DELEGATED DECISION REPORT

SMD/2019/0581 **Valid 15/10/2019**	**LAND ADJACENT TO NO.65 CELLARHEAD ROAD CELLARHEAD**	**OUTLINE APPLICATION WITH ALL MATTERS RESERVED FOR PROPOSED ERECTION OF BUNGALOWS** **(OUTLINE - MINOR APPS)**

MAIN ISSUES

- Principle of Development & Green Belt
- Design, Landscape and Visual Impact
- Amenity
- Highway Safety

DESCRIPTION OF SITE

The application site comprises a rectangular parcel of open agricultural land to the east of No.65 Cellarhead Road, Werrington spanning a width of some 54m and a depth of approximately 70m (0.35ha). The site lies in the open countryside outside of the development boundary as defined on the Saved Policies Map (1998) and in the Green Belt.

The site is bounded to the west by a large bungalow No.65 Cellarhead Road which stands at the end of a small ribbon of development of similar scale properties which extends westwards. To the east and south is open agricultural land, whilst the northern boundary is defined by the A52 Cellarhead Road. The High School and its associated grounds lie on the opposite side of the highway.

PROPOSAL

The application seeks Outline consent for the erection of bungalows with all matters reserved including access. No definitive number of units is provided within the description of development. An indicative Site Plan showing four units was initially provided. However since submitting the application the agent has requested that this indicative plan be disregarded. However this indicative plan is included within the supporting Planning Statement.

Whilst neither the description of development, nor Section 1.0 (Proposal) of the Planning Statement makes explicit reference to the development comprising a rural exception site (i.e. 100% affordable housing site) there are references within the Planning Statement to Green Belt policy which cites ‘limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)” as an exception to inappropriate development within the context of the NPPF, and to ‘Older Persons Housing’.

RELEVANT LOCAL AND NATIONAL PLANNING POLICIES

Section 38(6) of the Planning and Compulsory Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application.

The Local Development Plan for this site comprises the Saved Policies of the Staffordshire Moorlands Local Plan (1998); Staffordshire Moorlands Core Strategy (adopted 26th March 2014) and any relevant Supplementary Planning Documents (SPD's).

The Staffordshire Moorlands Emerging Local Plan (Submission Version February 2018) has now been through an Examination by an Independent Planning Inspector and as such planning policies within it can be given appropriate weight, in line with paragraph 48 of the NPPF.

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

In June 2018, the Council subsequently agreed to submit the Local Plan Submission Version to the Secretary of State for examination. Hearing sessions were conducted in October 2018 and the Inspector issued his initial post-hearing advice in January 2019 which set out some actions for the Council and a range of modifications that would be necessary to make the plan sound. The full schedule of modifications is to be determined and will be subject to consultation in due course. The Inspector will then be in position to write his final report. Subject to the findings of the appointed Inspector, the Local Plan can then be adopted by the Council. This will be towards the end of 2019 at the earliest. At this point, Upon adoption, it the Local Plan will supersede the adopted Core Strategy and become part of the statutory development plan for the District.

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

- The stage of preparation – the Local Plan is now at an advanced stage of preparation as the Council has submitted it to the SoS for examination

- The extent to which there are unresolved objections to relevant policies – this varies depending on the policy in question. The Officer Comments section of this report identifies the level of outstanding objections to each policy and recommends the amount of weight to be given to them at this stage in the process

- The degree of consistency of policies with the NPPF – given that the Council has submitted a Local Plan that it considers to be sound, all policies are deemed to be consistent with the NPPF.

The revised National Planning Policy Framework (2019) sets out the Governments planning policies for England and how these are expected to be applied. As stated in paragraph 2 of the NPPF, the document is a material consideration which must be taken into account in planning decisions.

Core Strategy Development Plan Document 2014

S01 Spatial Objectives
SS1 Development Principles
SS1a Presumption in Favour of Sustainable Development
SS2 Future Provision of Development
SS3 Distribution of Development
SS4 Managing the Release of Housing Land
SS6 Rural Areas
SS6 Other Rural Areas Area Strategy
H1 New Housing Development
H2 Affordable and Local Needs Housing
DC1 Design Considerations
DC3 Landscape and Setting
R2 Rural Housing
T1 Development and Sustainable Transport

Emerging Local Plan Submission Version 2018

S01 Spatial Objectives
SS1 Development Principles
SS1a Presumption in Favour of Sustainable Development
SS2 Settlement Hierarchy
SS3 Future Provision and Distribution of Development
SS4 Strategic Housing and Employment Land Supply
SS8 Larger Villages Area Strategy
SS10 Other Rural Areas Strategy
H1 New Housing Development
DC1 Design Considerations
DC3 Landscape and Settlement Setting
T1 Development and Sustainable Transport

National Planning Policy Framework

Achieving Sustainable Development	Chapter 2
Delivering a Sufficient Supply of Homes	Chapter 5
Promoting Sustainable Transport	Chapter 9
Achieving Well Designed Places	Chapter 12
Protecting Green Belt Land	Chapter 13

SITE HISTORY / RELEVANT PREVIOUS APPLICATIONS

SMD/1984/0094 (Old Ref: 84/12883)	Outline permission for the erection of three detached dwellings (Refused)

CONSULTATIONS

Publicity

Site Notice expiry date: 27th November 2019
Neighbour consultation period ends: 6th November 2019
Press Advert: N/A

Public Comments

None received

Town / Parish Comments

Werrington Parish Council: No comments received at time of writing

Staffordshire County Council Highways

No objection subject to conditions

OFFICER COMMENTS

Principle of Development & Green Belt

Principle of Development

The application site lies outside of the current development boundary for Cellarhead as indicated on the Saved Policies Map (1998) and would also lie outside of the development boundary if the Emerging Local Plan was adopted in its current form. The site therefore lies in the open countryside and is also situated within the North Staffordshire Green Belt. The application is therefore subject to strategic housing policies SS2, SS3, SS4, SS6 and SS6c, and development management policies H1 and R2 in the Core Strategy.

The above policies aim to control development by supporting housing schemes within the development boundaries of the towns and larger villages. CS Policy R2 lists the criteria for the types of housing that will be supported in the Rural Areas, outside of the development boundary. New housing development on greenfield land does not accord with this policy and thus the proposal is in direct conflict with the Local Development Plan.

At the time of writing, the Council are unable to demonstrate a 5 year supply of deliverable housing sites, and as such the above policies which directly relate to the supply of housing within the Core Strategy are out-of-date for the purposes of the NPPF. However, as the site lies within the Green Belt, the application is subject to

restrictive policies which relate to Green Belt development, as listed at footnote 6 to paragraph 11 of the NPPF, and thus the presumption in favour of sustainable development – often referred to as 'the titled balance' – is not engaged.

The application could only therefore be supported in principle should it comply with restrictive Green Belt policies within the NPPF and all other material considerations.

Green Belt

Chapter 13 of the NPPF contains the restrictive policies relating to Green Belt development and begins by highlighting that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt being their openness and their permanence.

Paragraph 134 of the NPPF sets out the five purposes of the Green Belt, which includes assisting in safeguarding the countryside from encroachment.

With regards to assessing an application, paragraph 143 states that inappropriate development, is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 144 goes on to state that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Paragraphs 145 and 146 of the NPPF set out a list of exceptions as to where the construction of new buildings and other development are not regarded as inappropriate development (and thus acceptable in principle subject to all other material considerations). One such exception comprises "*limited infilling in villages*'. Another exception referred to within the policy section of the supporting Planning Statement is "*limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites).*" None of the other exceptions are applicable in this case.

To be acceptable in principle and accord with restrictive Green Belt policy, the key tests for this application are therefore firstly a) is the site located within a village and secondly b) does the proposal comprise limited infill. As the supporting Statement makes reference to Older People's housing, the application has also been assessed as to whether it meets the exception of Limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)

a) Is the site located within a village?

Cellarhead, alongside Werrington, is defined within the current Core Strategy and within the Emerging Local Plan as a 'Larger Village'. The main nucleus of Cellarhead is centred around the crossroads where the A52 meets the A520, some 300m to the

east of the site, and extends westwards on the northern side of the A52, evidenced by a housing estate which surrounds the School on three sides.

Whilst the row of existing bungalows including No.65 and the adjacent site is detached and isolated from the main pattern of development, and not within the development boundary, it is considered nevertheless that the site does lies within the confines of Cellarhead village, as per the argument submitted within the accompanying Planning Statement.

b) Does the proposal comprise 'Limited Infill'

The accompanying Planning Statement argues that the proposal is limited infill and refers to an Allowed Appeal concerning a site on land to the rear of 42 & 44 Copthorne Road, Fellbridge, in Tandridge District Council dated 28th March 2013.

A Location Plan is provided showing the context for the appeal site, which shows the site sitting at the end of a turning head flanked on 3 sides by existing residential. To the west and south west is the existing estate of Birch Grove. The southern boundary of this appeal site is bounded by a large detached property and its associated curtilage, whilst similarly the eastern boundary also borders a large detached property with a large curtilage.

Section 4 of the Statement argues that the site comprises limited infill, highlights that the referenced appeal decision shows clearly that even a 4 unit scheme can be considered to fall within the definition of limited. The Statement refers specifically to paragraph 10 of this Appeal Decision, which states the following:

"Infilling is not defined in either the Framework or under Policy CSP1, although the supporting text to Policy CSP1 at paragraph 6.17 refers to infilling in the Green Belt settlements. The Council has taken the view that its text is in conflict with the Framework which refers to 'limited infilling', and the decision notice states that the proposal would not be infilling. However, given the nature of the site with residential development to the immediate south and west, and the form of development which has occurred along Copthorpe Road, I consider that this proposed development falls to be considered as infilling and in the context of the surrounding development and the settlement of Felbridge, the addition of four houses would fall to be defined as limited infilling."

In arguing that this application site comprises infill, the supporting Planning Statement states the following:

"Cellarhead is characterised both by large housing estates built near to the secondary school along with sporadic ribbons and clusters of development along the main road and at the Cellarhead crossroads. In this context, the limited infilling of the modest space on the road frontage would be an unusual form of development and would constitute infilling in the village in a similar manner to that which has occurred in the past. There is no upper limit on what constitutes infilling and as such 4 modest but well spaced bungalows would not be overdevelopment of this gap in the existing villagescape.

It is contested that the site does accordingly comply with policy and is limited infilling within the village of Cellarhead."

In response to this argument, it is firstly considered that whilst four dwellings may have been considered 'limited infill' for the purposes of the referenced appeal site, there is indeed no definition for what constitutes 'limited infill' within the Local Development Plan or the NPPF, and as such each application is assessed on a case by case basis.

Whilst there is no definition of what constitutes infill within the Core Strategy, the Emerging Local Plan, or the NPPF, a useful starting point, and widely accepted definition, is "small scale development that fills a gap in an otherwise largely built up frontage."

This approach has been consistently applied to development proposals within the District that lie within the Green Belt. Examples include an Outline application for a bungalow a short distance away at Greenacres, Ash Bank Road, Werrington which was approved under (SMD/2019/0268), and an Outline application for a single dwelling on land associated with Prospect House Farm, Sutherland Road, Longsdon (SMD/2018/0231). Both applications were considered to constitute limited infill in a village, due to the fact that they sat within the confines of their respective villages and that in each case the site consisted of a small gap between a continuous built frontage (i.e. bounded by residential development on both sides, with further development on the opposite side of the road).

The site is bounded to the west by No.65 Cellarhead Road but unlike the examples cited above, does not form part of a continuous frontage, with open agricultural land lying to the south and east. The gap between the eastern garden boundary of No.65 Cellarhead Road to the west and the western garden boundary of No.33 Cellarhead Road - the nearest property to the east - is approximately 130m. This does clearly not represent a small gap. Furthermore, it is noted that the whole of the "gap" would not be infilled.

For the reasons above, it is concluded that the site does not constitute limited infill within a village, and thus fails to meet the relevant exception set out at paragraph 145 of the NPPF.

<u>c) Limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)</u>

Whilst the description of development on the Application Form or the Proposal section of the Planning Statement doesn't explicitly note that the proposal comprises 100% affordable housing for local community needs, the supporting Statement does make scant references under the policy section and very special circumstances section of the Statement to Older Peoples Homes, suggesting that a suitable occupancy condition could be applied restricting the dwellings to people that are at least 67 years of age. A further condition relating to self-build is also referenced.

Under Very Special Circumstance 'A' the Statement quotes the Council's Strategic Housing Market Assessment (SHMA) stating that:

"*there will be an increase from 4,939 older people (75+) living alone to 8,067, an increase of 63%. These trends will have a significant impact on the types of housing required by Staffordshire Moorlands residents over the plan period and suggest a clear need for specific elderly car provision going forward*." (Paragraph 7.84)

The Statement also makes reference to Policy H1 of the Emerging Local Plan in that it makes specific provision for special groups "*particularly older people*".

The adopted policy context for rural exception (affordable and local needs housing) is Policy SS6c, which allows rural exception sites in the rural area in accordance with Policies H2 and R2 of the Core Strategy.

Policy H2 states that in or on the edge of villages, small schemes for 100% affordable housing will be allocated in the Site Allocations DPD or will be permitted on suitable rural exception sites which are well related to services and facilities and where a demonstrable need exists within the local plan area which cannot otherwise be met by means of provision in the plan.

Policy H1 of the Emerging Local Plan cannot at this stage be given any significant weight in the assessment and determination process given that the Plan is yet to be adopted. Nevertheless, the context in which the applicant's statement refers to making specific provision for special groups *'particularly older people'* is important.

The policy states that all development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets the identified housing needs, having regard to the location of development, the characteristics of the site, and the economics of provision.

Policy H3 of the Emerging Local Plan refers to Affordable Housing and allows for 100% Affordable Housing,

The supporting Statement somewhat erratically appears to formulate an argument that suggests that this site could fall within the exceptions set out within paragraph 145 of the NPPF, being limited affordable housing for local community needs under policies set out within the Local Plan, and that by providing such homes for the older generation also presents the very special circumstances required should the Council find the proposal to be inappropriate development in the Green Belt.

The SHMA is a district wide evidence based document that has informed the policies set out in the Core Strategy. The strategic housing policies within the Core Strategy make provision for the identified housing need within the SHMA; this document offers no evidence regarding the housing needs for specific demographics (including the older generation) in individual settlements and parishes.

The site is not considered to be particularly well related to services and facilities, being approximately 1 mile from the nearest service centre Werrington and given its relatively isolated location in the Green Belt are not considered to be suitable, within the context of Policy H2 of the Core Strategy. No evidence has been submitted with the application that there is a specific and demonstrable need for local needs older

people accommodation in Cellarhead that cannot be met through the provision of other strategic housing policies in the Core Strategy in more sustainable locations outside of the Green Belt.

Given that the application makes no specific reference to the site being a local needs/affordable housing scheme and in light of no demonstrable evidence, the application is not judged to be a rural exception site and fails to comply with Policy H2 of the Core Strategy and the exception test for affordable housing & local community needs under paragraph 145 of the NPPF.

In light of the above analysis, the proposal comprises inappropriate development in the Green Belt by definition, contrary to paragraph 143 of the NPPF.

The application can therefore only be supported should very special circumstances exist that clearly outweigh the substantial harm to the Green Belt by definition, and any other harm, which includes the encroachment into the open countryside. This matter is assessed as part of the overall planning balance.

Design, Landscape and Visual Impacts

CS Policy DC3 refers to Landscape Character and states that development will be supported where it respects and enhances local landscape character, resisting proposals which would harm or be detrimental to the character of the local and wider landscape.

Paragraph 127 states amongst other things that decisions should ensure that developments will add to the overall quality of the area; are visually attractive as a result of good architecture; and are sympathetic to the surrounding built environment.

This in an Outline application with all matters including access reserved. As such, it is not possible to fully assess any aspects of the detailed design such as layout, scale, and appearance. However, it is possible to assess the likely impact of the proposal on the character and appearance of the site and wider rural landscape.

The application site lies outside of the development boundary in the open countryside in an area of open agricultural land that is bounded to the north by the A52 and to the west by No.65 Cellarhead Road. Open agricultural land extends eastwards and southwards.

Whilst the description of development does not refer to a specific number of residential units, the supporting Statement does make reference to four units, in line with the referenced appeal. It is therefore reasonable to conclude that the envisaged scheme is for four bungalows.

Notwithstanding the fact that matters of detailed design cannot be assessed under this outline application, it is nevertheless concluded that the erection of four bungalows in an open rural setting will lead to the encroachment into the countryside which would subsequently result in significant harm to the rural landscape character

of the site, contrary to Policy DC3 of the Core Strategy and paragraph 127 of the NPPF.

Amenity

CS Policy DC1 states that new development should protect the amenity of the area, including residential amenity, in terms of satisfactory daylight, sunlight, outlook, and privacy.

Paragraph 127 states that planning should create places with a high standard of amenity for existing and future users.

As the application is Outline with all matters reserved, it is not possible at this stage to fully assess matter of residential amenity and living conditions as per the issues listed in Policy DC1. It is considered that the site would theoretically be large enough to accommodate a small number of units in a way whereby the residential amenity of both current and future occupiers of properties could be protected.

However, this does not alter the fact that the application is not supported due to the conflict with national Green Belt policy and the significant and adverse harm to the rural landscape character as set out above.

Highway Safety

CS Policy T1 requires developments to be sited where they can be accommodated within the existing highway network. Emerging Local Plan Policy is consistent with this adopted policy.

Paragraph 108 of the NPPF states that in assessing applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users. Paragraph 109 goes on state that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

This is an Outline application with all matters reserved including access. As such, it is not possible to fully asses the potential impacts on highway safety. Given the proximity to the A52 with existing direct access, it is considered likely that should the application have been found to be acceptable in principle, matters of highway safety could be addressed.

CONCLUSION / PLANNING BALANCE

Policy SS1a of the adopted core strategy reflects the presumption in favour of sustainable development set out within the National Planning Policy Framework (NPPF).

Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with an up-to-date development plan without delay; or, 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:

- 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

- 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.

This application seeks outline permission for an unspecific number of bungalows on land adjacent to 65 Cellarhead Road, Cellarhead with all matters including access reserved. An indicative plan included within the Planning Statement shows four units laid out in a horseshoe pattern. The application would result in limited generic socio-economic benefits associated with open market housing provision.

The site lies within the open countryside and also within the Green Belt. Whilst strategic housing policies within the Core Strategy are considered to be out-of-date due to the Council not being able to demonstrate a 5 year housing land supply, the application is subject to restrictive NPPF policies set out within Chapter 13 as listed at footnote 6 to paragraph 11, and as such the presumption in favour of sustainable development (often referred to as the 'titled balance') is not engaged.

As set out within this report, the application has been judged as failing to meet any of the exceptions to inappropriate development set out under paragraphs 145 and 146 of the NPPF, and thereby constitutes inappropriate development in the Green Belt. In line with paragraph 144 of the NPPF, the application must in order to comply with restrictive Green Belt policies, submit 'very special circumstances' that outweigh the substantial harm to the Green Belt by definition, and any other harm.

The supporting Statement argues that should the Council disagree with the notion that the application comprises 'limited infill within a village' and thereby conclude that the application comprises inappropriate development, there are 'very special circumstances' present which make the application acceptable in Green Belt terms. An assessment of these 'very special circumstances' as submitted under points A-E in the Planning Statement, is undertaken below:

Very Special Circumstance 'A' argues that the application is sustainable, and states that there is a presumption in favour of sustainable development.

Firstly, the fact that the site lies within the Green Belt means that application is subject to restrictive policies as set out at footnote 6 to paragraph 11 of the NPPF. The presumption in favour of sustainable development is not engaged. The sustainability of the location with regards to its links to services and facilities, generate negligible economic benefits, and that the bungalows would meet a demand for the older generation, or the promotion of the site as a self-build housing scheme, are not, either individually or cumulatively, considered to constitute very special circumstance that outweighs the substantial harm to the Green Belt by way

of inappropriateness and the resultant harm caused by the encroachment into the open countryside, and thus conflicting with one of the Green Belts fundamental aims.

Very Special Circumstance 'B' and 'C' argue that the fact that the Council have a chronic shortfall of housing and no up-to-date housing policy in place constitutes very special circumstances.

Whilst there is indeed a shortfall in housing supply, and thus no up-to-date housing policies, this does not allow or warrant inappropriate development in the Green Belt. The NPPF makes provision to address the situation where a Council cannot demonstrate a 5 year supply of housing through the presumption in favour of sustainable development at paragraph 11. However, development within the Green Belt is explicitly exempted from those provisions and the presumption is not engaged.

Very Special Circumstance Reason 'D' argues that the bungalows would be occupied by over 67 year olds, will meet a growing demand for elderly accommodation, and as such comprises a very special circumstance.

No evidence has been put forward that there is a specific or demonstrable need for elderly peoples homes in Cellarhead and at no point within the application submission is there any reference to the proposal being 100% affordable/local needs housing. The application has not been submitted by or endorsed by or prepared in partnership with a Registered Provider or specialist elderly care provider.

Whilst it is acknowledged that going forward, the Council should ensure that any housing proposal that is acceptable in principle contains an appropriate housing mix which provides for and includes elderly accommodation, the provision of open market bungalows for the elderly is not a strong enough reason (very special circumstance) to outweigh the substantial harm to the Green Belt by definition, or the resultant harm caused by the encroachment into the countryside, and thus conflicting with one of the Green Belts fundamental aims.

Very Special Circumstance Reason 'E' refers to council having a need evidenced in the self build register and anecdotally from local agents to deliver housing sites for those that seek to built their own homes, and that evidence locally suggests that when plots of land become available, they are quickly acquired.

The provision of self build plots is mentioned within the confines of Reason A. No evidence has been supplied with the application with regards to demand for self built sites. Notwithstanding this point, the fact that the plots could be acquired by people wishing to build their own homes to satisfy any demand which corresponds with the Council's self-built register does not constitute a 'very special circumstance' that outweighs the substantial harm to the Green Belt by definition, or the other resultant harm to the Green Belt caused by the encroachment into the countryside, and thus conflicting with one of the Green Belts fundamental aims.

Very Special Circumstance 'F' notes that the site is free from any known legal or technical constraints that would hinder the early start being made in development and as such the site could assist with the Council's need to deliver housing sites and especially those that can be quickly developed and brought to the market.

The fact that the site is deliverable and available is irrelevant in assessing whether a proposal for housing in the Green Belt is acceptable in principle, and certainly does not constitute a very special circumstance that outweighs the substantial harm to the Green Belt by definition, or the resultant harm caused by the encroachment into the countryside and thus conflicting with one of the Green Belts fundamental aims.

The above assessment leads to the conclusion that there are no very special circumstances – either individually or cumulatively – that outweighs the substantial harm to the Green Belt by reason of inappropriateness or the substantial harm to the Green Belt resulting from the encroachment in to the open countryside. As such, the application is in direct conflict with relevant paragraphs contained within Chapter 13 of the NPPF and thus constitutes an unsustainable form of development.

In line with Policy SS1a of the Core Strategy and paragraph 11 of the NPPF the application is recommended for refusal for the reason set out in full on the Decision Notice.

OFFICER RECOMMENDATION: Refuse

Case Officer: James Stannard
Recommendation Date: 27th November 2019

X B.J. Haywood

Signed by: Ben Haywood

On behalf of Staffordshire Moorlands District Council