

Kingsley Parish Council (KPC) are pursuing two thrusts of argument.

The first covers our belief that the Reserved Matters Application SMD/2019/0646 is not sufficiently aligned with the flawed Outline Permission SMD/2016/0378 and so should be refused in its entirety for the following reasons:

- the Outline Permission granted by 0378 never addressed the reason for refusal of unacceptable traffic impact stated in the SMD/2014/0682 decision notice and took no account of the independent traffic and road safety reports carried out by Paul Mews Associates referred to in our submissions.
- the 190 "lodges" are being placed at higher density in only two Quarry zones instead of 250 units well spaced out in three zones.
- some of the "lodges" in Quarry 3 are to be placed on ground of uncertain safety and stability.
- the "lodges" turn out to be caravans.
- the number of units to be sold has increased from 20% up to an unknown number. Looking at the other Laver Leisure sites it can be seen that their policy is to sell all units, none are for direct rental. This factor, which pushes the development towards a more residential facility, invalidates all the volume assumptions used to determine the size of the hub facilities, the traffic flows and the potential employment used to justify the outline.

The Inspector is asked to weigh these matters in reaching his decision on the planning balance.

The second thrust is focused on precisely the reasons stated in the Decision Notice refusing the Reserved Matters Application. Taking these in order from SMDC's Local Plan adopted in September 2020:

*-SS1 Development Principles*

*\*development which maintains the locally distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings;*

*\*development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas, including the Peak District National Park, both now and for future generations.*

*-SS11 Churnet Valley Strategy*

*Any development should be of a scale and nature and of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features.*

*-DC1 Design Considerations*

*All development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council's*

*Design Guide SPD. In particular, new development should:*

- 1. be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area;*
- 2. be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance;*

**In the evidence submitted by the appellant the accommodation proposed does not demonstrate any design features which reflects the surrounding area, no brick, no stone, no tile and little variation in type of construction. There is no exclusion in the above policies which allows the excuse that being largely hidden from view the development is somehow exempt. There are only four design types proposed leading to a depressing uniformity quite unlike the surroundings. The appellant claims that the manufacturing process is not typical of caravans, in fact it is same process applying only a different exterior finish.**

#### *E4 Tourism and Cultural Development*

*New tourism and cultural development which complements the distinctive character and quality of the District will be supported having regard to the Area Strategies in Policies SS 5 to SS 10 and Churnet Valley Strategy Policy SS 11. In addition:*

*-Developments in other locations may be supported where a rural location can be justified. New accommodation, attractions and facilities should:*

*A) support the provision and expansion of tourist, visitor and cultural facilities in the rural areas where needs are not met by existing facilities; and*

*B) all development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area, enhance the heritage, landscape and biodiversity of the area and shall not harm interests of acknowledged importance.*

The Churnet Valley Masterplan (CVMP) instructs us as to the type of tourism needed, in section 5 Sustainable Tourism and the Masterplan Principles can be found:

*Visitors will enjoy enhanced experiences at authentic destinations. Residents will feel the benefits of tourism in a way that doesn't undermine their local sense of place. Tourism businesses will reduce costs through greater efficiency, improving quality, creating new jobs and strengthening local economies in the process. And all this will be delivered in such a way that protects and improves the broader environment, natural and manmade.*

**The application does not provide an 'authentic' destination nor does it protect and improve the broader environment.**

and a little further:

#### *Defining Future Potential Visitors*

*5.1.16 The Tourism Study(5) provided an overview of the range of visitors that already come, or could be attracted to holiday in the Churnet Valley and wider Staffordshire Peak District. The Masterplan needs to focus on those committed to staying overnight, as this is both the most sustainable for the environment and community, and offers the most valuable economic contribution to the industry. The Tourism Study set out the market segments, characteristics and*

potential for growth as follows:

*Countrysiders:*

*Primarily coming for a combination of experiences - activities, discovery/ sightseeing, and rest & relaxation. Outdoor activities will be the predominate activity but the natural environment/scene will be a key underpinning appeal. They will have an interest in heritage and natural history and will have the propensity to travel around/ explore.*

*Typically they will be short break through to week-long staying visitors. Demographically they will be middle-aged ABC1 couples travelling from a wide area.*

*They are categorised as one of the most important markets for the area.*

*Family Fun:*

*This segment may overlap with elements of the 'Countrysiders' group (above) to an extent - the differentiator will be the influence and motivation of Alton Towers in the trip. Countrysiders' families will be likely to stay longer and undertake a wider range of activities, including heritage and natural history, rather than just come for Alton Towers (staying either on the resort or in the immediate area).*

*As with day visitors motivated by Alton Towers the group will be predominantly C1 with children all ages (from pre to secondary school) and travelling from a wide catchment. This group will generally stay at Alton Towers with limited activity elsewhere in the district.*

**The appellant is clearly seeking this second segment who it is argued will not be concerned an 'authentic' destination or critical of the appearance of the accommodation.**

**The 'modus operandi' of Laver Leisure is that of a Holiday Park populated by caravans of which 100% are sold on and not rented directly. The choice of a caravan type accommodation is no doubt a cost effective proposition for Moneystone but does not correspond to the image of a high quality or 'high end' holiday park which has been promoted from the very outset.**

Interestingly during the hearing two experts were able to come to entirely opposite opinions as to the suitability of the caravans based on the same basic information.

Can a caravan be sufficiently dressed up to look like a lodge? It may be more instructive to consider the opinion of the many members of the public who objected to this proposal. It is also no surprise that the Planning Applications Committee said ***It is considered that the proposed lodges, which are little more than caravans with cladding, fail to deliver the required high standard of design.*** Whatever is said the description and images provided are of caravans despite their external finish, their skirts, their shallow pitched roofs and the fact that they stand above ground level.

**Drawing from the written and verbal evidence examined by the Moneystone inquiry KPC conclude that the appellant has not succeeded in overturning the decision of the Planning Applications Committee on each and every element. The issues raised are not resolvable by conditions.**

