

**Subject:** Additional Objection Comments – Planning Application SMD/2025/0237 (Cotton Dell Glamping, Side Farm, Cotton Bank)

Dear Planning Officer,

Following my original objection, and in light of further issues coming to light, I have reviewed the Staffordshire County Council Highways consultation response (dated 17 July 2025) and wish to submit the following additional comments. The Highways response contains significant factual inaccuracies, overlooks practical limitations of the access route, and fails to account for existing usage that contradicts its conclusions.

## **1. Incorrect Statement About Use of the Track**

The Highways Authority claims:

“Once past Rock Cottage, Cotton Bank appears to serve only Side Farm.”

This is factually incorrect. After Rock Cottage (my residence), Cotton Bank also provides access to:

- Cotton Bank Farm, a separate and occupied property beyond Side Farm;
- Land owned by Staffordshire Wildlife Trust, accessed regularly for land management and public interest;
- Grazing land actively used by local farmers, with livestock (particularly sheep) frequently present on or near the track.

Therefore, the track already serves multiple users and purposes. This inaccurate assumption appears to have materially influenced the Highways Authority’s position regarding the severity of access issues and the need for mitigation.

## **2. Suggested Passing Bays Are Impractical**

The report states that “additional passing bays would likely be beneficial” but does not condition them. More importantly, it fails to recognise that:

- Additional passing bays cannot be feasibly constructed where they are needed most.
- Much of the track runs between private land not owned by the applicant, including landowners who have not consented to alterations.
- The physical geography, mature vegetation, and narrow verges severely limit possible improvements.

It is misleading to suggest that later improvements can resolve this issue. In reality, the track’s limitations are fixed, and the development would introduce permanent conflicts between users without safe passing solutions.

## **3. Underestimated Trip Generation and Traffic Impact**

The Highways assessment relies on trip data based on a hotel model—estimating 9 trips per day across all four units—but this is inappropriate for glamping. Key oversights include:

- Multiple daily trips by guests to shops, pubs, tourist attractions, etc., due to the remote location;
- Regular traffic from cleaning staff, refuse collection, deliveries, and maintenance contractors;
- Possible additional servicing trips related to hot tubs, which are visible in submitted images but not declared in the application or Design and Access Statement.

#### **4. Hot Tubs Not Disclosed, Leading to Incomplete and Misleading Application**

Hot tubs are not mentioned in the Design and Access Statement or the application form. However, the pod plans and elevations document, as well as the artist's impression on page 20 of the Design & Access Statement, clearly show hot tubs. This omission suggests the application is incomplete and potentially misleading.

No information has been provided about drainage or water usage related to the hot tubs, which could have significant environmental impacts. From personal experience of glamping sites with hot tubs, their presence conflicts with the applicant's claim that the site is intended as a quiet, peaceful retreat.

#### **5. Lack of Photographic Evidence of Access Track**

The application does not appear to include any photographs of the access track demonstrating to the planning authority just how narrow and unsuitable it is for commercial use. This absence of visual evidence further contributes to the impression that the application may be deliberately misleading regarding the suitability of the access.

#### **6. Environmental and Livestock Risks Ignored**

The Highways response neglects the grazing land where livestock regularly use or cross the track. Increased vehicle movements pose risks of animal collisions, distress, and disturbance, with no mitigation proposed. This is both a public safety issue and a concern for neighbouring landowners and ecological land management.

#### **7. Site Acknowledged as Unsustainable**

The Highways team explicitly states:

"The site is not in a sustainable location."

This acknowledgement should carry considerable weight in the planning balance. A fully car-dependent, isolated glamping site with no safe walking or public transport options directly contradicts local and national sustainability objectives.

#### **8. ATC Data Interpretation Is Selective and Likely Incomplete**

The Highways response references an Automatic Traffic Count (ATC) near the junction with Garston Village Road, noting:

“These show a weekday average of 38.6 vehicles in total... equating to an average of 3 vehicles per hour.”

This data is used to imply the local road network is lightly trafficked. However, this conclusion is potentially misleading because:

- The ATC equipment recorded only vehicles turning right out of Cotton Bank.
- Traffic turning left or arriving from that direction was likely not captured.
- The equipment was installed directly adjacent to a 90-degree blind bend, meaning vehicles would have been moving very slowly or stopping at this point, potentially affecting traffic flow and data accuracy.
- This likely underreports actual traffic volumes and renders the data an unreliable baseline for impact assessment.
- Even if Garston Village Road has low volumes, this does not reflect conditions on Cotton Bank itself, which is an unadopted, unbound, single-track lane used by residents, farm traffic, and livestock.

Given the reliance on this ATC data in the Highways Authority’s judgment, the potential flaws and limitations in the measurement mean their traffic conclusions should be treated as invalid until a full, multi-directional count is undertaken.

## **Public Rights of Way and Sustainable Transport Claims**

It should be clarified that the public right of way running along the access track consists solely of public footpaths, not bridleways or byways. Consequently, cycling is not permitted on these footpaths under current public rights of way legislation. The applicant’s suggestion that guests will be able to explore the area easily by bicycle using these routes is therefore incorrect.

While the footpaths provide valuable pedestrian access and encourage walking, promoting cycling along these footpaths is inappropriate and conflicts with legal restrictions. The development must respect the lawful status of these routes and not assume or encourage non-permitted uses.

Regarding sustainable transport:

- The claim that the site will be accessible by bicycle via existing public rights of way is inaccurate, as lawful cycling routes to the site do not exist.
- Nearby bus stops are situated at a considerable walking distance from the site, which is impractical for visitors, especially those carrying luggage or during adverse weather.
- Current bus services are very limited, operating only twice daily and not at all on Sundays, making public transport an unreliable option.

Given these significant limitations, the site's practical reliance on sustainable transport such as walking, cycling, and public transport will be minimal. This undermines the applicant's stated commitment to reducing private car travel. Without substantial improvements in transport services and lawful cycling infrastructure, the development will remain heavily car-dependent.

## **Conclusion**

The application is based on flawed and incomplete assumptions regarding access and transport. The Highways report contains inaccurate claims about track usage, impractical mitigation suggestions, and an understated assessment of traffic impact. The failure to disclose hot tubs and their environmental implications, combined with the absence of photographic evidence of access constraints, further weaken the application's credibility. These concerns, together with the physical and environmental constraints of the site, make this development unsuitable for this location.

I respectfully request that the application be refused.

I reserve the right to submit further comments or additional points should they arise during the course of the application's consideration.

Yours faithfully,

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