

**KEN
WAINMAN
ASSOCIATES Ltd**

Planning Consultant

PLANNING STATEMENT

Client: Mr D Hamilton & Dr C Craven

Location: Adderley Mill, Trimpos, Adderley, Cheadle, ST10 2NJ.

Proposal: Demolition of disused industrial buildings; erection of 4 detached houses, and re-location of site access.

Date: March 2021.

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1. INTRODUCTION

1.1 The aerial photograph below shows the site. The red line is approximate.

Fig. 1



Pertinent Planning History

- 1.2 Pre-application advice was provided in 2018 by Mark Ollerenshaw. Unfortunately, the copy I have is undated and has no reference. Please see the application form for a summary of the advice. That advice stated that Mr Ollerenshaw considered that he was *“satisfied that the site is positioned in a sustainable location and would not result in the creation of isolated dwellings in accordance with paragraph 55 of the NPPF”*.
- 1.3 In 2019 an application (SMD/2019/0676) was submitted for the *“Proposed demolition of disused industrial buildings and erection of 7 dwellings consisting of 3 detached houses and 4 semi-detached houses”*. This was withdrawn in 2020 after an objection by the County Council on highway grounds and concerns from the case officer that the industrial site to the north would harm the amenity of future residents. The highway concern related to the existing access’ inadequate sightlines. The case officer did not specify his concerns. Environmental Health raised the need for a noise assessment; suggested conditions for site waste, lighting, and possibly drainage; and provided advice on asbestos removal and ground contamination.

2. BACKGROUND INFORMATION

2.1 The policies referred to in the text are unless specified otherwise, are from the Staffordshire Moorlands Local Plan (2020). Heritage Assessment[HIA]), Flood Risk Assessment (FRA), Tree Survey, and

2.2 Basic information on the site and the proposed development:-

- Located in the Green Belt.
- It is a disused vacant contaminated industrial site in a former coal-mining area.
- There is an industrial site immediately to the north and agricultural engineers on the opposite side of the road to the southeast.
- A Heritage Assessment[HIA]); a Flood Risk Assessment (FRA); a Coal Mining Risk Assessment; and Contamination, and Environmental, Noise Assessments; a Transport Technical Note; a preliminary ecological site appraisal (Phase 1); and specific reports on bats, water vole, otter, and reptiles are submitted with the application.
- The site was originally a corn mill, then a bone mill which closed approximately 25 years ago. Since then the site has accommodated various mixed uses and has been vacant for the last four or five years. It is in such poor condition that the Historic Impact Assessment (HIA) states that it is not economically viable for the former corn mill to be retained on this site because it is too altered and in too poor a condition and that it has no historic value.
- The existing access has very inadequate sightlines particularly the one to the north. The site existing vehicular access onto the public highway has the following visibility splays:
 - in the leading (southern) direction a visibility splay of 2.4m x 77m;
 - in the northern (trailing) traffic direction a visibility splay of just 2.4m x 6.5m is achievable.
- Parts of the site are in Flood Zones 2 and 3. The rest – on which it is proposed to build - is in Flood Zone 1.
- The submitted Phase 1 Geo-Environmental Desk Study concludes that there is a potential risk from asbestos, potentially contaminative materials stored on-site; a moderate likelihood of soil contamination on the site near the proposed development, and a moderate risk of ground gas from an infilled mill pond adjacent to the north of the site, and a nearby former landfill site.
- The Preliminary Ecology Appraisal (PEA) report concluded that there would be no impact on Great Crested Newts, on badgers, scheduled list 1 birds, or on

associated habitat. Phase 2 bat, reptile, and water vole and otter surveys were also carried out. A small loosely-aggregated bat colony was recorded and evidence of water voles passing along the stream was found. Water vole burrows were recorded off-site nearby. No species of reptile was recorded on-site, or within the zone of influence over the full survey period during May 2019. No evidence of otters was found.

- Noise from the industrial site to the north and road traffic noise are potential problems. An acoustic assessment has been carried out and measures to reduce potential noise from the industrial site to the north are included in the proposal.
- There are mature trees along the stream on the western side of the site and the road frontage. Some are to be removed. See the Tree Survey Report.

3. THE PROPOSAL

- 3.1 The application is for the erection of 4 houses based around a short cul-de-sac and a short drive. A new site access is proposed in the centre of the site's road frontage. The existing access would be permanently closed.

Site Area

- 3.2 Total site area, including both the land owned by the applicants and the area where the owner is not known = 3,174 sq. metres.

Land ownership

- 3.3 The bulk of the site is owned by the applicants but the owner(s) of the strip of land along the eastern side of the brook is/are not known. Hence, it is intended to advertise the proposal (Notice No.2) in the local paper, once the planning application number is known so that it can be mentioned in the advert.

- 3.4 The area (2789sq.m) hatched green on the submitted Block Plan (Drawing No. 1487-15) is owned by the applicants. The area (365 sq. m.) where the ownership is not clear is hatched blue.

Noise attenuation

- 3.5 The Environmental Noise Assessment (ENA) recommends measures to reduce possible disturbance and noise from the adjoining industrial site to the north.
- 3.6 These measures are set out in the ENA and the proposed acoustic fencing and brick walls shown on the Site Plan (no. 1487-08). The measures are:

- Specified glazing and ventilation for each house to reduce internal noise levels to acceptable levels.
- An acoustic fence along the northern boundary.
- 1.8m high brick walls along the road frontage of the gardens on Plots 1 and 2.

Access

3.7 A new access is proposed in roughly the centre of the road frontage as recommended in the Transport Consultant's Report. The present access would be closed. This is the optimum location for a new site access if the site is to be brought into use. Whilst it doesn't meet the sightline requirements for a de-restricted 60 mph road it is the best that can be achieved on the site and would be a significant improvement on the present situation especially as the number of vehicles generated would be lower and mainly consist of smaller non-commercial vehicles.

Contamination and Coal Measures.

3.8 The Report recommends that an intrusive geotechnical ground investigation (Phase 2 Survey) should be undertaken and should include analysis for soil, ground gas, and groundwater contamination testing.

3.9 As recommended in the Coal Mining Risk Assessment, before construction work begins, but after the demolition of the existing buildings, a detailed site investigation to assess the potential risk from shallow unrecorded mine workings would be undertaken.

3.10 Any contamination found on the site would be mitigated or removed depending upon the findings of the Phase 2 Survey

Biodiversity

3.11 The proposals include:-

- The installation of new bats roosts as recommended in the ecology report.
- The removal of the hard-core bank revetments and their replacement with soil banks planted with wild plant seeds and trees.
- Create a "green" buffer along the stream to provide future suitable habitats for reptiles, water voles, and wildlife generally.
- The removal and replacement of four trees – T2 and T3, T5 & T6, and root protection areas around the remaining trees to the west of the stream.
- The removal of any ground contamination is likely to improve water quality.

4. PLANNING POLICY

4.1 The Development Plan is the Staffordshire Moorlands Local Plan (adopted September 2020). A list of the key issues and the relevant policies in the Local Plan and the National Planning Policy Framework is set out below.

4.2 Key issues and relevant policies: -

	<u>Issues</u>	<u>Local Plan Policies</u>	<u>NPPF policies as relevant</u>
•	Green Belt - appropriateness	-	Chapter 13, para. 145(g)
•	Green Belt – openness & policy	-	Para. 145(g)
•	Loss of employment land	E2	-
•	Transport (safe access)	DC1	
•	Brown Field land	SD1, H1(5)(e)	Para, 118
•	Landscape Impact	DC3	Chapter 15
•	Rural Housing	SS10, H1(5)(e)	-
•	Housing	H1	Chapter 17 & para 11
•	Flood Risk	SD5	Chapter 14
•	Ground contamination	SD4	Paras. 178-183.
•	Coal Mining legacy	SD4	Paras. 178-183.
•	Historic asset	DC2	Chapter 16
•	Ecology/Nature	NE1	Chapter 15
•	Trees	NE2	Para. 174, Chapter 15
•	Design, including density.	DC1	Chapter 12
•	Impact of surrounding uses on future occupants.	DC1	Para. 127 (f) Chapter 12.
•	Sustainability	1a,SD1(2) & (3)	Paras 1-12, Chapter 2

Continued>>>>

5. THE CASE IN SUPPORT OF THE APPLICATION

5.1 The case proposal would: -

5.2 Green Belt

- **Be appropriate development in the Green Belt;** developing previously developed land in accord with National Planning Policy Framework (NPPF) Green Belt policy because it would have less impact on the openness of the Green Belt than the existing development; significantly reducing the footprint and volume of buildings on the site. The total existing building footprint is 1283 sq. m. (40.42% of the site). The proposed total development footprint is 499 sq. m (15.72% of the site). The total volume of the existing buildings is 5968 cubic metres. The total volume of the proposed houses would be 2781 cubic metres; a difference of 3187 cubic metres; a 54.4% reduction in volume.
- **Not conflict with Green Belt policy in the NPPF.**
- **Replace the industrial use which is inappropriate in the Green Belt.**

5.3 Regeneration

- **Regeneration of a vacant outdated site.**
- **Make use of a site that is unsuited, and cannot be used, for modern industrial use** because of its poor access; location on a Class C minor road; and the poor condition of the buildings. The current site conflicts with Local Plan Policies E3 and DC1 (safe access).
- **Make effective sustainable use of previously developed land** in accord with Chapter 11 in the NPPF.
- **Enable the remediation of contaminated ground and the removal of asbestos in the buildings which would be demolished.**

5.4 Access and Highway safety

- **Greatly improve site access** which at the moment is significantly sub-standard thereby improving highway safety. Whilst the proposed sightlines (2.4m x 77m to the north and 2.4m x 63m to the south) would be less than normally required for a de-restricted 60mph road (2.4m x 215m) the proposal represents a major improvement compared to the present access particularly as actual traffic speeds on the road are much lower than 60mph (see the Transport Technical Note).
- **Lessen traffic generation from and to the site;** further improving highway safety.

5.5 Flood Risk

- Meet the requirements in the NPPF (para. 163) regarding Flood Risk, namely: -
 - **All four proposed houses would be in Flood Zone 1 where the risk of flooding is minimal.**
 - **The development would be appropriately flood resistant.** The permeable surface area on the site would be significantly increased from 17% to 72%.
 - **Manage and minimise flood risk through the layout, design, and the proposed drainage strategy.** The FRA recommends specific finished floor levels, no raising of ground levels in Flood Zones 2 and 3, post and rail fencing in the floodplain, and the design of a sustainable drainage scheme. All these measures have been incorporated into the proposed scheme.
 - **The access would be in Flood Zone 1.**
- **Significantly reduce the area of the site covered by buildings and impervious hard surfaces would reduce run-off and improve drainage.**

5.6 Biodiversity

- **Create a “green” buffer zone along the stream, and the proposed landscaping and the proposed bat mitigation measures would make a positive contribution to nature conservation.**
- **Enhance biodiversity by using only native species in the proposed landscaping.**

5.7 Heritage

- **Not cause harm to a local heritage asset** because the asset has been considerably altered and is in too poor a condition for its restoration to be viable, practical, or worthwhile. See HIA.

5.8 Landscape Impact

- **Enhance the surrounding landscape by reducing the amount and height of the buildings on the site.**

The present buildings on the site can be seen from the public footpath to the south-west in the field on the other side of the brook. The adjoining photograph shows the view.



VIEW FROM THE SOUTH WEST

- **Tree planting – hawthorn and alder – is proposed in the gap to soften views of the site.** The maximum height of the existing buildings is 8.250m (166.54 OSD). The chimney in the north-east of the site would be demolished as part of the proposal. The site is lower than the land to the southwest so that the buildings appear to be lower. The new houses would equally appear to be lower in the landscape. The existing trees along the brook provide partial screening and the proposed replacement tree planting will be in the gaps.
- **Improve the appearance of the site and the local area.**

5.9 Loss of employment land

- **Not satisfy criteria in Policy E3, namely: -**
 - Sites must be “well located to the main road and public transport network”. The application site is not; located as it is on a Class C Road with a 60-mph speed limit and with very inadequate access which can't be improved sufficiently to satisfactorily serve a modern industrial site.
 - **Sites must be able to provide or are physically and viably capable of providing through redevelopment, good quality modern accommodation** attractive to the market. This is not the case here. The existing buildings are not physically capable of meeting modern industrial needs and the inadequate access would prevent redevelopment.
- **Not be likely to reduce run-off and therefore flood risk significantly** because modern development requires relatively areas of impervious heavy-duty surfacing for parking and turning areas including for articulated vehicles.
- **Most likely be financially unviable for industrial use because of the cost of remediating the contamination on the site.**

Housing Provision.

- 5.10 Although now the District has a 5-year supply of deliverable housing land windfalls are included in its annual house-build targets. **This site would provide four windfall houses.**

Impact of surrounding uses on future occupants.

- 5.11. **The proposed layout meets the Council's space about buildings and amenity standards and design requirements in Policy DC1.**

Sustainability

5.11 **The sustainability benefits far outweigh any disbenefits.** Sustainability should be assessed in-the-round and not just on travel distances. It is accepted that the site is about 850-900 metres from the edge of Cheadle and future residents are likely to rely on cars although the site is within comfortable cycling distance of the town. Further, the NPPF accepts that the motor vehicle is the main form of rural transport and that as such it can be acceptable. In the interests of sustainability, the applicants would be prepared to provide electric charging points at each house.

5.12 The sustainability benefits of the proposal are: -

- Economic – The development would create jobs during the construction phase and future occupants are most likely to support local shops and businesses and local facilities in Cheadle.
- Social – The development would provide four houses.
- Environmental – the development would: -
 - Be in accord with Green Belt policy;
 - Regenerate a vacant site making efficient use of the land;
 - Significantly reduce the site's built-footprint and impermeable surface area.
 - Improve the appearance of the site.
 - Reduce adverse visual impact on the landscape.
 - Make a positive contribution to nature conservation.
 - Improve landscaping along the stream and on the site as a whole.
 - Remediate possible ground contamination, including removing asbestos.
 - Substantially Improve site access as well as reducing traffic generation and the number of heavy vehicles traveling to and from the site via a rural road.
 - Be in cycling distance of Cheadle.

6 CONCLUSION

6.1 The proposal would make beneficial use of an outdated, vacant, contaminated, industrial site. The proposal would enable the amelioration/removal of site contamination and is the most – probably the only – viable way of achieving this. Also, it would make beneficial, sustainable use of the site which is unsuited for modern industrial use, provide needed houses, ensure acceptable noise levels on the site, reduce the risks from flooding, improve and protect biodiversity, as well as being appropriate development in the Green Belt.