

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 10 April 2025 12:00:11

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
Newport
Please select
NP20 5AB

Submission: Objection

Comments: PART 3

iii) The provision of permanent accommodation as part of this development would severely impact on the character and appearance of the Conservation Area;

1. Statutory and National Heritage Duties

The Local Planning Authority must give effect to the statutory duty under Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The 2024 NPPF, in Paragraph 213, affirms this statutory position, stating:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm.'

The NPPF further clarifies in Paragraph 219 that:

'Local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'

The applicant suggests that because the site is already developed, the addition of further low-key caravans would not be harmful and may result in minor visual improvements. However, this does not meet the threshold

of enhancement required by the Act and the NPPF. The proposal neither preserves nor enhances the Conservation Area. Rather, it entrenches the very harm identified in the Council's own Conservation Area Appraisal.

2. Conflict with Local Plan Policies DC1 and DC2

Policy DC1 requires all development to be of high quality, reinforcing local distinctiveness through scale, materials, layout, and landscape design. The proposal's reliance on standardised mobile units with limited architectural or landscape merit fails to reflect or respond to the historic context and quality of the Rudyard Vale area.

Policy DC2 provides specific protection for heritage assets, requiring proposals to enhance the setting and significance of both designated and non-designated assets. This includes conservation areas and their contributing elements. The site lies within the setting of several historically and architecturally important villas, such as Spite Hall and The Villa (formerly Rudyard Vale), the latter having strong associative value and designed by the notable architect William Sugden.

The applicant's own acknowledgment of existing 'clutter' and 'ad hoc' development on the site, referenced directly from the Conservation Area Appraisal, undermines the suggestion that the new proposals are an enhancement. Rather, the proposal perpetuates and compounds existing harm, and thus fails both Local Plan and national policy tests.

3. Misapplication of Character Appraisal Findings

The Rudyard Conservation Area Appraisal (2016) characterises the application site as degraded through previous poor-quality development. It refers to a:

'muddle of structures' and a 'lack of well-defined space';

and confirms that:

'Rudyard Vale, which was once a rural idyll... has slowly become surrounded by trees and cluttered with ad hoc mobile homes, caravans and chalets.'

The purpose of a Conservation Area Appraisal is to identify areas of erosion so that targeted enhancements and betterment can be delivered. Proposals that merely replicate and add to the 'ad hoc' pattern of development do not align with the aims of conservation policy. The reintroduction of basic landscaping and internal roadways within the boundaries of a caravan site does not achieve the necessary uplift in quality, coherence, or historic understanding required by both the NPPF (2024) and Local Plan.

4. Landscape, Visual and Cumulative Harm

Contrary to the applicant's assertion that 'views of the site will, in reality, change little,' heritage impact is not measured solely in terms of visibility.

The proposed standardised structures are not of a high quality. Their materials, form, and layout reinforce visual and spatial fragmentation rather than rectifying it. They offer no contribution to understanding or reinforcing the linear development pattern of cottages or villas on the slope, nor do they respond to the historic settlement morphology noted on the 1816 Horton Manor Map.

The proposed development within the Rudyard Conservation Area:

- Fails the statutory test under Section 72(1) of the 1990 Act;
- Conflicts with the NPPF (2024), as well as being contrary to Policies DC1 and DC2 of the Staffordshire Moorlands Local Plan; and
- Offers no meaningful enhancement, instead contributing to cumulative harm in a sensitive landscape.

iv) The proposal would encourage greater car use on this part of the highway network that would lead to an impact on highway and public safety.

My client is deeply concerned about the significant and unregulated intensification of the use of the caravan park, which appears to have occurred in the absence of any formal planning application or public consultation. This intensification is having a detrimental impact on both the internal environment of the site and the surrounding locality, including local residents in Rudyard and users of the adjacent road network.

1. Uncontrolled Intensification of Occupation

Without planning permission, the character and occupancy capacity of the caravan park has materially changed. Smaller, single-bedroom units have been replaced with substantially larger, multi-bedroom units many of which are capable of accommodating families and multiple adult occupants.

This replacement of compact units with larger, higher-occupancy units has had the practical effect of doubling the resident population of the caravan park. Such a substantial intensification of use has profound implications not only for internal amenity (including demand for shared spaces, facilities, and services within the site) but also for external impacts on the rural road network, surrounding settlements, and wider infrastructure.

Crucially, this escalation in occupation has occurred without any planning application or supporting impact assessments. In failing to seek planning permission for what amounts to a material change of use, the site operator has circumvented necessary scrutiny regarding the capacity of the land, services, and local highway network to support such growth. This expansion cannot be regarded as incidental or minor; it represents a fundamental shift in the scale and nature of the use of the land.

2. Increase in Vehicular Traffic and Car Ownership

As a consequence of this intensified residential use, my client has observed a significant increase in vehicle ownership and associated car movements to and from the site. Based on a provision of two parking spaces per caravan, the presence of 40 caravans equates to a potential 80 vehicles regularly using Lake Road for access. This projection does not account for visitor traffic, service vehicles, or deliveries, which further compound the impact.

Lake Road, which serves as the sole access to the site, is a narrow, rural lane that was historically a dirt track. It is wholly unsuited to safely accommodate the level of traffic now being generated. There is already noticeable congestion, particularly at peak hours and weekends, and a growing sense of anxiety among local residents regarding highway safety and pedestrian conflict.

The cumulative effect of a doubling of caravan occupancy and the associated increase in vehicle movements has introduced unacceptable pressure on local road infrastructure, particularly at the Lake Road junction and the nearby roundabout, both of which lack the capacity to accommodate such intensified flows without significant delays and safety risks.

3. Inappropriate Access and Retrospective Works to Highway

In an apparent effort to accommodate the larger caravans now brought onto site, the caravan park operator has unilaterally undertaken works to widen Lake Road. My client is not aware of any planning or highways consent having been sought or granted for these alterations, nor of any assessment having been undertaken regarding the impact of such works on drainage, character, or local ecology.

The widening of a historically narrow country lane to facilitate larger static units raises important questions regarding the compatibility of the development with its rural context. The change is not merely physical; it is a signifier of a shift in intensity and urbanisation that conflicts with the intended low-density, seasonal character of such a caravan park.

It is apparent that the caravan park has undergone a fundamental and unregulated transformation. The doubling of occupancy, proliferation of vehicles, and physical alterations to the road infrastructure have occurred without planning permission or meaningful oversight. This constitutes clear overdevelopment and gives rise to demonstrable harm to local infrastructure, visual amenity, and the tranquillity of the Rudyard area.

The NPPF notes that in assessing applications for development it should be ensured that adequate opportunities to promote sustainable transport modes have been taken up; safe and suitable access to the site can be achieved for all users and any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree. It goes on to describe that the development should be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Due to the location of the site, it is not well served by public transport and will encourage the use of the private car, that is conflict with the Government's agenda of reducing trips and travel by private car.

The surrounding highway network is devoid of footways and lighting. The nature of the proposed use will be entirely reliant on guests arriving by private car. The number of vehicles using the surrounding highway network is going to increase significantly. The harm will be compounded with vehicles not being familiar with the area that will increase the level of conflict and lead to potentially dangerous manoeuvres on the highway.

The proposed intensification of the use of this access and local highway network will lead to a greater conflict for all road users, thus increasing the risk for accidents and potential harm for all road users.

Overall, the proposed development would have a severe residual impact on highway and pedestrian safety. It would encourage greater use of the private car and result in a form of development that is not sustainable. Accordingly, the proposal is clearly contrary to the NPPF and local planning policy.

v) Impact on the local environment;

My client raises several serious concerns relating to the environmental degradation and ecological impact arising from recent site clearance works, which appear to have been undertaken without appropriate surveys or safeguards in place.

1. Loss of Vegetation and Landscape Character

A number of hedgerows and small trees and other vegetation have been removed from the site, leaving the land stripped of its previous ecological and visual character. The cumulative result is a sterile and denuded landscape that no longer integrates with its rural surroundings. This loss of biodiversity and green infrastructure is wholly inconsistent with the principles of sustainable development as set out in the NPPF, which require that development contributes to the conservation and enhancement of the natural environment, including the protection and restoration of biodiversity and valued landscapes.

The wholesale removal of vegetation appears to have occurred without an ecological assessment or landscape strategy to guide and mitigate such actions. The works have not only diminished the site's ecological value but have also eroded its visual amenity and the character of the wider area. This raises questions about compliance with local policy objectives that seek to maintain and enhance the quality of the rural environment.

2. Failure to Undertake Protected Species Survey (Bats)

My client is particularly concerned that no bat survey was carried out prior to the demolition of a building on site that had stood for over three decades and was believed to contain a bat roost within the roof void. Bats are a European Protected Species, and it is a legal requirement under the Conservation of Habitats and Species Regulations 2017 (as amended) to undertake appropriate surveys where there is a reasonable likelihood of their presence.

3. Asbestos Risk and Public Health

Finally, my client notes that no asbestos survey appears to have been conducted prior to the demolition of the aforementioned building and several static caravans on site. Given the age and type of these structures, it is highly likely that asbestos-containing materials were present. The lack of a demolition and refurbishment asbestos survey not only breaches the Control of Asbestos Regulations 2012, but also raises serious concerns about the potential release of hazardous fibres into the environment and the associated risk to public health.

The omission of an asbestos survey, combined with the absence of any publicly available documentation confirming safe removal and disposal practices, warrants immediate scrutiny.

In light of the above, it is clear that the applicant has failed to meet national and local policy requirements concerning environmental protection, biodiversity, and public safety.

vi) Absence of a Surface Water Drainage Strategy and Risk of Increased Flooding

My client is seriously concerned by the absence of any submitted surface water drainage strategy to accompany the proposal. This omission is particularly problematic given that the development would result in a significant increase in the extent of impermeable surfaces across the site. The replacement of greenfield or low-permeability areas with hardstanding, structures, and vehicle circulation areas will inevitably lead to increased rates and volumes of surface water runoff.

In the absence of a robust drainage strategy underpinned by sustainable drainage principles (SuDS), the proposal poses a real risk of exacerbating localised surface water flooding both within the site itself and downstream, including on adjacent land and properties. It is not sufficient to assume that runoff can be absorbed or conveyed without demonstrating where, how, and to what standard drainage infrastructure will be provided and maintained.

There is no indication that the applicant has assessed existing greenfield runoff rates, proposed a means of attenuating peak flows, or considered infiltration testing or discharge rates to local watercourses. Moreover, no maintenance regime has been proposed for any future drainage infrastructure, leaving open the possibility of long-term system failure and associated flood risk.

In light of the above, the absence of a site-specific surface water drainage strategy renders the application incomplete and incapable of being properly assessed. It fails to demonstrate compliance with the principles of sustainable development and does not sufficiently mitigate the increased flood risk likely to arise as a direct consequence of the scheme.

PART 4 CONTINUED IN NEXT BOX

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.staffs Moorlands.gov.uk/YourData>
