

Planning Statement

Full Planning Application for erection of single storey extensions
at Boathouse Cottage, Reacliffe Road, Rudyard
For Mr. & Mrs. Dudley

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1.0 INTRODUCTION

- 1.1. This Planning Statement has been prepared to support a revised application for the extension and alteration of a former boathouse on the shore of Rudyard Lake.
- 1.2. The cottage benefits from full residential status conferred by application SMD/2011/0259, and has recently received planning permission for the erection of a single storey rear extension and single storey side extension (SMD/2016/0763).
- 1.3. The extensions approved encompassed a total floorspace of 29.9sq.m. and incorporated the creation of a single storey kitchen extension off the western elevation of the building, along with a bedroom and bathroom extension off the southern elevation, linked to the original boathouse by a central glazed link.
- 1.4. This revised application proposes a modestly larger extension than that which has been approved, encompassing a similar kitchen and bedroom / bathroom extension, but with a larger link section connecting the bedroom section to the original boathouse.
- 1.5. This Planning Statement seeks to demonstrate that the proposed development is acceptable in terms of its impact on the Green Belt, and on the character and appearance of the Conservation Area.

2.0 SITE DESCRIPTION

- 2.1. The application site lies on the western shore of Rudyard Lake, and comprises a detached former boathouse that benefits from full residential status. It sits within a substantial plot and is comprises a number of mature trees. The eastern boundary of the site fronts onto Rudyard Lake, with the western boundary comprising Reacliffe Road. Woodland extends to the north and south of the site. Vehicular access exists direct off Reacliffe Road which serves a driveway that runs down to a slipway into the lake. The front door of the property faces northwards towards this driveway. The site as a whole lies within the recently designated Rudyard Conservation Area, and is also within the area restricted by an Article 4 direction to control permitted development extensions.

3.0 PLANNING POLICY

- 3.1. Paragraph 11 of the NPPF confirms that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for this area comprises the Staffordshire Moorlands Core Strategy DPD (March 2014) and the following policies are of relevance to the determination of this application.

- 3.2. Policy SS1a of the Core Strategy states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - Specific policies in that Framework indicate that development should be restricted
- 3.3. Policy SS6c of the Core Strategy states that the rural areas will provide only for development which meets an essential local need, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. It goes on to state that essential local needs will be met by allowing the conversion, extension or replacement of an existing rural building in accordance with policies R1 and R2 of the Core Strategy. Policy SS6c also states that strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.
- 3.4. Policy DC1 of the Core Strategy states that 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 SPD. In particular, new development should (amongst others):
- be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area;
 - be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, density, layout, siting, landscaping, character and appearance;
 - create, where appropriate, attractive, functional, accessible and safe public and private environments which incorporate, amongst others, landscaping and designing out crime initiatives;
 - protect the amenity of the area, including residential amenity, in terms of satisfactory daylight, sunlight, outlook, privacy and soft landscaping;

- promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate, in accordance with policy NE1;
- provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use;
- ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed;

3.5. Policy DC2 of the Core Strategy states that the Council will safeguard and, where possible, enhance the historic environment, areas of historic landscape character and interests of acknowledged importance, including in particular scheduled ancient monuments, significant buildings (both statutory listed and on a local register), the settings of designated assets, conservation areas, registered historic parks and gardens, registered battlefields and archaeological remains by:

1. Resisting development which would harm or be detrimental to the special character and historic heritage of the District's towns and villages and those interests of acknowledged importance.
2. Promoting development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of conservation area appraisals, design statements, archaeological assessments, characterisation studies and Masterplanning.
3. Preventing the loss of buildings and features which make a positive contribution to the character or heritage of an area through appropriate reuse and sensitive development, including enabling development, unless their retention is not viable or there would be substantial planning benefits to outweigh the loss.

3.6. Policy DC3 of the Core Strategy states that the Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by resisting development which would harm or be detrimental to the character of the local and wider landscape or the setting of a settlement and important views into and out of the settlement as identified in the Landscape and Settlement Character Assessment, and supporting development which respects and enhances local landscape character and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character Assessment.

3.7. Policy R2 of the Core Strategy states that other than sites allocated for housing development in the Site Allocations DPD, only the following forms of housing development will be permitted in the rural areas outside the settlement and infill boundaries of the town and the villages:

- Affordable housing which cannot be met elsewhere, in accordance with Policy H2.

- A new dwelling that meets an essential local need, such as accommodation for an agricultural, forestry or other rural enterprise worker, where the need for such accommodation has been satisfactorily demonstrated and that need cannot be met elsewhere.
- Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area.
- Extensions to existing dwellings provided they are appropriate in scale and design and do not have a detrimental impact on the existing dwelling and the character of the rural area.
- The conversion of non-residential rural buildings

3.8. Policy NE1 of the Core Strategy states that the biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development. The Council will achieve these by resisting development that could have an adverse effect on European, National, regional and locally designated site, and by ensuring that development produces a net gain in biodiversity with any unavoidable impacts appropriately mitigated for.

4.0 MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF)

4.1. The National Planning Policy Framework sets out guidance in respect of development within the Green Belt. It also sets out guidance in respect of securing high quality design and safeguarding heritage assets. The content of the NPPF has been taken into consideration in the preparation of this application and is discussed in more detail within the Statement of Case below.

Rudyard Conservation Area Appraisal

4.2. The Rudyard Conservation Area Appraisal defines and records the special architectural and historic interest of the conservation area and also identifies opportunities for enhancement. It is intended to act as a guide for owners of buildings and land, as well as the Local Authority. It is accompanied by an Article 4 Direction which has served to remove various permitted development rights within the Conservation Area boundary. The content of this document has been taken into account in the preparation of this application and is discussed in more detail within the Statement of Case below.

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4.3. The recent approved development on the site constitutes a material fall-back position against which this application must be determined. The significance of this approved scheme in the context of the proposed extensions is discussed in more detail within the Statement of Case below.

5.0 PLANNING ISSUES

Impact on the Green Belt

- 5.1. As with the previous application, the submitted proposal encompasses the erection of single storey side and rear extensions to the existing cottage, on a site that lies within the North Staffordshire Green Belt. Policy SS6c of the Core Strategy states that essential local needs will be met by allowing the conversion, extension or replacement of an existing rural building in accordance with policies R1 and R2 of the Core Strategy. It goes on to state that strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.
- 5.2. Government policy relating to development in the Green Belt is set out within the National Planning Policy Framework. It confirms in paragraph 89 that local authorities should regard the construction of new buildings as inappropriate within the Green Belt. It nevertheless goes on to list a number of exceptions which includes:
- “the extension alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building”
- 5.3. There is no definition within the NPPF as to what constitutes a disproportionate addition but some discussion on the matter is set out within policy R2 of the Core Strategy, which states that extensions to existing dwellings will be permissible provided they are:
- “appropriate in scale and design and do not have a detrimental impact on the existing dwelling and the character of the rural area”.
- 5.4. In determining the previous application (SMD/2016/0763) the Local Authority concluded that the proposed extensions, which represented an increase in footprint of some 29.9sq.m. (stated as 30.2 sq.m. within the delegated report) amounted to an inappropriate form of development within the Green Belt.
- 5.5. Paragraph 87 of the NPPF confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 88 of the NPPF goes on to state that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and that very special circumstances will not exist unless:
- “the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations” (my emphasis)
- 5.6. The previous application on the site was approved by the Local Authority as they were satisfied that very special circumstances had been demonstrated to

clearly outweigh both the harm by inappropriateness and other harm arising from the proposed single storey extensions. Specifically, the delegated report commented that:

“The extensions echo the extant building in style whilst being subordinate in proportions. The side extensions being set back from the lake edge are at least partially recessive especially the middle element. Giving weight to the claimed very special circumstances of a very small original building size the proposal is considered to be acceptable in Green Belt terms.

- 5.7. This revised proposal encompasses a modestly larger extension to that approved under application SMD/2016/0793. Given the conclusions reached by the Local Authority in its determination of the previous application, it is expected that this revised proposal will also be concluded to be an inappropriate form of development within the Green Belt.
- 5.8. Before considering the applicant's case of very special circumstances it is first necessary to consider what additional harm to the Green Belt would arise as a consequence of this proposal, having regard to the applicant's established fall-back position.
- 5.9. The revised proposal will encompass the same kitchen extension as that approved under application SMD/2016/0793, along with the same proportions and width of extension that originally encompassed the bedroom and bathroom (now proposed as a bedroom and second bedroom). The increase in floorspace compared to that previously approved relates only to the central link section of the extension which is to be modestly enlarged.
- 5.10. The delegated report accompanying application SMD/2016/0793 confirmed that very special circumstances had been demonstrated to justify an increase in gross external floor area of the existing cottage of 87%, and an increase in developed footprint on the site of some 71%. However, that latter figure is erroneous as it fails to take account of the existing shed. The calculations shown in Figure 1 overleaf show the correct calculations, and are based on Gross External Areas calculated using CAD software.
- 5.11. The figures demonstrate that the originally approved scheme represented a percentage increase in built footprint on site in the order of 51%, not the 71% quoted within the delegated report. The anomaly appears to have arisen owing to the shed not being deducted within the Local Authority's calculations. The figures in Table 1 go on to show that the revised proposal will result in a percentage increase in built development on the site (64%) which is lower than that which the Council had stated to be justified by very special circumstances in its determination of the previous application (71%).

Figure 1 – Comparative Analysis of Extant Permission / Proposed Development

	LPA Calculations	Applicant Calculations
Existing GEA	34.6sq.m.	33.7sq.m.
Existing Shed GEA	8sq.m.	8.4sq.m.
Approved Increase in GEA	22.2sq.m.	21.55sq.m.
Overall Approved GEA	64.8sq.m.	63.65sq.m.
% Increase (Dev Footprint)	71%	51%*
Proposed Extension GEA	----	69.1sq.m.
Increase in GEA over Existing	----	27sq.m.
% Increase (Dev Footprint)	----	64%

*Calculations have been worked out establishing the increase between the 'As Existing' Built Footprint (42.1sq.m.) and the 'As Proposed' built footprint (63.65sq.m.) which gives a figure of 21.55. That figure is then divided by the original 'As Existing' Built Footprint Figure, and multiplied by 100.

- 5.12. The delegated report accompanying application SMD/2016/0793 comments that the main public views of the development will be from Reacliffe Road from the southwest, and that the small kitchen extension would mask views of the side extensions. That same rear kitchen extension will also screen and mask views of the section of building proposed to be enlarged under this revised application, and as a consequence, the proposed development will have no materially greater impact on the openness of the Green Belt than that which has already been approved by the Local Authority.
- 5.13. As with the previous proposal, the applicants case of very special circumstances focuses on the very small floorspace of the original dwelling. The existing dwelling has not been previously extended and occupies a very small area of floorspace (33.7sq.m. GEA excluding boat store and balcony). It does not provide an appropriate level of residential accommodation, comprising only of a lounge/kitchen area and separate toilet/shower room. The proposed extension will bring the accommodation on site up to a modern day standard and has been derived through a thorough understanding of the constraints of the site. The extension is larger than that which the Local Authority has approved under application SMD/2016/0793 but for the reasons discussed above, will not have a materially greater impact on the openness of the Green Belt.
- 5.14. The Nationally Described Space Standards, published by DCLG in March 2015 as part of a wider housing standards review, sets out minimum space standards that should be accommodated within new dwellings in the interests of securing an appropriate level of residential floorspace. The guidance was published to replace existing space standards utilised by local authorities, and is a technical

space standard to be implemented through the planning system. In the absence of any locally adopted space standards by the Local Authority, it is considered that the Nationally Described Space Standards constitute a material consideration that should be taken into consideration in the determination of this application.

- 5.15. The National Described Space Standards indicate that for a two bedroomed property comprising of a double bedroom and single bedroom there should be a *minimum* internal floorspace of 61sq.m. The existing dwelling has no internal storage area, no separate bathroom, nor separate bedroom areas. It can only be described as a very small dwelling with substandard accommodation. The proposed extension would increase the gross *internal* floorspace of the property to 60.4sq.m. and provide a separate double bedroom, single bedroom, bathroom and kitchen. By way of comparison the recently approved scheme had a gross *internal* area of 54.1sq.m. and accommodated a separate double bedroom, bathroom and kitchen. The proposal therefore represents an increase in the gross internal floorspace of the dwelling of just 6.3sq.m. compared to the extant permission.
- 5.16. Paragraph 9 of the NPPF confirms that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including:
- “improving the conditions in which people live, work, travel and take leisure”
- 5.17. The proposal, like the previous permission, will derive a positive improvement to the quality of the built and historic environment, by delivering a high quality design that respects the character of the existing cottage, and which will secure the removal of the existing shed and LPG tank on the site. The proposal will furthermore improve the quality of life of the applicants by improving the conditions in which they live, and bringing the dwelling up to a modern day standard. Such material considerations are considered to lend significant weight in favour of the proposed development.
- 5.18. The extensions are furthermore appropriate in scale to the original property, encompassing a lower ridgeline and narrower gables which match those of the approved scheme, thereby ensuring that the proposed development will maintain a subservient relationship to the original dwelling and preserve the existing cottage as the main feature within the rural area. The muted palette of materials furthermore ensures that the proposed development will assimilate well with its wooded backdrop, and will not result in significant encroachment of development beyond that which already exists, as there is a storage shed located immediately to the south of the cottage which will be replaced by the proposed extension.
- 5.19. Overall it is considered that very special circumstances exist to justify a departure from Green Belt policy, in that the existing dwelling is very small to

start with and does not propose an appropriate level of floorspace. The proposed development furthermore represents a very modest increase in floorspace over and above that which the Local Authority have already approved under application SMD/2016/0793, and the total increase in built footprint (64%) is less than that which the Council have previously confirmed to be justified by very special circumstances in the determination of the previous application (71%). The proposal will furthermore derive a beneficial enhancement to the Green Belt through the removal of the existing shed and LPG tank on the site. The proposed development is therefore considered to be acceptable from a Green Belt perspective.

Design & Visual Impact

- 5.20. The design philosophy for this revised proposal is based on the scheme previously approved on the site under application SMD/2016/0793 and adopts a sympathetic and complimentary design that relates well to the existing cottage, whilst appearing subservient to it, with both extensions having a lower ridge height and narrower gable width than the existing cottage. The use of large amounts of glazing and glazed balcony will further serve to reinforce the original cottage as the main feature within views from the lake, with the glazing reflecting the water beyond. The existing cottage will furthermore retain its existing projecting balcony and existing external appearance, save for the addition of one new opening and enlargement of the existing openings in its front elevation (north) and repainting dark grey to match the colour of the proposed extension. The existing boat store beneath the dwelling is also to be retained unaltered. The proposed development will also utilise a matching palette of materials of timber cladding and tiled roof, as per the approach adopted under the previous application.
- 5.21. The previously approved scheme was met with the approval of both the Conservation Officer and the Conservation Liaison Panel, and was considered to constitute a high quality design. The revised proposal adopts the same design philosophy as the previous scheme, and will not have any materially greater impact on the character and appearance of the Conservation Area than the extant permission, as the increase in size proposed is to be accommodated in an area which by the Council's own admission will be screened from Reacliffe Road by the kitchen extension. The proposal therefore accords with the provisions of policy DC1 of the Core Strategy in this regard.

Heritage Impacts

- 5.22. The application is accompanied by a Heritage Statement which has assessed the impact of the proposed development on the Ruddyard Lake Conservation Area, which is a designated heritage asset. As with the previous proposal the extensions will result in less than substantial harm to the heritage asset, and that the benefits of the proposal in terms of deriving positive improvements the appearance of the area and improved residential accommodation collectively serve to outweigh the limited harm to the heritage asset. The proposal therefore accords with the provisions of policy DC2 of the Core Strategy.

Impact on Trees

- 5.23. The proposed extensions are to be located in close proximity to a number of existing mature trees on the site, and these have been a significant constraining factor in the development of this proposal. This revised application is accompanied by an Arboricultural Survey incorporating an Arboricultural Impact Assessment and Method Statement prepared by Tree Heritage, and this demonstrates that the proposed foundation design for the extensions will not have an adverse impact on the long-term health of these existing trees. As a consequence the proposal will not require the removal of any existing trees, or give rise to harm to their future health, and thus will not give rise to a loss of biodiversity. The proposal therefore accords with the provisions of policy NE1 of the Core Strategy.

6.0 CONCLUSION

- 6.1. It is considered that very special circumstances exist to justify the proposed development having regard to the conclusions reached by the Local Authority in its determination of the previous application, and the limited increase in size that is proposed in this revised application. The revised proposal will not have any materially greater impact on the openness of the Green Belt compared to the extant permission, and will adopt the same design philosophy. The proposal will furthermore not give rise to harm to the Conservation Area, and will ensure that existing trees are safeguarded.
- 6.2. The proposed development is accordingly considered to constitute a sustainable form of development that accords with the provisions of policies SS6c, R2, DC1, DC2 and NE1 of the Staffordshire Moorlands Core Strategy DPD and guidance contained within the National Planning Policy Framework. The Local Authority is therefore requested to grant planning permission for the proposed development.