Hermitage Farm

Froghall Road, Ipstones Bank, Froghall,
Stoke-on-Trent, Staffordshire ST10 2HQ





Supporting Statement for Proposed Conversion of Self-Catering Holiday Let Units to Permanent Dwelling

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1.0 Introduction and Site Description

1.1 The site that is the subject of this proposal constitutes a grade II listed stone barn, now used as self-catering holiday lets but used prior to conversion as a barn, cart shed and pump house, which overlooks the separately listed 'Hermitage' farm house on its north side. The farm is a 132-acre mixed livestock farm (102 acres owned, 30 acres leased) lying between Froghall and Ipstones and overlooking the wooded Churnet Valley in the Staffordshire Moorlands. Both the main farmyard complex and the isolated barn have 17th century origins, altered in the 19th and 20th centuries and built of coursed, dressed and dressed red sandstone.

1.2 The farm sits on a prominent sandstone plateau, which rises to a strong ridge further north, near Ipstones, known as Ipstones Edge. The River Churnet runs to the south-west of the farm and the B5053 (Froghall Road) forms the boundary on the east side. Extensive woodland adjoins the farm to the west and south (Ruelow Wood) and east (Moseymoor, Foxt and Cloughhead Woods). A smaller block of woodland to the north might possibly correspond with an old game covert formerly known as 'Hermitage Thicket', although it is marked on an 1879 map as the site of an old quarry. The old hamlet of Froghall lies about 0.48 miles to the south and the centre of the village of Ipstones is 1.25 miles away to the north.

1.3 Ruelow, Moseymoor and Cloughhead Woods form parts of the extensive Churnet Valley Site of Special Scientific Interest (SSSI). There are three grade II statutory listed buildings on the site, including the Hermitage (farmhouse) itself, the barn 20 metres to the north (the subject of this planning and listed building consent application) and another barn 300 metres to the north. The house, which was listed as long ago as May 1953, is built from coursed, dressed and squared red sandstone of ashlar quality, with a tiled roof and brick chimneystack rising from the central roof valley. It is described as being of the late 17th or early 18th century, with mid-19th century alterations and additions. It is of two distinct parts, with the front range thought to be attempting an appearance in keeping with 18th-century fashion and the rear range harking back to traditional forms and detailing of the 16th century. The official listing description for the barn covered by this application (listed in December 1986) runs as follows:

> *"Barn. Early C18 with C20 alterations. Coursed dressed and squared red sandstone; tiled roof on chamfered eaves band; verge parapet. 2-level plan of hay loft over cattle sheds. Long frontage (approximately 25m) with one hay loft door, right of centre, to upper level. 3 doors with heavy lintels (blocked to centre, and now a window to left) set to right of centre; C20 wide entrance to right and left ends. Included for group value."*

1.4 Planning permission and listed building consent was granted in June 1999 for this building to be converted for use as holiday accommodation (SMD/1999/0944 + 0945). Bed and breakfast facilities for tourists are also provided in the farmhouse. The currently advertised self-catering holiday accommodation is provided within the listed barn (two units, dubbed 'The Coach House' and 'The Pump House'), a former cowshed and hay loft (one unit, dubbed 'The Lodge') and a modern stone bungalow built on the site of a derelict cowshed (dubbed 'Ruelow', after the nearby woodland). These are all ranged around the historic farmyard area to the north of the farmhouse. This application relates only to the future use of the listed barn.

2.0 Details of Proposed Development

2.1 Although the self-catering holiday lets at the farm were previously profitable, in recent years this side of the business has declined dramatically. The applicant therefore wishes to discontinue the letting of the two remaining functional letting units in the old barn and instead convert the whole building into four permanent dwellings for private occupation. A fuller explanation of the reasons for the proposed change is provided below in paragraphs 4.12 to 4.14 and in the Performance Audit Report that accompanies this Statement. As the building to be converted is a grade II listed building, its historical and architectural significance is examined in detail in Section 3. However, very little change is required to the building's existing fabric and appearance, either inside or externally. Relevant planning policies are considered in detail in Section 4, together with consideration of pertinent planning application and planning appeal decisions relating to similar proposals for other farm buildings in this area and further afield.

2.2 The only external alterations proposed to the listed former barn that houses the holiday letting units are the re-opening of three existing rear elevation openings to create (fully glazed) doorways into the new rear

garden areas and the addition of three more doorways on the same elevation, of similar proportions and with matching stone lintels. This would afford the two central units garden access from both the kitchens and the lounges. The doors should not be visible from the rear because of the proposed garden fencing. Internally, on the ground floor only, the existing en-suites would be removed to create larger lounges, as well as the smaller kitchen in the Coach House unit. The hallway to the small unit at the east end would be reduced in size in order to enlarge the kitchen.

2.3 To the rear, the existing lean-to machinery shed, the adjoining (fully enclosed) shed to the north and the partially open-sided cattle shed north of that would all be removed to create enclosed private garden space within their footprint for the four dwellings. These would consist of small lawns and paved patio areas, enclosed by close-boarded timber fencing 1.8 metres high, with concrete gravel boards. These are all modern in character and of no special architectural or historic interest (see photographs 1 to 4 below). A new stone retaining wall would be erected on the northern boundary of the gardens, to separate the remaining farm buildings from the new residential curtilage. The existing access yard to the east would be modified to create the new car parking area, providing eight residents' parking bays and four bays for visitors. It would be necessary to remove the existing wall to the north-east of the converted barn to create a gentler turn for vehicles from the old farmyard into the new car park. New stone retaining walls would be erected to either side of the car park access. Residents would share the existing farmhouse drive for vehicular and pedestrian access, but would no longer be allowed to park in the south-east car park, as holiday visitors do at present.

2.4 The retained farm buildings (see photographs 5 to 12 on page 4 below) would, after the conversion, be accessed from the existing (but currently disused) second driveway to the north (see photographs 13 & 14 on page 5 below). The farming business would then be entirely separated from the residential and holiday accommodation at the southern end of the site.



*Above: **photographs 1-4**, showing the three sheds attached to the converted, stone-built holiday letting barn (which is seen on the far left of the first image and on the far right in the third image). The second and fourth images show the exterior and interior of the cattle shed at the north end of this grouping. The interior of the storage shed immediately adjacent to the stone barn is shown in the photographs on page 10 below. The interior of the middle shed was not accessible on the day the photographs were taken.*









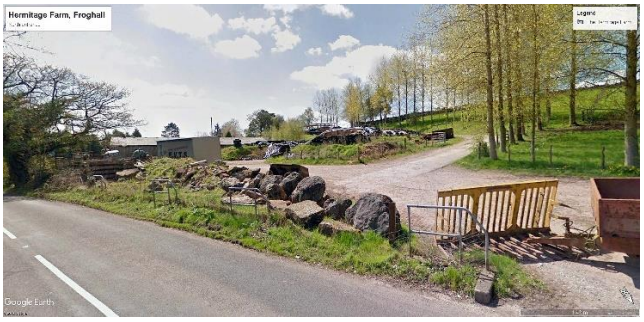








*Above, **photographs 5 to 12**, showing the buildings to be retained in agricultural use*





*Above, **photographs 13 & 14**, showing the disused access to the north, which would be brought back into regular use as the new main access to the retained farm building group and other parts of the working farm*

3.0 Heritage Statement

Origins

3.1 The site has ancient origins, having belonged to the Manor of Ipstones until its sale in 1649. The farm was subsequently sold to Michael Bradshaw in 1651. In the Ipstones parish register for 1656 the spelling was 'Armitage' and apparently this pronunciation is still used by some local people. The name 'Hermitage' was probably adopted in the sense of a 'secluded retreat', rather than implying that it was actually the abode of a hermit in a religious sense. The modern spelling is used on Yates's map of Staffordshire published in 1775. Although the official listing description does not date the present farmhouse and barns earlier than the late 17th century, Faith Cleverdon's PhD thesis of 2002 entitled *Landscape with Buildings: A North Staffordshire Study Based on the Medieval Parish of Leek, Volume 2* dates the south pile of the double-pile farmhouse to around 1600, reading it as a parlour cross-wing. She believes the north pile was added in the 18th century, with both parts using stone sourced from the adjacent farmland. In the 20th century, the present 'ingle nook' in the main parlour was added, with the old triple hearth removed from the kitchen and the kitchen fireplace's bressummer raised.

Josiah Fernihough

3.2 It has not proved possible to trace the owners or occupiers after Michael Bradshaw until Josiah Fernihough, a timber merchant, was the owner in the 1790s. Josiah was born in Ipstones about 1738 and married Catherine Oulsnam at Ipstones in April 1770. His daughter Maria was born at the Hermitage in November 1792, so he probably lived there at least from the time of his marriage and probably before that. He died in February 1804.

3.3 His son, also Josiah, was born in 1771, married his wife Charlotte in 1790 and died in June 1844 at the age of 72. His gravestone in the churchyard at Ipstones states that he was "of Froghall". It is known that he, too, lived at the Hermitage, also working as a timber merchant, as he is mentioned in a notice to the creditors and debtors of Jeremiah Fernihough (joiner and shopkeeper of Ipstones), printed in the *Staffordshire Advertiser* for 3rd January 1807. It seems he was also a farmer for a time, since an auction advertisement in the same newspaper, dated 9th March 1822, stated that Josiah Fernyhough [*sic*] of the Hermitage was "declining" (giving up) the farming business and selling off his livestock (dairy cows, pigs and horses), equipment and implements, dairy and brewing utensils, furniture and kitchen requisites.

3.4 Five years later, Josiah Fernihough of Froghall, "timber merchant, dealer and chapman", was declared bankrupt (*Staffordshire Advertiser*, 9th June 1827). It took several years for his financial affairs to be sorted out. He was still living in the vicinity in 1830, when a petition of several trustees

to execute Acts for repairing the road between Cheadle and Leek and to the road above Froghall Bridge was published in a volume of Parliamentary Papers for February 1830. This stated:

> *"…if power were given to alter or vary the Line of the said Road from a certain dwelling-house at Frogall [sic], in the parish of Ipstones, now in the occupation of Josiah Fernihough, along or through several closes of land, parcel of a certain Farm, called The Hermitage Farm, and to join or communicate with the present Road at or near the northern end of one of the said closes, called the Far Cow Pasture;…"*

Interestingly, William White's Derbyshire Directory of 1834 has Josiah in charge of a 'beer house' at Froghall. The farmers listed there included James and John Fernihough, as well as Richard and William Scarratt, but the names of their farms were not stated.

3.5 Nearby Ruelow Wood was described in an advertisement for timber sales appearing in the *Staffordshire Gazette* for 11th January 1840, under the auspices of Mr. Weston of the Shawe Estate, presumably acting as agent for the Beech family, who were Lords of the Manor of Kingsley and owners of much land there and in Ipstones parish at that time.

> *"The Ruelow Wood is justly celebrated for its magnificent Oak Timber, great part of which is calculated for ship building and other select purposes; many of the Trees contain upwards of 100 feet each, the shafts being of great length, particularly straight, and abounding in cleft; whilst for texture and durability it may challenge a comparison with any Oak in the Kingdom. The Ash, which is remarkably clear and tough, is also of large dimensions, many of the shafts running upwards of 60 feet in length…the Ruelow Wood occupies a declivity, at the immediate foot of which runs the CAULDON CANAL, which communicates with that of the TRENT and MERSEY, so that the whole of the above described Timber may be put on board of boats at a trifling cost."*

3.6 The second Josiah's son James married Anne Scarratt in April 1811, establishing a link with that family, members of which were later tenants at the Hermitage Farm. The Fernihoughs of Ipstones can be traced back to at least May 1571, when the marriage of Alice Fernihough was recorded in the parish register. Charles Fernihough gifted the land on which the Ipstones Edge School was built in 1751 and Edward Fernihough was the minister at Ipstones Church in 1788. It is possible that members of this family occupied the Hermitage from an early date, perhaps around the turn of the 18th century.

Richard & Thomas Scarratt

3.7 It would appear that the Scarratts had taken over as farmers at the Hermitage by the early 1830s. Certainly, in the 1841 census, Richard and Hannah Scarratt were living there, both aged 55, together with son Thomas (aged 15), three young agricultural labourers and two domestic servants. Thomas had taken over as farmer at the Hermitage by the time of Kelly's 1850 Directory of Staffordshire, which also lists William Scarratt at Petty Fields Farm, Josiah Fernihough farming at 'Winkhill Lound', Mary Fernihough at Bottom House Farm, William Fernihough at Park Farm, John Fernihough at Lady Edge Farm, James Fernyhough at New House Farm and William Fernyhough at Booths Farm. It is clear that the Fernihough/Fernyhough family had strong farming roots in this area. Around this time, James Beech, as Lord of Kingsley Manor, held a considerable area of land in the Moseymoor Valley, including Hermitage Farm and Ruelow Wood. The 1851 census lists 25-year-old Thomas Scarratt as farming 112 acres at the Hermitage, employing one man and one boy. Other members of the household included his mother Hannah (now a widow, aged 66), two uncles and three servants. The *Derby Mercury* for 30th November 1853 carried an article about Thomas's successful capture of a goose thief on his farm.

3.8 In the 1861 census, Thomas was still at the Hermitage, farming 150 acres, aged 36, and assisted by his uncle, Richard Ball (aged 47), together with six live-in servants, including a waggoner,

'cow boy', shepherd, errand boy (?), dairy maid and house maid. The address is given as "Hall Riddings" rather than the Hermitage, but several other entries are similarly labelled. In February 1864, Thomas married Frances Fernihough of New House, Ipstones.[1] Harrod's Staffordshire Directory for 1870 listed many farmers in Ipstones parish, but without naming any of the farms. The list included Charlotte and Thomas Scarratt, adding that Thomas was also a landowner. Josiah, Mary, Philip and William Fernyhough were also listed, the first three being landowners. The 1871 census listed Thomas and Frances at the Hermitage, aged 45 and 33 respectively. The farm was now 132 acres. The couple had five young children, three farm servants and one general servant. Two cousins (one a Fernihough) were also staying with them at the time.

3.9 In the 1873 Return of Owners of Land, Thomas was recorded as owning over 32 acres of land in Ipstones parish, with a gross estimated rental value of £80 per annum. The rest of his land at the Hermitage was presumably rented from the Shawe Estate. On 7th April 1876, the *Staffordshire Sentinel* made reference to the 'Hermitage Thicket', two miles from Froghall Station, in a hunting report. This name does not appear on any known map of the locality, but its possible identification has been postulated in paragraph 1.2 above. Another article in the same newspaper, dated 18th September 1880, described James Beech, the 'squire' of Kingsley. He was a keen but cautious huntsman and sportsman who was very proud of the greyhounds he bred and who rarely travelled beyond the bounds of his own estate. He employed gamekeepers in Ruelow and Hazels Woods, who were stationed at every point where poachers might try to strike. At the end of his life, he bought an estate at Clifton, near Bristol, and built a large house there, only to die soon after moving into it. He was buried in the family vault at Kingsley in November 1828, aged 63.

3.10 The 1881 census again recorded Thomas and Frances Scarratt (aged 55 and 42) at the Hermitage, the farm now amounting to 140 acres. They had five children and four servants living with them. By 1891, Thomas (aged 65) was a widower, but four of his children were still living at home, now all in their twenties and probably helping to run the farm. There were also three visitors and four servants. Thomas was still at the Hermitage in 1896, when he appeared in Kelly's Staffordshire Directory. He died in 1897 and his son Thomas took over the farm. On 19th March 1898, the *Leek Post & Times* announced that Thomas Scarratt Junior of The Hermitage had been elected to the general committee of the Leek and District Agricultural & Horticultural Society. The 1901 census lists Thomas, aged 38, as both a farmer and land agent, at the Hermitage, together with his wife Ann (39), four-year-old daughter Mary and four servants, including a cowman, waggoner, housekeeper and one general servant.

Bennett Fallows

3.11 However, by 1904, Kelly's Directory listed Bennett Fallows as the new tenant farmer at 'The Hermitage'. By the time of the 1911 census, he was aged 49 and was living at Hermitage Farm with his wife Emily (46), sons Bennett and George (19 and 17, both also working on the farm), daughter Gertrude (16, doing the dairy work on the farm) and 18-year-old servant Thomas Large, the cowman. The farmhouse was said to have eight principal rooms (excluding bathrooms, scullery, landings, lobbies and closets). Bennett was still there in 1921 but was said to be jointly occupying 'Hall Farm' at Ipstones with George Austin by 1922 (*Staffordshire Advertiser*, 15/4/1922). He was at Booth's Hall Farm by September 1928.

3.12 The Hermitage has had a tradition of being haunted since the time the Fallows arrived there. Anthony Poulton-Smith's book *Paranormal Staffordshire* (2009) relates how a reporter for a Matlock newspaper travelled over the county border to the Hermitage in the early stages of the First World War to investigate claims of ghostly noises described by several residents and visitors to the house. Colonel Beech and his tenant Bennett Fallow(e)s are both mentioned, but it was said to be the

[1] *Staffordshire Advertiser*, 13/2/1864

previous owner that was the ghost – presumably referring to Thomas Scarratt Senior, who had died in 1897. According to the story, he had acquired a reputation for miserliness, had a permanently bent back, was never seen without his top hat, and was disliked by all who knew him. Local legend had it that he had amassed a small fortune. The Fallows family were convinced his ghost remained in the house.

3.13 Though no-one saw anything, they felt draughts and heard rustling sounds when using the stairs. Mrs. Fallows' brother, Edward Wheeldon, once visited with his wife, but they were unable to sleep because they said they could hear someone running up and down the stairs all night long. They tried to call out to the others in the house, but could not make themselves heard. In 1916, a servant girl claimed she often heard ghostly screams from beneath her bedroom window. Bennett's cousin Richard Fallows stayed one night and said he heard the American organ playing a familiar tune in the sitting room, though no-one had been downstairs at the time. One evening, the family heard a tremendous clatter of falling planks and went outside with lanterns to investigate, only to find not a single plank out of place. Jane Fallows felt "the unmistakeable touch of a human hand against her face." The ghost supposedly preferred to cause disruption at Easter, Whitsun, Christmas, haymaking time and at the summer and winter solstices!

3.14 Another ghostly tradition concerns a large black dog, the size of a donkey and with glowing red eyes, said to be seen from time to time in the road near the Hermitage. This story was also recounted in the Rev. F. Brighton's *The Tale of Ipstones* (1937), W.P. Witcutt's *Notes on Staffordshire Folk-Lore* (1942) and Jennifer Westwood & Jacqueline Simpson's *The Lore of the Land* (2005), besides other books published in recent years. The dog, sometimes known as the 'Padfoot' or 'Boggart', appeared both near Hermitage Farm and beside Indefont Well in Ipstones, though his chief role was apparently to guard graves.

Douglas Beech and the Shawe Estate

3.15 As mentioned above, the land at and around Hermitage Farm was once leased from the Beech family of The Shawe, Kingsley, which (as Lords of the Manor of Kingsley) owned much of Froghall and the lower 'Mosey Moor' (Moseymoor) valley, along with Hermitage Farm and Ruelow Wood. Much of the Shawe Estate was sold from September 1919, upon the death of Rowland John Beech; the lots included Hermitage Farm and the woods (272 acres), as well as Booth Hall Farm (181 acres). The Beech family archives record that Captain Douglas C. M. Beech sold 'The Shawe' and all the tenanted farms soon after he inherited them from his father Rowland, preferring the family's other house at Brandon Hall, near Coventry, where he and his brother could hunt with the Atherstone Hounds "in excellent hunting country".[2] The purchasers of the 272 acres of farmland, woodland and game coverts at the Hermitage were Thomas Bolton & Sons, who paid £4,500 for it, with Bennett Fallows as the sitting tenant farmer. Thomas Bolton & Sons were brass and copper miners and manufacturers, based in nearby Cheadle from 1852 until 1961; they ran a Copper Wire Works at Froghall, a short distance south of Hermitage Farm, and another at Oakamoor, about two miles downstream. The company finally went into liquidation in 2014.

Churnet Valley Iron Ore

3.16 The Churnet Valley has long been known for its deposits of a red earthy or 'brown' hematite iron ore (a hydrated oxide of iron), which occurs in a distinct layer. It is composed of approximately one-half peroxide and a third of more of metal. In the Hermitage locality, a seam five to six feet above what was once known as 'First Grit' and now as 'Woodhead Hill Sandstone' exists some 120 feet below the Crabtree coal seam. The deposit is found in an area that is roughly elliptical in shape, with an east-west axis three miles long and a north-south axis of one mile. This area includes the

[2] Source: http://kingsleyremembers1914.org.uk/?p=135

Mosey Moor (Moseymoor) Valley and the Ipstones Park district. There is a yellow or orange tinge to the stone found in the Lower Mosey Moor valley. The hematite ore area was under the control of four main groups of landowners and their lessees by the mid-19th century. The first of these was James Beech (as described in the preceding paragraph), who held the land on the Kingsley or west bank of the River Churnet, as far as the Dalespink, separating it from the Consall Hall Estate. He also held a considerable piece at the eastern end of the area, known as the Lower Mosey Moor Valley, which – as mentioned above – included Hermitage Farm and Ruelow Wood.

3.17 The earliest lease agreement was signed by James Beech of The Shawe and William Eli Bowers on 22nd June 1854, concerning *"All that Mine, Vein, Bed of mineral substance called red ore iron stone within certain estates of the said James Beech, situate in the Parishes of Kingsley, Checkley and Ipstones for the term of thirty years"*. This lease included the Beech property near Froghall, the lower Mosey Moor Valley and, on the north-east bank of the Churnet, Ruelow Wood and Hermitage Farm. Bowers found stone of very good quality cropped out at about 18 inches thick in Hazles Wood, level with the base of Raven Rocks and opposite Consall Flint Mill. On the Mosey Moor property, he sank a shaft close by the stream, near the spot where a colour mill later stood. The stone here, which was darker in colour, was carted in the early months to a new wharf that had been established on the Caldon Canal at the start of the new Froghall walk.[3]

3.18 By the 9th October 1854, Robert Massey of the Paddock Farm, Ipstones [a short distance to the north of Hermitage Farm] had leased to Edward Hambly and three partners in the iron trade the ironstone and coal lying under most of his land, with royalties to be paid at a rate of one shilling per ton for ironstone and 6d for coal. This company was later called the Froghall Iron Ore Company. West of the Hermitage, a short, sharp incline and tramway was used in Ruelow Wood, where the stone quarried was part of the Beech/Bowers agreement. This was given the name 'Cherry Eye Incline' and was under concession to the Bettanys. The Cherry Eye Mine, high up in Ruelow Wood, was the last ironstone mine to continue operating in the Churnet Valley. The Forrester family, and later also Tom Bettany, took the mine concession from Beech and Bowers and managed to make a success of the venture until their lease expired in 1907.[4] Bridge No. 53 on the Caldon Canal is still known as 'Cherry Eye Bridge'; it led up to the site of the mine. The stone extracted from the Cherry Eye Mine was latterly used for paint making, due to its excellent red colour and quality.[5]

The Beardmores and Barlows

3.19 It has not proved possible to establish from Internet archival sources who occupied the farm between 1928 and 1980, but the present farmer advises that the farmers prior to 1980 were the Beardmores, who were related to the Fallows. The Barlow family acquired Hermitage Farm in 1980, concentrating on beef, sheep and poultry production, with some arable crops. The present farmer still has a herd of around 160 beef cattle at the Hermitage. The family began taking in bed and breakfast guests from 1985 and set up an agricultural contracting business in 1991. A hilltop barn, north of the main farm building group, had been redundant since 1984 but was listed, grade II, in December 1986, and was restored and converted to a residential property in 2005-06. The curtilage listed farm building range just north of the farm house has also been in use as self-catering holiday cottages since permission was granted for this in 1999.

3.20 Up until at least 1988, Ordnance Survey maps showed no modern agricultural buildings on the site; however, during the 1990s a number of modern metal and concrete farm sheds were erected to the north of the stone building near the house that has been converted to holiday cottages. These

[3] Paragraphs 3.16-17 are taken almost verbatim from Herbert A. Chester's *Churnet Valley Iron: The Mills and the Mines*, Landmark Publishing, 1979, 2nd Edition 2002, pages 77-78.
[4] Used with minor alterations from pages 79, 95 & 102 of *Churnet Valley Iron* (details as above)
[5] Source: https://www.alamy.com/stock-photo-cherry-eye-bridge-over-the-caldon-canal-churnet-valley-near-froghall-49758319.html (John Keates)

sheds have all benefitted from agricultural exemptions under the General Permitted Development Order, although the last was granted approval of its siting and appearance under a Prior Notification in October 2006 (SMD/2006/0758, formerly 06/00833/NOT-AG). Some of these will be removed to create a garden and car parking area for the new dwelling, if the current planning application is approved. Plans were drawn up back in 2000 to convert the lean-to storage shed immediately behind the application building into a kitchen, breakfast room and games room, with lobby and outdoor patio area, at which time the building had previously been in use as a cattle-shed. This was intended to supplement the holiday cottages conversion. Initial advice was received on the proposal in September 2001, but the scheme does not appear to have progressed to the planning application stage. At any rate, the shed has continued in farm storage use up to the present day (see photographs 15-17 below).

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4.0 Relevant Planning Policies

4.1 The relevant national and local planning policies and design guidance applicable to this proposal are as follows:

- *National Planning Policy Framework 2019 (NPPF), paragraphs 11(d), 73, 74, 78, 79*
- *Staffordshire Moorlands Local Plan 2016-2031, Core Strategy, policies DC2, DC3, SS6(c), R2*
- *Staffordshire Moorlands Local Plan 2016-2031, Submission Version (unadopted), policies SS10, SS11, H1(5)(d)*

4.2 The relevant policies of the National Planning Policy Framework 2019 are considered below in the context of several recent Appeal and planning application decisions for similar proposals. The issues examined include the need for local authorities to demonstrate a five-year supply of housing land, the definition of 'isolated' dwellings in the countryside and the desirability of directing housing development to locations where it would enhance or maintain the vitality of rural communities.

4.3 In February 2018, Acorn Rural Property Consultants of Tiverton, Devon, put a news article on their website detailing how a holiday occupancy condition attached to a barn conversion had been removed on appeal, despite being in conflict with a Local Plan. The location was not specified, but the owner had been refused planning permission to remove the condition to allow permanent residential occupation, on the grounds that the location was unsustainable. The appeal inspector took the view that the National Planning Policy Framework (NPPF) required housing to be located where it would enhance or maintain the vitality of rural communities and that, whether as holiday accommodation or as an unrestricted dwelling, the use of the building would have some social and economic benefits, as its occupants would make use of local services and facilities. In addition, the Inspector judged that the wording of the condition compromised its enforceability, because it contained no specific definition of 'holiday accommodation' and, therefore, it would be challenging to establish where holiday use ended and permanent occupation began.[6]

4.4 In December 2015, Plainview Planning described another appeal win for a holiday owner who wished to convert a holiday let into a permanent residential dwelling at an undisclosed address near Amberley, in the Horsham District of West Sussex. The property fell outside of a settlement boundary and within the South Downs National Park. This company had handled the planning application, arguing that the Horsham District Development Framework could not present a five-year housing land supply and therefore the application should be considered in response to the National Planning Policy Framework (NPPF). The supporting Statement also argued that the proposed change of use would add to the variety of housing stock on offer within a sustainable location and justified how the proposed change of use would meet the requirements of a paragraph 55 (now paragraphs 78-79) dwelling in preserving the vitality of rural communities.

4.5 The application was refused by Horsham District Council on the single ground of inadequate living conditions, due to the size and layout of the proposed dwelling. Plainview took the refusal to appeal; the Planning Inspector saw fit to agree with the points they had raised and confirmed that the size and amenity of the chalet would provide satisfactory living conditions for future residents and would not be in conflict with the design and amenity aims of local policy.

4.6 Also in late 2015, Carver Knowles of Strensham, Worcestershire made a successful application to Tewkesbury Borough Council to remove the holiday occupancy condition on a complex of four barns primarily on a change in government planning policy basis. The key points for the planning officer were that no external alterations were required in the conversion process and the barns were noteworthy enough in terms of character to warrant future preservation. The sustainability argument was that there was less harmful impact if a barn was lived in full time and maintained regularly, compared with an empty holiday cottage. The planning officer also acknowledged that, as basic services were available within two miles of the property, the occupiers would not be considered to be completely isolated from basic services and amenities.[7] Hermitage Farm is only 1.25 miles away from the local shops in Ipstones and many more amenities at Cheadle can be reached in a drive of 3.9 miles (using the A521). Leek is 8.2 miles away by road and Hanley 10.3 miles (via the A52). See also paragraph 4.9 below about local bus services and 4.10 about other local shops and services available in the locality.

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[6] Source: https://acornrpc.co.uk/wp-content/cache/page_enhanced/acornrpc.co.uk/removal-holiday-occupancy-condition/_index.html_gzip

[7] Source: https://www.carverknowles.co.uk/time-to-remove-holiday-occupancy-conditions-from-barn-conversions/

4.7 In December 2017, Sinead Lowry of Stephen Scown Solicitors (which operates in Devon and Cornwall) put an article on their website about 'Isolated Homes in the Countryside'. Paragraph 55 of the National Planning Policy Framework (as it then stood) sought to promote sustainable development in rural areas, stating that local planning authorities should avoid new "*isolated homes in the countryside*", unless certain special circumstances applied. The exceptional circumstances might be the need for a rural worker to live permanently at their place of work or the "*exceptional quality*" or "*innovative nature*" of the design of the dwelling. The NPPF did not provide a definition of "isolated homes" to guide local authorities in their decision-making and so Paragraph 55 often had to be applied to new homes in countryside areas considered remote, due to a lack of services such as transport links or shops. However, the meaning of "isolated homes" in Paragraph 55 had recently been considered by the Planning Inspectorate and by the High Court. The equivalent paragraphs in the February 2019 revision of the NPPF are 78 and 79.

4.8 When considering the appeal, which was for an eco-dwelling, the Inspector found that "isolated" "*needs to be understood in its normal usage as referring to something that is apart or alone*". He found that, as the new dwelling would be in the immediate context of an existing house and with other built development along the same lane, this meant the dwelling would not be "isolated" for the purposes of the NPPF. In a different case, recently considered by the High Court, the District Council's sole ground of challenge against the Secretary of State had been that the Inspector had misunderstood and misapplied Paragraph 55, by not appreciating that the meaning which should be given to the term "isolated homes" was "*homes which were remote from services and facilities*". However, the High Court held that the term "isolated homes" should be "*interpreted objectively in accordance with the language used, read…in its proper context*". Mrs Justice Lang considered that it should be given its ordinary, objective meaning of "*far away from other places, buildings or people; remote*". The author of the article concluded that these cases provided an interpretation of "isolated homes" that was likely to narrow the application of Paragraph 55 to new homes remote from other development, rather than new homes in countryside locations remote from "services and facilities".[8]

4.9 The holiday lets at the Hermitage are close to the main dwelling and are not truly isolated, insofar as the house called 'Hill Croft' is just 0.28 miles away to the south-east, with the Foxtwood Cottages 0.3 miles to the south-east, the house at the Foxtwood Kennels 0.35 miles to the east, that at Foxtwood Farm 0.47 miles east and Paddock Farm 0.75 miles to the north. The Aimee's Bus Service route 30 runs between Cheadle and Leek via Ipstones, Froghall, Kingsley and Kingsley Holt (Mondays to Fridays only).

4.10 Even though Hermitage Farm itself is located within a fairly isolated rural location, many shops and local services are available at nearby villages. Ipstones has a 'One Stop' village shop and post office (2 Froghall Road, formerly Londis), two butchers, a Hallmark/Thorntons gift shop, three public houses, a memorial hall, two churches, two schools, a fire station and a gymnasium. There is also the Staffordshire Farm Supplies Country Store. Froghall has Hetty's Tea Shop and Churnet Woodland Crafts. The Kingsley area has a bathroom supplies store, Autoline Motors (vehicle parts) and SP Motorcycle Parts and Projects, as well as a computer repairs service. Kingsley Holt has the Blacksmith's Arms pub, a Methodist Church, the Thornbury Hall Restaurant and a recreation ground. The Bottomhouse, Berkhamsytch and Winkhill area has a wedding carriage hire facility, an Indian restaurant (Mehek) and a café-cum-shop (Cottage Kitchen), as well as the Peak Wildlife Park (formerly the Blackbrook Zoo). Cheadle has Asda, Iceland and Morrison's supermarkets; Co-op (Blythe Bridge and Tean), Spar (Forsbrook), Tesco Direct (Forsbrook) and McColl's (131 Tean Road) Convenience Stores; a greengrocer (D. F. Brookes), vintage furniture shop, embroidery shop, post office, tyre depot, schools, churches and so on. There is a small Londis convenience store at Brookhouses, Cheadle. The bigger shopping centres at Leek, Stoke-on-Trent and Hanley are only a short drive away.

[8] Source: https://www.stephens-scown.co.uk/planning/isolated-homes-countryside/

Local Plan Core Strategy

4.11 On page 114 of the Staffordshire Moorlands Local Plan 2016-2031 Core Strategy (adopted March 2014), support is given to the provision of tourist accommodation in the District, whilst acknowledging an over-supply generally of small-scale, family-run, self-catering holiday lets:

> *"Existing tourist accommodation in the Staffordshire Moorlands is generally small-scale family-run businesses, usually rurally located, often in converted buildings. The area has a relatively high proportion of self-catering types of accommodation and very few hotels and serviced accommodation. At present a very low proportion of visitors to the Moorlands stay overnight and supply is particularly low in the three towns. Within the Churnet Valley the provision of further short and long stay visitor accommodation is particularly supported – the Churnet Valley Masterplan will provide further guidance on suitable sites and scale. Particular attention should be paid to the quality of new tourist accommodation."*

4.12 In the case of Hermitage Farm, whilst in the past the holiday let business has been profitable and regularly used, in more recent years this has ceased to be the case. Our client advises that the self-catering part of the tourist business at the farm has seen a large downturn over the past four years. Many of the visitors (around 80%) come because of the proximity to Alton Towers, but this attraction now has its own hotels, self-catering chalets and 'tree house' accommodation on its own estate. Moreover, many other holiday cottages have sprung up nearby as a result of other farms diversifying. The Sykes Holiday Cottages website lists no less than 42 holiday lets within five miles of Froghall, with 23 within three miles and 12 within two miles.

4.13 In 2018, there were only ten self-catering customers spread over the three holiday cottages still in use at the Hermitage. In an effort to improve income, some of the cottage bedrooms have been used to supplement the farmhouse bed and breakfast accommodation at weekends during the peak season. Over the last few years, most bookings have been made via the 'Late Rooms' or booking.com websites, as modern trends mean that up to 99% of customers search online. Private advertising has become much less worthwhile. The separately provided annual income figures from the bed and breakfast/self-catering holiday lets enterprise over the twelve years from 2007 to 2018 show some fluctuations, with a peak reached in 2014 at £67,879 but a rapid fall-off from 2017 to a figure of just £23,722 in 2018.

4.14 In 2007, the accommodation was always fully booked at weekends, with short breaks on the self-catering units and a significant proportion of full week stays, as with the bed and breakfast guests. In 2018, even the bed and breakfast accommodation was only half occupied at weekends and only at around 20% of its capacity for mid-week bookings. This compared with 90% weekend and 70% midweek bookings a decade earlier.

4.15 Although planning permission was originally granted for three three-bedroom units and one one-bedroom unit in the old barn, in recent years, only the two units in the northern half of the building have been advertised on the website in recent years, due to the fall-off in demand, with the ground floor bedrooms now used as lounges. The northernmost 'Coach House' is equipped for up to eight people, though it is capable of sleeping nine, and the Pump House is equipped for a maximum of five people. The disused units could accommodate up to another eight people.

4.16 In the past, the District Council has refused to remove holiday occupancy conditions on farm building conversions on a number of grounds, but principally because to do so was considered to conflict with Core Strategy policies R2 and SS6(c). I therefore discuss below recent planning and appeal decisions relevant to this scenario which are in the Staffordshire Moorlands District.

4.17 A significant Appeal Decision applicable to the Staffordshire Moorlands District was that made against the refusal of application SMD/2016/0770 of December 2016, to convert a bunk barn at The Lodge, Mill Road, Oakamoor into a private dwelling. The appeal was considered by planning inspector Debbie Moore and allowed in her Decision of 11 September 2017. Although the application had been

deemed to conflict with Policies SS6c and R2 of the adopted Core Strategy, the Council could not demonstrate a 5-year supply of deliverable housing sites in its area and the Policy R2 was considered to be out of date. These were considered to be key factors in deciding that the conversion represented sustainable development and should therefore be granted planning permission.

4.18 At the time, the relevant paragraphs of the National Planning Policy Framework (NPPF) were numbers 47 (which sought to boost significantly the supply of housing) and 49, which stated that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority could not demonstrate a five-year supply of deliverable sites. The equivalent paragraphs in the 2019 NPPF are numbers 73 and 74; the wording has been modified, but the import is largely the same. Moreover, paragraph 14 was triggered (now paragraph 11(d)), which (in its amended form) states that:

> *"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
>
> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
>
> *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

4.19 Core Strategy Policy SS6c, which seeks to restrict development in the countryside, unless it meets an essential local need, supports rural diversification and sustainability of rural areas, promotes sustainable tourism or enhances the countryside, was afforded significant weight because it has wider aims besides aiming to restrict new housing development in the countryside. It also seeks to sustain the rural economy and enhance the quality of the countryside, and was therefore considered to be not wholly out-of-date. Policy R2 was considered to carry limited weight, as its restrictive purpose was at odds with the district's inability to maintain a five-year housing land supply. It was accepted that the limited availability of local services would require future occupants of the proposed private dwelling to rely on their own cars, contrary to Core Strategy Policy SS1 and the NPPF's encouragement of the fullest possible use of public transport, walking and cycling. However, the existing use of the building was an important consideration, which needed to be weighed against the conflict with local and national policy. The most recent use of the appeal building was as a bunk barn with six shared bedrooms. The use was likely to generate car journeys to access recreational facilities and other services and, given the number of bedrooms, the number of trips would be likely to be comparable to, if not greater than, a single three-bedroom dwelling. The existing use was therefore a valid fallback position and, as the use could be resumed, this consideration carried significant weight.

4.20 In the present case, the existing holiday lets are advertised as providing sleeping accommodation for up to 9 people in the Coach House and up to 5 in the Pump House; at least eight more people could be accommodated if the rest of the building was still let out to holiday guests – a total of 22 people. The proposed conversion would provide four private dwelling units, with first-floor double bedrooms accommodating a total of 14 people. This would be likely to result in a significant reduction in potential daily car journeys on the narrow local roads, compared with the currently permitted holiday-let scenario.

4.21 The Oakamoor appeal case also made reference to paragraph 55 (now paragraphs 78 & 79) of the NPPF, which aimed to direct housing development to locations where it would enhance or maintain the vitality of rural communities. Isolated homes in the countryside should be avoided unless specified special circumstances exist; two of these are that the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; and that the development would re-use redundant or disused buildings and so enhance its immediate setting. In the Hermitage case, the proposed dwellings would sit alongside existing dwellings, so would not be wholly isolated. They would bring the whole of an increasingly disused heritage building back into optimal viable use and full-time occupancy, with minimal need for alterations and maintaining the existing external appearance.

4.22 Another key factor in the Oakamoor appeal case was (as also in the Amberley case discussed earlier) the Council's inability to demonstrate a five-year supply of deliverable housing sites. Whilst there was a glut of holiday accommodation in the district, there was a serious and significant shortfall in the housing supply. As the building had been out of use for several years, there were no economic benefits associated with its retention as tourist accommodation, whilst the conversion and sale as a private house would bring economic returns, albeit in the short term. Future occupants would make a minor contribution to the use of local shops and other services and support community facilities. The benefits associated with permanent residential use would probably be consistent throughout the year and so would have an overall positive impact on the vitality of the local rural community.

4.23 Another relevant recent planning application in the vicinity of the Hermitage was SMD/2017/0764, which was approved on 3rd August 2018. This was to remove the condition (No. 3 relating to permission 03/00594/FUL) restricting occupancy of the formerly converted barn and stable at Rock House Farm, Foxt ST10 2HN to holiday use only. The accompanying Planning Statement, prepared by Ken Wainman Associates of Leek in November 2017, drew attention to the two appeal decisions already discussed above in paragraphs 4.7-8 and 4.17-22. In its paragraph 5.6, the Statement mentioned that less than two years' supply of deliverable housing land existed in the Staffordshire Moorlands District at the end of March 2017. The shortfall had already existed for eight years. Since the production of this Statement, the District Council has published the Submission Version of the Local Plan which is intended to update the adopted Core Strategy. However, as this is still at least six months away from adoption, little weight can be given to its content at the present time. Nonetheless, its relevant content is considered in paragraphs 4.30-32 below.

4.24 The Rock House Farm Statement went on to point out that the holiday cottages were not economically viable and that the need for housing in the locality and wider District was greater than the need to retain surplus holiday accommodation. In view of the housing shortfall, greater weight ought to be given to the presumption in favour of sustainable development, as contained within the NPPF and Policy SS1(a) of the adopted Core Strategy. The proposed conversion would have no adverse impact on the character of Foxt and certainly less than new housing would have. It would also not adversely impact upon the local holiday accommodation market, as the existing level of provision in the District had changed (increased) since planning permission for holiday lets on the site had been granted. The buildings were pleasing in appearance, well maintained, stone structures typical of the area and capable of conversion to permanent residences with little, if any, alteration to their appearance. All of this also applies to the Hermitage scenario, and as listed buildings the permanent use would help to protect heritage assets, in line with bullet point 3 of Policy R2.

4.25 Paragraph 6.18 of the Rock House statement pointed out that holiday cottages fall into the same use class (C3) as open market, permanent housing, the only difference being that holiday cottages are restricted by condition as to the length of time anyone can stay in the building continuously. In the Hermitage's case, the barn conversion's occupancy arrangements were altered by planning permission 04/01361/FUL, which sought to remove and replace condition no. 2 of planning permission SM99-0224 to allow normal residential use during the winter season. This was clarified in Condition No. 1 attached to the permission:

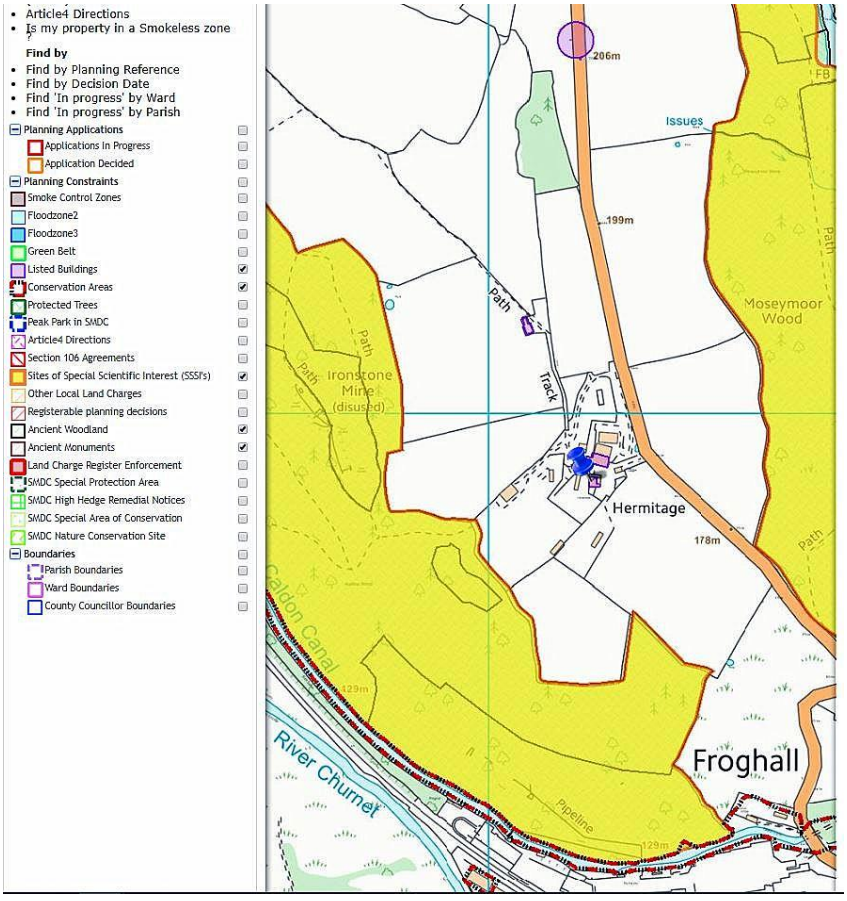
> *"The premises shall be used for short stay holiday accommodation not exceeding 4 weeks at any one time, except during the period 1st October to 31st March when it may be used for class C3 (dwelling houses) of the Town and Country Planning Use Classes Order, 1987 as long as no occupancy exceeds 3 months of any 12 month period. A register of such occupants, including details of duration of stay, will be kept and made available for inspection by the Local Planning Authority, if requested."*

4.26 The Rock House statement pointed out that the holiday cottages already contained all the facilities necessary for residential use, including parking provision and garden space, and that no external or internal alterations were needed to allowed them to be used as "unencumbered" dwelling houses. The Hermitage building will require a modest amount of internal rearrangement and the demolition of some modern farm machinery and cattle sheds to create private garden areas and a dedicated parking area to the rear of the building, but otherwise will undergo no external alteration or removal of internal load-bearing walls. The Statement concluded that the changing holiday market in the locality in recent years meant that the holiday cottages were no longer viable because of their much-reduced occupancy rates. Their removal from the holiday let market would therefore have no adverse impact on tourism in the area – as supply was exceeding demand. The same is true of the converted barn at the Hermitage, as the submitted income figures for 2007 to 2018 dramatically indicate.

4.27 Policy DC2 of the new Local Plan 2016-2031 Core Strategy, as adopted in March 2014, 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. The proposed changes include more specific references to the NPPF, stating that the Council will conserve and where possible enhance heritage assets, including their setting, in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF.

4.28 Policy DC3 adds that it will also protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by 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. It will also support opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape. The proposed rewording includes a reference to resisting development which would lead to prominent intrusion into the countryside or have an adverse impact of significance to the character of the countryside. It also adds a clause in favour of development which maintains the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds. In this case, the location of the building to be converted is already within the developed old farmyard area and will be immediately adjoining the existing building group. The minimal alterations involved will not involve the loss of any existing woodland, hedgerows, waterfalls, walls or ponds.

4.29 The District Council's interactive planning map indicates that the farm has three listed buildings, but does not fall within the Green Belt, Peak Park or a Conservation Area. Ruelow and Moseymoor Woods, to the west and east, have SSSI status and contain areas of Ancient Woodland, but the farm itself lies outside of any protected areas (see extract below, figure 18). It is also in Flood Zone 1, with a low risk of flooding.



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Local Plan Submission Version

4.30 Since the abovementioned Rock House Farm case was decided in September 2017, the District Council has published its Submission Version of the Staffordshire Moorlands Local Plan (February 2018). At paragraph 7.22, it is explained that the target requirement for new dwellings in the District between 2012 and 2031 is 6,080, or 320 per year. Paragraph 7.25 says this requirement is to be met from all available sources, including conversions or changes of use of existing properties. Policy SS10 (Other Rural Area Strategy) includes the conversion of existing rural buildings to help meet housing requirements. Policy H1(5)(d) permits the conversion of rural buildings for residential use, where the building is suitable and worthy in physical, architectural and character terms for conversion; and where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets. At the Hermitage, the existing holiday-lets barn could be converted to permanent residential use with minimal alteration, bringing the increasingly disused building back into full-time use.

4.31 The Strategic Housing Market Assessment Final Report of June 2014 was last updated in February 2017. At paragraph 4.27 in the 2017 Update, the report states that overall, against a five-year target of 1,100 new dwellings, the District delivered 622 (net), an under-delivery of 478 dwellings (phased policy requirement) or an under-delivery of 798 against the annual average target, during the five-year period between 2011 and 2016. Paragraph 4.29 adds that the Council had failed to deliver the required 220 dwellings per annum every year since 2011, except for 2014-15. The worst problem was with the supply of affordable housing, where there was a current supply backlog of 552 dwellings (Core Output 3, page 76).

4.32 As of 11th April 2017, the Local Plan was still under examination by the Inspector and his letter stated that the Housing Implementation Strategy was

> *"helpful as far as it goes but it should also include a section about measures that will be used to ensure that a five-year supply of housing will be maintained over the Plan period to meet the housing target… The earliest date the Plan will be adopted is likely to be the Autumn of 2019. In order to show evidence of an up-to-date five years' housing land supply (HLS) at adoption, with flexibility to respond to changing circumstances, the five-year supply position and the trajectory should be updated so that it has a base date of 31 March 2019."*

Churnet Valley Masterplan

4.33 Policy SS11 of the Local Plan Submission Version deals with the Churnet Valley Strategy and Masterplan, of which the Hermitage Farm site forms a part. This policy supports the provision in this area of short stay and long stay visitor accommodation, together with the expansion of existing tourist attractions and facilities and the provision of compatible new tourist attractions and facilities. Although the current proposal would result in the loss of two holiday cottages, other tourist accommodation would continue to be available at the Hermitage site, in the remaining cottages and the farmhouse. The loss would be insignificant, given the low uptake and the over-provision of similar holiday cottages in the surrounding area.

4.34 The Churnet Valley Masterplan itself forms a Supplementary Planning Document (March 2014). Whilst its focus for the Froghall Character Area is redevelopment of the former Bolton Copper Works site, it does provide for minimal development elsewhere, including the conversion of existing buildings (bullet point 2 under section 7.5.3). Section 8.2 deals with the area's heritage. Relevant portions are quoted below:

> *"The Churnet Valley has a rich and diverse history and its past management has, in part, resulted in the landscape we are familiar with today... Beyond the valley slopes a rich agricultural landscape survives and its character speaks of mixed pastoral and arable form of farming which may go back a thousand years. Certainly, there are many small farmsteads with 17th century and possible earlier origins.*
>
> *"The area's designated heritage assets (listed buildings, scheduled ancient monuments and conservation areas) and its non-designated heritage assets shall be protected and maintained in a state of good repair and enhanced wherever possible… Development proposals shall not cause avoidable harm to any heritage assets and consideration given to promoting public accessibility, understanding and appreciation of the Churnet Valley's history and its corresponding built heritage. These measures will, in turn, encourage*

visitors to experience the cultural heritage of the area. Development should seek to conserve and enhance the historic landscape character of the Churnet Valley.

"All development proposals affecting any heritage assets will be the subject of an impact statement and measures taken to minimise any adverse impact on their special significance… Where impacts of a heritage asset (designated or undesignated) are justified, an appropriate degree of evaluation and/ or mitigation will be agreed commensurate to the level of impact and the significance of heritage asset/s to be affected."

4.35 As the proposed change of use to permanent rather than temporary residential occupation will involve minimal physical change to the building, the character and setting of the listed building will be preserved. The required evaluation of the heritage asset's special significance has been undertaken in this Statement and will, in itself, contribute to the *"understanding and appreciation of the Churnet Valley's history and its corresponding built heritage."*

5.0 Conclusion

5.1 The proposal basically seeks to change the holiday letting barn from time-limited Class C3 use by short-stay holidaymakers and winter period temporary residents to permanent Class C3 residential use. This will involve no external changes and only minimal internal adjustments. The provision of four self-catering letting units is no longer economically viable because of the glut of alternative accommodation available nearby and the units are now unoccupied much of the time. The Staffordshire Moorlands has a longstanding housing land shortfall and has been failing to meet its five-year housing land supply requirement over a prolonged period. Moreover, its Core Strategy policies R2 and SS6(c) are out of date and the Local Plan DPD has still not been adopted and is unlikely to be for at least another six months. The addition of four new residences would make a minor but significant contribution towards the local housing need and should therefore be considered sustainable development. Despite the rural seclusion of the Hermitage, essential services are available at a distance of less than two miles and many other facilities are available within a bus or car journey of three to ten miles. Other tourist accommodation would continue to be offered on the Hermitage site, albeit on a reduced scale. I therefore respectfully request that planning permission be granted to this proposal forthwith.



*Above, **photograph 19**: the stone farm buildings near the farm house, now converted as holiday cottages (Trip Advisor)*