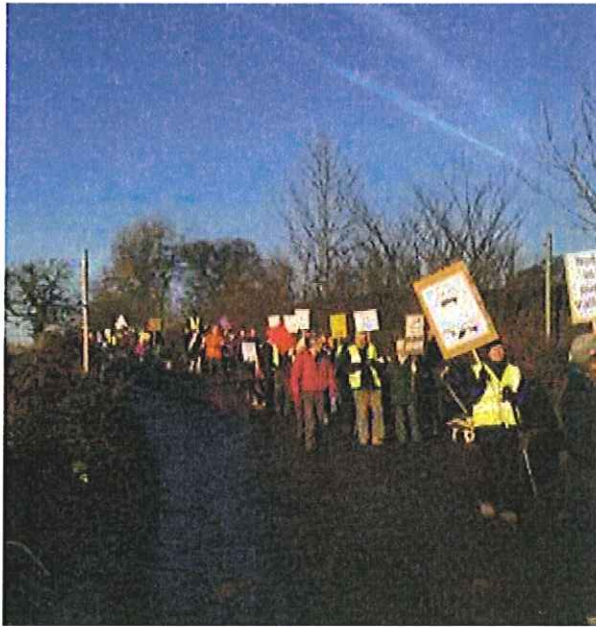
Local children playing in Whiston's Children's Play Area. Whiston Eaves Lane (visible on the right) has no path.



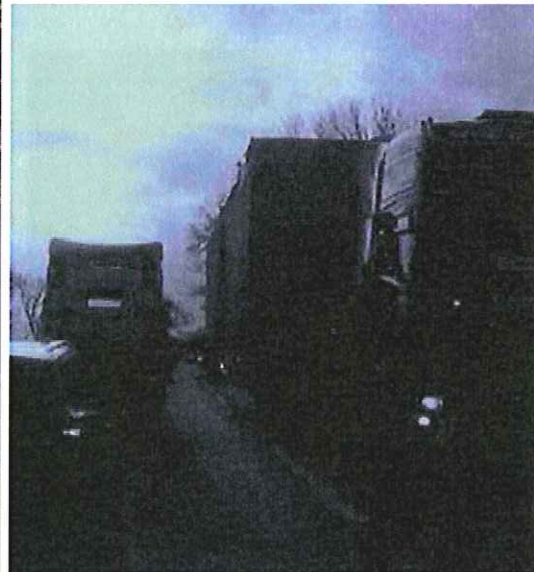
Annual migratory toads mating on the road outside the entrance to Moneystone Quarry – regularly squashed!



Someone else thought Whiston Eaves Lane was bigger than it is! The police had to come and move the cars so the lorry could get down and the road was blocked for hours.



Villagers on a walk down Whiston Eaves Lane to object to the proposals at Moneystone Quarry



Lodges on route to Alton Towers



Lodge delivery down Farley Lane, Oakamoor.



Whiston Eaves Lane/A52 Junction. Vision can be cured with a 30mph speed limit!



Blakely Lane, the road for 100 lodges ingress & egress.