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PLANNING APPLICATION FOR CONVERSION OF ST WILFRID'S CHURCH

PLANNING STATEMENT

ST WILFRID'S CHURCH, COTTON LANE, COTTON

ON BEHALF OF AMOS GROUP LTD

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

39 Bennetts Colmore Place, 39 Bennetts Hill, Birmingham, B2 5SN
T 0121 308 9570 **www.pegasusgroup.co.uk**

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

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1. INTRODUCTION

1.1 This Statement has been prepared by Pegasus Group, on behalf of Amos Group Ltd (the applicant), in support of a planning and listed building consent application for the conversion of St Wilfrid's Church into four holiday lets, office and associated parking and landscaping works.

1.2 St Wilfrid's Church is Grade II listed and adjoins the former Cotton College buildings (also Grade II). The Church held its last service in 2010 and has remained vacant since. The surrounding College buildings are derelict following the closure of the college in 1987.

1.3 The Church is badly in need of repair and securing a new use that will ensure its long-term protection is now a priority.

1.4 The purpose of this Statement is to consider the development proposals against relevant policies contained within the development plan as well as taking into account other material planning considerations relevant to the determination of this application, including national planning policy and guidance.

1.5 The following sections of this statement identify the relevant issues pertinent to the consideration of the application submission and include:

- A description of the application site and the surrounding area;
- A description of the proposed development, including works to the Grade II listed Church;
- A summary of relevant planning policy.
- An assessment of the application proposals against the development plan along with material considerations.

1.6 Overall this Statement will demonstrate that the proposed development constitutes an accepted form of development that accords with development plan and national planning policy.

2. SUPPORTING DOCUMENTS

2.1 The following documents have been submitted as part of the application:

- Design and Access Statement, prepared by Pegasus Group,
- Proposed Site Plan (reference no. 2016-44-004, revision I), prepared by Lime Architecture,
- Existing Elevations 1 of 3 (reference no. 2016-44-101, revision A), prepared by Lime Architecture,
- Existing Elevations 2 of 3 (reference no. 2016-44-102, revision A), prepared by Lime Architecture,
- Existing Elevations 3 of 3 (reference no. 2016-44-103, revision A), prepared by Lime Architecture,
- Existing Ground Floor Plan (reference no. 2016-44-104, revision B), prepared by Lime Architecture,
- Proposed Ground Floor Plan (reference no. 2016-44-110, revision P), prepared by Lime Architecture,
- Proposed First Floor Plan (reference no, 2016-44-111, revision N), prepared by Lime Architecture,
- Proposed Elevations 1 of 2 (reference no. 2016-44-112, revision J), prepared by Lime Architecture,
- Proposed Elevations 2 of 2 (reference no. 2016-44-113, revision G), prepared by Lime Architecture,
- Proposed Sections (reference no. 2016-44-114, revision I), prepared by Lime Architecture,
- Proposed Second Floor Plan (reference no. 2016-44-115, revision H), prepared by Lime Architecture,
- Proposed Roof Plan (reference no. 2016-44-116, revision G), prepared by Lime Architecture,
- Proposed Roof Details 1 of 3 (reference no. 2016-44-901, revision A), prepared by Lime Architecture,
- Proposed Roof Details 2 of 3 (reference no. 2016-44-902, revision A), prepared by Lime Architecture,
- Proposed Roof Details 3 of 3 (reference no. 2016-44-903, revision A), prepared by Lime Architecture,
- Proposed Floor Plan (reference no. 2016-44-904, revision A), prepared by Lime Architecture,
- Proposed Unit 2 Entrance Door Details (reference no. 2016-44-905, revision C), prepared by Lime Architecture,
- Proposed Unit 2 Entrance Door Details (reference no. 2016-44-906, revision D), prepared by Lime Architecture,
- Proposed Unit 3 Entrance Door Details (reference no. 2016-44-907, revision A), prepared by Lime Architecture,
- Proposed United 3 Entrance Door Details (reference no. 2016-44-908, revision A), prepared by Pegasus Group,
- Official Copy of Title Plan (title number SF559398), prepared by the Land Registry,
- Bat Potential Roosting Features Report, prepared by Wildlife Discovery Ecological Consultants,
- Bat Presence/Absence Survey Report, Prepared by Wildlife Discovery Ecological Consultants; and,

Statement of Heritage Significance, prepared by Drury McPherson Partnership

3. THE SITE AND SURROUNDINGS

3.1 The application site is 2,048m2 in size and consists of St Wilfrid's Church, with its associated hardstanding/parking area. The church is served via a private drive accessed from Cotton Lane. This access also serves the former Cotton College.

3.2 There are no trees of any significance within the application site itself, but there are a large number of mature trees on the surrounding land contributing to the verdant appearance of the area.

3.3 St Wilfrid's Church is a grade II listed building, designed by celebrated 19th century architect Augustus Pugin in 1846, on the commission of the Earl of Shrewsbury.

3.4 The church was originally built for Father Francis Faber so that a Catholic community could be established in the area, but in 1873 the Church and the adjoining Cotton Hall became a catholic college, following the relocation of Sedgley Park School from Wolverhampton. The college was known as Cotton College and was used for this purpose until 1987. Since then the college buildings have remained derelict. However, St Wilfrid's Church continued to be used for services up until 2010. The church has been closed since and now the building has fallen into a state of disrepair and is now in urgent need of investment to secure its long-term future. It is understood that Staffordshire Moorlands District Council have included St Wilfrid's Church on their local list of buildings at risk through vacancy, under-use, neglect or structural repair.

3.5 The Heritage Statement that accompanies the application provides full details of the site's history and describes the architectural significance of the building.

3.6 The site is located in Flood Zone 1, representing the lowest risk of flooding.

3.7 The site and surrounding land falls within the Churnet Valley Special Landscape Area.

3.8 The site is surrounded by the Grade II listed Cotton College to the west, and St John the Baptist's Church to the north. It is understood that services still occasionally take place at the St John the Baptist's (Anglican) Church. However Cotton College has been unused for nearly 20 years and has fallen into disrepair.

3.9 The land surrounding the site comprises the landscaped grounds of the former College. Approximately 120 metres to the west is an area of woodland which the District Council has designated as a Nature Conservation Site (NCS). The NCS includes Peggy's and Bath Woods which is an area of ancient woodland. Approximately 600 metres to the south is Bath Pasture, a Site of Special Scientific Interest (SSSI).

3.10 The application site lies approximately 1.6 kilometres from the village of Cotton, with facilities including a primary school, and public house. There is currently no open bus service operation in Cotton with the nearest bus stop in use located at Cauldon Low (adjacent The Cross Inn) which is 4 kilometres from the site.

3.11 The nearest convenience store is Londis in Alton, which is approximately 4.8 kilometres to the south of the site. The nearest supermarkets in Cheadle (ASDA and Morrisons) 8 kilometres to the south west.

3.12 There are a number of tourist facilities within the surrounding area benefitting from the proximity with Alton Towers (2.8 kilometres from the site). The Star Camping and Caravan Club sis character lies within 2.9 km of Alton Towers, making this area an attractive location for tourists who wish to visit the park.

4. PLANNING HISTORY

4.1 In terms of planning history relevant to the application site, notably there was a previous planning application (Reference no. SMD/2000/0465) for the change of use/conversion of sacristy to residential, which was approved on 29th June 2000. It is understood that this permission was implemented, and the residential use of building commenced.

4.2 The adjoining Cotton College building was subject to a planning application for the change of use of the building to flats, a hotel and a leisure complex (Reference no. SMD/1988/0450). This was approved on 20th November 1989, but development did not proceed.

4.3 With regards to the latest proposals to convert St Wilfrid's into holiday accommodation, pre-application advice from Staffordshire Moorlands District Council was received on 15th February 2019. This response confirmed that the Council considered the principle of the use to be acceptable but required evidence to assess the impact of the conversion on the heritage asset.

5. DEVELOPMENT PROPOSALS

5.1 The application seeks planning and listed building consent to convert St Wilfrid's church into 4 holiday lets along with office accommodation, associated parking and landscaping.

5.2 The accommodation on site will comprise one 3-bedroom, two 8-bedroom and one 9-bedroom holiday apartments, along with independent office accommodation located at the western end of the building. The office space is currently intended to be used by Amos Group (the applicant) to support the estate management.

5.3 The proposal seeks to minimise the impact on the fabric of the building, with the internal works (including separating/partition walls) largely reversable or demountable meaning no harm to the significance of the heritage asset long-term.

5.4 In effect the proposal will create a free-standing internal structure consisting of three floors through most of the nave, sanctuary and sacristy. This will create the living space for the four holiday lets, along with a meeting room for the office. However, the proposal has been designed to minimise the impact of the internal works on the external appearance of the building, by ensuring that the new internal floors are set back from the windows by 750mm.

5.5 A full height atrium is proposed within proposed Unit 2 to allow the Pugin designed stained glass window dating 1848 to be seen in its entirety from the outside of the building. Voids are also proposed above first floor level of the office and Unit 3 to ensure the east and west windows remain unobscured by internal floors when viewed externally.

5.6 The external works to the building will be limited to those necessary to facilitate the change of use of the building and where possible will only impact the more contemporary extensions to the building. They include the following:

- New door on north elevation (fifth bay) below existing window to serve Unit 2;
- New door on south elevation (sanctuary) below window and to serve Unit 3;

- New window to sanctuary at ground floor level to serve Unit 3;
- New window at first floor level above roof of sacristy to serve Unit 3; and
- Replacement valley gutter.

5.7 The application also proposes the formation of a car park in the courtyard area to the north of St Wilfrid's. This area already consists of hardstanding but will be resurfaced to provide a more sympathetic surface material. Parking spaces will be laid out with semi-bound decorative gravel with timber edging. A total of 14 parking spaces are proposed for the holiday lets.

5.8 Semi-bound decorative gravel is also proposed for the paths providing access to the proposed holiday lets and office building.

5.9 New lawn areas will be provided around the church building providing shared amenity space for occupants of the holiday lets to enjoy. The proposal does not include private gardens so that areas around the church remain open and are free from enclosures.

6. PLANNING POLICY AND MATERIAL CONSIDERATIONS

6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include national planning policy and guidance, particularly the NPPF.

6.2 The Development Plan for the area comprises of the Core Strategy which was adopted in March 2014. The Core Strategy seeks to guide land use planning within Staffordshire Moorlands until 2026. Policies relevant to the application proposal are considered below.

DEVELOPMENT PLAN – STAFFORDSHIRE MOORLANDS CORE STRATEGY (2014)

6.3 Paragraph 7.46 sets out the strategy for the Churnet Valley. It confirms that the area will be promoted for sustainable tourism to support rural regeneration. It advises that a Masterplan is to be prepared which will provide detailed guidance on specific areas within the Churnet Valley.

6.4 **Policy SS1a – Presumption in Favour of Sustainable Development** reaffirms guidance in the National Planning Policy Framework for there to be a presumption in favour of sustainable development. The Council will work pro-actively work with applicants to find solutions to developmental issues. Planning permissions will be granted unless any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits (assigned against the policies of the National Planning Policy Framework) or specific policies within the Framework suggest that development should not be permitted.

6.5 **Policy SS2 – Future Provision of Development** states that Provision will be made for new retail, transport, recreational, community and tourism facilities and services to meet the identified needs of settlements within Staffordshire Moorlands.

6.6 **Policy SS6C – Other Rural Areas Area Strategy** provides support for tourism developments in the Churnet Valley in accordance with Policy SS7. The policy also acknowledges the need to meet essential local need by allowing the conversion of an existing rural building in accordance with policies R1 and R2. Furthermore,

suitable development that secures the conservation of a future heritage asset is also supported by this policy. All development proposals in the area must respect and respond sensitively to the distinctive qualities of the surrounding landscape. will also be developed between recreational and tourist resources. regarding development must also be minimised.

6.7 **Policy SS7 – Churnet Valley Area Strategy** identifies this area as being suitable for sustainable tourism and rural regeneration. Support will be given for development that provides short and long stay visitor accommodation. Measures to remediate and restore derelict land, buildings and features including the appropriate redevelopment of sites will also be encouraged. Development within the area should be of a scale and nature and of a high standard of design which conserves and enhances the heritage of the Churnet Valley. Sustainable tourism is defined in the supporting text as tourism that takes into account the current and future economic, social and environmental impacts while balance the needs of visitors, the economy, the environment and host community.

6.8 **Policy SD1 – Sustainable Use of Resources** encourages development on previously developed land in sustainable locations in allocating land for development and determining planning applications, with several exceptions.

6.9 **Policy E1 – New Employment Development**. This policy confirmed that new employment development will be assessed according to the extent to which it supports and improves the local economy in terms of meeting business needs. With regards to new business developments (use classes B1 (a, b and c) should be located in existing or proposed employment areas or in or on the edge of town centres. Elsewhere business developments will only be permitted for the expansion of existing businesses or for small-scale development provided they would not have an unacceptable impact on amenities or character and appearance of the area.

6.10 **Policy DC2 - The Historic Environment** 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 and significant buildings.' This will be done by resisting development that harms historic development, and promoting development which sustains, respects or enhances buildings which contribute to the character and heritage of an area.

6.11 **Policy DC3 – Landscape and Settlement Setting** states that the Council will protect and enhance local landscape and the setting of settlements within Staffordshire Moorlands. This will be done by resisting development harmful to the character of the local and wider landscape and supporting development which respects and enhances local landscape character.

6.12 **Policies SO6 and SO7** set out several spatial objectives within Staffordshire Moorlands. These policies promote sustainable regenerated rural areas, enhanced tourism facilities for visitors.

6.13 **Policy R1 – Rural Diversification** states that development within rural areas will be assessed in supporting the character, appearance and biodiversity of the countryside. Development should also support sustainable diversification of the rural economy, facilitate economic activity and sustain the historic environment. Development should be suitably located in suitably located buildings

6.14 **Policy E3 – Tourism and Cultural Development** sets out the criteria as to which tourist and cultural development will be assessed. Development should support the local economy and promote the distinctive character and quality of the District as well as enhance the role of Staffordshire Moorlands as a tourism and leisure destination.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework (NPPF) 2019

6.15 The NPPF sets out the Government's planning policies for local authorities and how these should be applied.

6.16 Paragraph 9 sets out three overarching objectives for planning. These are an economic objective, designed to build a strong and competitive local economy, a social objective, designed to promote healthy and vibrant communities and an environmental objective, aiming to protect and enhance the natural, built and historic environment.

6.17 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. Plans should be creative in seeking opportunities to meet the development requirements in their respective areas.

6.18 Paragraph 20 states that strategic policies should set out an overall strategy for development and make sufficient provision for conservation of the natural, built and historic environment.

6.19 Paragraph 38 demonstrates that local planning authorities (LPAs) should approach decisions regarding proposed development in a positive and creative way. LPAs should seek to approve applications for sustainable development where possible, and work proactively with the applicant.

6.20 Paragraph 47 states that planning permission should be determined in accordance with the development plan set out by the LPA unless material considerations indicate otherwise.

6.21 Paragraph 80 states that planning decisions should help economic growth. Significant weight should be placed on the need to support the economy and take into account wider opportunities for development.

6.22 Paragraph 83 states that planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside.

6.23 Paragraph 88 confirms that the sequential approach should not be applied to applications for small scale rural offices.

6.24 Paragraph 170 concerns conserving and enhancing the natural environment.

6.25 Paragraph 176 concerns habitat and biodiversity. It states that the same protection as habitat sites will be given to listed sites.

6.26 Paragraph 177 states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on habitat sites.

Churnet Valley Masterplan Supplementary Planning Document (SPD)

6.27 The Churnet Valley Masterplan provides a comprehensive framework for future development in the Churnet Valley. The document was adopted in March 2014.

6.28 The Masterplan identifies 'opportunity sites', attractions which 'have or could play a key role in delivering the strategy'. Notably paragraph 7.6.6. of the SPD identifies Cotton College as a potential development site. The document states that 'there are a number of uses potentially suitable for the site including residential, leisure and employment uses in line with the existing Cotton College Development Brief'.

Staffordshire Moorlands Local Heritage Register Supplementary Planning Document

6.29 The Staffordshire Moorlands Local Heritage Register Supplementary Planning Document was adopted in February 2008.

6.30 The document lists a number of sites of heritage interests, including listed buildings. St Wilfrid's Church is a Grade II listed building.

6.31 The SPD states that in some cases alterations to a building may be desirable in order to preserve it for future use.

6.32 Given the age of the document, little weight should be afforded for it in determining the outcome of this application.

Design Principles for Development in the Staffordshire Moorlands Supplementary Planning Document (SPD)

6.33 The Design Principles for Development in the Staffordshire Moorlands Document illustrates basic design principles within rural areas of Staffordshire Moorlands. It was adopted as a Supplementary Planning Document in February 2018.

6.34 The SPD outlines that many traditional buildings in the District form an accepted part of the landscape and contribute positively towards the character of the area. The Council will make an exception to the policy against new development in the countryside by allowing conversions that are in principle acceptable.

6.35 The SPD sets out several development principles for the conversions. Alterations to the roof are discouraged, and rooflights should be kept to a minimum. The roof structure on listed buildings should be retained and exposed internally.

6.36 Replacement windows should be avoided with the exception of situations where a window is beyond repair or the existing window is of inappropriate design.

6.37 Historic features should be retained and accurately restored where they add to the character of the building.

6.38 Existing features should be retained where possible. Alternations and straightening should be avoided unless in the instance of being necessary for the maintenance of the building.

6.39 Interior conversions to buildings should avoid the removal of features such as staircases, panelling mouldings or important internal spaces. Partition walls and false floors should be removable and not damage the fabrics and material of the original building.

Staffordshire Moorlands Local Plan (2016-2031) - Submission Version 2018

6.40 Staffordshire Moorlands District Council are in the process of reviewing their Local Plan. The submission version of the Staffordshire Moorlands Local Plan was submitted to the Secretary of State for Examination in June 2018 and Examination hearing sessions took place in October 2018. The Inspector published Main Modifications considered necessary to make the plan sound for consultation running from the 18th September until the 31st October 2019.

Although the emerging Local Plan is at advanced stage policies contained within can only be afforded limited weight while the consultation is underway[1] .

6.41 Policy E4 – Tourism and Cultural Development states that development within these industries that promotes the distinctive character of the District will be supported. New tourist accommodation should be developed in locations that either offer or could offer either good connectivity with other tourist destinations, convenient access to other settlements or areas specifically identified for tourist and development purposes in the Churnet Valley Masterplan or other relevant documents. Developments on other locations may be supported if it supports the expansion and provision of tourist facilities and that development is of high quality and does not harm the landscape.

6.42 Policy DC1 – Design Considerations states that all development should be well-designed and enforce local distinctiveness. Development should be of a high quality and add value to the local area and be designed to respect the site and its surroundings by promoting a positive sense of place and identity. Where possible, development should also create appropriate and attractive public environments. The amenity of the surrounding area should also be protected.

[1] West Oxfordshire District Council v (1) Secretary of State for Housing Communities and Local Government (2) Rosconn Strategic Land Limited [2018] EWHC 3065 (Admin)

7. PLANNING ASSESSMENT

7.1 This section of the Planning Statement addresses the main planning issues that are likely to arise during consideration of this planning and listed building application.

7.2 Having reviewed the merits of the development proposals in the context of the planning policy framework for the area, the Applicant considers the main issues in this case to be as follows:-

- Principal of Development
- Heritage Impact
- Landscape and visual impacts
- Ecology
- Transport and Parking
- Flood Risk and Drainage
- Other Technical Matters

7.3 These issues are addressed separately below.

Principal of Development

7.4 This application proposes the conversion of St Wilfrid's Church into 4 holiday lets along with office accommodation, parking and landscaping. Insofar as the principle is concerned, the applicant considers that the proposal is fully supported by the development plan. There are also clear material considerations that weigh in favour of granting this application, and these are also explained in the following section.

The Development Plan

7.5 In considering any planning application, the starting point must be the development plan, unless material considerations indicate otherwise.

7.6 In this case the application site lies within the Churnet Valley. This is a location where Policy SS7 offers support for short and long stay visitor accommodation of the type proposed here. It also promotes measures to restore buildings, and

clearly given St Wildfrid's is identified as a building at risk, then opportunities to preserve the buildings heritage significance long-term must be taken.

7.7 Policies SS6c and E3 also encourage sustainable tourism, again with a focus towards the Churnet Valley in recognition of the opportunities for links between a range of other recreational and tourist resources. Both polices support conversions of existing buildings, especially where development would result in the conservation of a heritage asset. It is clear therefore that there is considerable support from the development plan for tourist accommodation of the nature proposed here.

7.8 With regards to the proposed office use, this space is intended to be used by Amos Group to assist the day to day running of the guest accommodation along with their other business interests. The use will therefore have a positive impact on the local economy. Policy E1 confirms that new employment development will be assessed according to the extent to which it supports and improves the local economy. Given that the office space will support the tourist accommodation, then the proposed use is consistent with the objectives of Policy E1. Furthermore, the third bullet point of Policy E1 outlines the preference for new B1 uses to be focused towards existing or proposed employment areas or town centres, however it also confirms that small-scale development will be permitted elsewhere provided they would not have an unacceptable impact on amenities, character or appearance. It is therefore considered that the proposed office use is fully supported by Policy E1. It is also material that paragraph 83 of the NPPF (2019) states that decisions should enable sustainable growth of all types of business in rural areas both through conversion of existing buildings and well-designed new buildings. Paragraph 88 of the NPPF confirms that the sequential approach "should not be applied to applications for small scale rural offices". It is clear therefore that the government do not intend offices of the nature proposed here to be the subject of the town centre first approach.

7.9 In terms of the reuse of historic buildings, Policy DC2 underlines the Council's commitment to safeguarding and where possible enhancing the historic environment. Point 2 of DC2 confirms that the Council will promote development which sustains, respects or enhances buildings which contribute to the character or heritage of an area. The application proposal represents an appropriate reuse of the building which will sustain the buildings significance.

7.10 Overall it is clear that the principal of development is entirely consistent with the development plan, and national planning policy contained in the NPPF. The application proposal will have economic benefits and help support the local tourist economy, but fundamentally the development will safeguard the significance of St Wilfrid's Church which is on the Council's list of buildings at risk. The sustainable reuse of the building must be a priority.

Heritage Impact

7.11 Under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 there is a statutory duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural. In decision making local planning authorities should also consider relevant policies of the development plan along with the NPPF.

7.12 In this case a supporting Statement of Significance prepared by Drury McPherson Partnership to provide a detailed assessment of the impact on the proposal on the heritage asset (St Wilfrid's Church) and its setting, which includes other Grade II listed buildings.

7.13 The statement finds that the evidential and historical values of St Wilfrid's are of 'considerable significance' to the local community. This is defined by Heritage England's guidance as 'elements whose values contribute to the place's status as a nationally importance place. These are the qualities that warrant listing at grade II."

7.14 The statement also finds that despite alterations and extensions to the church, the character and appearance of the building is still broadly true to Pugin's original design.

7.15 The heritage statement concludes that the proposal provides 'a sustainable long-term use for a building of high significance that has been redundant for a number of years and is currently decaying and at significant risk.'

7.16 The report finds that the harm to the heritage significance of the building will be less than substantial, with key features from Pugin retained. Furthermore, the design of the scheme has been made as such to minimise any 'harm' to the heritage significance of the church.

7.17 The building has not been used as a church for 10 years and there is no prospect of the Church being used for ecclesiastical purposes again. Tourist use is considered to be a viable and sustainable use that would safeguard the heritage asset for the foreseeable future.

7.18 Drury McPherson Partnership have provided advice throughout the design stages of this scheme. Their report confirms that the external works will have a very limited impact on the heritage significance of the church. The internal works are more significant but will be the minimum necessary to deliver the new use and have been designed to be reversable. It is therefore considered that the proposed development is consistent with Policy DC2 the Adopted Core Strategy and advice contained in Chapter 16 of the NPPF (2019), and particularly paragraphs 192 and 196.

Landscape and Visual Impacts

7.19 The site is within a rural area, just outside the village of Cotton. Immediately surrounding the building is an area of woodland, the abandoned Grade II listed Cotton College and fields. The site is also adjacent to the Church of St John the Baptist, a Grade II Listed building.

7.20 St Wilfrid's Church is located in the Churnet Valley. The Churnet Valley Landscape Character Assessment (2011) identifies the site as falling within the 'dissected sandstone cloughs and valleys' character area. The states that the:

"Churnet Valley is characterised by deeply incised, generally wooded valleys associated with the River Churnet and its tributaries. Outside of the valleys the land becomes a more gentle rolling landscape, with smaller valley features, and a more open, pastoral nature…. Views are generally experienced from higher ground. More enclosed views are experienced from within the Cloughs and valleys. Remnant Historic Parkland is located throughout the study area creating a strong character to the area."

7.21 The proposal does not involve the erection of new buildings and the works to external areas are very limited. The proposal does not result in the loss of trees or vegetation so the overall impact on the landscape character of the area is negligible. Indeed, the restoration of the building, and the maintenance of the grounds to accommodate the holiday lets will enhance the appearance of the site, and therefore the proposal will make a positive contribution to the landscape and

visual amenity of the area. The proposal fully accords with Policies DC3 and SS7 Core Strategy.

Ecology

7.22 The application is supported by a Bat Potential Roost Features Survey Report (January 2019) and Bat Presence/Absence Survey Report (June 2019) produced by Wildlife Discovery Ecological Consultants (WDEC).

7.23 The Bat Potential Roost Features assesses potential roosting places for bats on the site, including whether bats were present on the site. The survey studied eleven trees on the site in order to establish the presence of bats.

7.24 The Bat Potential Roost Features Survey Report concludes that the trees on the site offer a low to moderate potential for bats to inhabit. However, the Bat Presence/Absence Survey Report confirms the presence of bats within the Church. The report sets out a number of recommendations which can be secured by suitably worded conditions prior to works commencing if necessary. The bell tower was identified as having a presence of bats. It is important to note that the proposed development does not include any works or alterations to the bell tower.

7.25 It is clear that subject to the implementation of the WDEC recommendations the proposal will not have an adverse impact on biodiversity and will therefore the application will accord with Policy NE1 and government advice in Chapter 15 of the NPPF.

Transport and Parking

7.26 The application site is accessed via Cotton Lane a Class C country road with no pavements. The road is not heavily trafficked and links the A52 in the north to the village of Cotton and the B5417 to the south.

7.27 The proposed development is small-scale and will not result in a significant number of traffic movements, particularly compared with the established use of the site as a college.

7.28 The proposal will utilise the existing access on to Cotton Lane. This access arrangement is considered appropriate for the level of usage proposed.

7.29 The site lies approximately 1.6 kilometres from the village of Cotton, which is within walking distance, but would require pedestrian to share use of Cotton Lane.

7.30 The scheme offers a total of 16 parking spaces created largely through the rationalisation of existing hard standing areas. This level of parking provision is considered adequate for the proposed development. Service and refuse collection vehicles will be able to access and manoeuvre on site without impacting the highway.

7.31 Overall it is considered that the proposed development can be accommodated on the highway network without adverse impact. The level of parking is sufficient for the use proposed. The application therefore accords with Policy T1 and government policy contained at Chapter 9.

Drainage and Flooding

7.32 The site lies in Flood Zone 1, representing the lowest risk of flooding.

7.33 The proposal will utilise existing drainage connections, and final foul and surface water drainage details can be a requirement of a planning condition and provided before the building is brought into use.

Other Matters

7.34 Given the location of the site, the application proposal will not have an impact on existing residential amenity.

7.35 The design of the scheme will provide adequate private amenity for occupants of the holiday cottages and the proposed office is of a small-scale and will not generate activity that would result in noise and disturbance. The proposal therefore accords with Policy DC1 of the Core Strategy.

8. CONCLUSION

8.1 This Statement has been prepared by Pegasus Group on behalf of Amos Group in support of a planning application for the conversion of St Wilfrid's Church, Cotton to four holiday apartments plus an office unit with associated access and landscaping works.

8.2 The proposal will safeguard and preserve the heritage of a Grade II listed building which is currently in a state of disrepair and in urgent need of investment. This is highly material to the determination of this application.

8.3 The provision of tourist accommodation within the Churnet Valley is strongly supported by the development and the Churnet Valley Masterplan SPD. The proposal will make a positive contribution to the tourist economy of the area.

8.4 Overall this Statement has shown that the application proposal is entirely consistent with the development plan and government policy contained in the NPPF. In these circumstances planning and listed building consent should be awarded without delay.