

PLANNING STATEMENT

**WOODHEAD GARAGE
CHEADLE**

MARCH 2022

Site Address:

Woodhead Garage, Froghall Road, Cheadle, ST10 2DN

Applicant:

MJS Transport (UK) Ltd.

Proposal:

Proposed extension to existing yard area to provide additional vehicle parking and associated landscaping works

Planning Statement:

Date Issued: 29th March 2022

Job Reference: RDP/2022/039

Report Prepared By:

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1 Introduction

- 1.1 Rob Duncan Planning Consultancy Ltd. has been instructed by MJS Transport (UK) Ltd. to seek full planning permission for the extension of an existing haulage yard on land at Woodhead Garage, Froghall Road, Cheadle.
- 1.2 MJS Transport (UK) Ltd. have operated from the application site since 1995 and have grown consistently over the years, expanding their premises as they have done so. The application proposes to enlarge the existing yard area to provide additional space for the parking of lorries and staff parking in the interests of improving the circulation of vehicles within the site and to support the continued growth of the business.
- 1.3 The existing site, inclusive of the existing buildings and associated yard occupies an area of 18,925 square metres. The application proposes to extend the yard by some 3386 square metres. The yard will be surfaced in concrete and drained via the existing sustainable drainage system on the site.
- 1.4 The existing yard has space for the parking of 43 lorries and 2 vans. The application proposes to remove six of the existing spaces that lie parallel with the northern elevation of the building, along with the eleven spaces located to its northeast and provide a new parking area encompassing a total of 52 lorry parking spaces (a net increase of 35).
- 1.5 Associated with the proposal is the formation of a new staff car park which will have space for the parking of 43 vehicles. The two parking areas are to be enclosed by a substantial landscaping buffer that will extend across the northeastern site boundary. Further landscaping is proposed along the eastern site boundary.

2 Site Location

- 2.1 The application site lies on the western side of Froghall Road and comprises an existing haulage depot / warehouse that has been occupied by the applicant since 1995. The site benefits from a large portal framed warehouse building that sits centrally within the site, and which is surrounded to the north, east and west by hardstanding that is used for the parking and manouvering of vehicles.
- 2.2 Residential development lies to the south of the existing site (Masfield Close) with further residential development located to the east on the opposite side of the Froghall Road. To the north of the site lie agricultural fields, which rise up and away from the site in a north/northeasterly direction. The site lies on the edge of the town of Cheadle, and is located wholly within the North Staffordshire Green Belt.

3 Planning Policy

3.1 Section 38(6) of the Planning and Compulsory Purchase 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 Development Plan for this area comprises the Staffordshire Moorlands Local Plan of which the following policies are of relevance to the determination of this application:

3.1 Policy SS1 of the Local Plan relates to 'Development Principles' and states that the Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands in terms of delivering (amongst others):

- Easy access to jobs, shops and transport services by all sections of the community
- Increased economic prosperity and opportunities for employment and greater local capacity with an educated, skilled and flexible workforce
- A healthy, safe, attractive, active, well-designed and well-maintained environment
- Development which maintains the locally distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings
- Support development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions

- 3.2 Policy SS4 of the Local Plan relates to 'Strategic Housing and Employment Land Supply' and states that land will be made available for 15.3ha of employment land which comprises of 50% B1a/B1b (office, R&D) and 50% B1c/B2/B8 (light industry, general industry, storage and distribution) through the allocation of sites under Policy E2 and through windfall sites.
- 3.3 Policy SS7 of the Local Plan relates to the 'Cheadle Area Strategy' and states that the Council and its partners will seek to expand the role of Cheadle as a significant service centre and a market town. This will be achieved (amongst other measures) by addressing traffic related issues in the town centre and along the A521 and A522, and creating employment growth and increasing the diversity of employment opportunities to meet existing and future needs by:
- Supporting the retention and growth of JCB and other existing businesses within the town
 - Supporting improved access to JCB and existing employment sites
 - The development of employment land through new site allocations in the Local Plan
 - Providing facilities and land for new start-up businesses
 - Improving and intensifying the use of existing employment areas at New Haden/Brookhouses
- 3.4 Policy SS10 of the Local Plan relates to the 'Other Rural Areas Strategy' and states that these areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. This will be achieved through a number of actions, including:
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- Enabling the limited expansion or development of business for employment uses where a rural location can be justified.
- Giving priority to the need to protect the quality and character of the area and requiring all development proposals to respect and respond sensitively to the distinctive qualities of the surrounding landscape.
- Maintain the Green Belt, exercising strict control over inappropriate development allowing only for exceptions as defined by Government policy.

3.5 Policy E1 of the Local Plan relates to 'New Employment Development' and states that new employment development will be assessed according to the extent to which it supports and improves the local economy in terms of providing for the needs and skills of the existing and future local resident workforce and meeting identified business needs, having regard to the Spatial Strategy Policies in SS2, SS3, area strategy policies, and general employment land requirements set out in Policy SS4. In general, the Council will endeavour to support the expansion of existing businesses and new businesses in the District, subject to a number of provisions, including the following:

- All proposals should help maintain or enhance an appropriate range of employment premises and sites across the District in terms of their scale, location and type
- Other types of employment uses (including B use class developments (B1b, B1c, B2 and B8), commercial sui generis uses etc) should be located in existing or proposed employment areas. Such development outside of existing or proposed employment areas but within the settlement boundary may also be acceptable when it would not create undue harm to the character, appearance or amenity of the area. New-build

developments not on existing or proposed employment sites and outside of the settlement boundary may be supported where a rural location can be justified.

- The sustainable redevelopment, intensification or improvement of existing employment sites for new business and industrial developments will be supported provided it would not have an unacceptable impact on the amenities, character or appearance of the area.

3.6 Policy DC1 of the Local Plan relates to 'Design Considerations' and states that all development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council's Design Guide SPD. In particular, new development should:

- be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area
- be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance
- protect the amenity of the area, including creation of healthy active environments and residential amenity, in terms of satisfactory daylight, visual impact, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution
- promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate
- provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use

3.7 Policy DC3 of the Local Plan relates to 'Landscape and Settlement Setting' and states that the Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by:

1. Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence
2. 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 evidence
3. Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds
4. Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape
5. Ensuring that development does not adversely affect the wider setting of the Peak District National Park.

3.8 Policy NE1 of the Local Plan relates to 'Biodiversity and Geological Resources' and states that these will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence) by (amongst other measures):

- Conserving, and enhancing regional and locally designated sites. The Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests, unless it can be demonstrated that:

- A) there is no appropriate alternative site available; and
 - B) all statutory and regulatory requirements relating to any such proposal have been satisfied; and
 - C) appropriate conservation and mitigation measures are provided; or if it is demonstrated that this is not possible
 - D) the need for, and benefit of, the development is demonstrated to clearly outweigh the need to safeguard the intrinsic nature conservation value of the site and compensatory measures are implemented.
- Expecting all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature, size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.

4 Other Material Considerations

National Planning Policy Framework

- 4.1 The National Planning Policy Framework (NPPF) seeks to secure the delivery of sustainable development, and sets out policies, *inter-alia*, aimed at safeguarding the Green Belt, supporting the growth of the economy, ensuring high quality design, safeguarding highway safety and securing a net gain to biodiversity. The content of the NPPF has been taken into consideration in the preparation of this application.

SMDC Landscape and Settlement Character Assessment

- 4.2 The Landscape and Settlement Character Assessment (LSCA) identifies the site as lying within the Ancient Slope and Valley Farmlands Character Area. The content of the LSCA has been taken into consideration in the preparation of this application.

SMDC Growth Strategy

- 4.3 The SMDC Growth Strategy (2018) confirms that employment growth is a key political priority and identifies a number of issues with regards to business, employment growth and skills. The content of the Growth Strategy has been taken into consideration in the preparation of this application.

5 Planning Assessment

Impact on Green Belt

- 5.1 The application proposes the expansion of the existing yard area adjacent to the applicant's existing warehouse to provide additional lorry and car parking with associated landscaping. The application site is located within the Green Belt wherein policy SS10 of the Local Plan confirms that strict control will continue to be exercised over inappropriate development, allowing only for exceptions as set out in Government policy.
- 5.2 Paragraph 150 of the National Planning Policy Framework identifies a number of types of development that are not inappropriate in the Green Belt, provided that they preserve its openness and do not conflict with the five purposes of including land within it. The list of exceptions includes:

"Engineering Operations"

And

"Material changes in the use of land"

- 5.3 The submitted proposal involves both a material change of use of the land from its current use as agricultural, to industrial use (Use Class B8), and also involves engineering operations in the form of the expansion of the yard area and formation of the landscaping bund along the northeastern boundary of the site.
- 5.4 The proposed engineering works (formation of the yard area and landscaping buffer) will preserve the openness of the Green Belt and not result in any material conflict with the five purposes of including land within the Green

Belt, as the resultant yard area will remain an open in nature, with no buildings constructed upon it or retaining walls formed. The land will be gently graded, and a new landscaping buffer formed along the northeastern site boundary which will not affect the openness of the Green Belt.

- 5.5 The proposed use of the resultant yard area for the parking of vehicles will also preserve the openness of the Green Belt. The parking of vehicles upon the site, in particular the lorries, will amount to a *transient impact*, rather than a permanent one. In a typical week the lorries start leaving the site from 02:00hrs with the yard usually empty by 06:00hrs. The lorries then start returning to site from mid/late afternoon onwards up to around 21:00hrs. The yard areas remain largely empty and open during the intervening period, i.e., the majority of the day. Approximately 30% of the lorries do not return to site at all until the end of the week, as they stay out on site.
- 5.6 It is consequently concluded that the proposed formation of the yard area and associated change of use of the land amounts to an appropriate form of development within the Green Belt that meets the requirements of paragraph 150 of the National Planning Policy Framework, and the relevant provisions of policy SS10 of the Local Plan.
- 5.7 Notwithstanding the above conclusion, and without prejudice to the applicant's case, if the Local Authority were to conclude that the submitted proposal amounts to an inappropriate form of development within the Green Belt, there are a number of material considerations applicable to this case that would amount to very special circumstances to clearly outweigh the totality of harm to the Green Belt. These will now be discussed.

Very Special Circumstances (Without Prejudice)

- 5.8 Paragraph 147 of the NPPF confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the NPPF goes on to state that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, going on to state that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.9 Owing to the transient impact of the proposed use of the yard area, the open nature of the yard itself, and the screening effect of the proposed landscaping buffer, it is submitted that the impact of this development on the openness of the Green Belt and the five purposes of including land within it would be limited. The totality of harm arising is furthermore clearly outweighed by the following material considerations.

Economic Benefits

- 5.10 The first material consideration weighing in favour of the proposed development is the benefits of this development to the growth of the existing business and the wider economy. Paragraph 81 of the NPPF states that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be

a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”.

- 5.11 This guidance is enshrined within policies E1 and SS7 of the Local Plan which states that the Council will endeavour to support the expansion of existing businesses and new businesses in the District, and will support the sustainable redevelopment, intensification or improvement of existing employment sites provided it would not have an unacceptable impact on the amenities, character or appearance of the area.
- 5.12 MJS Transport was formed in 1988 and at that time constituted a sole trader business with one member of staff. The business began to grow and In 1995 relocated to the Woodhead Garage site and at that time employed six people. By 2007 the number of staff employed by the company had risen to 32. The business subsequently embarked on a modernisation program in 2008 which included taking down all of the existing buildings and erecting purpose-built offices (including training room), workshop, warehousing, welfare facilities and lorry and staff car parking which was carried out with an investment of approximately £1million. A further £2 million was subsequently invested in 2015 to extend the warehouse/workshop and provide additional staff car parking and a lorry car parking area.
- 5.13 The business serves the warehousing, handling, distribution and maintenance and other adhoc requirements of businesses in Cheadle, and the surrounding Staffordshire Moorlands area, whilst also offering the same services to clients throughout the UK and Europe. The central location of the site within the UK is important to the company’s growth nationally and key to the bespoke services they offer to their Cheadle and Staffordshire Moorlands based clients. The business now employs some 75 members of staff and is a

thriving local business, with has seen its turnover grow from £3.9 million in 2017 up to 6.7 million in 2021. The business projects a 10% increase in its turnover year on year into the future, with a corresponding 5% - 10% increase in the number of employees year on year (approximately 20-40 employees over the next 5 years).

5.14 To put the applicant's track record of generating employment growth into context, it is noted that in their most recent planning application for the expansion of the existing warehouse on the site (SMD/2014/0265) they projected an increase of 12 members of staff from its total of 36 at the time that application was made (48 total). That approved development was completed in 2018 and the business now employs some 75 members of staff, far exceeding the employment growth that it had predicted.

5.15 Due to the success and growth of the business the company are now in desperate need of increased staff car parking facilities as well as lorry/trailer parking facilities. The proposed staff car parking area will accommodate the existing staff car parking whilst allowing for future growth in staffing levels in the coming years. The proposed lorry parking area will likewise accommodate some of the additional vehicles they already have, along with additional parking associated with the future growth of the business and improve the operational efficacy of the business. Keeping this business under 'one roof' is paramount to maintaining its high service levels, cost effectiveness, and minimising vehicle movements (discussed in more detail below).

5.16 The proposal will also have a beneficial effect on the wider local economy. The proposal represents a further £1million investment by this business into Cheadle, along with opportunities for further employment growth (approximately 20-40 jobs over the next 5 years). By facilitating the growth

of the business, the proposed development will enable MJS Transport to offer their services to additional customers within the Moorlands and wider area, whilst also maintaining their existing base of clients. In doing so the development will help to facilitate economic growth of those other businesses as part a ripple effect.

- 5.17 Further economic benefits will arise as a result of additional spending within the local economy. The Local Authority's Quantifying the Economic Impact of Development Report cites national research that between 4.5% and 9% of an employee's overall weekly household spend is spent close to their place of employment, which in the Staffordshire Moorlands equates to £1,394 per annum. The same report also states that people who live and work locally spend approximately 41% of their disposable income in the local area, meaning businesses that attract a proportion of in-migration of new working age residents will have a greater positive impact on the local economy, as long as there is a sufficient supply in the housing market. In the Staffordshire Moorlands, this would equate to £11,182 per relocating / new employee per annum. The employment growth forecast by the company will therefore have a positive impact on the local economy, and such benefits carry substantial weight in favour of the proposed development.

Lack of Alternative Sites

- 5.18 A further material consideration in favour of the proposed development is the lack of alternative sites within the Staffordshire Moorlands for the applicant's business to expand into. The Local Authority's Growth Strategy (2018) identifies a lack of fit-for purpose accommodation and freehold sites as a constraint to business growth and confirms that the Council's own portfolio of commercial sites have a high occupancy rate.

5.19 To assess whether any sites would provide a suitable alternative to the existing site, the following criteria have been applied to reflect the applicant's reasonable operating requirements for their business:

- The site should have buildings with a minimum floor area of 4150 square metres (size of existing building)
- The site should have on-site parking for a *minimum* of 50 lorries
- The site should have on-site parking for a *minimum* of 50 cars
- The site should have a good means of vehicular access suitable for access by lorries

5.20 A search has been conducted of Rightmove (Commercial), Prime Location (Commercial), Zoopla (Commercial), OntheMarket (Commercial), Realla, The Estates Gazette and the Local Authority's own inward investment register for available industrial sites. The following sites have been identified and considered:

5.21 Blythe Business Park – Unit 6A Sandon Road, Cresswell: These premises do not have sufficient floor space to meet the applicant's reasonable operational requirements, nor does it have sufficient off-street car parking (15 spaces). The site furthermore has no lorry parking provision at all. This site is therefore unsuitable.

5.22 Light Industrial Unit, New Haden Industrial Estate, Cheadle: These premises have a gross floor area of just 402 square metres, and thus falls substantially below the minimum floorspace requirement of the applicant's business. The site furthermore does not have sufficient off-street parking for cars or lorries to come anywhere close to the reasonable requirements of the applicant's business. This site is therefore unsuitable.

- 5.23 Chorley Mill, West Street, Leek: This building is set over three storeys and thus is not ideally suited for warehousing and distribution use. The building furthermore has a gross floor area of only 817 square metres, and thus falls substantially below the minimum floorspace requirement of the applicant's business. The site only has limited car parking (5no. spaces) and thus falls substantially below the level required by the applicant's business. The premises is furthermore noted to benefit from an extant consent for conversion to a large HMO in any event and is being marketed accordingly. This site is therefore unsuitable.
- 5.24 Cross Street Mill, Leek: This building is currently utilised as offices and is set over two storeys. It has a gross floor area of 2845 square metres, which falls below the applicant's minimum reasonable requirement, and also has no off-street parking for either cars or lorries. It is therefore unsuitable.
- 5.25 Former petrol station off Broad Street, Leek: This site extends to 0.32 hectares and has no buildings upon it. If one were to cover the entire site with buildings, it still would fall 950 square metres short of the applicant's reasonable requirements. There would furthermore be no suitable amount of off-street parking for cars or lorries in that event. This site is therefore unsuitable.
- 5.26 Having regard to the above assessment it is concluded that there are no suitable alternative premises available within the Staffordshire Moorlands to meet the applicant's reasonable operating requirements and expected future growth. Retaining and expanding the business on its existing site is therefore the only realistic option available. The lack of any suitable alternative sites therefore lends further significant weight in favour of the proposed development.
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Reduction In Vehicle Movements

- 5.27 The second material consideration that weighs in favour of the proposed development is a reduction in vehicle movements to and from the site. The business currently utilises numerous third party vehicles to deliver into and collect from their warehouse on a daily basis. In the vast majority of cases these comprise of 44 tonne GVW articulated lorries. The proposed development will allow the company to expand their existing fleet and staffing numbers such that they can undertake this work themselves, and in turn reduce the need for third party vehicles to visit the site.
- 5.28 The applicant projects that vehicle movements in and out of the site would halve as a consequence, as their own vehicles would come in fully loaded, unload into the warehouse, reload from the warehouse, and go back out again. At present the third party lorries usually arrive fully loaded, unload into the warehouse and then leave the site empty. Another third party vehicle then arrives empty, and then departs fully loaded. Such inefficiencies would be resolved by the proposed development.
- 5.29 Policy SS6 of the Local Plan sets out an objective of addressing traffic related issues within Cheadle town centre and along the A521 and A522. The submitted proposal will contribute positively to that objective by streamlining the manner in which the business operates and significantly reducing the number of vehicles arriving at and departing from the site. Such environmental benefits lend further significant weight in favour of the proposed development.

Landscape & Biodiversity Enhancement

- 5.30 The existing yard area abuts up to the adjacent field and presents a very hard edge to the existing settlement. The submitted proposal entails an expansion of the existing yard area into the adjacent field, but also proposes a

substantial landscaping buffer along the northeastern perimeter of the site, with supplementary planting also to be undertaken to the eastern site boundary. The extent of the landscaping buffer is shown on the submitted plans and sections. The proposed landscaping buffer will provide a natural enclosure to this site, softening up the edge between it and the field beyond, such that on approach along the Froghall Road the impact of the existing parked vehicles will be softened and enhanced.

- 5.31 The proposal also presents an opportunity to derive a significant improvement to local biodiversity. The existing field is used for cattle grazing. The proposed landscaping buffer, which covers an area of approximately 3386 square metres, will provide new woodland, shrub margin and meadow grass, with further hedgerow planting to be undertaken along the northeastern and eastern site boundaries. These areas will derive a *significant* net gain to biodiversity that far exceeds the *net* gain required policy NE1 and the NPPF. Such environmental benefits carry further significant weight in favour of the proposed development.

Summary of Very Special Circumstances

- 5.32 It is concluded that the substantial benefits of the proposed development associated with enabling the sustainable growth of the business, generating additional employment and the knock-on benefits to the local economy, coupled with the lack of alternative sites, the benefits of the proposal in reducing vehicle movements, and the landscape and biodiversity enhancements that would ensue, collectively amount to very special circumstances to clearly outweigh the totality of harm to the Green Belt.

Landscape Impact

- 5.33 Owing to the location of this site on the edge of the settlement of Cheadle, the application has been informed by a Landscape and Visual Impact

Assessment prepared by FFC Landscape Architects. The document identifies fifteen *potential* receptors within a 1km radius of the site, going on to evaluate the impact of the development on nine of those receptors (the remainder having been excluded owing to lack of impact).

- 5.34 The LVIA concludes that the proposed development will have a low adverse impact on five of those receptors, a medium adverse effect on one receptor, and a high adverse effect on three receptors, those being views from the property directly east of the site, traffic approaching from the north and views from the new housing development to the east/southeast.
- 5.35 To mitigate the impact of the development on local receptors, a landscaping and planting scheme has been proposed, which will provide a strong degree of natural enclosure to the site and reduce all but one of the medium and high adverse impacts down to low impact. A high adverse impact to the new housing site nearby will remain, with the LVIA noting that the position of the existing vehicular access means mitigatory planting will not be possible. The existing yard is already visible from this receptor in any event.
- 5.36 The proposed landscaping scheme is shown on the submitted site plan and includes a mixture of new tree and shrub planting. The delivery of this landscaping buffer can be secured via an appropriately worded planning condition and in doing so the development will meet the requirements of policy DC3 of the Local Plan.

Design & Layout

- 5.37 The application site currently comprises of a large portal framed industrial building that is consolidated towards the centre of the site. Areas of hardstanding extend to the east, north and west of the building and provide parking for existing vehicles associated with the business. The application

proposes to extend the existing yard further northwards into the adjacent field to provide additional parking space for lorries and cars associated with the business.

5.38 The proposed layout arranges the lorry parking in a manner which meets the operational requirements of the business, whilst also maintaining an appropriately sized area for the turning, manouvering and loading / unloading of vehicles. The business currently operates three types of vehicles:

- 44 tonne GVW articulated lorries
- 32 tonne GVW rigid lorries
- 3.2 tonne GVW vans

5.39 There is currently space for the parking of 43 lorries and 2 vans on the site along with four loading bays. The application proposes to remove the six existing spaces that lie parallel with the northern elevation of the building, along with the eleven spaces located to the northeast of the building. The removal of those spaces is being undertaken in the interests of improving circulation space, as the parking of lorries in these areas serves to restrict vehicle movements within the site.

5.40 The proposed parking area will accommodate a total of 52 lorry parking spaces, representing a net increase of 35 spaces over and above that which already exists on the site. This new parking area will serve to improve the circulation of vehicles within the site, whilst maintaining the existing turning, manouvering and loading area at the rear of the building, and also allowing for the future growth of the business.

- 5.41 A new staff car park with space for up to 46 spaces is also proposed, broken up by landscaping and planting, with the extended yard area as a whole also benefitting from the extensive landscaping and planting buffer proposed to the north of the new parking areas. This landscaping area will rise up to a higher level than the yard area and provide an effective visual screen and softening of the proposed development. Such landscaping can be secured via planning condition, and in doing so the development will meet the requirements of policy DC1 of the Local Plan.

Residential Amenity

- 5.42 The application site lies to the west of a cluster of residential properties that lie on the opposite side of the Froghall Road. The submitted proposal will serve to reduce the impact of the applicant's operations on neighbouring residential amenity, as it will enable the business to be less reliant upon third party operators, and thus reduce the number of vehicle movements to and from the site.
- 5.43 As discussed earlier, the third party lorries usually arrive fully loaded, unload into the warehouse and then leave the site empty. Another third party vehicle then arrives empty and departs fully loaded. The proposed development will enable the applicant to reduce reliance upon these third party operators, utilising their own vehicles that would come in fully loaded and depart fully loaded. In doing so a substantial reduction in movements will ensue, and in turn that will serve to reduce the impact of the development on the amenity of existing residents. The proposed development is therefore in accordance with the requirements of policy DC1 of the Local Plan.

Highway Safety

- 5.44 The site benefits from an existing vehicular access point onto the Froghall Road which is of suitable width and geometry to meet the needs of the business, and which has good visibility in both directions on egress. The means of access will be unaltered by this proposal, and as such no adverse impact to highway safety will ensue as a consequence of this development.
- 5.45 It is furthermore submitted that the proposal would amount to a betterment to highway safety, in that it will enable the applicant to reduce reliance upon third party operators, and in doing so significantly reduce the amount of vehicles coming to and from the site. The proposed development consequently meets the requirements of policy DC1 of the Local Plan.

6 Conclusion

- 6.1 Having regard to the considerations set out within the Planning Assessment above, it is concluded that the submitted proposal amounts to an appropriate form of development within the Green Belt and will not result in any significant adverse harm to the character and appearance of the landscape, or derive harm to neighbouring residential amenity or highway safety.
- 6.2 Notwithstanding the above, and without prejudice to the applicant's case, if the Local Authority were to conclude that the proposal amounts to an inappropriate form of development within the Green Belt it is submitted that the economic benefits of the development in enabling the sustainable growth of the business and generating additional employment, coupled with the lack of alternative sites, and the benefits of the proposal in reducing vehicle movements, and securing enhancements to the landscape and local biodiversity, collectively amount to very special circumstances to clearly outweigh the totality of harm to the Green Belt.
- 6.3 The proposed development is therefore in accordance with the requirements of policies SS1, SS4, S7, SS10, E1, DC1, DC3 and NE1 of the Staffordshire Moorlands Local Plan and policies set out within the National Planning Policy Framework.