

Appeal Statement (Heritage)

Driftwood, Reacliffe Road, Rudyard,
Staffordshire Moorlands,
Staffordshire, ST13 8RS

January 2023



CAMBRIDGE HERITAGE
LIMITED

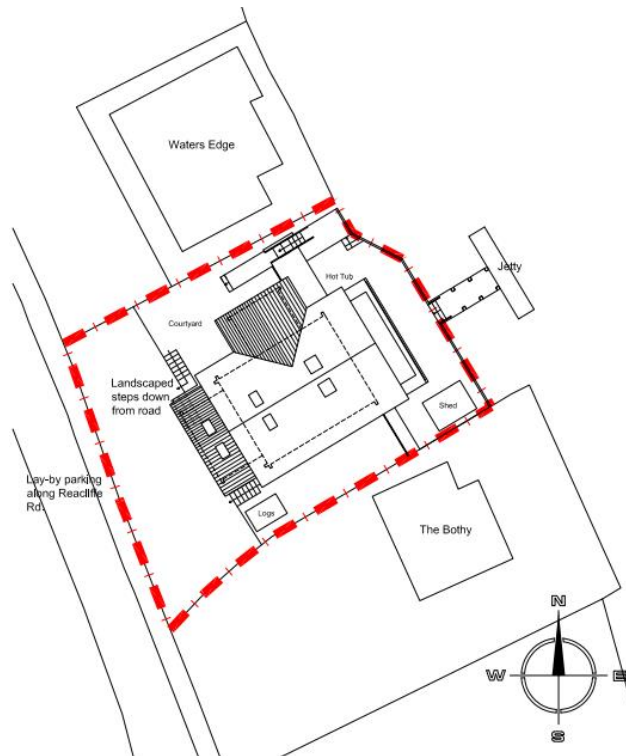


Figure 1: Appeal Site Plan with red-line boundary (Hewitt & Carr Architects)

Document: Appeal Statement (Heritage)

Project Number: 0289A

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1.0 – INTRODUCTION

Qualifications

- 1.1 I am Jacob William Billingsley. I hold the degrees of BA (Hons) in History from King’s College, University of London, and MSt in Building History from Wolfson College, University of Cambridge. I am a Member of the Society for the Protection of Ancient Buildings (SPAB) and an Affiliate Member of the Institute of Historic Building Conservation (IHBC).
- 1.2 I am Managing Director of Cambridge Heritage Limited, a company which provides independent heritage consultancy. During my career I have dealt with a wide range of cases involving physical changes to historic structures and new development affecting conservation areas and the settings of heritage assets.
- 1.3 I have provided expert heritage evidence at public inquiries and for many other appeals. My work has included the assessment of effects on a wide range of heritage receptors in England and Wales, involving listed buildings, conservation areas, scheduled monuments, historic parks and gardens, and expansive ancient landscapes.
- 1.4 My firm is involved in a wide range of work including examining the effects of housing developments, urban extensions, renewable energy schemes, commercial and industrial developments, as well as national infrastructure projects on cultural heritage assets.

Background to this Appeal

- 1.5 Validated on 18/06/2021, planning application SMD/2021/0378 was submitted to the Local Planning Authority (LPA), Staffordshire Moorlands District Council (SMDC), for the erection of single-storey extensions to side and rear of “Driftwood”, Reacliffe Road, Rudyard, Staffordshire Moorlands, Staffordshire, ST13 8RS, (henceforth referred to as the “appeal site”).
- 1.6 The appeal site “Driftwood (39 Steps)” is situated on the western shoreline of the Rudyard Lake. It is surrounded by Rea Cliffe woodland to the west and is accessed via Reacliffe Road.
- 1.7 The appeal site is in the Rudyard Conservation Area and in the Green Belt.

- 1.8 The appeal site building was constructed following planning permission in 2000 for a ‘replacement holiday chalet’ (SMD/2000/0785). The application consented a single-storey timber chalet style building with a bedroom at attic level, designed by Hulme Upright Architects (**Figure 3**). This chalet sits on top of an earlier boat house at basement level on a plot of circa. 19m x 14.5m in area. The adjacent plots are of a similar size and are also occupied by timber chalets constructed mainly in the 20th century.
- 1.9 Determined on 08/11/2022, two reasons were provided by the LPA for the refusal of the application SMD/2021/0378. The first reason related to the impact of the proposal on the character and appearance of the Rudyard Conservation Area, which forms the subject of this appeal statement. The second ground for refusal related to the impact of the application on the Green Belt which is dealt with in a separate report.

Scope of this Statement

- 1.10 My statement addresses the LPA’s first reason for the refusal of planning application SMD/2021/0378, which reads as follows:

‘The proposals are harmful to the character and appearance of Rudyard Conservation Area as the side extension would add considerable bulk to the building, harming its simple form and it would take the building very close to the adjacent property, harming the visual separation of the buildings when viewed from the lakeside. Consequently would detract from the special architectural and historic character of the area. Furthermore, insufficient justification has been provided to indicate that the alterations are necessary to achieve public benefit which would offset the less than substantial harm caused. The development is contrary to Policy DC2 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework Section 16 , Paragraph 193 and 196’¹

- 1.11 No listed buildings are cited as being affected (either physically or in terms of their setting) by the LPA and I concur with this conclusion. Historic England do not appear to have been consulted on the application. Therefore, in my statement I address the significance of the Rudyard Conservation Area and the effect of

¹ Reason 1 for refusal of planning application SMD/2021/0378

change on that significance only. My statement does not address the planning balance which is dealt with in a separate statement produced by DLP Planning.

1.12 In summary and contrary to the LPA's first reason for refusal, I do not believe that the appeal scheme will cause 'less-than-substantial' harm to the character and appearance of Rudyard Conservation Area and do not consider that the proposal would add considerable bulk to the existing building.

1.13 In my opinion, the appeal site plan (**Figure 1**) and elevations (**Figures 13-14**) demonstrate that the additions proposed to the rear and side of the building are modest in scale, bulk and massing and will not represent overdevelopment or an unacceptable impact on the separation between the chalet and its neighbours.

1.14 I detail in **Chapter 4** why I believe the proposal does not contravene any national or local heritage and conservation planning policy and complies with Policy DC2 of the SMBC Local Plan and with Chapter 16 of the NPPF which deals with conserving and enhancing the historic environment.



Figure 2: Historic England Asset Mapping (Historic England; note: the footprint of the structure shown on this map appears to illustrate the previous, smaller structure replaced by the existing timber chalet consented under application reference SMD/2000/ 0785).

The floor plan shows a two-story house with a basement. The main floor includes a Loggia, a Hall, a Kitchen (2275), a Bath (2080), a Utility, and a Bedroom (2080). The upper floor includes a Bedroom (2018), a Utility, and a Bedroom (2080). The plan also shows a Courtyard Garden, a Kitchen/Utility Store (1234), and a Balcony. Dimensions and room numbers are provided.

Driftwood, Rudyard



Figure 5: Photograph of Driftwood from Rudyard Lake

2.0 – LEGISLATION AND POLICY

Legislative Background

- 2.1 Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires the decision maker to have special regard to the desirability of preserving or enhancing the character and appearance of a conservation area.
- 2.2 The decision maker must give considerable importance and weight to the desirability of preserving the significance of the conservation area and there is a strong presumption against the grant of permission for development that would harm its character and appearance.
- 2.3 For the purposes of this assessment, preserving equates to an absence of harm. Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.

NPPF, Significance and Harm

- 2.4 The significance of a heritage asset is defined in the NPPF as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5 The NPPF requires the impact on the significance of heritage asset’s (Listed Building, Conservation Areas, etc) to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 200 and 202 of that document.
- 2.6 National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and recent case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.
- 2.7 The Council’s first reason for refusal indicates that it considers the harm to be less than substantial, as described within paragraph 202 of the NPPF. With this

said, paragraph 202 is not cited within the Decision Notice, with paragraphs 193 and 196 of the NPPF instead cited. This appears to be erroneous.²³

2.8 Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

2.9 Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

2.10 Paragraph 202 of the NPPF deals with less than substantial harm to the significance of designated heritage assets, and states:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

2.11 Paragraphs 206 and 207 of the NPPF deal with Conservation Areas. Paragraph 206 states that LPA's should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

2.12 Paragraph 207 of the NPPF acknowledges that not all elements of a conservation area 'will necessarily contribute to its significance.'

² Para. 193 of the NPPF states that LPA's 'should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.' Given that this paragraph of the NPPF is a requirement on the LPA and not the applicant, citing this paragraph within the Decision Notice appears to be a mistake.

³ Similarly, Para 196 of the NPPF states: 'Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.' There was no suggestion by the LPA that there has been deliberate neglect of, or damage to, a heritage asset.

Local Policy

Staffordshire Moorlands Local Plan (2014-2033)

2.13 Applications for planning permission are decided in accordance with the Local Development Plan unless material considerations indicate otherwise. The planning application was therefore assessed against the Staffordshire Moorlands Local Plan (2014-2033).

2.14 The Local Plan was adopted on 9th of September 2020 and sets out the LPA's vision and strategy for the District until 2033. The Local Plan covers the Staffordshire Moorlands area except for the part that lies within the Peak District National Park Authority.

2.15 Reason 1 for refusal of the application cited Policy DC2 of the Local Plan which deals with the historic environment. The policy has been reproduced below:

- 1. The Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.*
- 2. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF.*
- 3. All applications likely to affect heritage assets will require the submission of a heritage statement, including a qualitative visual assessment where appropriate.*
- 4. Where development is likely to affect archaeology, both designated and undesignated, the Council requires the submission of a desk based assessment, and where appropriate, field surveys and trench evaluation by a qualified professional.*
- 5. Where the loss of significance is unavoidable, recording should take place and this should be added to the Historic Environment Record as a minimum, held by Staffordshire County Council.*
- 6. The Council will continue its proactive approach to heritage assets at risk and welcomes development proposals which would result in the sympathetic reuse of these assets in line with NPPF policy.*
- 7. The Council will promote development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of Conservation Area Appraisals, Design Guidance and Statements, Archaeological Assessments, Characterisation Studies and Masterplanning.⁴*

⁴ Policy DC2 of the Staffordshire Moorlands Local Plan (2014-2033).

3.0 – SIGNIFICANCE: RUDYARD CONSERVATION AREA

Rudyard Township

- 3.1 Rudyard was formerly a township in Leek parish and later a civil parish approximately 580 hectares in area.⁵ It extends from a hill called Gun on its east side to Rudyard Lake, a reservoir formed in 1799 by damming the brook which marked the western boundary with Horton.
- 3.2 The land lies at 600 ft. beside Rudyard Lake and rises to 1,000 ft. on Gun. The underlying rock is mostly “Bunter Pebble” with sandstone of the Millstone Grit variety in the north and west parts of the township.⁶
- 3.3 A hamlet on which the township centred in the 18th century was gradually deserted in the following century, replaced by the present Rudyard village in Horton, which grew up to cater for tourists visiting Rudyard Lake.
- 3.4 Rudyard has been identified as an estate called “Rudegeard” in the early 11th century, the name having been derived apparently from Old English words meaning the “shrub rue” and an enclosure.⁷
- 3.5 The village of Rudyard as we know it today is largely a result of the environmental changes pertaining from the creation of the reservoir in the valley at the end of the 18th century, drained by the Dunsmore Brook to supply the Caldon Canal.⁸
- 3.6 Before this time the township was formed of scattered farms and a few more substantial residences, such as Rudyard Hall. ⁹ Six people in Rudyard were assessed for tax in 1327 and seventeen were assessed for hearth tax in 1666. The population was 109 by 1801.¹⁰

⁵ A P Baggs, M F Cleverdon, D A Johnson and N J Tringham, 'Leek: Rudyard', in A History of the County of Stafford: Volume 7, Leek and the Moorlands, ed. C R J Currie and M W Greenslade (London, 1996), pp. 216-219. British History Online <http://www.british-history.ac.uk/vch/staffs/vol7/pp216-219> [accessed 06.01.2023].

⁶ Ibid

⁷ Ibid

⁸ Alan Weeks & Brian Radcliffe, 'History of Rudyard Lake: Before the Reservoir'; [accessed 06.01.2023]. <https://www.rudyardlake.com/history-of-rudyard/>

⁹ Ibid

¹⁰ A P Baggs, M F Cleverdon, D A Johnson and N J Tringham, 'Leek: Rudyard', in A History of the County of Stafford: Vol.7: <http://www.british-history.ac.uk/vch/staffs/vol7/pp216-219> [accessed 06.01.2023].

3.7 The first half of the 19th century evidently saw a gradual development of Rudyard Reservoir as a leisure destination. At this time rights to fishing, shooting and boating were owned by the Earl of Macclesfield on the eastern side of the Lake and by the Haworth family on the west.¹¹

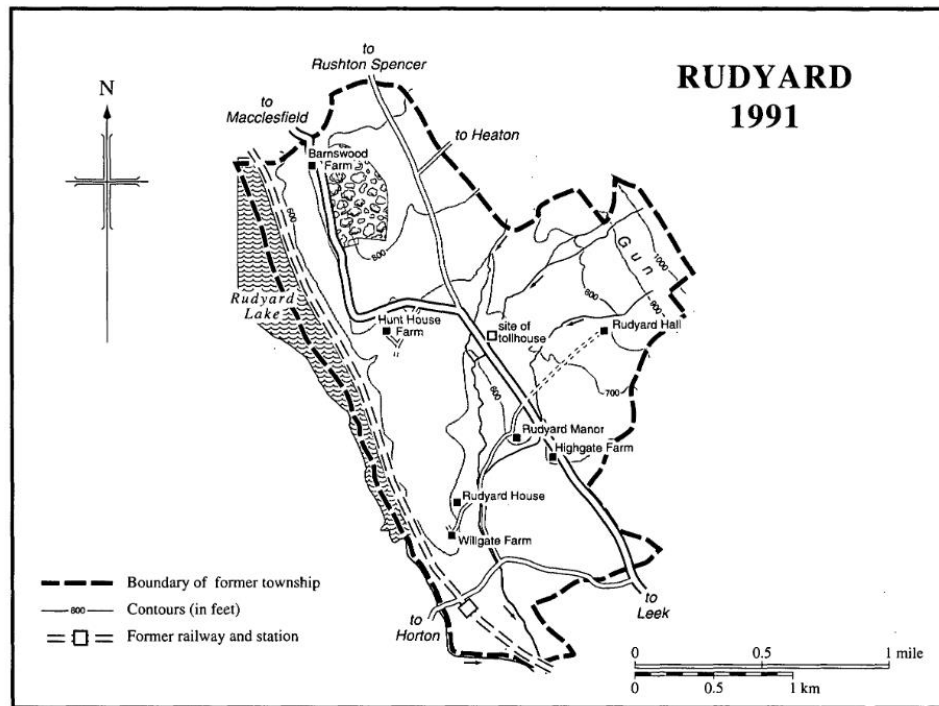


Figure 6: Map of the Rudyard, 1991

Rudyard Lake

3.8 Rudyard Lake was created at the turn of the 18th century as a reservoir for the Caldon canal, the water reaching the canal by a feeder which enters a branch canal in Longsdon. The reservoir is two miles long and covers 163 hectares and was fed by the Dingle Brook and the Rad Brook.

3.9 The reservoir took four years to build between 1797 to 1801. In order to construct the dam, a 12 foot x 12 foot trench was manually dug out across the valley. Subsequently, puddling clay was laid at the bottom of the dam to ensure

¹¹ Alan Weeks & Brian Radcliffe, 'History of Rudyard Lake: Before the Reservoir'; [accessed 06.01.2023].
<https://www.rudyardlake.com/history-of-rudyard/>

that it was water-tight. A more substantial feeder was constructed in around 1811.¹²

3.10 The reservoir has been exploited as a tourist attraction since the mid-19th century when the North Staffordshire Railway Company opened a station in the vicinity. The wooded ground to the west of the reservoir was landscaped after 1831 with walks and seats by William Nunns, a local gardener.

3.11 The lake has remained a popular destination for sailing, rowing and fishing. Rudyard Lake sailing club was established in 1956. It first used a lakeside bungalow as a clubhouse and from 1958-1963 the former lodge to Cliffe Park. The North Staffordshire Rowing Club moved to Rudyard (from Trentham) in 1989 and has a boathouse at the south end of the lake.

3.12 The famous author Rudyard Kipling owes his name to Rudyard Lake. His father - John Lockwood Kipling - was working locally and met Alice MacDonald in 1863, subsequently courting her at Rudyard Lake. It is said that Rudyard Kipling's parents had been so moved by the beauty of the lake area that when their first child was born in India, they referenced it when naming him.¹³

Chalets at Rudyard Lake

3.13 As detailed in the Conservation Area Appraisal, the development of the tourist industry in the early 20th century provided opportunities for the development of holiday homes and chalets for tourists around Rudyard Lake.

3.14 In the first decades of the 20th century and right through to the turn of the next century groups of chalets were constructed around the lake, principally in timber and many with open verandas. The North Staffordshire Railway, with its new powers under the 1904 Act, for instance, established several refreshment chalets on the west side of the lake in this period.

3.15 Two distinctive purpose-built chalets noted within the Appraisal for their innovative style are Foxgloves (formerly The Hacienda) and The Brackens, to

¹² Staffordshire HER Record for Rudyard Lake: MonUID: MST13158; HER Number: 51741; https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MST13158&resourceID=1010 ; [accessed 06.01.2023].

¹³ <https://www.rudyardlake.com/rudyard-kipling/> [accessed 05.01.2022]

the west of Reacliffe Road. Both are highly distinctive two-storey Swiss style chalets, built in Arts and Crafts style, with timber-frame and verandas.



Figure 7: Photograph of Rudyard Lake dam, circa. 1920

Summary of Significance: Rudyard Conservation Area

3.16 The heritage value of the Rudyard Conservation Area principally derives from the serendipitous natural beauty of the area which was arguably enhanced by the creation of a man-made reservoir for the canal network around 1800.

3.17 Historic and architectural interest is found in the story of how the reservoir was initially engineered and developed, as well as in the buildings which sprung up around the lake and the way in which it was exploited by various waves of people over two centuries for various means of leisure and tourism.

3.18 A key element of the history of the Conservation Area over the last two centuries has been the waves of development around the lake in response to the evolving utilisation of the body of water for the leisure industry.

3.19 A summary of the ‘distinctive, key characteristics’ of the Rudyard Conservation Area and its special heritage interest, reproduced from paragraph 2.2 of the Appraisal document dated 2016, has been detailed below:

2.2 The distinctive, key characteristics of Rudyard can be summarised as follows:

- *A place of natural beauty dominated by a man-made, early 19th century reservoir*
- *A largely Edwardian tourist resort with wide range of both land-based and water-based activities: walking, cycling, rowing, canoeing, sailing, angling and a miniature steam railway, attract a wide range of visitors each year*
- *An exposed and dramatic location, dominated by views from the dam, the lake itself and the A523; weather patterns on the lake can change rapidly and the valley can produce a significant fetch.*
- *Lush vegetation, with areas of ornamented landscape and a backdrop of dense mixed woodland connect spaces and frame the main views*
- *Pockets of visitor holiday accommodation to suit various budgets, developed piecemeal following late nineteenth century land auctions*
- *Widespread and historic public access - long interconnected public routes along the footpath network encircle the lake and run alongside the canal feeders; combined footpaths and cycleways run along the route of the former Churnet Valley railway line, with water-based access up and down the lake.*
- *Picturesque groupings of traditional and modern boathouses and chalets punctuate the lakeside*
- *A few large 19th century villas sit with extensive and mature landscaped grounds*
- *An intimate narrow network of rural lanes and scattered ribbon development line the approach routes, hidden from the wider area by the rolling agricultural setting¹⁴*

Contribution of Appeal Site to Conservation Area

3.20 The appeal site is on the western bank of Rudyard Lake and the chalet was constructed following the approval of planning permission in 2000. The building is assessed as making a neutral contribution to the character and appearance of this part of the Conservation Area.

¹⁴ Rudyard Conservation Area Appraisal (July 2016); paragraph 2.2



Figure 8: Staffordshire VII.4 OS map; revised 1877-1878; published 1879





Figure 11: Part of the 'Rudyard Phase Plan' map 2016

(note: Driftwood was constructed in c.2000 and is coloured purple, indicating it is post 1930)

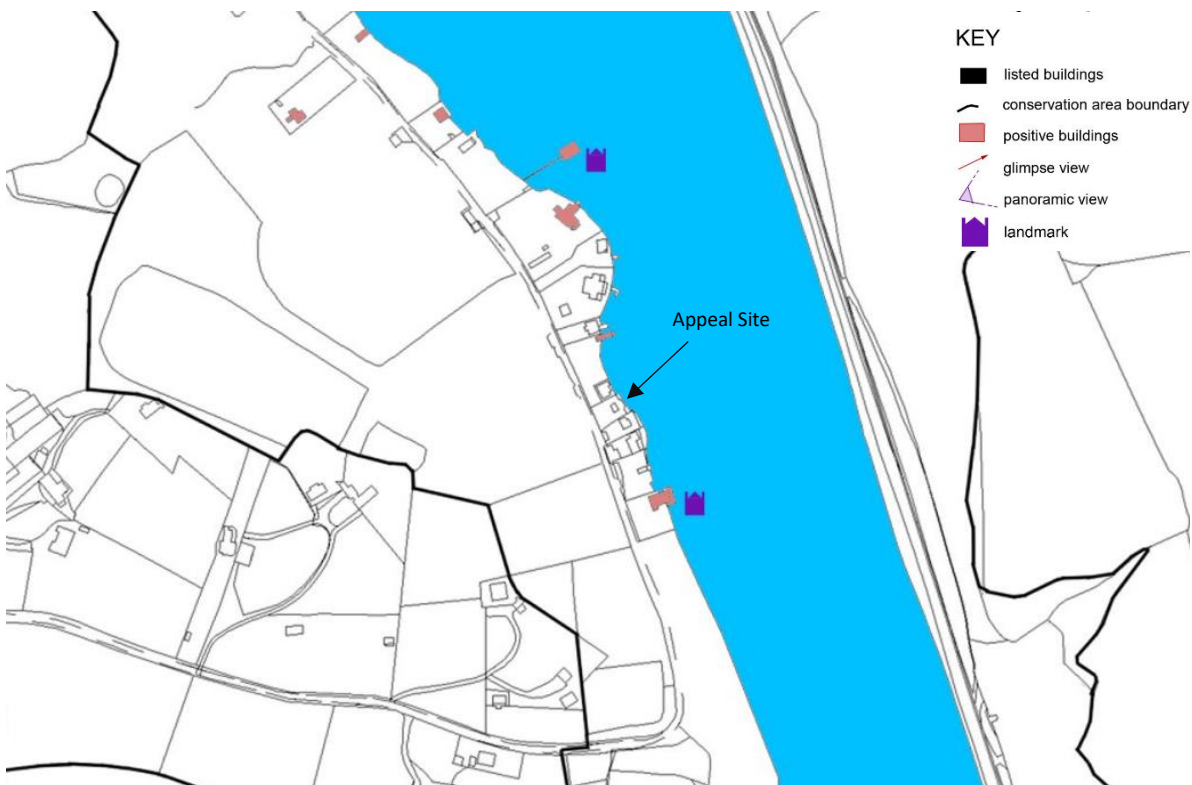


Figure 12: Part of the 'Rudyard South: Spatial Analysis' map 2016

4.0 – APPEAL SCHEME AND IMPACT ON SIGNIFICANCE

The Appeal Proposal

4.1 It is proposed to construct a modest single-storey extension to the rear and side of the existing chalet to provide one new bedroom and a kitchen/ utility room. This will represent a minor increase to the footprint of the building.

4.2 Given that the building is not a heritage asset itself and is not statutorily or locally listed, having been constructed in circa 2000, the internal alterations associated with the appeal scheme are not considered to have the capacity to impact the character and appearance of the conservation area or its significance.

4.3 The proposed alterations to the external appearance of the building are shown in **Figures 13-14**. The elevations demonstrate that the extensions proposed to the rear and side of the building represent a modest increase to the massing and bulk of the existing structure and are wholly appropriate in character and subservient in scale.

4.4 Furthermore, the materials to be utilised for the extensions are in keeping with the materiality of the local built environment, matching those found on the existing chalet and elsewhere in this part of the Conservation Area. The windows, including the two conservation rooflights have been appropriately aligned with the existing fenestration of the building.

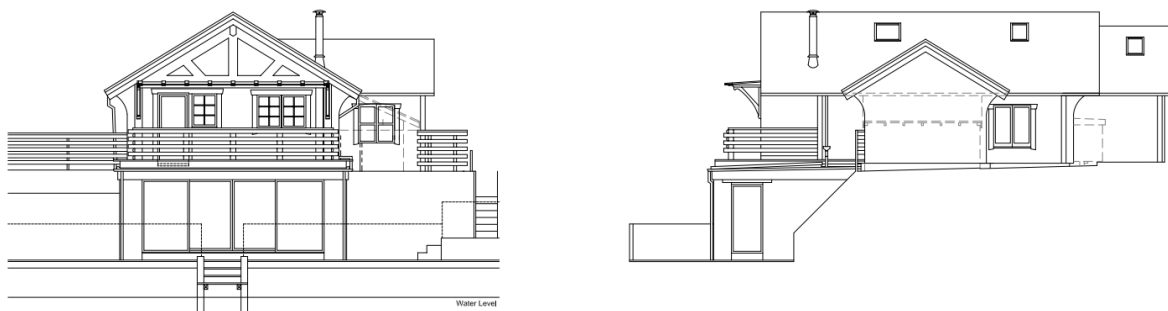


Figure 13: Proposed front (left) and side (right) elevations (Hewitt & Carr Architects)

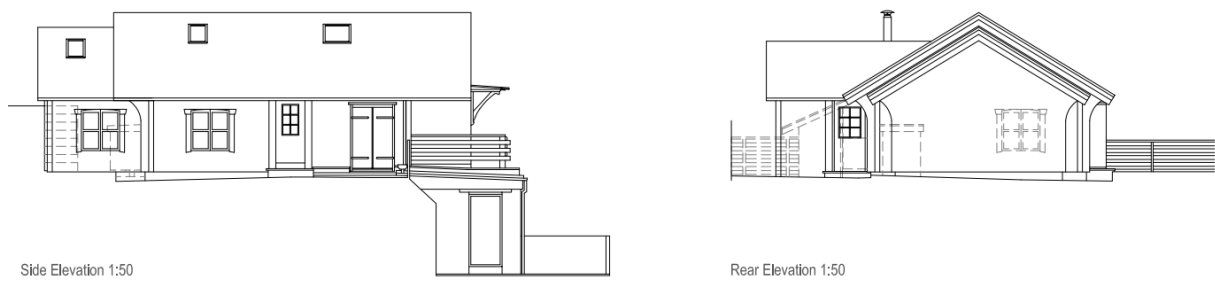


Figure 14: Proposed side (left) and rear (right) elevations (Hewitt & Carr Architects)

Impact on Significance

4.5 In my view, the appeal proposal would not cause harm to the significance of the Rudyard Conservation Area for the following reasons:

- The proposals relate to a timber chalet constructed following permission in 2000 which is not of any inherent heritage value. This is confirmed by the Rudyard South: Spatial Analysis' map (**Figure 12**) which illustrates that the building and its immediate neighbours are not of any heritage value and make at best a neutral contribution to the character and appearance of the area.
- Given that the appeal site building is not of heritage value and was constructed in post 2000, the proposal for minor extensions to the building would not result in the loss of any historic fabric.
- I believe that the form, scale and sitting of the single-storey extensions to the rear and side are modest and in keeping with the character and appearance of the host building and the other structures in this part of the Conservation Area. This is best illustrated by **Figures 1**, and **13-14**.
- The materials will match those found on the existing structure and the windows will match the existing fenestration arrangement and style of the building.
- The proposal would not impact the setting(s) of any listed buildings or non-designated heritage assets (**Figure 12**). There would be no impact on positive or landmark buildings in the area and no impact on 'glimpsed' or 'panoramic' views (**Figure 12**).

4.6 Should the appeal scheme be implemented, the significance of the Rudyard Conservation Area would in my view remain intact and unchanged. There would be no vitiation or drain on the heritage value of the area and no harm to the key elements contributing to the distinctive characteristics of Rudyard as summarised in 2.2 of the Appraisal document and 3.16 of this report.

4.7 No harm to heritage significance will result from the proposal, meaning that Paragraphs 200 to 202 of the National Planning Policy Framework will not be engaged. There is preservation for the purposes of the decision maker's duty under section 72(1) of the Act.

Comments on Decision Notice

4.8 The first reason for the refusal of planning application SMD/2021/0378, which relates to built heritage, has been reproduced again with my comments provided below:

'The proposals are harmful to the character and appearance of Rudyard Conservation Area as the side extension would add considerable bulk to the building, harming its simple form and it would take the building very close to the adjacent property, harming the visual separation of the buildings when viewed from the lakeside. Consequently would detract from the special architectural and historic character of the area. Furthermore, insufficient justification has been provided to indicate that the alterations are necessary to achieve public benefit which would offset the less than substantial harm caused. The development is contrary to Policy DC2 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework Section 16 , Paragraph 193 and 196'

4.9 The decision notice states that the modest side and rear extension to the chalet would in fact cause less than substantial harm to the Rudyard Conservation Area on the basis that:

- i. The extension would add 'considerable bulk to the building'. In my view the proposed elevations (**Figures 13-14**) show that the side and rear extensions would not add considerable bulk to the existing chalet. To the contrary, the additions are modest and subservient. They relate appropriately to the existing building constructed in 2000 and the ratio between the existing chalet and the overall size of the plot.

- ii. The extension would harm the ‘simple form’ of the existing building. There is no suggestion from the LPA that the existing chalet building or its ‘simple form’ makes a positive contribution to the character and appearance of the Conservation Area or indeed that the ‘simple form’ of the chalet structure has any inherent heritage significance. This is confirmed by the Rudyard South: Spatial Analysis’ map (**Figure 12**) which illustrates that the building and its neighbours are not of heritage value and make at best a neutral contribution to the character and appearance of the area. I agree that the existing chalet has a relatively ‘simple form’ but do not concur with the assessment that the modest extension to the side or rear would cause harm to this form, or the neutral contribution the building makes to this part of the Conservation Area.
- iii. The extension would ‘take the building very close to the adjacent property, harming visual separation of the buildings when viewed from lakeside’. As demonstrated by **Figures 1 and 4**, the single-storey addition to the side of the building would leave adequate separation between Driftwood and the adjacent property to the north. The scale of the additional footprint is indeed subservient to the overall size of the building and is appropriate to the location of the chalet and the building to plot ratio. With regards to the view from lakeside, it is evident from the photograph reproduced of Driftwood from on Rudyard Lake in **Figure 5** that the rear extension would not be seen at all

4.10 I do not believe that the appeal scheme would result in any level of less than substantial harm to the heritage value of the Conservation Area. Paragraph 202 of the NPPF is not engaged in my view and therefore there is no requirement for ‘public benefits’ to outweigh the less-than-substantial harm alleged by the LPA.

4.11 It is also clear to me that there is full compliance with all heritage and conservation related planning policy, both national and local. The fact that paras. 193 and 196 of the NPPF were mistakenly cited by the LPA in their Decision Notice demonstrates the haste at which the application was refused

without full and detailed consideration of the matters at hand, namely whether the proposal would actually cause any level of harm to the character and appearance of the Conservation Area and the relevant policy tests.

Note on Policy Compliance

- 4.12 As previously noted, in my opinion the modest additions to the appeal site building would be in keeping with the character and appearance of this part of the Rudyard Conservation Area and therefore would be compliant with national and local heritage and conservation planning policy.
- 4.13 Paragraphs 200-202 of the NPPF would not be engaged, given that the proposal would not result in any harm to the significance of the Conservation Area. There would similarly be no contravention to Policy DC 2 of the Staffordshire Moorlands Local Plan (2014-2033) which relates to the historic environment.

5.0 – CONCLUSION

- 5.1 The appeal site is located on lower western bank of Rudyard Lake, within the Rudyard Conservation Area and on the Green Belt. The existing chalet was constructed following planning permission in 2000 (SMD/2000/0785) and along with the neighbouring chalets makes a neutral contribution to the character and appearance of the Conservation Area.
- 5.2 The modest side and rear extensions to the chalet will preserve the character and appearance of this part of the Conservation Area. It will be just as significant after the completion of the development as it is today and there will be no adverse impact on its character and appearance, or significance.
- 5.3 Paragraphs 200-202 of the National Planning Policy Framework (2021) will not be engaged and there will be no harm to significance. There is preservation for the purposes of the decision maker's duty under section 72(1) of the Act.