

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 30 July 2021 09:36:52

Application Reference No. : SMD/2021/0307 Site Address: Knypersley Mill Farm Judgefield Lane Brown Edge Staffordshire ST6 8UG Stoke-On-Trent Comments by: Geoff Watts

From:

Pool Dam Cottage
Judgefield Lane
Brown Edge
Staffordshire

ST6 8UG

Phone:

Email:

Submission: Objection

Comments: Dear Mr Hurst,

Further to my previously submitted comments, in the event that the application is deemed currently valid, please lodge my objection to the proposal for caravan storage at Knypersley Mill Farm (application SMD/2021/0307). I object as I do not believe the proposals comply with SMDC adopted Local Plan Policy and Section 13 of the NPPF (I am sure that you will in any event be measuring the proposals against the same local plan and NPPF criteria as cited below and will draw to your own rationalised conclusions):

1. As far as I am aware, historically only a small number of caravans have been stored (in the building but possibly not to any great extent on the menage), and few are currently stored at the farm, although it is possible that a number of vacant caravans that have been located for extended periods of time elsewhere on the farm are at this moment stored on the menage area. The proposal appears to be to maintain and increase the amount of caravan storage at the farm. This potentially has a significant, detrimental and unfair impact upon the owners of the adjacent Knypersley Mill property who share the access track (and have a legal commitment to contribute 50% to the repair of the track) that is currently (and would to a greater extent) be utilised for transporting caravans to/from the farm. No mitigation is provided to avoid intensification in use (and therefore repair) of the track and irrespective of the further comments made below, I am of the opinion that the proposed increase causes harm to the amenity and commitments of the owners of the Mill and therefore contravenes NPPF paragraph 148:

‘When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’

The detrimental impact upon the amenity of Knypersley Mill also means that the proposal cannot meet the exceptions provided by local plan policy E4.2 which states that:

‘New accommodation, attractions and facilities should: A) support the provision and expansion of tourist, visitor and cultural facilities in the rural areas where needs are not met by existing facilities; and B) all development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area.....’

2. The proposed increase in open-air caravan storage represents an intensification of a tangibly visible and therefore inappropriate use within a fairly isolated rural location in the greenbelt. As such, I am of the opinion that the proposals are not supported by NPPF greenbelt policy generally, nor do they comply with exceptions provided in local plan policy E4.1 as the proposals do not meet the following criteria:

‘New tourist, visitor and cultural accommodation, attractions and facilities should be developed in locations that offer, or are capable of offering either: A) good connectivity with other tourist destinations and amenities,

particularly by public transport, walking and cycling; or B) in locations in or close to settlements where local services, facilities and public transport are available; or C) in areas specifically identified for tourism development in the Churnet Valley Masterplan or other relevant documents.

3. The applicant has not, as far as I can tell, submitted any special circumstances that could possibly outweigh non-compliance with greenbelt policy or guidance. The storage may represent some association with the use of land at the farm and arguably bolster a rural business, but with no tangible benefits to the surrounding area or local economy. It is my opinion that no special circumstances have been provided for any of the current or proposed caravanning facilities at the farm. Therefore any increase in storage in fact represents an intensification and consolidation of unauthorised (and arguably inappropriate use) and activity at a greenbelt location. As such, I am of the opinion that the proposals are not supported by NPPF greenbelt policy guidance (specifically paragraphs 147 to 151), or by local plan policy SS10 which as an over-arching theme states in respect of rural areas:

'These areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside' and specifically states under item 6 of the policy that SMDC and its partners will:

'Maintain the Green Belt within Staffordshire Moorlands. Strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.'

4. Currently, the farm benefits from a certified camping and caravan club site which allows for short periods of residency for maximum 5no. touring caravans at any one time. Arguably, the allowable use is not particularly sustainable given that there are no public transport links, shops or other facilities anywhere close by to the site and is therefore generative of car/road journeys for basic amenity. The proposed intensification of storage could significantly increase the generation of car journeys to/from the site far beyond those currently allowed by the certified site, and therefore render the farm enterprises less sustainable than they currently are. As such, I am of the opinion that the proposal contravenes local plan objective SO11 which makes it an objective

to reduce the need to travel or make it safer and easier to travel by more sustainable forms of transport,

and cannot comply with local plan policy SS10.3 which seeks to

'enhance and conserve the quality of the countryside by; Limiting uses which generate a substantial number of regular trips in areas that are not well served by public transport.'

5. Caravans jut out into the road when towing vehicles stop at the entrance gates into both the certified site and the farm/mill track entrance. This is hazardous to road users on the sharp bend at the highways access. However, the junction is currently and historically relatively bereft of caravan traffic. Few caravans currently use the site access with any real frequency as the majority of caravans located around the farm appear to reside there for significant amounts of time so the hazard is arguably manageable with only a small number actually properly being touring caravans or being empty caravans located in/around the farm buildings. A potentially significant increase in caravan traffic at the highway junction, as could be brought about by the proposals, would in my opinion render the junction more hazardous than it currently is. The junction is frequent witness to minor accidents and it is amazing that to date so few injuries at the junction have been recorded. I am of the opinion that the proposed intensification of use contravenes local plan objective SO11 and policy SS10.3 (refer to item 5 above) and does not meet local plan policy T1 which states:

'The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and accommodates residual development traffic in line with the Integrated Transport Strategy. This will be achieved by:..... Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.'

Additionally, I argue that the resultant increase in danger at the junction would be against the Integrated Transport Strategy (ITS) aim 5.1 to 'Maintain the current condition and safety of the highway network and improve public transport connectivity and quality of life for local communities', nor would it align with the strategy stated in Appendix 2 of the ITS, 'Countywide Initiatives' for 'promoting sustainable travel'.

As an aside, I note that the agent has provided reference to an appropriate planning inspectorate decision in support of the application. I suggest that the following more recent appeal decisions may be more appropriate to this application?

APP/X1925/C/20/3250187, decided 22 July, 2021

APP/H1033/W/17/3187785, decided 16 February, 2018

Obviously, I would appreciate it if you would take the above thoughts into account when determining the application. If the proposals were to retain use of the one building for the storage of a few 'unseen' caravans only and/or retention of the menage for limited equestrian use then it is unlikely that I would have lodged an objection to Mr Hall's application. The impact would be far less upon the Mill owners, arguably the proposed usage more appropriate and the stored caravans not visible in the wider green belt setting.

Yours faithfully,

Geoff Watts

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