

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 30 August 2021 22:44:16

Application Reference No. : SMD/2021/0335 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
Brown Edge
Staffordshire
ST6 8UG

Phone:

Email:

Submission: Objection

Comments: Dear Mr Hurst,

Please lodge my objection to the proposal for expanding campsite operations at Knypersley Mill Farm (application SMD/2021/0335). My objection is based upon the following:

1. Ownership Certificate A accompanies the application. Irrespective of what is stated in the applicant's planning statement, I am fairly certain that Mr Hall is not the sole owner of the land to which the application relates. Whether or not other land owners have been notified should be clarified as I believe the wrong certificate of ownership may have been completed, potentially rendering the application invalid.
2. The proposal is described as an extension of the 'Certified Site' campsite. This is non-sensical as a certified site can only provide accommodation for up to five touring caravans and not the number of caravans and huts proposed by the applicant.
3. The submitted site plan drawing states that the certified site has been operated in a correct manner since 2014. This is certainly not the case as the site over this period has frequently hosted more than 5 caravans with many pitched in excess of 28 days and with some being pitched and inhabited for several years. As this is a retrospective application, surely it should be looking to regularise the current and historic use of the site which is used primarily to accommodate permanently/substantially inhabited caravans and shepherd huts? Would an approval of the proposals give the applicant licence to continue to use the existing

and increased 'camping' facilities in the illicit manner in which the site is currently operated?

4. The track and caravan pitch that has been formed near to the mill pond has been excluded from the area edged red. Despite the assertions in the submitted planning statement that it is in fact essential hardstanding/access for mill pond maintenance works, the hardstanding was in fact utilised throughout much of 2020 to house a single caravan, is served by caravan service hook-up connections, accommodates a picnic bench and does not extend to the mill pond to facilitate access for maintenance. In my opinion, it is a caravan pitch and access to that caravan pitch, and the application should seek to regularise its existence.

5. It is stated in the application and on the submitted site plan drawing that a Vardo style caravan is proposed. The submitted information does not make clear where this is.

6. The application does not appear to be seeking approval for the seemingly unlawful CCTV camera system that has been installed on the campsite. Presumably it is operational development associated with the current campsite and falls outside of permitted development. As installed, the system appears to monitor without consent traffic/movements to/from Knypersley Mill and likely infringes upon the privacy rights of members of the public within and outside of the applicant's ownership boundary; none of which seems right or proper.

7. The current site use and proposed increase in caravan pitches and shepherds huts is incongruous and highly visible within the greenbelt location. Considering further that the current 'certified site' has been operated with scant regard for compliance with the Camping and Caravan Club's certification, and that no further 'special circumstances' have been tabled in the submitted information, I am of the opinion that the proposals are not supported by Section 13 of the NPPF relating to greenbelt policy generally nor compliant with SMDC adopted Local Plan Policy; in particular paragraph 148 of the NPPF which states:

'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.'

8. The site is not served by public transport and there are no local amenities or services in the vicinity. Therefore, I am of the opinion that the proposals do not comply with exceptions provided in local plan policy E4.1 which states that:

„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.'

9. The detrimental impact upon the amenity of Knypersley Mill (increased noise, increased traffic, visual intrusion) and arguably of other properties in the locality 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.....'

10. 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 additional caravans and shepherd hut accommodation 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 sustaining of current and intensified use in fact represents an intensification 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 overarching 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.'

11. Vehicles entering the current campsite do so dangerously as there is extremely limited visibility around a tight bend at the bottom of a steep hill where cars and cyclists (particularly) would have difficulty stopping if a vehicle turned across their path. 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.;

Obviously, I would appreciate it if you would take the above thoughts into account when determining the application.

Yours faithfully,

Geoff Watts

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