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From: planningcomments@staffsmoorlands.gov.uk
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Categories: [REDACTED]

Application Reference No. : SMD/2026/0250 Site Address: John Munroe Independent Hospital Reacliffe Road
Rudyard Staffordshire ST13 8RU Leek Comments by: Lynn Nancarrow
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Submission: Objection

Comments: OBJECTION TO PLANNING APPLICATION & SUBMISSION OF MATERIAL EVIDENCE

Application Reference: SMD/2026/0250

Site Location: John Munroe Independent Hospital, Camrose Hill (Horton Bank), Rudyard, ST13 8RU

Proposal: Change of use from C2 (Hospital) to C2a (Secure Residential Institution)

Dear Ben Hurst,

I am writing to formally object to planning application SMD/2026/0250 for the change of use to a C2a secure residential institution at the John Munroe site. While the site has an established history as a C2 care facility, the shift to a highly secure, high-occupancy C2a institutional holding completely alters the planning profile and introduces unsustainable material impacts to our local community.

I urge Staffordshire Moorlands District Council to refuse this application based on the following planning considerations, and critical omissions in the applicant's submission:

1. Severe Omission of Material Evidence: No Noise or Traffic Assessments

As a matter of planning procedure, the application is fundamentally deficient. The applicant has failed to submit a Noise Impact Assessment and has failed to provide a 24-Hour Traffic Management Plan. A change of use to Class C2a introduces an entirely different, high-intensity activity profile. By omitting these critical technical documents, the applicant has failed to prove that the development will not cause severe harm to local highway safety and

residential amenity. The council cannot legally or safely grant permission in the absolute absence of this baseline data.

2. Documented Safety Failures in the Managing Director's Existing Facilities

The applicant's managing director, Mohammad Faquir Amjid, operates the Windsor Clinical and Home Care Services Group Ltd, which runs the "Apple Hill" psychiatric nursing facility in Maidenhead—a site operating the exact type of internal secure mental health framework proposed here. The Care Quality Commission (CQC) currently rates this flagship facility as "Requires Improvement" due to critical, documented safety failures. The official CQC inspection report from June 2023 explicitly notes that under this management network, "environments were not always safe or well maintained," "staff did not always fully assess and manage risks to people," and "the use of restrictive practices was not always managed safely or delivered by staff that had the required training." If this management team cannot maintain a safe environment or properly train staff to manage risks on a standard C2 locked ward, can they be trusted to operate a high-custody C2a secure unit immediately bordering local schools in Rudyard.

3. Complete Lack of C2a Custodial Track Record and Operational Viability

Under UK planning law, a C2a classification is legally reserved for secure detention and custody institutions. The applicant, Avora Healthcare Ltd (Company No: 14893398), is a newly established shell entity that has historically filed dormant accounts. While the director's broader companies have experience running standard C2 care homes with internal locked doors for dementia or standard rehabilitation, his corporate portfolio contains zero history of managing a true C2a detention facility. Entrusting a high-security custody environment immediately adjacent to vulnerable children's educational settings to an entity with zero proven operational capability in this specific use class creates an unmitigated, unacceptable safeguarding risk. The council has no empirical data or historical safety records to prove this specific applicant can safely manage a high-custody facility.

4. Open-Ended General Land Use Risks Under Class C2a Land Designation

The Local Planning Authority must evaluate this application based on the full statutory scope of Use Class C2a. Under UK planning law, Class C2a is a specialized land designation reserved exclusively for secure detention, explicitly encompassing prisons, youth offender institutions, military barracks, immigration detention centres, and secure forensic hospitals. Because a blanket approval for a C2a designation permits the legal restriction of liberty and involuntary custody, granting this change of use opens the site to any of these high-security custodial uses in the future without requiring further planning consent. Given that the site shares its immediate boundaries with sensitive educational settings and sits within a restricted conservation environment, granting an open-ended C2a custody land designation introduces a profound and unmitigated long-term risk to public safety and infrastructure compatibility.

5. Severable Corporate Structure and Lack of Local Accountability

Public records show a complex network of over 20 distinct corporate shells under the director, which separates property-owning assets (e.g., Sariis Estates Ltd) from care-delivery vehicles. This multi-layered corporate architecture effectively shields the parent network from direct liability. If operational failures, perimeter breaches, or insolvency occur at the Rudyard site, the localized corporate shell faces the liability while the primary property assets remain protected. This setup fails to provide the long-term, legally binding institutional accountability required to guarantee the safety of the surrounding Rudyard community.

6. Logistical Impossibility of Specialist Staffing in a Rural Location

A legally compliant C2a secure facility requires an exceptionally high, continuous ratio of forensic-trained psychiatric nurses, specialized clinicians, and dedicated security personnel. The previous operators of the C2 facility failed and closed down in 2022 precisely because they could not successfully recruit or retain qualified staff in this isolated, rural Staffordshire Moorlands village. The applicant's broader active healthcare operations are heavily anchored in urban hubs like Manchester. There is no evidence to suggest that a Manchester-based management network can realistically source, transport, or retain the specialized, highly secure-unit staff required for this remote site. An understaffed or poorly staffed C2a facility directly compromises local public safety.

7. Severe Highway Safety Risks and Topographical Unsuitability

The application site is accessed via Camrose Hill (Horton Bank), a steeply inclined, narrow rural road heavily constrained by the historic topography of the Rudyard Conservation Area. The geometric profile of this hill—characterised by severe gradients, blind summits, and a lack of continuous pedestrian footpaths—is entirely unsuited to the intensified, rigid traffic profile of a secure C2a institutional facility. A secure facility generates continuous, time-sensitive vehicle movements, including heavy shift-rotation staff crossovers, secure courier vans, and emergency blue-light services, all of which must navigate this steep incline.

8. Unsustainable Staff Volumetrics and Prolonged Shift Handover Surges

The scale of the proposed development—introducing a 57-bed unit requiring up to 134 Full-Time Equivalent (FTE) staff—generates a volume of concentrated traffic that Camrose Hill cannot physically absorb. Even if the applicant asserts that the secure C2a designation applies to only a partial percentage of the beds (such as a split model with half secure and half standard care), the staffing and traffic profile remains completely unsustainable. Even under a conservatively reduced staffing projection of 95–100 FTE to accommodate a partial secure layout, the site still commands an overlapping shift-change presence of over 60 vehicles concurrently. Because secure C2a elements dictate specific staff-to-patient security ratios, shift changeovers cannot be staggered broadly, creating prolonged, multi-wave traffic spikes that conflict directly with school operating hours.

9. Deficit in Off-Street Parking Capacity and Dangerous Highway Overspill

A review of the submitted site layout plan reveals a fatal operational flaw: the facility provides only 46 marked parking spaces. This allocation is structurally incapable of handling the unique overlap patterns of an intensive C2a secure facility. Under the full 134 FTE model, the absolute necessity of overlapping shift changeovers triggers an active demand for at least 84 parking spaces simultaneously, as the incoming shift must arrive and undergo security briefing before the outgoing shift can depart.

This creates an immediate, unmitigated shortfall of 38 parking spaces during every peak handover window.

Even under a heavily reduced, split-site operational model forcing a minimum overlap of 60+ concurrent vehicles, the site remains entirely over-capacity by at least 14 spaces.

Because the site is topographically locked within a sensitive conservation area and cannot physically expand its internal parking lot, this deficit will force a continuous overflow of staff, multi-agency, and visitor vehicles to park

directly on the narrow, unlit verges of Camrose Hill. This creates a severe physical bottleneck and increases accident risks on a steep, winding incline.

10. Severe Safeguarding Proximity, Traffic Conflict, and Evacuation Risks to Local Schools

The site sits directly within a highly sensitive educational corridor, bordering Horton Lodge Community Special School and sitting directly opposite Horton St. Michael's CE First School. Introducing a secure detention facility within dropping-off and playtime distance of young, vulnerable children is fundamentally incompatible with local safeguarding policies.

Furthermore, the council must give decisive weight to the highly unique nature of Horton Lodge Community Special School, which houses children overnight who suffer from severe physical disabilities, complex medical needs, and an inability to move independently. In the event of an emergency requiring the evacuation of Horton Lodge, the critical highway congestion or verge overspill parking caused by the site's parking deficit could physically block specialized accessible transport and emergency vehicles, introducing an unacceptable risk to public safety and human life.

11. Network Capacity Failure and Strategic Bottlenecks (B5331 Corridor)

The proposal relies entirely on the B5331 (Rudyard Road) as the primary arterial corridor to feed vehicles from the A523 into Rudyard village and up Camrose Hill. The B5331 possesses severe geometric constraints, most notably the restricted low railway bridge underpass and the complex mini-roundabout intersection at Harpers Gate in the village centre. This junction is the definitive village hub, managing heavy tourist traffic to Rudyard Lake alongside local residential movements. The B5331 is fundamentally incapable of absorbing the regular, time-critical vehicle distributions of a secure C2a institutional holding facility without triggering total network issues.

13. Absolute Unsuitability of Alternative Network Routes

Should vehicle movements attempt to bypass the B5331 or the base of Camrose Hill, all alternative rural routes feeding the site are geometrically incapable of absorbing an increase in institutional traffic. The eastern lane network via School Lane would route time-critical, high-frequency staff and emergency vehicles directly past the pedestrian access gates of Horton St. Michael's First School. Alternative northern approaches via Reacliffe Road are restricted single-track lanes heavily used by road users accessing the Rudyard Lake tourism network.

14. Geographical Site Unsuitability and Winter Accessibility Risks

The geographical location of Camrose Hill presents severe, cyclical highway safety hazards that make it entirely unsuitable for a high-intensity, secure C2a institutional deployment. This steep rural incline currently sits entirely outside the local authority's primary gritting network and is highly susceptible to severe ice and snow drift during winter months. A secure institutional facility operates on rigid, time-sensitive dependencies (24-hour blue-light emergency services and continuous staff shift updates). During inclement winter weather, vehicles navigating this steep, unlit hill regularly lose traction, causing potential issues and creating a secondary pedestrian safety risk for young families stranded on frozen verges.

15. Detrimental Impact on Public Rights of Way and Community Character

The physical infrastructure legally mandated to support a C2a secure perimeter—including 2.4m to 3.0m anti-climb fencing, continuous high-intensity security lighting, and intrusive CCTV networks—will severely harm the character, visual amenity, and open landscape of the Rudyard Conservation Area. Furthermore, as officially noted in the council filings, the development heavily impacts a historic Public Right of Way. Upgrading the site to a high-security facility will inevitably lead to the aggressive surveillance, restriction, or effective loss of rural footpaths used heavily by local residents and tourists, causing a direct conflict with local plan policies regarding green infrastructure and community access.

16. 24-Hour Operational Intensification and Severe Impact on Residential/Institutional Amenity

The applicant's assertion that operational opening hours are irrelevant fundamentally misrepresents the true planning profile of a Class C2a facility. By definition, a secure facility requires an intensive, 24-hour operating model that introduces a continuous baseline of noise, light, and traffic completely alien to the current C2 use. A C2a holding facility relies on rigid, mandatory shift-pattern handovers at unsociable hours (e.g., 22:00 and 07:00), prompting sudden, high-volume vehicle spikes as incoming and outgoing staff overlap. Forcing this high-frequency, 24-hour activity profile onto Camrose Hill—where vehicle headlights will sweep directly into adjacent homes and engine idling will break night-time noise thresholds—represents a severe and unacceptable degradation of residential amenity. Furthermore, the 24-hour operational noise and light pollution will severely disrupt the sensitive sensory and sleep requirements of the complex-needs children housed overnight at Horton Lodge.

Conclusion

The proposed change of use represents a speculative, high-risk property play that lacks the operational capability, staffing viability, and corporate accountability required to ensure public safety. The conversion fails to respect the character of the Rudyard Conservation Area, threatens child safety outside two local schools, compromises an important Public Right of Way, and relies on an unproven corporate entity whose managing director has documented safety failures at existing facilities.

A partial or split secure designation does not resolve these conflicts; it merely introduces fragmented operational pressures onto a failed highway framework. Furthermore, the total lack of a Noise Impact Assessment and 24-Hour Traffic Management Plan leaves the council with no evidentiary choice but to refuse this application.

Finally, if the Planning Committee is minded to approve this application despite overwhelming public objection, it is vital that the Council exercises its full statutory powers under The Town and Country Planning Act 1990 to protect the Rudyard community from the applicant's fragmented corporate structure. The Council must enforce the following strict fallback protections:

¿ Parent Company Guarantees via Section 106: Due to Avora Healthcare Ltd operating as a newly formed shell company with historically dormant accounts, any approval must be legally contingent upon a binding Section 106 agreement. This deed must force the wealthy parent or sister entities controlled by the managing director (such as Sariis Estates Ltd or Windsor Clinical and Home Care Services Group Ltd) to act as absolute financial and operational guarantors. This ensures long-term institutional accountability if the local shell entity faces insolvency.

¿ Strict C2A Restrictive Use Condition: To prevent the site from being structurally flipped, a restrictive condition must be attached to the approval notice explicitly stating: "The premises shall be used as a secure psychiatric rehabilitation hospital only, and for no other purpose within Use Class C2A of the Schedule to the Town and Country

Planning (Use Classes) Order 1987." This will legally strip away any automatic rights to convert the site into a young offenders institution, or bail hostel without a brand-new, full planning application.

đ Pre-Commencement Operational and Security Gateways: The Council must impose strict pre-commencement conditions ("Grampian conditions"). No use of the site should be permitted until the applicant submits, and the Council approves in writing alongside Staffordshire Police, a comprehensive Perimeter Security Management Plan and an independent Clinical Staff Recruitment Strategy. If the applicant cannot empirically prove how they will securely manage the boundary or recruit specialist forensic staff to this rural village, the facility must not be permitted to open.

I strongly urge Staffordshire Moorlands District Council to refuse planning permission for SMD/2026/0250.

Yours sincerely,

Lynn Nancarrow

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