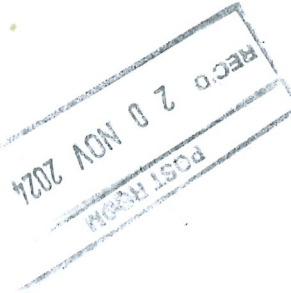


Frank James
252 Eaves Lane,
Bucknall,
ST2 8LY

15/11/24

Planning Department
Staffordshire Moorlands District Council



Dear Sir/Madam,

Re: Objection to Planning Application [SMD/2024/0486]

I am writing to formally object to the planning application for the proposed gypsy/traveller site at the land north of Moorside Farm - My objections are based on the following grounds:

1. **Conflict with Local Plan and Policies:** The proposed site does not align with the following policies.

Staffordshire Moorlands Local Plan reference below –

SS10 of the Staffordshire Moorlands Local Plan and the NPPF.

The proposed development will be intrusive into the countryside outside of a development boundary, appearance, in a manner not in keeping with the locally distinctive landscape character. Additionally, there is not any amenities for residential development. The development is contrary to Staffordshire Moorlands Local Plan Policies SS1, SD2 and DC3, and the NPPF

Policy H4 – Gypsy and Traveller Sites

Policy states-

The Council will seek to meet these residual requirements by applying the following criteria in the determination of applications for gypsy and traveller sites or sites for travelling show people:

- *Safe and convenient vehicular and pedestrian access to the site should be provided;*

The site is to be accessed via a narrow lane which is single track in many instances and is not a safe road with a 'National Speed limit' in place which is not safe for the passage of pedestrians to the site.

- *The site must be large enough to provide for adequate on site facilities for parking, storage, play and residential amenity;*

The agricultural greenfield site is now an intentional, unauthorised development and has been installed with notable ditches blocked to the site and closed board fencing in excess of 2.5m high.

States: "A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities."

- The applicant who is now occupying the unauthorised development has relocated from a fixed address in Talke I understand.
- The applicant appears to have no existing family or connection to the area.

Policy E: Traveller sites in Green Belt

States:

'16. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.'

17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.'

The applicant has not demonstrated within his application that there are 'very special' or 'exceptional circumstances' – to cause harmful impact on the agricultural greenbelt landscape.

2. **Environmental Impact:** The development would cause significant harm to the local environment, particularly the:
 - Openness of the greenbelt
 - The lack of services to the site meaning the development will be reliant on fossil fuels (gas/ oil) and septic tank with which no details have been provided.
 - The Bio net diversity has suffered with the inappropriate unauthorised hardstanding development that has already been installed, without permission.
3. **Infrastructure and Services:** The local infrastructure, including the road is not equipped to handle the additional demand, particularly the commercial use.
4. **Community Impact:** The proposed site could lead to increased tensions and negatively affect community cohesion. The development is opportunistic within a well-established greenbelt area – there have been various applications within the immediate areas for fixed dwellings which have either been hard fought or dismissed on many occasions - given quite rightly the impact on character and openness. Development at the site has already progressed without permission which has negatively impacted the community and immediate neighbours.

5. Commentary on the applicants Application for Planning Permission:

Assessment of the Flood risk and

Question - *How will surface water be disposed of?* – The applicant has stated Soakaway and Main Sewer – there is no main sewer serving this area – therefore this is a false statement.

Ownership Certificates and Agricultural Land Declaration

Question - *Is any of the land to which the application relates part of an Agricultural Holding?* – The applicant stated it does not. This is a false statement given the site in question is wholly that of an Agricultural Holding.

Biodiversity net gain (BNG)

As you are aware this is a legal requirement introduced on the 12 February 2024 - the applicant considered that this does not apply to their application given this retrospective – I would suggest this is not a valid argument and a full Bio Net diversity should be undertaken and provided for review with application. The illegal development of the site was undertaken after 12 February 2024 therefore the BNG requirement should not be waived.

Furthermore, there have been no environmental considerations or impact studies provided – in any other circumstance would be require validating such a residential application.

Applicants Planning Statement

Item 8 - THE APPLICANT GYPSY/TRAVELLER STATUS

The applicant is known to have moved from a fixed address of 12 years from Talke.

Item 10. VERY SPECIAL CIRCUMSTANCES (VSC)

We note the applicant has sought to demonstrate the site has been previously developed, which is not true. It is true that that the previous owner allowed the agricultural holding to become 'rough' with redundant agricultural machines not adequately disposed of – however for circa 50 years the property has been managed as an agricultural holding storing and rearing cattle – it is a misrepresentation to suggest the site was 'Brownfield' I believe.

Item 11 - THE GTAA AND NEED FOR SITE/PITCH ACCOMMODATION IN THE BOROUGH

The applicant has suggested that the Gypsy and Traveller Accommodation Assessment for the Borough dates from 2015 and is 'outdated'. It is detailed in Policy H4 which allows for a period from 2019 up to 2034 and was based on accurate data.

12. AVAILABILITY OF ALTERNATIVE SITES

The applicant has not provided any evidence that there is lack of sites or provided evidence that the sources alternative appropriate sites has been exhausted.

15. RESIDENTIAL AMENITY

- *The site is reasonably accessible to shops, schools, health facilities and other community facilities on foot, by cycle or public transport;*

The site is remote and does not offer reasonable access to shops, schools, health facilities or any other community facilities on foot or by cycle, there is also no public transport available.

- *The site should not be detrimental to amenities of adjacent occupiers; Adequate levels of privacy and residential amenity for occupiers should be provided and sites should be 'soft' landscaped to positively enhance the environment and increase the site's openness rather than 'hard' landscaped;*

The unauthorised development of the site is proving detrimental to the immediate neighbours to the site.

- The site has been 'hard' landscaped and has negatively affected the environment and decreased the sites openness.
- Flood lighting has been installed without permission which lands on the adjacent neighbour's property and is already on all hour of darkness, which is detrimental to the privacy of the adjacent neighbour.
- A caravan already partially occupied on site which has been located directly overlooking the property adjacent - this would contravene general design policy for fixed dwellings.
- The Armshead corridor and Wetley Moor Common is an important Green Belt the neighbouring Stoke- On-Trent District it offers an important soft green vista from for those views from the areas of Hanley, Badley Green and beyond.

- *Sites or features of natural value should not be significantly harmed by the proposal;*

The unauthorised development included lighting, high fencing and hard landscaping is already depreciating the sites natural value.

- *development causing harm to heritage assets will need to be justified against NPPF Policy.*

Development of gypsy and traveller or travelling showpeople accommodation in the Green Belt will not be allowed unless there are very special circumstances.

The applicant has not proved within his application that there are 'very special circumstances' for the development. The applicant has no recent ties to the area, rather his children were all born in Stoke-on-Trent and the family have all lived in Talke Pitts for over 10 years I understand. Clearly, this is not within the Staffordshire Moorlands. The area has not recently or historically played host to the travelling community.

Planning Policy for traveller sites

Policy D: Rural Exceptions sites

The applicant has stated that the site will not be used for commercial uses. We note that the applicant's current business has been addressed to the site.

You will see above that we have demonstrated that this retrospective application is not altruistic in nature and seeks to gain residential and commercial use of a site which is located in a rural area of greenbelt, on an agricultural holding.

I urge the planning authority to consider these points and refuse the application.

Thank you for your attention to this matter.

Yours faithfully,

Frank James