Planning Policy Statement
Alterations and extensions at The Raddle Inn and erection of three Holiday Lodges

The Raddle Inn, Quarry Bank, Hollington, Staffs ST10 4HQ

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1. Introduction

This Planning Policy Statement is submitted in support of a planning application to Staffordshire Moorlands District Council in respect of a proposed public house extension (including shop) and holiday chalets at The Raddle Inn, Quarry Bank, Hollington. It examines national and local planning policies of relevance, concluding that the proposal is broadly in conformity with policies and that any conflict is outweighed by the benefits.

The proposal constitutes the diversification of the public house, which will help to ensure its survival as a business. During the first eight years of the 21st century annual beer sales in the UK were steady at around 35,000 million barrels a year, though since then sales have declined (to 26,913,000 in 2016)[1]. As the Daily Telegraph reported in December 2014[2] "it is in the "on" trade (licensed premises) where the collapse has been spectacular, rather than the "off" trade (primarily supermarkets and off licences). Over the 10 years to 2013, per capita sales in the latter were down 16pc - but they had slumped by a shocking, catastrophic 54pc in the former." The article quotes a report by the Institute of Economic Affairs[3] that concludes that "taxation, regulation and the recent decline in disposable incomes are the leading causes of the decimation of the UK pub industry since 2006, responsible for around 6,000 pub closures. The smoking ban and the alcohol duty escalator are particularly culpable." The report discusses macro solutions such as relaxing the smoking ban and changes in taxation, though in the meantime individual pub owners need to actively consider options to ensure their establishments remain economically viable. In this instance the Applicant has

[1] Source: British Beer & Pub Association, downloaded from BBPA website 22.11.17.
[2] Article by Allister Heath, 14 December 2014, downloaded 22.11.17.
[3] Christopher Snowden (December 2014): Closing Time: Who's killing the British pub? Institute of Economic Affairs

long argued that he needs to be able to expand his tourist accommodation enterprise and provide additional services to visitors (and to local people). In 2016 CAMRA launched a campaign jointly with www.holidaycottages.co.uk to raise awareness of the decline of the British pub; research by the latter found that "its customers still see the pub as a prominent feature to their getaway. From the years 2014 to 2015, searches for a cottage near a pub have increased by a whopping 158%.[4]" CAMRA reported at the time that 27 British pubs were closing every week.

2. Site Description and Location

The site lies within the Staffordshire Moorlands Special Landscape Area, a Safeguarded Mineral Infrastructure Site and 2 No. Mineral Safeguarding Areas (Bedrock Sand and Building Stone), as defined in the Core Strategy. Within the 'settlement hierarchy' Hollington is one of the 'smaller villages'.

The application relates to two distinct areas: 1) the public house and associated car parking areas, some outdoor seating areas and the existing lodges to the rear (west) of the public house all located on the western side of Quarry Bank; and 2) a field located broadly north-west of the public house on the eastern side of Quarry Bank.

The Raddle Inn is located approximately 800m north-west of the main residential developed areas of Hollington village; there are some dwellings located along Quarry Bank and Quarry Rd. There is a stone cottage (holiday let), owned by the applicant, located on the corner of Quarry Bank and the track that would be used to access the field where the proposed chalets are located. Immediately north and east of the boundary of the field is a quarry. There are trees and hedges along the western, northern and eastern boundaries of the field. Within the field there are currently two buildings, one of which consists of toilets while the other is used for storage. There is a hard-standing area along part of the southern boundary of the field. A Public Right Of Way runs directly along the track passing by the southern boundary of the field and there are numerous Public Rights Of Way crisscrossing surrounding fields, providing opportunities for informal recreation. The surrounding land is open countryside, predominantly in agricultural use.

The site lies some 6.5 kilometres from Cheadle and 5.5 kilometres from Uttoxeter. It is approximately 5 kilometres from the new JCB golf course in Rocester, which is due to open in 2018, and the A50 to Alton Growth Corridor road improvements nearby. It is approximately 5 kilometres from Alton Towers.

The public house already benefits from six chalet units, of which three are visible from Quarry Bank, and a two-storey stone cottage used for holiday lets. The site is fenced along the eastern boundary separating the site from the quarry, making the whole site fully enclosed.

The access to the site is clearly visible. Quarry Bank is accessed from Hollington Road coming from the direction of Upper Tean.

The proposal has been designed to make use of the topography of the land to provide a pleasant outlook for the visitors as well as to minimise visual intrusion and impact on neighbouring uses. The decking with hot tubs outside the chalets will enhance visitors' experience of the site without leading to unacceptable visual intrusion. The shop resulting from the extension will serve the

[4] Source: CAMRA Campaign News, downloaded 22.11.17.

existing chalets and holiday cottage and the proposed three chalets as well as offering a small-scale retail outlet for convenience goods to local residents. Hollington currently has no village shop and is poorly served by public transport, so the proposal will make the settlement more sustainable.

3. Planning History

SMD/2017/0398 – Alterations and extensions at The Raddle Inn and erection of 3 Holiday Lodges. Refused, 29.09.2017. Summary of reasons for refusal: unsustainable form of development because site is greenfield, Hollington is a 'smaller village' (as defined in the Development Plan) with a small population, very few services, facilities or tourist attractions and barely any public transport. The location of the proposed lodges would therefore encourage journeys by private car.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=114920

SMD/2013/0912 – Construction of self-catering holiday accommodation consisting of 3no lodges, 3no wigwams and the construction of a well-being centre. Refused, 21.01.2014. Summary of reasons for refusal: 1) Unsustainable form of development; no evidence of demand for a well-being centre; such a facility in the location would encourage trips by car). 2) Unacceptable impact on the character and appearance of the rural landscape. 3) Insufficient information re noise impact of neighbouring quarry on amenity of the chalets & wigwams.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=18560

SMD/2013/0104 – Erection of wellbeing centre, 3 holiday chalets and 3 wigwams. Refused, 10.04.2013. Summary of reasons for refusal: Same as SMD/2013/0912 along with 'insufficient information regarding potential impact on minerals extraction'.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=17510

SMD/2008/1344 – Erection of utility block and 6 holiday wigwam cabins. Refused, 10.02.2009. Appeal Dismissed, the main reasons being: 1) Unsustainable form of development; 2) Impact on the character and appearance of the area.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=12697

SMD/2007/1161 – Permanent siting of 4 holiday chalets and use of cottage as holiday let for a temporary period of 5 years. Refused, 23.01.2008.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=11030

SMD/2007/0776 - Permanent siting of 4 holiday chalets and use of cottage as holiday let for a temporary period of 5 years. Refused, 14.09.2007. Appeal Dismissed.
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=10621

SMD/2005/0265 – Two-storey front extension. Approved, 15.02.2005
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=7152

SMD/2002/1028 – Removal of stables and erection of holiday let chalet. Approved, 24.09.2002
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=7152

SMD/2001/1145 – Conservatory and porch. Approved, 15.11.2001
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=2447

SMD/2000/0119 – Single-storey extension to provide children's room. Approved, 06.04.2000
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=142#

SMD/1997/0025 – Siting of five holiday chalets. Approved, 05.02.1998
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=40721

SMD/1995/0357 – Private first-floor conservatory and fire escape to serve upper living accommodation. Approved, 17.10.1995
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=43852

SMD/1992/0907 – Extension to car park and cellar area. Approved, 15.06.1992
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=38528

SMD/1991/0321 - Extension to car park and extension to form cellar area. Refused, 07.04.1992
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=38959

SMD/1987/0440 – Change of use of grazing land to form car park area. Approved, 24.06.1987
http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=30092

4. National Policies of Relevance

Section 3 of the NPPF, on 'Supporting a prosperous rural economy' is very relevant to the proposal and so it is reproduced in full. Paragraph 28 states that:

> Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:
>
> - support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
> - promote the development and diversification of agricultural and other land-based rural businesses;
> - support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
> - promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

These key planks of government policy on supporting a prosperous rural economy are very relevant indeed because the proposal amounts to the sustainable growth and expansion of a rural business in the tourism and leisure sectors; the proposal will benefit the local community and visitors alike; the site is in an appropriate location and identified needs are not being met by existing facilities in rural service centres; and because approving the proposal will promote the retention and development of local services and community facilities in the village, notably a local shop and a public house.

It is important to note that the NPPF does not rule out development in locations not well-served by public transport. One of the Core Planning Principles set out in paragraph 17 is that LPAs should "actively manage patterns of growth to make the fullest possible use of public transport, walking

and cycling, and focus significant development in locations which are or can be made sustainable". Unpicking this Core Planning Principle it may be said that:

a) the injunction on LPAs is not to prohibit development in locations poorly served by public transport but to manage patterns of growth to make the fullest possible use of public transport, walking and cycling;
b) LPAs are told not that they must prohibit development in locations not regarded as sustainable but that they should focus significant development in locations which are or can be made sustainable; in other words, development not classed as 'significant' is unaffected, and settlements deemed unsustainable should not be preserved in aspic or left to decline; where appropriate, efforts should be made to make them sustainable.

The NPPF also cautions against a 'one-size fits all' approach to transport. Paragraph 29 states that: "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas."

Similarly, paragraph 34 states that LPAs "should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas."

Clearly one difference between urban and rural areas is that the former tend to be well-served by public transport whereas the latter generally are not. The recent announcement made by Staffordshire County Council about bus services in the county indicates that there will be increased emphasis on market-driven services. Hence development proposals that increase the demand for public transport can be welcome. But if public transport is unlikely to be available, is there an alternative recognised by the NPPF as a suitable solution in rural areas?

The glossary makes it clear that "Sustainable transport modes" means "Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport." In other words, the NPPF is more subtle and sophisticated in its approach to sustainable transport than some people realise. It would be quite wrong to assert that the NPPF is simply saying that reliance on the private car is unacceptable.

The Applicant is prepared to accept a condition requiring that he installs one or more charging points for electric or hybrid vehicles prior to bringing the proposed chalets into use. He will thus be facilitating sustainable transport modes as desired by the government and explained in the NPPF.

It is worth noting that ownership of electric and hybrid cars is accelerating quickly. In November 2017 the Society of Motor Manufacturers and Traders (SMMT) published data showing that in October 2017 some 3,232 cars eligible for the Plug-In Car Grant (pure electric, other electric and hybrid) were registered, 47.5% more than in October 2016. The registrations for year to date showed an increase of 22.8% in 2017 compared with 2016, against a fall in total car registrations of 4.6%. The Plug-In Car Grant appears to have stimulated a rapid growth in the number of such vehicles. Since the launch of the Plug-In Car Grant in January 2011, there have been 119,881 eligible

cars registered. In July 2017 Dutch bank ING published a report[5] predicting that all new cars sold in Europe will be electric within less than two decades, driven by government support, falling battery costs and economies of scale. Hence the situation is very different from 2009 when the more recent appeal was determined.

5. Local Policies of Relevance

The decision notice in relation to the previous application for this development stated that (in addition to non-compliance with selected sections of the NPPF), "the proposed lodges constitute an unsustainable form of development given that the site is greenfield, Hollington is a 'smaller village' (as defined in the Development Plan) with a low population, very few services, facilities or tourist attractions and barely any public transport. The location of the proposed lodges would therefore encourage journeys by private car. Consequently, the proposals would be contrary to Development Plan policies T1, SS1a, SS6b, SS7, E3, R1 and the Churnet Valley Masterplan. As a result, aspects of the vision, aims and objectives and strategies of the Core Strategy would be threatened and undermined."

The officer's report states that the following are relevant to determination of the application.

The Development Plan comprises:

- Staffordshire Moorlands Local Plan (Adopted 1998)
- The Staffordshire Moorlands Local Development NPPF Core Strategy
- (Adopted March 2014)
- The Minerals Local Plan (Adopted December 1999) Saved Policies 2007
- Staffordshire & Stoke-on-Trent Joint Waste Core Strategy (Adopted March
- 2013)

Staffordshire Moorlands Local Plan (1998)

Development boundaries outlined within the 1998 Adopted Local Plan are still in force until such time as they are reviewed and adopted through the site allocations process. Public consultation on specific site allocations has now commenced.

Adopted Staffordshire Moorlands Local Development Framework (LDF) (26th March 2014)

The Staffordshire Moorlands Local Development Framework (LDF) is a District-wide development plan which replaces the Staffordshire Moorlands Local Plan to provide a framework for delivering development up to 2026. The Core Strategy is the key LDF document. It is a strategic District-wide plan which influences how and where the Staffordshire Moorlands will develop in the future. It sets out what the Council would like to achieve in each of the main towns and the rural areas outside of the Peak District National Park. The Core Strategy provides the framework for future LDF documents which will then identify specific sites for development in the District (Site Allocations) Development Plan Document and provides detailed guidance to supplement the policies (Supplementary Planning Guidance).

[5] ING Economics Department (July 2017) Breakthrough of electric vehicle threatens European car industry Authors Max Erich & Jurjen Witteveen ING Economics Department

The following Core Strategy (CS) policies and Supplementary Planning Documents have been identified by officers as relevant to the determination of the application:-

- SS1 – Development Principles
- **SS1a – Presumption in Favour of Sustainable Development**
- SS2 – Future Provision of Development
- SS3 – Distribution of Development
- SS6 – Rural Areas
- **SS6b – Smaller Villages Area Strategy**
- SS6c – Other Rural Areas Area Strategy
- **SS7 – Churnet Valley Area Strategy**
- SD1 – Sustainable Use of Resources
- SD2 – Renewable/Low-Carbon Energy
- SD3 – Carbon Saving Measures in Development
- SD4 – Pollution and Flood Risk
- **E3 – Tourism and cultural development**
- TCR1 – Development in the Town Centres
- TCR2 – Retailing Outside of Town Centres
- DC1 – Design Considerations
- DC3 – Landscape and Settlement Setting
- C1 – Creating sustainable communities
- **R1 – Rural Diversification**
- NE1 – Biodiversity and Geological Resources
- **T1 – Development and Sustainable Transport**

Supplementary Planning Guidance/Documents:-

- Design Principles for Development
- Churnet Valley Masterplan

The CS policies in bold type are those cited in the decision notice as justifying refusal of the application (SMD/2017/0398) submitted in June 2017. Some of the other policies are also relevant and provide support. Others are less relevant and we provide no comment on those. Our comments on those policies regarded as relevant are as follows:

- SS1 – Development Principles

The policy provides support for the proposal in that the proposal will contribute positively to the social, economic and environmental improvement of the district in terms of delivering quality local services, including provision for tourist facilities in response to anticipated visitor numbers; secondly easy access to a shop for all sections of the community; and thirdly increased economic prosperity and opportunities for employment. The Applicant is prepared to accept a condition requiring installation of a charging point, so the development will entail efficient and effective use of resources and contribute effectively to tackling climate change and reduced carbon emissions.

- SS1a – Presumption in Favour of Sustainable Development

Reflecting the presumption in the NPPF, this Policy states very clearly that “planning applications that accord with the policies in this Core Strategy … will be approved without delay, unless material considerations indicate otherwise”.

- SS6b – Smaller Villages Area Strategy

The proposal is consistent with this Policy, which seeks to enhance community vitality by, *inter alia*, protecting and enabling services and facilities that are essential to sustain rural living; and meeting local community social or economic need by enabling small-scale new employment development for a rural enterprise or an existing authorised business use.

- SS6c – Other Rural Areas Area Strategy

This Policy (paragraph 5) commits the Council to enhancing tourist opportunities by:

  - Supporting sustainable tourism developments and measures in the Churnet Valley in accordance with Policy SS7; and
  - Allowing for small-scale tourism developments in other areas (in accordance with policies E3 and R1).

- SS7 – Churnet Valley Area Strategy

The Policy states that the Churnet Valley is identified as an area for sustainable tourism and rural regeneration. Within this area particular support will be given to specified forms of development and measures including short stay and long stay visitor accommodation, and the expansion of existing tourist attractions and facilities and the provision of compatible new tourist attractions and facilities. Hence there is considerable support for the proposal subject to compliance with Policies for the protection of the environment (see below).

- E3 – Tourism and cultural development

As the supporting text explains, "this Policy positively supports the important role that tourism and culture plays in the economy of the Staffordshire Moorlands and the contribution it makes to increasing physical activity and improving health and well-being. It is essential however that all new tourism, visitor and cultural proposals that are located outside settlement boundaries should be in sustainable locations and carefully assessed so that they do not have a detrimental impact on the local area. The policy also accords with the Spatial Strategy and policy SS7 which seek to promote the Churnet Valley as a sustainable tourism and recreational resource." We explain elsewhere in this document why we regard the location as sustainable and in particular why it will be served by sustainable transport.

- DC1 – Design Considerations

The Policy requires 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. A Design and Access Statement is appended to this document. Officers have already accepted (Report paragraph 7.20) that the proposed extension would accord with the design tenets of Core Strategy policy DC1, the SPD 'Design Principles for Development' and section 7 of the NPPF.

- DC3 – Landscape and Settlement Setting

The supporting text explains that there has been a move away in national Government guidance from 'blanket' local landscape designations in favour of locally based Landscape Character Assessments. The continued use of the current Special Landscape Area designation is therefore not considered sufficiently sensitive to local landscape characteristics and it is proposed to address local landscape impact through the use of a Landscape Character Assessment instead. In September 2017 the Planning Committee accepted that the impact of the proposal on the landscape will be

satisfactory. The Committee concluded at its September 2017 meeting that the impact of the lodges on the character and appearance of the area/rural landscape were acceptable.

- R1 – Rural Diversification

The supporting text explains that Policy R1 supports rural diversification and identifies the requirements for development. It adds that the need for rural areas to be able to meet their economic and community needs is recognised as an important issue in both the former West Midlands Regional Spatial Strategy (RSS) and national planning guidance. The former RSS recognised strengthening the rural economy and enabling sustainable diversification as a key priority for the region. There is a particular need in the District to support the rural economy, enable farm diversification and support rural communities whilst at the same time protecting the countryside from inappropriate development. Paragraph 8.8.6 further explains the balancing exercise required: "Whilst encouraging rural economic diversification is important to strengthening the rural economy, at the same time, it is important to ensure that such development is located within sustainable locations and does not have a negative impact on the countryside." Again, the matter of sustainable locations is addressed elsewhere in this document.

- T1 – Development and Sustainable Transport

Paragraph 8.10.3 of the supporting text explains that this policy reflects national transport planning policy in the NPPF which seeks to deliver a system that supports sustainable transport through the integration with land use planning at all levels, so that transport and planning work together to support more sustainable travel choices and reduce the need to travel. We discuss the meaning of 'sustainable travel modes' in section 4 of this document.

Minerals Local Plan for Staffordshire 2015 – 2030

We understand that the site falls within a Minerals Safeguarding Area (MSA). The Minerals Local Plan (MLP) restricts development in a MSA. The Minerals Authority noted in its initial comments that approximately 60% of the site for the proposed lodges falls within the permitted boundary for Redstone Quarry (operated by Staffordshire Stone). Based on the MLP the extension to The Raddle Inn would be one of the exemptions which accords with the policy, therefore there are no objections. Although the Minerals Authority submitted a holding objection to application SMD/2017/0398, this was later withdrawn. Hence we can assume compliance with the MLP.

6. Policy Assessment

The decision notice in relation to the previous application for this development dated 29 September 2017 gave the following reason for refusal:

> "The proposed lodges constitute an unsustainable form of development given that the site is greenfield, Hollington is a 'smaller village' (as defined in the Development Plan) with a low population, very few services, facilities or tourist attractions and barely any public transport. The location of the proposed lodges would therefore encourage journeys by private car. Consequently, the proposals would be contrary to Development Plan policies T1, SS1a, SS6b, SS7, E3, R1 and the Churnet Valley Masterplan. As a result, aspects of the vision, aims and objectives and strategies of the Core Strategy would be threatened and undermined. The proposals would also not adhere to the sustainability thread running through the NPPF or section 4 of the NPPF, which seeks to promote sustainable transport."

The implication of the reasoning is that reliance on private transport is by definition unsustainable transport, and that in the absence of public transport a development proposal is inevitably unsustainable. But as we explain in section 4 above, the NPPF makes it clear that reliance on the

private car is not by definition unsustainable. Sustainable transport modes include low and ultra-low emission vehicles (and car sharing), so facilitating the use of such vehicles amounts to encouraging sustainable transport. As mentioned in section 4, above, the Applicant is prepared to accept a condition requiring that he installs one or more charging points for electric or hybrid vehicles prior to bringing the proposed chalets into use.

We explain in section 4, above, that the key planks of government policy on supporting a prosperous rural economy are extremely relevant because the proposal amounts to the sustainable growth and expansion of a rural business in the tourism and leisure sectors; it will benefit the local community and visitors alike; the site is in an appropriate location and identified needs are not being met by existing facilities in rural service centres; and because approving the proposal will promote the retention and development of local services and community facilities in the village, notably a local shop and a public house. Conformity with paragraph 28 of the NPPF results in significant weight in favour of the proposal.

Establishing that the proposed development will encourage the use of sustainable transport modes goes a long way toward showing that the proposal amounts to sustainable development. Not only are there no other significant objections to the proposal, it will bring about economic and social benefits without environmental harm or economic and social disbenefits.

It is apparent from recent appeal decisions that:

a) Inspectors accept that sustainable rural tourism does tend to rely more on private transport than certain other uses of land, and that this is acceptable; and
b) An objection based on sustainable transport and isolation from 'sustainable settlements' may be insufficient to block a proposal if other Plan policies are satisfied.

In an appeal decision letter dated 4 January 2016 (APP/Y2430/W/15/3130670) relating to a site in the Melton Mowbray area of Leicestershire, the Inspector, Roisin Barrett BSc (Hons) MSc Dip UD Dip Hist Con IHBC MRTPI, wrote (paragraph 12): "Whilst the appeal development would be located in a locality with limited services and facilities, and this would increase reliance on private forms of transport, I acknowledge that rural tourism by its nature is more reliant on private transport, than housing, for practicality in carrying luggage, the requirement for flexibility when people are not in their usual daily routine and sightseeing." And later: "I consider that the appeal development would be located to provide the potential for future tourists to make use of public transport, walking and cycling. In coming to this conclusion, I have had regard to paragraph 29 of the Framework, which indicates that opportunities to maximise sustainable transport solutions will vary from urban to rural areas." Then in paragraph 17 she wrote: "I conclude that the proposed development would be located so as to benefit businesses in rural areas, communities and visitors and provide future users with a choice of transport mode. In this regard, it would generally accord with LP saved policies … Further, it would accord with bullet point 3 of paragraph 28 of the Framework. And in paragraph 31: "The appeal development would contribute to the economic, social and environmental roles of sustainable development as set out in paragraph 7 of the Framework. Limited material harm has been identified, relating to the lack of local services and facilities. Taking this into account, the benefits of the appeal development would outweigh the adverse impacts and accordingly I consider that the appeal development would fall within the definition of sustainable development as set out throughout the Framework."

In an appeal decision dated 12 February 2016 (APP/D2510/W/15/3136646) the Inspector, S D Harley BSc(Hons) MPhil MRTPI ARICS, described the appeal site (paragraph 5) as lying within open countryside in an isolated position some distance from any other buildings and divorced from any settlement with services and facilities. He/she concluded that "it is not a particularly sustainable location in terms of easy accessibility to services and facilities for visitors. However, I acknowledge that rural tourism by its nature is more likely to rely on the private vehicle. I conclude that in principle the location is not so isolated as to justify withholding permission for that reason alone provided that other planning policies are satisfied."

Taking sections 3 and 4 of the NPPF together, it can be said that the proposed development is compliant with the NPPF insofar as it is relevant, which amounts to significant weight in favour of the proposal.

The Local Plan is supportive. There is considerable support from Policies SS1, SS1a, SS6b, SS6c, SS7, E3, DC1, DC3, R1 and T1, which amounts to significant weight in favour of the proposal. There is also compliance with the Minerals Local Plan for Staffordshire 2015 – 2030.

7. Views of Consultees

The views of statutory consultees in relation to application SMD/2017/0398, for the same proposed development, are summarised below.

Highway Authority

a) proposed extension to the public house: although it will be constructed over part of the existing car park [which will result in the loss of 2-3 parking spaces] there will still be adequate parking provision should the development proceed. Hence, it is considered that the extension per se will not result in any highway safety issues. A vending machine is currently placed within the required visibility splay to the south; this should be removed in order to achieve the required visibility splays at the car park access point.
b) proposed lodges: Whilst the proximity to the existing pub is acknowledged as is the fact that a shop could address some day-to-day requirements, the majority of visitors would arrive and leave by car and the majority of local tourist attractions, e.g. Alton Towers, Churnet Valley Railway are only practically accessible by car. Consequently, prospective users of the lodges would inevitably rely on use of the private car for virtually all journeys made. Hence it is considered that the proposed lodges do not accord with policy T1 of the CS (nor section 4 of the NPPF).

Minerals Authority – no objection to extension or chalets.

Environmental Health Team – no concerns about the amenities (eg. impact from noise) of prospective users of the proposed lodges. Existing buildings may contain asbestos; risk assessment advised before demolition; HSE can advise. Contamination risk assessment not deemed necessary, though unexpected contamination condition is recommended. Construction noise condition recommended. Condition prohibiting burning of waste on site recommended.

County Council Environmental Advice Team – some inconsistencies between newly drawn and previous sets of elevational drawings in terms of hedge/ boundary heights. There are Rights of Way to the east and southeast that may have fairly open views of the development. From this orientation

the lodges would potentially be seen as one mass, resulting in the perceived development mass being larger than the individual lodges. It is possible that views of development could be filtered by new planting; such a scheme would need to be based on an informed assessment.

SMDC/HPBC Regeneration Team – supportive comments summarised as follows:

- The latest figures from 'STEAM' show that there are 4.59m day visitors to the Moorlands each year, spending on average approx. £35.00 per person, per day.
- On average, each staying visitor to the Moorlands stays for three days. The economic impact of a staying visitor is approx. £64.50 per person per day (or £202.83 per visit).
- There is therefore a clear economic advantage to the Moorlands if greater numbers of day visitors can be converted into staying visitors – as this will support the wider tourism economy and tourism supply chain.
- The 'Destination Staffordshire Tourism Review, Strategy and Action Plan 2015-2018' (DSTRSAP) identifies that the number of bed spaces provided in Staffordshire and Stoke-on-Trent is just c. 16,500 compared to 39,000 in Derbyshire. One of the five key priorities of the DSTRSAP is to "Attract more staying visitors via improving the quality and range of accommodation stock – in order to extend visitor stays and increase visitor spend."
- The Stoke & Staffordshire Local Economic Partnership's (SSLEP) key strategy for the subregion is called the Strategic Economic Plan 2014-2030 (SEP). This recognises that tourism employs around 10% of all employees within Stoke-on-Trent and Staffordshire and thus forms a key part of the area's economic base. Staffordshire Moorlands District has the greatest concentration of employment in the tourism sector (largely due to Alton Towers and the Peak District), and the SEP identifies that the priority for the sector is "to make more consumers aware of Staffordshire as a destination for a short break, encouraging greater volume of overnight stays, increased revenue and more employment in the industry."
- The site of the planning application is less than 2 miles (three kilometres) from the boundary of the Churnet Valley Masterplan (CVM), which says the "limited range of accommodation" and "lack of provision for 'all-year-round' tourism" are key weaknesses for the area. Some of the goals of the CVMs are:
    - Enhancing the accommodation stock
    - Developing the visitor offer aimed primarily at the 'countrysider market', including families; and
    - Increasing overnight stays
- While the CVM doesn't apply directly to this application, the same principles of support for a wider number and range of tourist accommodation to increase the number of overnight stays forms part of a significant number of local and regional economic and tourism strategies.
- Should the planning application be approved, the applicant could receive support from the Regeneration Team with potential funding applications.

Parish Council – support

The application submitted in June 2017 (identical in its essentials to the current proposal) attracted 41 representations from neighbours and other members of the public, with all but one supportive. It can therefore be said that there is very considerable local support for the proposal.

8. Conclusions

The Applicant has long argued that he needs to be able to expand his tourist accommodation enterprise and provide additional services to visitors (and to local people). The proposal will help to ensure the survival of the public house so that it continues to serve as a focus for community activity in the locality, providing clear social as well as economic benefits. Research shows that increasingly customers for holiday accommodation seek a location close to a pub, so there is a clear synergy. The link will help to prevent the Raddle Inn from becoming one of the 27 pubs a week that are closing forever.

It is apparent from recent appeal decisions that:

a) Inspectors accept that sustainable rural tourism does tend to rely more on private transport than certain other uses of land, and that this is acceptable; and
b) An objection based on sustainable transport and isolation from 'sustainable settlements' may be insufficient to block a proposal if other Plan policies are satisfied.

We conclude that the proposed development is compliant with the NPPF insofar as it is relevant. There is a high degree of conformity with Section 3 of the NPPF, on 'Supporting a prosperous rural economy', and even if the LPA was not satisfied that the location is entirely sustainable it would be entitled to conclude that the proposal amounts to sustainable development. Indeed the proposed development is compliant with the NPPF insofar as it is relevant, which amounts to significant weight in favour of the proposal.

The Local Plan is also supportive. There is considerable support from Policies SS1, SS1a, SS6b, SS6c, SS7, E3, DC1, DC3, R1 and T1, which amounts to significant weight in favour of the proposal. There is also compliance with the Minerals Local Plan for Staffordshire 2015 – 2030.

Statutory consultees are broadly supportive: the highway authority has expressed concern about transport sustainability, though we have addressed the points they raise. The Regeneration Team have highlighted consistency with policies for tourism, including those for the Churnet Valley, and indicated that they may be able to help with access to grant funding. The County Council Environmental Advice Team have registered slight concerns about visual impact, though the Committee decided in September 2017 that the visual impact was acceptable. The Environmental Health Team have suggested conditions but have no objections. The Minerals Authority has no objections. The Parish Council has given the proposal its support.

Local people have expressed almost unanimous support; in fact there is very considerable local support for the proposal, with no fewer than 40 representations submitted to the Council in favour of application SMD/2017/0398, which was for essentially the same development.

Establishing that the proposed development will encourage the use of sustainable transport modes goes a long way toward showing that the proposal amounts to sustainable development. Not only are there no other significant objections to the proposal, it will bring about economic and social benefits without material environmental harm or economic and social disbenefits. The benefits in terms of boosting the rural economy and providing a service to the local community as well as visitors means that any harm is outweighed.

Appendix – Design and Access Statement

The Applicant has already considered a number of other uses for the site. After careful consideration and research the Applicant, who is keen to create additional tourist facilities in the area in line with the local tourism strategy of increasing overnight stays and to support the major tourist offer of the County (particularly Alton Towers and the JCB Golf Course development), feels that the installation of a shop and three chalets will provide a sympathetic form of development which would be acceptable to the Local Planning Authority and to local people and suited to the landscape in this location.

The long term viability of public houses in locations such as Hollington is important as public houses offer a community focal point and their loss means that not only are buildings becoming vacant but local people lose employment and the village loses an amenity.

Use
The Applicant intends the Pub extension to contain a disabled w/c, men's w/c and a reception area including a small shop. The shop will be open to local residents as well as the occupants of the holiday chalets. It will sell milk, bread and other daily requirements with an emphasis on local produce.

Scale
The proposed single storey extension to the main building will be approximately 5.5 metres long, 4.5 metres wide and 4 metres high; and each of the three chalets will be 10 metres long, 6 metres wide and 3 metres high to the ridge, all set within the existing landscape. The scale of the development is in keeping with the surrounding area. The chalets will be installed to make best use of the natural contours of the land, which slopes gently from Quarry Bank down into the valley below.

Layout
The chalets are supported on concrete pads, reducing the requirement for expensive ground preparation. The timber structures are raised off the ground, eliminating durability problems associated with ground contact.

Landscaping, surfacing and boundary treatment:
The impact on the Special Landscape Area will be mitigated by the sensitive setting of the chalets around the edge of the site. The impact of the neighbouring quarry on the site will be mitigated by hedging. The site is close to the road and does not stretch down the valley sides. They will be in line with neighbouring agricultural buildings clearly visible within the landscape in the adjacent field.

Protecting the Special Landscape Area (SLA) is a key requirement of the Local Plan, though in this location there is already an active quarry which has over 20 years' life. The location of the chalets in the adjacent field, respecting any development boundaries and zones, will not add further to the impact on the SLA nor will it affect the openness of the countryside in this location. The quarry will be adequately screened from the site and there will be no noise impact during the evening, night or weekends.

Each chalet will benefit from a small area of external space offering parking, seating and drying opportunities. The amenity of the holiday cottage in this respect, which has its own garden area, will not be affected. The chalets will be far enough apart to avoid any sense of 'cramming'. Externally the

space will be laid out for parking and an outside seating area with hot tub for each chalet will be provided.

Design Details
The design is detailed on the attached Drawings and above. Robust standard details will be incorporated to meet the requirements of the Building Regulations as appropriate.

Amenity
There are no adjacent neighbours and chalets will not be highly visible from the road due to existing hedging. Properties higher up the valley behind the Raddle PH will not be affected, nor will the remaining properties in the vicinity.