

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : SMD/2025/0053

Site Address: Rudyard Vale Caravan Park Lake Road Rudyard Staffordshire ST13 8RN Leek

Comments by: Mr Lloyd JonesLRJ Planning Ltd,

From:

Pen-y-Rhiw
Redbrook Road
Newport
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NP20 5AB

Submission: Objection

Comments: PART 5

5.0 SUMMARY

There are compelling reasons why the application should be refused. It is evident that the proposed development is fundamentally at odds with the national and local policy framework on several critical grounds.

First and foremost, the scheme would result in an unacceptable loss of residential amenity to my client at Belmont, through both a significant loss of privacy and an increase in noise and general disturbance. The elevated positioning and orientation of decked static units directly towards my client's private garden constitutes a clear and unjustifiable intrusion into their living conditions, amplified further by the complete absence of a Noise Impact Assessment or any operational management plan. The failure to properly assess these impacts contravenes not only Paragraphs 135(f) and 196 of the NPPF but also established legal precedent, such as *May v Rother DC* (2015), and statutory duties under the Human Rights Act 1998.

Moreover, the development represents an inappropriate form of permanent residential-style accommodation within the North Staffordshire Green Belt and open countryside. It fails to comply with Policies SS2, SS6C, and SS10 of the Staffordshire Moorlands Local Plan and with national Green Belt policy set out in the NPPF. The characteristics and functionality of the proposed lodges meet the legal definition of dwellinghouses, as established under the *Gravesham* test, and no attempt has been made to demonstrate compliance with the statutory tests set out in the Caravan Acts. In the absence of any very special circumstances, the proposal represents a clear and unjustified encroachment upon the openness of the Green Belt.

The scheme would result in the permanent introduction of inappropriate, domestic-style built form within the Rudyard Conservation Area, severely undermining its established rural and historic character. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council has a statutory duty to give special attention to the preservation and enhancement of the character and appearance of conservation areas. The proposals, by reason of their form, function, and intensity, fail to meet that test and would cause harm to a designated heritage asset without demonstrable public benefit.

For all the above reasons and in the absence of appropriate evidence, assessment, or mitigation, we respectfully submit that this application should be refused. The proposal is contrary to the development plan, fails to uphold national planning policy, and would result in serious harm to residential amenity, the character of the Green Belt, and the significance of a designated Conservation Area.

The cumulative effect of the issues raised, including the removal of established vegetation and habitat, the demolition of possible asbestos containing structures without survey or mitigation, and the lack of a bat survey despite the age and condition of the demolished buildings, points to a development that is being undertaken in clear disregard of environmental safeguards and statutory requirements.

Furthermore, the unconsented intensification of the site, marked by a substantial increase in the number and size of caravans, has resulted in a doubling of occupants and vehicles, placing serious strain on internal infrastructure, parking provision, and local roads. The physical limitations of Lake Road, and the absence of any improvements to access or traffic management, only heighten concerns about safety and capacity.

Equally troubling is the complete absence of a surface water drainage strategy. In the context of increasing impermeable surface coverage, this omission presents a credible and unacceptable flood risk to neighbouring land and infrastructure, contrary to both national planning policy and local flood risk management frameworks.

The proposal is therefore contrary to both local and national planning policies and does not comprise sustainable development. It is respectfully requested that the planning application is refused.

Yours faithfully

Lloyd Jones MRTPI Director

APPENDIX A ¿ RELEVANT PLANNING POLICIES

Adopted Local Plan (September 2020) and the Saved Local plan Proposals Map/ Settlement Boundaries (1998)

- ¿ S01 ¿ Spatial Objectives
- ¿ SS1 ¿ Development Principles
- ¿ SS1a ¿ Presumption in Favour of Sustainable Development
- ¿ SS2 ¿ Settlement Hierarchy
- ¿ SS9 ¿ Smaller Villages

- ¿ SS11 ¿ Churnet Valley Strategy
- ¿ DC1 ¿ Design Considerations
- ¿ DC2 ¿ Historic Environment
- ¿ DC3 ¿ Landscape and Settlement Setting
- ¿ E3 ¿ Existing Employment Areas and Premises
- ¿ E4 ¿ Tourism and Cultural Development
- ¿ T1 ¿ Development and Sustainable Transport
- ¿ T2 ¿ Other Sustainable Transport Measures
- ¿ NE1 ¿ Biodiversity and Geological Resources

LAST PART 5/5

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