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SUPPLEMENTARY STATEMENT

Design, Access and Heritage Statement

Change of use plus extensions to create 2 dwellings
at
Rudyard Memorial Institute,
Lake Road,
Rudyard, ST138RN

Introduction

This is as supplementary statement to accompany the amended plans which omit the on-site parking originally proposed. The amended plans are numbered 23-137- 04A, 23-137-05A and 23-137-06A.

This statement is therefore concerned with the traffic and parking implications and by inference the effect this has the protected tree on the site and heritage interest.

The other planning aspects of the scheme remain unchanged.

The site consists of a large piece of land occupied by a vacant and dilapidated building known as Rudyard Memorial Institute. It has a frontage to Lake Road and is within Rudyard Lake Conservation Area. The single storey building is set back from the road on a significantly higher level.

The building lies within a cluster of built development with dwellings to both sides, and a hotel opposite. It also lies within the Rudyard Lake Conservation Area.

The building has no architectural merit and is not identified as a building of intrinsic value or historical merit within the Council's Conservation Area Character Appraisal.

The building is accessed by steps up from the road and has no off-street parking or vehicular access other than directly from the road. A stone wall runs across the road frontage of the site and historic gate posts.

In the front of the building is a large beech tree which is a significant feature in the street scene. That has recently been the subject of a Tree Preservation Order.

Planning History

SMD/2023/0327 - Proposed change of use of memorial institute to form two number dwellings including single storey rear extensions, elevational alterations, removal of existing beech tree and excavation of land to form parking areas. Refused for the following reasons.

1. "The proposed development is located in the green belt. Part of the proposed development includes a large rear extension. This substantial extension of the building as well as the existing large extension on the northern side of the building will cumulatively result in a disproportionate addition to the floor area of the building and thus will be inappropriate development in the Green Belt, which by definition will be harmful to it. This is a form of development which is not supported by Green Belt policy. The proposed development would be significantly detrimental to the openness of the Green Belt, and no very special circumstances outweigh the harm have been identified. The development would therefore be contrary to Green Belt policy as set out in Policy SS10 of the Staffordshire Moorlands Local Plan and the Nation Planning Policy Statement section 13.

2. The application site is located in the Rudyard Conservation Area. The frontage of the former Memorial Institute building creates an interesting visual element in the frontage of Lake Road with the bank and the traditional stone wall, creating a sense of enclosure and definition to the street frontage. In the immediate vicinity, the same boundary type and material is seen at the opposite side of Lake Road and this portion of the road sees extensive surviving examples of this. The scheme proposes the significant reduction of this feature in the road frontage, this includes and is not limited to original boundary wall, gate and piers. The loss of the wall and bank will also cause harm through loss of the existing sense of enclosure. The large scale works to the front of the building would cause visual harm to the narrow lane, and the views along it by creating a car dominated frontage and a new large retaining wall and tarmac. The proposed works would not conserve or enhance the Conservation Area and would cause less than substantial harm to it. The public benefits of the scheme, including the provision of 2 dwellings at a time of housing land supply shortfall are not considered to be sufficient to outweigh this harm. The proposal is therefore contrary to policies DC1 and DC2, of the Staffordshire Moorlands Local Plan 2020 and advice in the National Planning Policy Framework
3. The works will require the removal of the large, prominent and attractive beach tree located at the front of the institute which benefits from protection under a Tree Preservation Order. This tree forms a very important feature in the street scene. Its loss would cause further significant harm to the character of the road and the conservation area. The proposal would thus result in the loss of an important mature tree of amenity value which would add to the harm to the character and appearance of the conservation area identified above and would be contrary to policies DC1, DC2 and NE2 of the Staffordshire Moorlands Local Plan 2020.

The current planning application seeks to overcome the reasons for refusal.

Proposed works.

The plans address the reasons for refusal of the earlier planning application by amending the parking arrangements and omitting the tree removal. The amended plans 23-137- 04A, 23-137-05A and 23-137-06A, accompanying this revised statement further amend these parts of the scheme.

The plans originally proposed off street parking for the new dwellings, by excavating it a small area of the bank in front of the building, to provide 1 car parking space for each new dwelling.

However, this has now been omitted for the reasons described below. As a result, no off-street parking would be provided for the proposed dwellings.

Historic Environment

The Council's Conservation Officer has objected to the works to provide off street car parking for the following reasons:

"The historic boundary treatment and boundary material palette at front elevation, paired with two stone gate piers to the left-hand-side of the plot with surviving gate, are not accurately depicted in the existing elevations. There is little exploration into the history of, or relationship of these, as they are of

quite some age in comparison to the current building. From brief investigation a building of a similar footprint is seen on maps dated 1898. Though whatever structure that once was is no longer, these features survive contributing as part of the character of the Conservation Area. As above, paired with the topography; creates an interesting frontage demonstrating the vernacular.

In the immediate vicinity, the same boundary type and material is seen at the opposite side of Lake Road. This portion of the road sees extensive surviving examples of this.

The scheme sees the total eradication of the frontage, this includes and is not limited to the tree/s, original boundary, gate and piers and such (again not clearly depicted). Despite the Design, Access and Heritage Statement recognising elements forming part of the setting of the area '*consist of intimate narrow network of rural lanes and scattered ribbon development, hidden from the wider area by the rolling agricultural setting. Accordingly, the significance of the area derives from its combination of cultural, natural, and built components set within a dramatic rolling wooded landscape*'.

In addition, the very open nature of the Rudyard Hotel car parking and respective facilities opposite I feel is offset to a degree, by having the remainder of a 'wooded rural backdrop' in features such as the plot at the former Memorial Institute. I am concerned further opening up and extensive hardscaping, with views straight onto cars and tarmac, does not contribute nor enhance the setting and feels very unnatural and generic.

I encourage the retention of the Beech Tree at principal elevation as I cannot support its removal, the retention of the boundary wall with stone piers and gate, and encourage reduction in extensive hardscaping and car parking at the frontage. If the concept is to deliver desirable dwelling/s set within a historic landscape, measures should be taken to provide enhancement. As currently, what interest and rural aspects afford the uninteresting building *some* value, look to be totally sanitised. Consequently, there would be a risk of visual obtrusion.

Further to this, I am not sure only providing steps to the front of the proposed property is conducive. An alternative may perhaps be that steps are omitted, and with the retention of the stone piers and gates to the left – that a more subservient design of a gradually ascending slope would be more enhancing and inclusive. Enabling some natural form, existing earth and greenery to also remain along with the Beech Tree, therefore providing enhancement.

To conclude; as the scheme stands it is seen to pose harm on the setting of the Conservation Area, of which at this time I cannot see thorough exploration to mitigate this, and therefore justification for said harm. I would encourage revisions of the project, happy to continue to advise. “

The amended plans, 23-137- 04A, 23-137-05A and 23-137-06A, the subject of this statement respond to those concerns by OMITTING all the proposed works to the frontage and retaining the existing tree. The existing steps up to the building are to be retained and will provide access on foot to each new dwelling. The wall, gates and pillars to the frontage will also be retained. The impact on the Conservation Area will be unchanged.

It is considered that the amended plans now represent less than significant harm to the heritage asset. In addition, the amended plans satisfy Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which states that Local Planning Authorities should, in conserving whether to grant consent have special regard to the desirability or preserving the building or its setting or any features of special architectural and historic interest which it possesses.

Tree Works

There is a mature beech tree on the site frontage, which has not been maintained for many years and it is extremely large. The branches extend over the building and the site frontage, and the roots will extend beneath the land between the building and the road. The tree was already protected because of its siting within the Conservation Area. More recently a Tree Preservation Order has been imposed.

The original plans, refused under SMD/2023/0327 proposed removal of the tree in order to provide off street parking.

The plans submitted with the second planning application proposed trimming back of some branches and lifting of the crown. In addition, excavation to provide off street parking would have been required within the tree's root protection zone (RPZ)

The amended plans accompanying this supplementary statement 23-137- 04A, 23-137-05A and 23-137-06A, no longer propose off street parking and no works are required to the protected beech tree or its RPZ.

This reflects the discussions between the Council Tree officer and the applicants arboriculturist. These two professionals could not agree that excavation works within the RPZ, even at its extremity would not have an adverse effect on the long-term health and longevity of the beech tree.

It is therefore a balance between the desirability of retaining the protected tree on the site, and the benefits of providing off street parking.

The Planning Balance

The amended plans 23-137- 04A, 23-137-05A and 23-137-06A accompanying this statement omit the proposed parking in order to avoid any potential harm to the protected beech tree on the site, and to avoid the loss of historic frontage features.

These matters have to be balanced against the fact that it will mean the proposed dwellings will not have off street parking.

The lack of parking for new dwellings is regrettable but is considered acceptable because of the heritage and biodiversity impacts of providing parking. There are no feasible alternatives to provide off street parking on the site.

The lack of parking must also be considered in context of the history of the Memorial Hall. It was built as a community facility like a village hall. It also had planning permission to be used as a tea room. The building could be re-used for such uses and commercial and community use, as a "Fall back" position. This would have a potential to generate more parking demand in the locality than the pair of small bungalows proposed.

Furthermore, a planning application to re-use and convert the building into a commercial use would be difficult to resist having regard to the fall-back position. A commercial use would generate parking demands for staff and customers. This would have a greater impact on traffic and on street parking than the proposed dwellings.

Conclusion

The works proposed by the amended plans numbered 23-137- 04A, 23-137-05A and 23-137-06A omit works to the site frontage features and remove plans for off street parking. This will represent less than substantial harm to the designated asset and in having special regard to preserving the special architectural and historic merit of the listed building is still considered to be acceptable where Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is relevant along with local policies.

Furthermore, removal of the car parking proposals will mean that there is no potential harm the protected beech tree on the site.

These mean that a less than optimum level of off-street parking can be provided, but this is considered acceptable on balance as it is a direct result of the LPA's desire to retain the tree on the site and conserve heritage.

In addition, the fallback position is that the Memorial could be re-used for commercial/community activities, and this would generate more parking demands than the proposed conversion to dwelling.