

**STAFFORDSHIRE MOORLANDS DISTRICT COUNCIL
PLANNING APPLICATIONS COMMITTEE**

2 August 2018

Application No:	SMD/2018/0212	
Location	Blakehall Fisheries, New Close Fields, Adderley, Cheadle	
Proposal	Proposed change of use and development comprising of camp site and touring caravan park with associated alterations and extension to the existing club house	
Applicant	Mr J Heath	
Agent	Byatt Oliver Associates	
Parish/ward	Cheadle	Date registered 24/04/2018
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REFERRAL

A recent and similar application was considered by the Planning Applications Committee in February 2018.

1. SUMMARY OF RECOMMENDATION

REFUSE

2. DESCRIPTION OF THE SITE AND ITS SURROUNDINGS

2.1 The application site forms part of the Blakehall Fishery site which lies in open countryside which is also designated as Green Belt. It comprises the single-storey "clubhouse" and café building and land to the south and west of it. This land is part of a much larger field. There is no defensible boundary to the west. The plans show this boundary remaining undefined. Part of the hardstanding parking area next to the clubhouse is also within the site. Access is via the long fishery access driveway which connects onto Trimpos/Brookhouse Road (a classified public highway). The main fishery pools lie to the north and east of the clubhouse. New Close and New Close Fields Farm lie further to the north. The field within the site rises towards the west and to the south where it adjoins existing woodland. The site has an area of 1.1 hectares.

3. DESCRIPTION OF THE PROPOSAL

3.1 This is a full planning application for a touring caravan park, campsite and extension to the existing clubhouse. A woodland area is also proposed in the southern part of the site adjacent to existing woodland. The single-storey flat roof extension to the clubhouse/café would provide an enlarged kitchen, store and

additional toilets and showers. This would result in 58 sq.m of floorspace being added to the 115 sq.m existing. The layout plans show new access roads leading into the proposed caravan park and camp site from the car park. According to the application forms four equivalent full time jobs would be created by the proposal.

3.2 The supporting statement provides some background to the Fishery. It refers to the Blake Hall Fishery being established in the 1990's. It says that as one of Cheadle's leading visitor attractions, keen coarse anglers and novice anglers' are all welcome with visitors traveling from far and wide to try their hand at the sport. The Fishery has 5 main fishing pools, which can accommodate over 180 anglers at any one time. There is a clubhouse which provides hot and cold food for the anglers and visitors who want to enjoy the peace and tranquility of Blake Hall. As a keen environmentalist and local land owner the applicant it says has invested heavily in the area and has planted new trees, formed woodland areas, reed beds and other types of habitats for all types of wildlife. The applicant it says has greatly improved the area over the last 2 decades and is eager to continue for future generations to enjoy.

3.3 This application is almost identical to one refused in February of this year under SMD/2017/0539. It attempts to address the four reasons for refusal. Given this, it is surprising that very little supporting information accompanies the application to address some of the reasons for refusal. No specific case for very special circumstances is made to address, for example, the fundamental issue of principle, reason for refusal 1. Members refused the application for four reasons which in brief were as follows:-

1. That the proposed caravan park amounts to inappropriate development in the Green Belt Furthermore, the proposal would be harmful to the openness of the Green Belt and there appears to be no very special circumstances with this proposal which can be deemed to outweigh the harm to the Green Belt as required by national and local planning policy particularly SS6c, E3 and R1.

2. The site is not considered to be well connected to existing tourist attractions and facilities by modes of transport other than the car and the provision of a caravan park of the size proposed, together with a campsite, would lead to a significant increase in vehicle movements in the area for visitors to reach attractions and services, resulting in an increase in emissions. Furthermore no evidence of need or demand has been provided for this type of tourist accommodation in the area. The proposal is therefore not considered to amount to sustainable tourism development and would therefore not comply with policies SS6c, E3 or R1

3. The site is close to a number of large ponds and therefore the proposal has the potential to harm the ecological value of the site including protected species. An Ecological Survey Report has not been submitted with the application and therefore the full impact on ecology cannot be assessed. This therefore conflicts with the aims of Policy NE1 and the NPPF

4. The site is within a ""High Risk"" historical coal mining area. There is therefore potential for the proposed development to affect ground stability and therefore the wider environment. A Coal Risk Assessment has not been submitted with the application and therefore the full impact on ground stability cannot be assessed. This

therefore conflicts with Policy SD1 'Sustainable Use of Resources' of the Staffordshire Moorlands Core Strategy.

3.4 The applicant sought pre-application advice on the scheme (together with proposed chalets) before the original application was submitted. The pre-application report to the applicant concluded that the proposal would be unlikely to be acceptable (ref: PAD/2017/0050).

4. RELEVANT PLANNING HISTORY

SMD/2017/0539 Change of use to campsite and caravan park and alterations and extensions to existing clubhouse. Refused

5. PLANNING POLICIES RELEVANT TO THE DECISION

5.1 The Development Plan comprises of:

- Saved Local Plan Proposals Map / Settlement Boundaries (adopted 1998).
- Core Strategy Development Plan Document (adopted March 2014)

Staffordshire Moorlands Local Plan (1998)

5.2 Development boundaries within the 1998 Adopted Local Plan are still in force until such time as they are reviewed and adopted through the site allocations process. Following consultation last year a Preferred Options Site Allocation DPD is currently out for consultation.

Adopted Staffordshire Moorlands Core Strategy DPD (26th March 2014)

5.3 The following Core Strategy policies are relevant to the application:-

- SS1 Development Principles
- SS1a Presumption in Favour of Sustainable Development
- SD1 Sustainable Use of Resources
- SD3 Carbon-saving Measures in Development
- SD4 Pollution and Flood Risk
- SS6C Rural area strategy
- DC1 Design Considerations
- DC2 Heritage
- C1 Creating Sustainable Communities
- NE1 Biodiversity and Geological Resources
- T1 Development and Sustainable Transport
- T2 Other Sustainable Transport Measures

National Planning Policy NPPF

National Planning Policy Guidance

Emerging Staffordshire Moorlands Local Plan

National Policy Guidance

4.3 Paragraph 48 of the newly adopted NPPF states that:

“...decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);*
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

Local Plan process

4.4 The Council agreed to publish the Local Plan Submission Version for representations in February 2018. At this point, the Council agreed that the Local Plan was “sound”. Formal representations were then invited from residents, businesses and other stakeholders to provide them with the opportunity to support or challenge the soundness or legal compliance of the Local Plan. This stage in the process followed three previous public consultations since 2015 which had informed the preparation of the Local Plan alongside a comprehensive evidence base.

4.5 In June 2018, the Council subsequently agreed to submit the Local Plan Submission Version to the Secretary of State for examination. An examination in public will now be held this Autumn in order to determine whether the Local Plan is sound and legally compliant. Subject to the findings of the appointed inspector, the Local Plan is expected to be adopted in the Spring of 2019. At this point, it will supersede the adopted Core Strategy and become part of the statutory development plan for the District.

4.6 In this context, the Council’s position on the weight to be given to the policies contained in the Local Plan Submission Version in terms of the three criteria set out in Paragraph 48 of the NPPF is as follows:

- The stage of preparation – the Local Plan is now at an advanced stage of preparation as the Council has submitted it to the SoS for examination
- The extent to which there are unresolved objections to relevant policies – this varies depending on the policy in question. The Officer Comments section of this report identifies the level of outstanding objections to each policy and recommends the amount of weight to be given to them at this stage in the process
- The degree of consistency of policies with the NPPF – given that the Council has submitted a Local Plan that it considers to be sound, all policies are deemed to be consistent with the NPPF.

Emerging Policies

The following policies are considered to be relevant to this application:

- Policy SS1 Development Principles
- Policy 1a Presumption in favour of sustainable development
- SS2 Settlement Hierarchy
- SS10 Other Rural Areas Strategy
- Policy E4 Tourism and Cultural Development
- Policy SD4 Pollution and Water quality
- Policy SD5 Flood Risk
- Policy DC1 Design Considerations
- Policy DC3 Landscape and Settlement Setting
- Policy NE1 Biodiversity and Geological Resources
- Policy NE2 Trees Woodland and Hedgerows
- Policy T1 Sustainable Transport

6. CONSULTATIONS CARRIED OUT

Press Notice expiry date: 23/05/18

Site Notice expiry date: 04/06/18

No letters of representation received.

<u>Town Council</u>	None received
<u>Ecology Officer</u>	No objections subject to conditions
<u>Environmental Health Officer</u>	Comments awaited
<u>Local Highway Authority</u>	No objections
<u>Trees and Woodland Officer</u>	No objections subject to conditions
<u>Coal Authority</u>	No objections
<u>Severn Trent Water</u>	No objection

7. OFFICER COMMENT AND PLANNING BALANCE

7.1 As with all applications, the LPA is required to determine this application in accordance with the Development plan, unless there are material circumstances which indicate otherwise and in determining these applications, it shall have regard to the provisions of the Development Plan, in so far as material to the application and to any other material considerations.

7.2 Core Strategy Policy SS1a establishes a 'Presumption in Favour of Sustainable Development' in line with the National Planning Policy (herein referred to as the

NPPF) where: (1) planning applications that accord with policies within the Core Strategy will be approved without delay and (2) where there are no relevant policies or they are out of date, the Council will grant planning permission unless material considerations indicate otherwise considering:-

- I. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or,
- II. Specific policies in within the NPPF indicate that development should be restricted.

7.3 In order to reverse the previous decision of the Council it is necessary for each of the four reasons for refusal for SMD/2017/0539 to be addressed. This forms the main focus of the analysis below with other material matters considered thereafter.

Principle of development

7.4 Reason for refusal 1 relates to the principle of development in the Green Belt. 7.5 Policy E3 refers specifically to tourism and cultural development. It makes specific reference at bullet point 2 to camping and touring caravans outside of the Green belt where it says that they may be acceptable subject to a number of criteria. However within the Green Belt it says that only small camping sites may be appropriate provided amongst other matters they do not prejudice 'openness' Although it is silent on touring caravans, read as a whole as it must, the clear inference is that touring caravans in the Green Belt are not appropriate development. This is supported in the text that follows the policy which refers to touring caravans and camping sites and says that 'Stronger controls will however apply across the Green Belt...'. It aligns with policy SS6C and the NPPF.

7.5 Policy R1 refers to rural diversification. It too confirms that within the Green belt inappropriate development which may otherwise be acceptable in terms of the policy must still be justified by very special circumstances.

7.6 The extension/alteration to the club house was considered to be appropriate development in the previous application because it would not result in disproportionate additions to the original building (para 89 in the 2010 NPPF / para 145 in the new 2018 version). However the majority of the application relates to the change of use of land to a camp site and touring caravan site. Para 89 (now para 145) relates solely to buildings and is not therefore applicable to this element of the application. Para 90 of the old NPPF, which was in force at the time of the previous application provided five other forms of development that are also considered to be 'not inappropriate' in the Green Belt. However the proposed use does not fall within any of the categories. The proposal was therefore inappropriate development in the Green Belt, confirmed by Policy SS6c. The new NPPF, which was adopted in July 2018 states at paragraph 146 that "*Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.*" These include "*material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)*". Therefore whilst a change of use to a camping and caravan site (which is a form of outdoor recreation) would not be

inappropriate development in principle it can only be held to be acceptable under the new NPPF provided that it preserves openness. Although it could be said to be transient to some extent the applicants are seeking all year round occupation to tie in with the fisheries. Each pitch would also have the towing vehicle –quite likely to be large and there would also be the new access/service roads and very likely some security lighting and night time light pollution all of which impact on openness. A good analogy could be drawn with a car park which is always held to impact on openness even though the parking of vehicles is transient.

7.7 Having regard therefore to the new NPPF touring caravans and camping sites are no longer considered to be inappropriate development in the Green Belt and harmful by definition. However, they would compromise openness and as such it is necessary to demonstrate that very special circumstances exist to clearly outweigh this harm and any other harm identified.

7.8 Emerging policy E4 refers to tourism and cultural development. It says that New tourism and cultural development which promotes the distinctive character and quality of the District will be supported having regard to the Area Strategies in Policies

SS5 to SS10 and Churnet Valley Strategy Policy SS11. 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.

7.9 Policy SS10 deals with the other rural areas including Green Belt. It provides for enhancing tourist opportunities by:

- Supporting sustainable tourism developments and measures in the Churnet Valley in accordance with Policy SS12 and the Churnet Valley Masterplan SPD;
- Allowing for small-scale tourism developments in other areas (in accordance with
- policy E4);
- Establishing strong linkages between recreational and tourist resources;
- Recognising and developing the close linkages to the Peak District National Park. Maintain the Green Belt within Staffordshire Moorlands”

7.10 In view of the level of objections it is considered that moderate weight can be given to Policy E4 but only limited weight can be given to Policy SS10. Furthermore, the supporting text to Policy E4 states “*sites for touring caravans and camping sites will be granted providing they meet the criteria set out in the policy. Stronger controls will however apply across the Green Belt, including those parts of the Churnet Valley which are within it, in order to preserve their openness*”. Policy SS10 also says that strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.

7.11 The NPPF requires LPA's to give substantial weight to any harm identified. In this case in addition to definitional harm. The replacement of open fields with touring caravans, tents, access roads and vehicles throughout the year could not be regarded other than compromising openness notwithstanding the fact that the use is to some extent transitory in nature. This part of the Green Belt would be less open than at present. Paragraph 79 of the Framework stresses the importance of keeping Green Belt land permanently open; one of the essential characteristics of Green Belts being their openness and permanence.

7.12 The applicant does not specify or identify what the very special circumstances are. His case is that the proposal is in line with the Councils Core Strategy, that it will boost tourism by providing a high quality attraction and boost the local economy. He says that the primary focus of the development is to support and enhance the existing fisheries use. The club house will act as the hub building. He says that the proposal will provide 5 new full time jobs and that it will integrate with surrounding communities (although the statement does elaborate on this and say what or how it will achieve this) and create an attraction for tourists and the local community.

7.13 In response to the points put forward by the applicant, the analysis above has demonstrated that the proposal is not in line with the Core Strategy. There is no doubt that the development would boost tourism and that there would be some benefit to the local economy. However all tourism proposals do this to some extent; it is neither exceptional nor special. The support and enhancement of the existing fisheries again is an obvious benefit but there is no evidence that it is a struggling enterprise that requires further development which could be regarded as contributing to 'special circumstances'. The provision of 5 jobs is also a benefit but in Green Belt terms it is not significant. Taken together these benefits could be considered to have moderate weight at best. However they do not clearly outweigh the harm identified to which substantial weight must be given. That is the test that must be applied and it is because of this that the conclusion is that very special circumstances do not exist. The proposal is unacceptable in principle. Reason for refusal 1 remains outstanding.

Location and Accessibility

7.14 Reason for refusal 2 refers to the lack of connectivity of the site to existing tourist attractions and facilities and the poor accessibility of the site. Reference is also made to the fact that there is no evidence of need or demand for this type of tourist accommodation.

7.15 Policy E3 says that new tourist and visitor accommodation should be developed in locations that offer, or are capable of offering, good connectivity with other tourist destinations and amenities, particularly by public transport, walking or cycling. Emerging Policy E4 contains similar requirements.

7.16 As stated in the previous application, the site is not located close to any tourist destinations or amenities and there is no nearby public transport. The policy also states new tourist accommodation should normally be located in or close to settlements where local services, facilities and public transport are available. The centre of Cheadle is a 2.0 mile car journey or bike ride. The distance by walking is

reduced to 1.5 miles but this is only managed safely via a half-mile unlit and unsurfaced path across fields to Brookhouse Road.

7.17 Outside of the areas with good connectivity, new accommodation should be of a scale which can easily be assimilated into the area in a sustainable manner. Due to the site location and poor connectivity, the provision of twenty caravan pitches and a camp-site is therefore likely to lead to a substantial increase in vehicle movements (and emissions) so that visitors can reach attractions mainly located in the Churnet Valley and reach essential services such as shops/supermarkets and pubs/restaurants.

7.18 This matter has not been addressed in this resubmission. The NPPF supports sustainable tourist accommodation “in appropriate locations where identified needs are not met by existing facilities in rural service centres”. However, there is no evidence or information to suggest there is any significant demand for more tourist accommodation in the area, especially as it is outside of the Churnet Valley. It is because of this that this reason for refusal has not been addressed. Reason for refusal 2 remains outstanding.

Biodiversity

7.19 Reason for refusal 3 of the previous application, SMD/2017/0539 related to the lack of an ecological survey to assess any potential impact on ecology from the development.

7.20 To address this reason, the current application is accompanied by a Preliminary Ecological Appraisal carried out by Evolution Ecology dated 5th March 2018. No significant ecological constraints were identified as a result of the survey. The Ecology Officer has considered this and accepts its conclusions. He advises that given the size and scale of the development and in line with Policy NE1, there are opportunities for biodiversity enhancements. This should include retention of the wet/marshy grassland and ditch to the south east which is shown for woodland planting, tree planting adjacent to the leylandii hedge along the southern boundary of the site should also be considered to improve the biodiversity value of the southern boundary of the site. Single species leylandii hedges tend to be relatively poor for biodiversity. Planting schemes should allow continuing management of the Leylandii hedge.

7.21 Subject therefore to conditions to secure biodiversity enhancement/landscaping as described above and elsewhere in this report, this reason for refusal is considered to be addressed. There is no conflict with Policy NE 1 or the NPPF.

Ground Stability

7.22 The site is within a High Risk Coal Mining Zone due to historical coal mining in the area which has caused a degree of land stability. Reason for refusal 4 was based on the lack of a Coal Risk Assessment to properly assess and understand the potential impact from the proposal on ground stability.

7.23 The current application is accompanied by a Coal Mining Risk Assessment prepared by Sladen Associates dated February 2018. This has been considered by the Coal Authority. They agree with the conclusions of the Risk assessment that any risk posed is low to very low due to the nature of the development and that no intrusive investigations or remedial measures are required. They raise no objection to the application.

7.24 It is for these reasons that reason for refusal 4 is considered to be addressed. There is no conflict with Policy SD1 of the Core Strategy.

Design of the club house extension

7.25 The proposed extension will provide a kitchen extension, store together with shower and toilet facilities. The extension is flat roofed and to be finished in timber to match the existing club house. No objection was raised to the design previously and there is no reason to take a different stance this time. The proposal is considered to be compliant with Policy DC1 and the NPPF

Landscape Impact

7.26 Although a landscape and visual impact assessment does not support the application, in the applicants view the proposals will seamlessly integrate with the landscape.

7.27 The Trees and Woodland Officer has considered the application and confirms that it would have no impact on any significant existing trees or hedgerows.

7.28 In terms of visual impact, at present the overall fisheries site comprises mainly low key development of clubhouse and informal parking areas, together with several pools which have been landscaped with tree planting; further woodland belt-type planting areas have been established to some of the boundaries eg south-west, south, north-east. The fisheries also lies within something of a hollow in the wider landform and this helps to assimilate into the local landscape.

7.29 The proposed development of touring caravan park and camp site would by its nature be a more concentrated, visually prominent use, with most caravans being white and tents often brightly coloured. There would be attendant vehicles adding to the concentration of visually prominent features. Despite this, however, the Trees and Woodland Officer does not consider that it would have a significantly harmful residual visual impact, especially once new structural landscape planting was well established. In support of this view he says that the application site itself is actually well screened from most surrounding publicly accessible viewpoints; Public footpath No. 58 (Cheadle Parish), becoming Public Footpath No. 21 (Dilhorne Parish) passes through fields to the south of the fisheries before actually crossing the southern part of the current application site and continuing to Dilhorne Common. There are views directly into the site from this footpath, but due to landform and existing trees/hedgerow this is only within approximately 150m of the site boundary. He says that these views would be addressed and mitigated by the indicative new woodland planting shown on the Proposed Scheme Two Site Layout Plan. Public Footpath No. 8 (Dilhorne Parish) follows the tarmac roadway serving Blake Hall and neighbouring

properties, with Public Footpath No. 17 (Dilhorne Parish) leading off this along the stoned access track into and through the fisheries site and carrying the route of the promoted self-guided Staffordshire Moorlands Walk “Centuries of Coal”; Again he says that the application site is only notably visible along a relatively short stretch of this track, within the fisheries site passing the long northerly pond.

7.30 He concludes that the limited visual impact would be appropriately mitigated by new structural planting, and a substantial new woodland area is indicated on the layout plan. However he does suggest some amendment to the general disposition of new planting for these reasons

- a) an area of existing wet/marshy grassland edged by a shallow ditch at the south-eastern corner of the site is shown within the proposed new woodland planting area. It is suggested that this should not be planted but retained in its existing state other than infilling/reinforcing the south-east boundary hedgerow/treeline which would still be appropriate. There would consequentially be a benefit to increasing the width of retained new planting around the south-eastern side of the proposed camp site area to compensate for a reduction in indicated new screen planting on this side.
- b) There would also be benefit in establishing some planting along the north-western boundary of the application site, where currently none is indicated, to address views from the public footpath to the north – perhaps a good native species hedgerow, together with a belt of trees (2 or 3 trees wide) to give some depth/density to the screening.

7.31 In light of the above no objection is raised on visual and landscape impact grounds subject to securing the amended details as described above through conditions picking up also on biodiversity enhancements – see discussion elsewhere. A fully detailed landscaping scheme should be required by condition in the event that planning permission is granted, and this should take into account suitable native species to suit local variations in ground conditions across/within the application site. For these reasons and as in the previous application, there is no conflict with Policy DC3.

Residential Amenity

7.32 The nearest dwelling is between 400-500 metres to the north of the site. The previous application concluded that the proposal would not harm the amenities of residents by way of privacy loss, noise or disturbance with the safeguard of appropriate environmental health conditions. There is no reason to take a different line this time as the proposal is virtually identical in scale and location.

Economic benefits

7.33 The Regeneration Officer has considered the application . She notes that the proposal will create four additional FTE jobs and safeguard two existing jobs. It will also provide additional jobs during the construction stage and in the supply chain. She comments that the proposal will encourage overnight stays in the area. Scarborough Tourism Economic Activity Monitor (STEAM) data for 2015 has identified that there were 4.6m day visitors to the Staffordshire Moorlands who spent on average £35.11 per day. In contrast, the 0.49m staying visitors spent £202.81 per

visit (or £65.42 per day based on an average 3.1 days). Therefore, assuming there is no overall increase in visitor numbers, the conversion of a day visitor to a staying visitor – through the investment in accommodation or attractions which encourage people to stay longer, will have an average boost to the local economy of £167.70 per visitor.

Planning Balance

7.34 The previous application was refused for four reasons. Two of these relating to land stability and ecology have been satisfactorily addressed. As such there is no technical constraint to the sites development for a caravan park, camping site and club house extension.

7.35 Reasons for refusal 1 and 2 remain outstanding. They relate to issues of policy principle and are not addressed in the application. Whilst the proposal is no longer inappropriate development in the Green Belt, there remains harm to openness. The NPPF requires the decision maker to give substantial weight to any harm. To be acceptable this harm must be clearly outweighed by other considerations such that very special circumstances exist. Unfortunately the case is weak and does not meet the high Green Belt test. There is conflict with the Development Plan and this reason for refusal remains outstanding. There is also the matter of accessibility, reason for refusal 2. Again this is not addressed in the current submission and also remains outstanding. There is conflict with the Development Plan in this respect too.

7.36 It is because of these matters that the application is recommended for refusal.

8. RECOMMENDATION

A. REFUSE for the following reasons:

1. The proposal represents inappropriate development in the Green Belt. It is harmful by definition. Furthermore, the proposal would also be harmful to the openness of the Green Belt. It is not considered that the considerations put forward by the applicant clearly outweigh the totality of the harm such that very special circumstances exist. The NPPF requires decision makers to give substantial weight to any harm to the Green Belt. The proposal is therefore contrary to policies SS6c, E3 and R1 of the Staffordshire Moorlands Core Strategy and the National Planning Policy Framework (NPPF).

2. The site is not considered to be well connected to existing tourist attractions and facilities, by modes of transport other than the car and the provision of a caravan park of the size proposed, together with a campsite, would lead to a significant increase in vehicle movements in the area for visitors to reach attractions and services, resulting in an increase in emissions. Furthermore no evidence of need or demand has been provided for this type of tourist accommodation on this site. The proposal is therefore not considered to amount to sustainable tourism development

and would therefore not comply with policies SS6c, E3 or R1 of the Staffordshire Moorlands Core Strategy and conflict with the NPPF.

- B. In the event of any changes being needed to the wording of the Committee's decision (such as to delete, vary or add conditions/informatives/planning obligations or reasons for approval/refusal) prior to the decision being issued, the Operations Manager – Development Services has delegated authority to do so in consultation with the Chairman of the Planning Applications Committee, provided that the changes do not exceed the substantive nature of the Committee's Decision.**