

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : SMD/2021/0335 Site Address: Knypersley Mill Farm Judgefield Lane Brown Edge Staffordshire ST6 8UG Stoke-On-Trent Comments by: Stephanie Burns

From:

Pool Dam Cottage
Judgefield Lane
Brown Edge
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Submission: Objection

Comments: I wish to object to the proposal for the Extension of existing 'Certificated Site' Campsite to accommodate 11 caravans, 4 shepherd's huts, 1 Vardo style caravan and new hardstanding.

I have the following comments to make in relation to the Planning Statement and Site Plan (at the time of writing the Application Form itself would not open from the link on the Staffordshire Moorlands Planning website):

i) The application states that the existing caravan site has been used *legally* for 7 years. I believe this to be inaccurate: there are/have been *residents* who have been on site for extended periods - well in excess of the 28 days permitted in the Camping and Caravanning Club license, and there have been numerous occasions when there have been in excess of the 5 caravans permitted.

ii) Regarding the justification for Freestanding Shepherds Huts, the Planning Statement states: *the siting of 4 serviced Shepherds Huts around the application site is again the slight intensification of an existing use on the site. These structures are semi-permanent*. The existing permission on the site is for touring caravans, whilst such Shepherds Huts are described as *semi-permanent*. This is a direct contradiction to the current permitted use, as the shepherds huts are essentially fixed structures. These Shepherds Huts are also sited outside of the current permitted field accessed directly from Judgefield Lane.

iii) Describing the development as a *slight* or *modest* intensification is a misnomer: the proposal is to increase the usage from 5 caravans to 15 caravans/shepherd's huts in total, which is a three-fold increase rather than a slight intensification.

iv) The hardstanding adjacent the millpond (referred to as the *fishing pond* on the plan) seems to have been excluded from the application, though it is mentioned in the Planning Statement. The mill pond has been in existence for nearly 200 years and has never before required access via a hardstanding for maintenance. It also appears that this handstanding *access* does not actually extend down to the millpond, yet it is equipped with a picnic bench and an electrical hook-up for a caravan. Indeed, anyone wishing to access the millpond for maintenance last year would have found themselves impeded by a caravan sitting on the *access* for an extended period of time.

v) It is interesting that the concluding comments in the Planning Statement document refer to 'short stay' in inverted commas, since the current approved Camping and Caravanning Club site, licensed for 5 caravans for short periods of time, appears to be used by the same residents for extended periods of time, functioning not as a site for touring caravans, but seemingly for long-term encampment of residents whom appear to commute to work on a daily basis from the site. It is therefore my great concern that the site is not being operated according to Camping and Caravanning Club rules - and restrictions, which surely are intended to preserve and respect the rural setting - and that it risks becoming a permanent, residential caravan site which will vastly affect and degrade the natural beauty of the area.

vi) Regarding the site plan provided, I wish to make the following observations:

1. There are numerous conflicting references to the differing numbers of shepherd huts to be accommodated. It is not clear what exists at the moment (for which retrospective approval is sought?) and what is proposed.
2. Is permission also being sought for the track shown on the plan, connecting the recently constructed hardstandings? It is my understanding that this is new development through open fields (from approx. pitch 14 extending roughly North to the certified caravan site).
3. It references a 'Vardo style caravan' in text, but there is no proposed location shown for this. Presumably this requires clarification, and would actually constitute an application for 12 caravans, not 11?
4. I note that the 'small field' for two caravans was 'created for COVID guests'. From recollection, I believe this had been used at times prior to COVID.
5. The site plan has no mention of the rather intrusive CCTV system that has been installed - should this not be included in the application?

Additionally, in the Location Plan, I note that the blue boundary line on the drawing includes some of the land belonging to Pool Dam Cottage; the black field line drawn on the ordnance survey plan appears to be correctly sited and the boundary line should follow this.

Please consider the following points as my objections to the proposed extension of the caravan site:

- i) The proposals do not accord with Greenbelt planning policy, as they do not 'preserve openness', and the facilities they provide are not 'essential to the rural economy'. Furthermore, the construction of various hardstandings - new development - across many areas of the farm site is inappropriate in this Greenbelt location and has harmed the character of rural farmland. It is my understanding that agricultural land should remain agricultural, and any need to service agricultural land should not require recently installed hardstandings since tractors are purpose-designed to travel across fields.
- ii) This proposal would have a significant impact on the Greenbelt location whilst the benefit to the rural economy would be negligible: there are limited tourist facilities in the rural vicinity to draw benefit from this proposal and to sustain increased tourist numbers.
- iii) Furthermore, the caravans currently in situ are highly visible in this special location, indeed they dominate

the view when approaching all the way down Greenway Bank from the West. Increasing the number of caravans to 11 (12?) pitches will look very crowded and further erode the quality of the Greenbelt.

iv) The caravans and Shepherd's Huts are alien in the landscape, which otherwise remains significantly unchanged, with limited development for centuries. It is a terrible shame that the listed Knypersley Mill, the historic structure that is the dam and the natural beauty of the reservoir and entire area could be further negatively impacted by increasing the caravan/shepherds huts pitches across the farm. The existing caravan site has done nothing to enhance the natural and historic character of the area, and increasing the number of pitches will further erode this character.

v) If this application is approved, there will be many more occupants (and likely permanent residents) on the farm site than there are in the 6 existing houses on Judgefield Lane. This seems disproportionate.

vi) I am very concerned that an approval of this application will lead to a permanent residential development by stealth, due to the applicant's apparent lack of regard for operating within rules and restrictions. Such a development would be inappropriate in scale and character would not be suitably and considerably controlled.

I would appreciate it if you could please consider my observations and objections with regard to this application.

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