Planning Statement

Site Address:

Horton Common, Lask Edge Farm, Lask Edge, Leek, ST13 8QS

Proposal:

5 pitches for touring caravans/motorhomes and up to ten tents

Prepared By:

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1. Introduction

1.1. Horton Common has been operating lawfully as a Certificated Site since 2014 with an exemption certificate issued annually through the Camping and Caravanning Club.

1.2. Horton Common benefits from certificate number 118/032 issued by The Camping and Caravanning Club Ltd, under Paragraph 5 of the First Schedule of the Caravan Sites and Control of Development Act 1960 and Section 269 of the Public Health Act 1936.

1.3. The certificate lawfully enables Horton Common to host up to five touring caravans/motorhomes and up to ten tents at any one time for members of the Camping and Caravanning Club.

1.4. This planning application is to enable Horton Common to host up to five touring caravans/motorhomes and up to ten tents at any one time for any member of the public. Hence, Horton Common would not be an affiliated Certificated Site.

1.5. This planning application does not seek to secure approval for any additional development at the site or any intensification of use compared to its existing lawful use. The purpose of the application is to seek approval for the use of Horton Common as touring caravan/campsite under the Town and Country Planning Act 1990. After which a Caravan and Camping Site Licence could be submitted to SMDC to secure the relevant permission to accept visits from any member of the public to Horton Common.

2. Horton Common Site History

2.1. In 2014 a full planning application (SMD/2014/0017) was submitted, and approval was successfully secured for engineering works to set up the facilities at Horton Common.

2.2. In 2015 a second full planning application (SMD/2015/0222) was submitted and approval was successfully secured for a road and five hard standing pitches to enable Horton Common to remain open during wet ground conditions.

2.3. In 2015 Horton Common received the award of Best CS within the Camping and Caravanning Club out of 1,600 Certificated Sites within the club's network around the UK. Horton Common has also been referenced within Camping and Caravanning Club publications on several occasion. Horton Common has also been featured in other national publications such as The Smallholder magazine.

2.4. Horton Common currently benefits from over 40 reviews on Google, all between 4-5 stars, with 5 stars being the maximum rating. Guests to Horton Common in their reviews not only reference the quality of facilities provided but also their enjoyment of the views over the Staffordshire Moorlands and Peak District.

3. Site and Surroundings

3.1. Horton Common is located on Lask Edge Road next to the Western Power communications tower. An existing and well-established willow hedge surrounds the majority of the boundary of the site from close proximity public views. The site covers an area of 0.54 hectares (1.37 acres) and is located within open countryside which is also designated as Green Belt.

4. Planning Policy

4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan, taking into consideration any material considerations relevant to the determination of the application.

4.2. Several policies from the existing/adopted SMDC Core Strategy DPD (2014), and the emerging Local Plan (2016 – 2031) are applicable to the determination of this application.

4.3. Policy E3 - Tourism and Cultural Development from the Core Strategy is particularly pertinent to this application. It is stated '*Small camping sites may be appropriate in the Green Belt provided they do not prejudice the 'openness', there is appropriate screening and any necessary facilities can be accommodated within existing buildings.'* It can be reasonably argued that this proposal is for a 'small camping site' and the form of development proposed is no more extensive than the current lawful use of Horton Common as a Certificated Site. Furthermore, appropriate screening exists and is well established. No increase in facilities is proposed as part of this application. The impact on Green Belt openness and mitigation measures are addressed below at point 5.

4.4. Policy R1 - Rural Diversification states *'Within the Green Belt, inappropriate development which is otherwise acceptable within the terms of this policy, will still need to be justified by very special circumstances.'* As per point 4.5 below, it is submitted that this proposal is not inappropriate development. However, with this application, it is also submitted that **the existing use of Horton Common as a Certificated Site is a fall back position and a material consideration**. Fall back positions are recognised as a material consideration with regards to very special circumstances.

4.5. The National Planning Policy Framework (NPPF) post the 2018 alterations states in paragraph 146 *'Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. (e) material changes in the use of land (such as changes of use for outdoor sport or **recreation**, or for cemeteries and burial grounds);'* As such, a touring caravan and camping site (a form of recreation) is not inappropriate development provided openness is preserved.

5. Preserving Green Belt Openness

5.1. It is proposed that an existing condition of the Certificated Site licence for Horton Common remains as a condition of planning approval. Namely, no unit may stay more than 28 consecutive days at a time.

5.2. Furthermore, a second condition of planning approval is proposed to limit the operating period of Horton Common to between March 1st and October 31st.

5.3. Its recognised that the current development and use of Horton Common as Certificated Site has some impact on the openness of the Green Belt. As do all developments within the Green Belt to some extent. However, approval of this application would enable the existing development to accept a wider range of guests. As such, making better use of the existing development, and existing impact on the Green Belt. This will also provide wider and increased benefits to other associated businesses within the community through increased tourism spend.

6. Current License Restrictions/Limited Marketing Opportunities

6.1. Horton Common currently operates as a CS (Certificated Site) as part of the Camping and Caravanning Club, as such the owners of Horton Common are only allowed to welcome guests of the said club under the terms of the licence. The Camping and Caravanning Club states on their website to have over 700,000 members.

6.2. However, The Camping and Caravan Club is only the second-largest camping organisation within the UK, with the Caravan and Motorhome club stated to have a membership closer to 1,000,000 members. Hence, there is a significant number of the public who own caravans/motorhomes which cannot currently visit Horton Common.

6.3. Furthermore, a condition of the current CS licence for Horton Common from the Camping and Caravanning Club states the site owner must agree to the following: *'Advertise the Certificated Site solely on the Club's website, within the Club's biennial publication 'SiteSeeker' and on websites owned and maintained by the Site owner'*.

6.4. Hence the current condition of the CS license to only market Horton Common on the Clubs own websites/publications severely limits the owners potential to market Horton Common, not only to the wider public but even to members of the

Camping and Caravanning Club who read/view caravan/motorhome related websites and magazines not owned by the club.

6.5. For instance, there are owners of caravans/motorhomes who are not members of either the Camping and Caravanning Club or the Caravan and Motorhome Club. Very popular websites such as Tripadviser.com, Pitchup.com, Campsites.co.uk and Coolcamping.com are used to research and book up on caravan/motorhome sites. However, under the current CS licence for Horton Common, none of these marketing/promotional channels can be used to attract guests to Horton Common.

7. Sustainability

7.1. Horton Common has been successfully operating since 2014 and is a national award-winning small campsite. Hence, the quality of the existing services and facilities provided have been validated. Therefore, its reasonable to determine that other members of the public (none Camping and Caravanning Club members) would be interested in visiting Horton Common, to also be patrons of other businesses in the local and wider area, increasing local tourism spend.

7.2. Guests to Horton Common frequently visit other local businesses, helping to improve the sustainability of these local community facilities. In the immediate vicinity, these include the Shippon Tea Rooms (within 200m), and the shops and pubs within the village of Biddulph Moor (within a mile).

7.3. Guests are also encouraged to visit other local tourist attractions such a Rudyard Lake and Biddulph Grange Gardens to name but a few as can be seen on Hortoncommon.co.uk.

7.4. The current and ongoing implications of the COVID-19 pandemic on the UK economy and particularly the UK leisure industry are becoming more apparent. Therefore, enabling Horton Common to operate under a licence provided by SMDC to accept any member of the public to visit/stay at Horton Common will not only help to support the viability of Horton Common directly but also the other local business which depend heavily on tourism. Especially with tourism being an

industry SMDC is trying to develop and encourage through the current adopted local plan and the emerging The Local Plan 2016-2031 for the Staffordshire Moorlands.

7.5. Horton Common operating between March 1st and October 31st has a total pitch capacity of 1,220 (244 days x 5 pitches). In 2019 Horton Common welcomed guests for a pitch occupancy of 353, hence 29% of total pitch capacity. Clearly demonstrating with that with a camping license provided by SMDC to allow any member of the public to visit Horton Common the existing facilities (5 pitches) can accommodate more guests and be better utilised.

8. Very Special Circumstances

8.1. Following the 'Wednesbury Principles' and established planning case law, for Green Belt 'very special circumstances' individual material considerations can be regarded as a very special circumstance or a collective of material considerations as a whole. For this application, it is proposed that multiple material considerations should be factored together, which amount to very special circumstances. Those material considerations referenced in the statement above include:

- No additional development is proposed.
- The existing use/development as a lawful fall back position.
- The ability to accept wider members of the public to Horton Common.
- The ability to market Horton Common on third-party websites.
- The opportunity to achieve a higher total pitch capacity.
- More guests will increase local tourism spend.
- The impact of COVID-19 on local tourism businesses.

9. Conclusions

9.1. It is accepted that the proposal will have some impact on Green Belt openness. However, it also has to be acknowledged the proposal will not impact Green Belt openness anymore than the existing lawful use of Horton Common as a Certificated Site. The existing lawful use also has to be acknowledged as a fallback position and material consideration in the planning balance.

9.2. The approval of this application will attract wider benefits to local community facilities and increased tourism spend within the area from the general public, not just from Camping and Caravanning Club members. The impacts of the COVID-19 epidemic are already showing to have significant impacts on the UK economy as a whole, but especially on the UK leisure industry.

9.3. Therefore, better utilisation of an existing leisure facility to bring more tourism spend into the local area with no additional impact on Green Belt openness than that which currently lawfully exists must carry significant weight in the planning balance.