

From: [darrell wood](#)
To: [Planning Comments \(SMDC\)](#)
Subject: Application Number SMD/2025/0053
Date: 29 April 2025 21:52:12
Attachments: [2 bedroom lodge for sale in Leek, Staffordshire, ST13.pdf](#)

Please note that we received the notification letter dated 2nd April on the 17th April. It is not acceptable to give 21 days to respond to letters which are delayed by 15 days particularly during holiday periods.

We object to the above planning application for a number of reasons:

1. High density site (increase from 34 to 49 caravans), lacking in green space and not in keeping with a conservation area
2. Lack of clarity with regard to residency terms and lack of compliance with residency terms of existing licence
3. Loss of Biodiversity not an increase as claimed
4. No attempts to address increased noise levels
5. No commitment to an on-site manager
6. Lack of screening from public footpaths
7. Waste management
8. Lack of clarity on parking

DENSITY. Although the current licence allows 40 caravans, the existing site plan shows that there are currently only 34. All changes - loss of green space, traffic, noise etc., - must therefore be considered based on an increase of 15 caravans (44%). A significant amount of work has been carried out to accommodate the new caravans so it is already evident that the site will be mainly hardstanding, access roads and parking with little green space. As a result it will present as a high-density development more reminiscent of a temporary construction worker site rather than a quality development which would enhance the conservation area.

RESIDENCY. There is no clarity on what is meant by 12-month residency. It is understood that the current licence requires all caravan owners to provide proof by means of a Council Tax bill that they own a property elsewhere ie., the caravans are second homes. Will this condition be applied to the new licence and if so, how will it be enforced ? The applicant does not make a strong case for extending from 9 to 12 months stating in one part of the Design and Access Statement that it is required in order for the site to be competitive then stating elsewhere that the existing site is already successful and well run implying that it is not necessary to change the residency period. We would also contend that there is minimal value to the local economy from allowing residency during winter months particularly as many of the attractions which are mentioned are closed during this period (unless of course it is the intention that the site allows permanent residency). I would also like to point out that up to 8 caravans were occupied outside the current 9-month residency period indicating that the applicant is not complying with the current licence.

Furthermore, caravans have already been advertised for sale with 11-month residency although the advert was removed from the Rightmove website at about the same time as the planning application appeared on the portal. A copy of the advert is attached for information.

BIODIVERSITY. There has been a reduction in Biodiversity since the applicant purchased the site not an increase as stated. The site originally included bee hives, a paddock with goats (biodiversity from the paddock not the goats) and a grass area near the entrance with snowdrops and bluebells. The hives and paddock have been removed to accommodate additional caravans and the wildflowers grubbed up and replaced with that least biodiverse of materials - garden turf. The claimed increase in biodiversity is an example of creative accounting. Thousands of square metres of hardstanding have been installed in anticipation of new caravans and a significant amount of vegetation removed and burnt on an adjacent field. By carrying out this work before the date the biodiversity value was calculated (27th January), an artificially low baseline was created from which management of a single mature oak and installing some turf contribute to providing a supposed 11.52% increase in biodiversity which is still barely above the 10% requirement. In addition, the application states that 'part of the proposal seeks consent for the demolition of an existing building on site' whereas all permanent structures have already been removed including the former site manager's office. The applicant should be asked if a bat survey was carried out prior to demolition. We have bats roosting in our house which is 30m away from the site of the manager's office so it is reasonable to assume that they might have been present in an adjacent structure which was not permanently occupied.

NOISE. 49 caravans with the associated increase in number of residents and traffic movements will create more noise than 34 caravans. This is a simple fact which has been addressed in the application by means of platitudes.

- It is stated that 'the site is well managed and historically there have been no issues with noise'. Correct but utterly irrelevant. The applicant makes no commitment to having an on-site manager, a significant proportion of residents will be new and there will be 44% more caravans.
- The Design and Access Statement makes reference to the background noise of the lake implying that the caravan site will not be noticed against this. This statement (not backed up by a noise survey) may be true but the car park at the lake is only open from 8 a.m to 5.30 p.m which means that most activities and noise occur during this period whereas residents are usually more concerned about noise during the evenings or night.
- It is stated that the site is well screened which is incorrect. A number of properties have no screening from the site and the screening for our property was lost with the demolition of the site manager's office which was unoccupied most of the time. This is being replaced by a caravan with the only possibility of screening being if we plant trees on our property.

SITE MANAGER. It is stated in the Design and Access Statement that it is 'anticipated' that one of the units would provide manager/warden accommodation yet the Planning Application states that no employment will be provided. The historical lack of any noise problems which the applicant attempts to take credit for was in large part due to the presence of an on-site manager which the applicant does not commit to providing. In addition, a site manager would be of value in managing any parking issues and enforcing any rules with regard to subletting which should be part of the licence.

LACK OF SCREENING. The removal of structures on the north west boundary means that the site is now fully visible from the Staffordshire Way footpath (Horton 55). We invite Councillors to view the site from this location.

WASTE MANAGEMENT. Under the previous site owner, items such as bottles and cans were collected separately for recycling. The area used for this will now be occupied by an additional caravan. The planning application states (page 9) that there will be no facilities to store and collect waste and no facilities for recycling. 49 four berth caravans occupied for up to 365 days per year produce an awful lot of waste and it is simply not acceptable (but cheaper) not to have recycling facilities.

PARKING. The application states one parking space per caravan but parking for two cars has been advertised on Rightmove. There does not appear to be any communal area for guests which is likely to result in additional pressure on parking within the village. How will parking be controlled in the absence of a site manager and have new residents been promised one or two spaces ?

Regards
Darrell and Isobel Wood
The Villa
Rudyard
ST13 8RP