

PLANNING STATEMENT

**LAND ADJ. 67 SHAW PARK ROAD
KINGSLEY HOLT**

MAY 2024

Site Address:

Land adjacent to 67 Shawe Park Road, Kingsley Holt, ST10 2DJ

Applicant:

Mr. F. Klucznik

Proposal:

Erection of 4no. bungalows for the over 55s and construction of garage

Planning Statement:

Date Issued: 15th May 2024

Job Reference: RDP/2024/033

Report Prepared By:

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1. Introduction

- 1.1 Rob Duncan Planning Consultancy has been instructed by Mr. F. Klucznik to seek full planning permission for the erection of 4no. bungalows on land adjacent to 67 Shawe Park Road, Kingsley Holt, whose occupancy are to be restricted to the over 55's.
- 1.2 Planning permission has previously been sought for residential development on this site, the most recently determined application being SMD/2018/0282. That application had proposed the erection of 4no. detached two-storey dwellings on the site, served via a shared driveway that then extended along the frontage of the dwellings. That application was refused by the Local Authority and subsequently dismissed at appeal by the Planning Inspectorate.
- 1.3 This revised submission proposes the erection of 4no. detached bungalows, arranged in a linear fashion within the site. Units 02 – 04 inclusive will follow the building line established by the neighbouring properties to the east, with a garage block located to the west of Unit 02. Unit 01 by contrast will occupy a more set-back position within the site. A footway will extend in front of Units 02 – 04 to provide a pedestrian means of access. The accommodation of the two different house types will each comprise of an open plan lounge / kitchen / dining room, three bedrooms, bathroom and a hallway. House Type A will have a gross internal floor area of 79.5m², whilst House Type B will have a gross internal floor area of 78.8m².
- 1.4 Vehicular access to the site will be taken direct off Shawe Park Road in the northwest corner of the site, which will be shared by all the properties. Parking for Units 02 – 04 will be provided by way of a single garage with parking space in front, whilst Unit 01 will have two parking spaces positioned alongside its western elevation.

2 Site Description

- 2.1 The application site lies within the rural area, and is located at the western end of the village of Kingsley Holt. The site comprises of grassland and is enclosed along its southern and western site boundaries by mature vegetation, with the landscape beyond dropping down towards a brook.
- 2.2 The northern boundary of the site is enclosed by a mature hedgerow, beyond which lies the carriageway of Shawe Park Road. On the opposite side of the road, beyond another mature hedgerow, lies an equestrian paddock and manege. To the east of the site, the land is bordered by the domestic curtilage of no.67 Shawe Park Road.
- 2.3 Properties within the surrounding area comprise of a mixture of single storey, one-and-a-half storey and two storey developments, with the two properties closest to the site comprising of bungalows. The design of those properties exhibits considerable variance and there is no strong prevailing vernacular.
- 2.4 The site has been previously found by the Local Authority to constitute a reasonably sustainable location for new housing. There are no statutorily listed buildings located in close proximity of the site, nor does the site lie within a Conservation Area.

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

3.2 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, in partnership with other agencies and services:

- a mix of types and tenures of quality, affordable homes, to meet the needs and aspirations of the existing and future communities
- quality local services, including provision for education, healthcare, leisure, community, cultural and tourist facilities in response to anticipated population change and visitor numbers
- 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
- development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas, including the Peak District National Park, both now and for future generations
- 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.

3.3 Policy SS3 of the Local Plan relates to the 'Future Provision and Distribution of Development' and states that provision will be made for at least 6080 additional dwellings (net of demolitions) to be completed in Staffordshire Moorlands during the period 2014 to 2033 - an annual average of 320 homes per year. Sufficient deliverable land will be identified to provide at least 5 years of development at all times. The policy goes on to confirm that 25% of the total housing requirement will be delivered within the rural areas.

3.4 Policy SS9 of the Local Plan relates to the 'Smaller Villages Area Strategy' and confirms Kingsley Holt to be a smaller village. The policy states that these settlements shall provide only for appropriate development which enhances community vitality or meets a social or economic need of the settlement and its hinterland. This shall be achieved via a number of actions, including:

- Enabling limited new housing development, including small infill schemes in accordance with Policy H1

3.5 Policy SS10 of the Local Plan relates to the 'Other Rural Areas Strategy' and confirms that the other rural areas comprise the countryside and the green belt outside of the development boundaries of the towns and larger villages and the open countryside surrounding the smaller villages. The policy goes on to state 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 via a number of actions, including:

- Restricting new build housing development in the countryside to that which has an essential need to be located in the countryside in accordance with Policy
- 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

3.6 Policy H1 of the Local Plan relates to 'New Housing Development' and states that, amongst other requirements:

- New housing development should provide for a mix of housing sizes, types and tenure including a proportion of affordable housing as set out in Policy H3, and where appropriate housing for special groups, to meet the needs and aspirations of the current and future population having regard to the Area Strategies.
- All development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets

identified housing needs, having regard to the location of the development, the characteristics of the site and the economics of provision.

- All housing development should be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. Higher densities will generally be appropriate in locations which are more accessible by public transport and which have good access to services.
- All new dwellings should aim to provide flexible accommodation which is capable of future adaptation by seeking to achieve adequate internal space for the intended number of occupants in accordance with the Nationally Described Space standard and delivered to meet accessibility standards set out in the Optional Requirement M4(2) of Part M of the Building Regulations. This will be determined on a site-by-site basis subject to considerations such as viability and design.
- All new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers of the dwellings whilst respecting the privacy and amenity of occupiers of existing dwellings.
- Housing development on sites not allocated for such purposes in Policy H2 will be supported within the development boundaries of the towns and larger villages subject to compliance with the Spatial Strategy and wider Local Plan policies.

3.7 Policy H1 goes on to state that outside of the development boundaries, limited infill residential development of an appropriate scale and character for the

Spatial Strategy will be supported, provided that the development is well related to the existing pattern of development of a smaller village and will not create or extend ribbon development or lead to a sporadic pattern of development. Otherwise, only the following forms of housing development will be permitted:

- a) Affordable housing which cannot be met elsewhere, in accordance with Policy H3
- b) A new dwelling that meets an essential local need, such as accommodation for an agricultural, forestry or other rural enterprise worker, where the need for such accommodation has been satisfactorily demonstrated and that need cannot be met elsewhere.
- c) Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area.
- d) The conversion of rural buildings for residential use where the building is suitable and worthy in physical, architectural and character terms for conversion; or where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.
- e) Proposals to redevelop previously developed land provided it is not of high environmental value.
- f) The subdivision of an existing residential dwelling provided it is not in an isolated location.

3.8 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 (amongst other requirements):

- 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
- provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use

3.9 Policy NE1 of the Local Plan relates to 'Biodiversity and Geological Resources' and states that the biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence) by:

1. By ensuring all development schemes have regard to the surveys and actions recommended by the Council's Extended Phase 1 Habitat Surveys

and Local Wildlife Assessment, and include measures for protection and enhancement of site biodiversity and protection of any geodiversity as appropriate.

2. Resisting any proposed development that could have an adverse effect on the integrity of an International site (or successor designation) alone or in combination with other plans or projects unless it can be demonstrated that the legislative provisions to protect such sites can be fully met. Any development with a potential to adversely affect a European site/s through construction activities should ensure that Ciria construction guidelines are followed including environmental good practice on control of dust and water pollution.
3. The Council will not normally permit any development proposal which would directly or indirectly (either individually or in combination with other developments) have an adverse effect on a Site of Special Scientific Interest. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.
4. 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.
5. 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.
6. Supporting opportunities to improve site management and increase public access to wildlife sites including supporting the objectives of the Staffordshire County Council Rights of Way Improvement Plan.
7. Ensuring development promotes the appropriate maintenance, enhancement, restoration and/or re-creation of biodiversity through its proposed nature, scale, location and design. The Staffordshire Moorlands Biodiversity Opportunity Map, in conjunction with the Staffordshire Biodiversity Action Plan, will be used to guide biodiversity enhancement measures to be included in development proposals as appropriate to the

nature and scale of development proposed and other environmental interest, in particular supporting opportunities to increase grassland and heathland habitats including supporting targets in the UK and Staffordshire Biodiversity Action Plan.

8. Protecting and enhancing habitats and species of principal importance for the conservation of biodiversity as identified in legislation, and recognising and implementing appropriate measures, including landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.
9. Recognising the value of the natural environment for sport and leisure activities and the need to manage such activities to ensure there is no conflict.
10. Ensuring the provision and protection of green infrastructure networks in line with Policy C 3.

3.10 Policy T1 of the Local Plan relates to 'Development and Sustainable Transport' and states that the Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and accommodates residual development traffic in line with the Integrated Transport Strategy. This will be achieved by (amongst other requirements):

1. Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.

2. Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 2.
3. Where appropriate all new development shall facilitate walking and cycling within neighbourhoods and town centres, and link with or extend identified walking or cycling routes. In addition applicants should also consider how their schemes can enhance the existing path network in line with the Staffordshire County Council Rights of Way Improvement Plan and also give consideration to the protection of non-definitive public footpath routes in addition to definitive routes.

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*, in respect of significantly boosting the supply of housing, securing high quality design, ensuring highway safety and delivering a net gain to biodiversity. The content of this document has been taken into consideration in the preparation of the application.

Staffordshire Moorlands Design Guide SPD

- 4.2 The adopted Design Guide SPD sets out guidance aimed at securing the delivery of high quality built development within the Staffordshire Moorlands. The content of this documentation has been taken into consideration in the preparation of the application.

Staffordshire Moorlands Space about Dwellings SPG

- 4.3 This document provides a series of numerical standards that new development should seek to achieve in the interests of safeguarding residential amenity. The content of this document has been taken into consideration in the preparation of the application.

Appeal Decision 3220112 – Land Adj. 67 Shawe Park Road

- 4.4 The above appeal decision related to the proposed construction of 4no. two storey dwellings on the same application site. The conclusions of the Planning Inspector in the determination of that appeal have been taken into consideration in the preparation of this application as material considerations.

5 Planning Assessment

- 5.1 The application site is located within the rural area, wherein policies SS9, SS10 and H1 of the Local Plan seek to restrict new residential proposals to a limited number of types of development. Policy H1 allows for limited infill development on the edge of smaller villages provided that it relates well to the existing pattern of development and will not create or extend ribbon development or lead to a sporadic pattern of development.
- 5.2 The proposed development will relate positively to the existing pattern of development exhibited in the surrounding area, reinforcing the linear arrangement of dwellings that exists along the south side of Shawe Park Road, with properties set back from the highway. The proposal will nevertheless not amount to infill and will extend the existing pattern of ribbon development that prevails in this area and to this end could be held to conflict with the Development Plan. We nevertheless submit that there are a number of material considerations that are pertinent to this proposal that serve to outweigh this conflict.
- 5.3 The proposed development will not result in the creation of isolated homes in the countryside. The bungalows will be closely related to the existing built up area of the village and will reinforce and reflect the strongly defined pattern of development that prevails along this part of Shawe Park Road. The band of mature vegetation and brook at the western end of the site furthermore acts as a strong defensible boundary against any future encroachment of development beyond the site. The proposed development therefore derives no conflict with the provisions of paragraph 84 of the NPPF.
- 5.4 The proposal will also accord with the general objectives of Policy H1 of the Local Plan in ensuring that an appropriate range and type of housing is

provided to meet identified needs. The proposed dwellings will comprise of single storey bungalows, which in their own right are in strong demand within the Moorlands in general. The applicant nevertheless also proposes to enter into a S106 Obligation with the Local Authority to restrict the occupancy of all of the bungalows to those persons aged 55 and over.

5.5 By restricting the occupancy of the bungalows to the over 55s the development will respond positively to the very pressing demand for accommodation suitable to meet the needs of an ageing population within the Staffordshire Moorlands, as confirmed within the Strategic Housing Market Assessment.

5.6 The Planning Practice Guidance confirms in this regard that:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is project to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.

(our emphasis)

5.7 The Planning Practice Guidance recognises ‘age restricted housing’ as a type of specialist housing designed to meet the diverse needs of older people. By providing a S106 Obligation to restrict the occupancy of the bungalows to the over-55s, the application will help to address the critical need for this type of

accommodation within the District. Such benefits are considered to carry substantial weight in favour of planning permission being granted.

- 5.8 The proposal will also secure the delivery of new housing on a site that has been previously found to constitute a suitable location by the Local Authority, who concluded in their determination of application SMD/2018/0282 that:

*“Kingsley Holt does not have an array of services for it to be considered as a truly sustainable location **however, the village is within close proximity to Kingsley where facilities including a church, school, bowling club and village hall can be found.** This application follows on from refusal of application reference SMD/2017/0496. During the course of considering the previous application the agent submitted information to demonstrate that the village is relatively well connected to other locations by bus including a Leek-Froghall-Cheadle service and a Hanley-Cheadle-Tea-Uttoxeter service. The site is not considered to be located within a truly sustainable location but **it is not wholly unsustainable as it is linked to other areas and services**”.*

(our emphasis)

- 5.9 Regard also needs to be given to the Local Authority’s continued shortfall in housing land supply. Whilst paragraph 76 of the NPPF confirms that Local Authorities are not required to demonstrate a five year deliverable supply of housing where its Local Plan is less than 5 years old (as is currently the case with the Staffordshire Moorlands until September 2025), it remains a matter of fact that the Local Authority’s housing delivery continues to fall well short of the targets set for itself within policy SS3 of the Local Plan.
- 5.10 Policy SS3 confirms that over the plan period 2014 – 2033 provision will be made for at least 6080 additional dwellings at an annualised rate of 320

dwelling per year. The Local Authority has a long history of housing under-supply and the table in Figure 1 below, extracted from the Local Authority's Annual Monitoring Report, serves to demonstrate that **at no point** since 2014 has the Local Authority delivered sufficient housing to meet the annualised housing requirement of 320 dwellings per annum (Policy SS3 refers).

Figure 1 – Table of Housing Completions (Source: SMDC Monitoring Report)

Year	Leek	Biddulph	Cheadle	Rural	District Total
2014/15	149	60	31	38	278
2015/16	29	28	10	32	99
2016/17	44	40	4	40	128
2017/18	40	33	13	56	142
2018/19	14	6	87	58	165
2019/20	85	18	22	78	203
2020/21	79	15	41	66	201
2021/22	29	11	57	80	177
2022/23	23	4	128	87	242
Total	492	215	393	535	1,635
Local Plan Target (%)	30%	20%	25%	25%	100%
Percentage % (to date)	30.1%	13.2%	24%	32.7%	100%

5.11 The Local Authority's Statement of Five Year Housing Land Supply (as of 1st April 2023) confirms that the annualised housing requirement now stands at 597 dwellings per annum in order to meet the housing shortfall against the targets set out in Policy SS3. In all of the monitored years, apart from 2014/15, the Local Authority has failed to achieve even half of that new annualised requirement.

5.12 There is unquestionably a significant demand for the delivery of new housing within the District, and the submitted proposal will make a positive contribution towards meeting that need, providing 4no. bungalows in a

location that the Local Authority has concluded to be sustainable for new residential development, and which does not derive any conflict with the National Planning Policy Framework. Such benefits carry further substantial weight in favour of approval.

- 5.13 Given the nature of the proposed development and the intention to restrict occupancy to the over 55s, coupled with the sustainable location of the site and the Local Authority's continued inability to demonstrate sufficient housing to meet the requirements set out within policy SS3 of the Local Plan, we submit that material considerations exist to clearly outweigh any conflict of the proposal with policies SS9, SS10 and H1 of the Local Plan.

Design & Layout

- 5.14 The previous application for the erection of four detached, two storey dwellings on this site (SMD/2018/0282) was refused by the Local Authority on the grounds that the development would have a harmful impact on the character and appearance of the surrounding area. An appeal against that decision was subsequently dismissed.

- 5.15 In dismissing the appeal the Planning Inspector observed that:

"Whilst the built form of Kingsley Holt is to the immediate east, the site's location and undeveloped appearance give it a strong visual affinity with the surrounding open countryside. The site contributes positively to the rural character of the open countryside, appreciable along Shawe Park Road"

- 5.16 The Planning Inspector went on to comment that:

*“Kingsley Holt contains single and two storey dwellings sited alongside one another. However, **the single storey scale of Nos 67 and 68 Shawe Park Road aids the transition into the open countryside** and helps visually define the extent of the built form of Kingsley Holt. **The two storey scale, siting and combined mass of the dwellings would be a visually intrusive feature in the open countryside.** Furthermore, **the downward slope of land away from Kingsley Holt and the vehicular use associated with the proposal at the site frontage would further add to the prominence of the development**” (our emphasis)*

5.17 The Planning Inspector went on to conclude that:

*“Owing to **the scale and mass of the development and the associated site activity, existing and proposed landscaping measures would not fully prevent this harm.** Whilst the proposal would not fully conform with the rear garden depths set out in the Space About Dwellings Supplementary Planning Guidance document, this in itself would not materially harm local character and appearance. However the harm identified above would remain”*
(our emphasis)

5.18 The submitted proposal has sought to respond positively to the concerns raised by the Planning Inspector in the determination of the previous appeal. The proposal comprises of 4no. bungalows, rather than two storey dwellings, with ridge heights that are much lower than the buildings previously proposed on the site. By resultant effect their massing is also substantially reduced by comparison.

- 5.19 The resultant development, like nos. 67 and 68 Shawe Park Road, will continue the transition between the built up area of the village into the open countryside, as observed by the Planning Inspector. The single storey form of the buildings means the development will relate positively to the dwellings immediately to the east of the site, and will be seen against the backdrop of mature vegetation at the western end of the site, and the rising landscape beyond. The proposed development will therefore not constitute a visually intrusive feature within the open countryside.
- 5.20 The layout of the site frontage has also been revisited, so as to remove the proposed vehicular access drive and the associated areas of hardstanding in and around the buildings. Instead, a communal parking area to serve Units 02 – 04 is proposed adjacent to the site access, along with a triple garage block. Instead of there being a road in front of the houses, this will be retained as greenery / planting, with a simple pedestrian footway provided. In doing so the hardstandings / vehicular movements within the site will not be anywhere near as dominant or harmful as the scheme previously considered and dismissed by the Planning Inspector. The prominence of the development is substantially reduced.
- 5.21 The design of the bungalows is not considered to be contentious. There are a wide variety of architectural styles and ages of development exhibited within the surrounding area, and there is no strongly prevailing vernacular. The single storey scale of the buildings is in keeping with the character of the area, as is the proposed palette of materials. The strongly defined eaves and ridge lines, emphasised by gables, the high solid-to-void ratio, and the simple arrangement of openings, all accord with the design guidance set out within the adopted Design Guide SPD.
- 5.22 The proposed dwellings will each have a gross internal floor area that meets the Nationally Described Space Standards, and will each have an area of private
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amenity space to the rear that exceeds the minimum required standard of 65m² as set out within the Space About Dwellings SPG. No conflict with the minimum interface distances set out within the Space About Dwellings SPG in relation to neighbouring properties will arise either. The submitted proposal will therefore provide future occupiers of the dwellings with a good standard of residential amenity, and safeguard the amenity of neighbouring occupiers.

- 5.23 Having regard to the considerations set out above it is submitted that the proposed development has served to constructively address the concerns raised by the Planning Inspector about the visual impact of the development, and meets the requirements of policies SS1, SS10, H1 and DC1 of the Local Plan in this regard.

Highway Safety

- 5.24 The application proposes the formation of a new vehicular access in the northwest corner of the site, in the same general location as the one proposed under application SMD/2018/0282 which was found to be acceptable to the Local Highway Authority.
- 5.25 The access will benefit from good visibility in both directions on egress onto Shawe Park Road, and will be of sufficient width to enable two vehicles to pass one another. Within the site there will be off-street parking of 2no. spaces per dwelling, which accords with the requirements of the Local Authority's adopted parking standards. There will also be associated manoeuvring space so that vehicles may exit the site in a forward gear.
- 5.26 The proposed development will therefore not lead to any severe residual impacts to highway safety and is considered to meet the requirements of policy T1 of the Local Plan, and guidance contained within the National Planning Policy Framework.

Biodiversity

- 5.27 The previous application was refused on the grounds that insufficient ecology information had been submitted to demonstrate that protected species and important habitats would be safeguarded and any impacts mitigated. This revised submission is accompanied by a Preliminary Ecological Assessment and Biodiversity Net Gain Report prepared by Elite Ecology.
- 5.28 The Preliminary Ecological Assessment serves to confirm that there are no priority habitats on the site, but recommends a number of precautionary / mitigatory measures, including the provision of a herptile method statement and an updated badger survey if works do not commence within 6 months of the original survey date. It also recommends that the linear features including trees T1 and T2 be retained, as is proposed to be the case. A series of other recommendations are also set out, and all of these can be secured via an appropriately worded planning condition.
- 5.29 The accompanying Biodiversity Net Gain Report and Habitat Map also serves to demonstrate that the proposed development will secure a net gain to biodiversity of 33.25%, with the parcel of land to the west / southwest of the site within the applicant's ownership, having been set aside to deliver the required biodiversity enhancements.
- 5.30 The provisions of the Biodiversity Net Gain Report can be secured via an appropriately worded planning condition, and in doing so the development will meet the requirements of policy NE1 of the Local Plan and guidance contained within the National Planning Policy Framework.

6 Conclusion

6.1 The submitted proposal constitutes a sustainable form of development having regard to the following conclusions:

- The proposal will accord with the objectives of the Local Plan and the NPPF in delivering an appropriate range and type of housing to meet identified needs for older persons, and will make a positive contribution towards addressing the significant shortfall in housing within the Staffordshire Moorlands.
- The design and layout of the development has constructively addressed the concerns raised in the previous appeal, and will not result in a prominent or harmful impact to the character of the area
- The proposal will provide an acceptable level of amenity for future occupiers and will not detract from the amenity of neighbouring properties.
- The proposal will not result in any severe residual impacts to highway safety and will provide adequate off-street parking.
- The proposal will safeguard protected species and deliver a net gain to biodiversity.

6.2 The proposed development is consequently held to meet the requirements of policies SS1, SS3, SS9, SS10, H1, DC1, NE1 and T1 of the Staffordshire Moorlands Local Plan, and policies contained within the National Planning Policy Framework, and supplementary planning guidance.