

PLANNING, DESIGN & ACCESS STATEMENT

**PROPOSAL : FULL PLANNING APPLICATION FOR
DEMOLITION OF BUILDING AND ALTERATIONS
TO SITE LAYOUT TO ACCOMMODATE 49
STATIC CARAVANS WITH ASSOCIATED
INTERNAL ACCESS ROADS AND PARKING
AREAS**

**ADDRESS : RUDYARD VALE CARAVAN PARK, LAKE
ROAD, RUDYARD, LEEK, STAFFORDSHIRE,
ST13 8RN**

APPLICANT : MR M BURNSIDE

DATE : JANUARY 2025 JOB No.: 2024-2920

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1.0 INTRODUCTION

This statement is submitted in support of a full planning application which seeks consent for the demolition of an existing building and changes to the site layout to accommodate 49 static caravans with associated internal access roads and parking areas at Rudyard Vale Caravan Park, Lake Road, Rudyard.

The application has been submitted by Sammons Architectural Ltd on behalf of Mr M Burnside and is accompanied by drawing numbers 2024-2920-01B, 2024-2920-02C, 2024-2920-03A, Ecological Impact Assessment (25th January 2025) and Biodiversity Net Gain Assessment (27th January 2025) both of which have been undertaken by Liz Ecology and all of which should be read in conjunction with this statement.

2.0 SITE DESCRIPTION

Rudyard Vale Caravan Park is an established caravan park which extends to some 8,989 sq metres. It is located at the end of Lake Road within the village of Rudyard, which lies to the north of Leek. The site is bounded with a woodland to the north and residential development to the east, south and west with Rudyard Lake lying in close proximity to the east.

For the purposes of the development plan the application site lies within the North Staffordshire Green Belt where more restrictive development plan policies apply. It also lies within the Rudyard Conservation Area and is covered by a blanket Article 4 direction.

3.0 PROPOSAL

The application site currently has a site licence for 40 static units with occupation restricted from 6th March to 6th January annually as controlled via planning permission SMD/2000/0539.

The application seeks consent to demolish an existing building and reorganise the existing site layout to increase the number of static caravans from the permitted 40 to 49 with associated internal access roads and parking areas to facilitate this.

It also seeks consent to extend the currently restricted opening season to allow all year round opening to bring it in line with similar parks in the Moorlands. All year round opening would enable the site to be more competitive and compete fairly with other providers which are not restricted and the increase in the number of statics is dictated by market demand and the increase in staycations following the recent Covid pandemic.

It is anticipated that one of the units would provide a manager / wardens accommodation.

At the time of the survey 35 out of 40 static units were present on the application site. Seven of these have already been removed as part of an ongoing maintenance programme during the sites winter shut down period. The application proposes to increase the number of units to 49 as shown on the proposed site layout plan submitted with the application. Sixteen of the existing units will remain in situ with the remaining site area redeveloped to accommodate the additional units with new internal access roads and parking areas provided to service the units.

4.0 PLANNING POLICY

Section 38(6) of the Planning and Compulsory 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 National Planning Policy Framework (NPPF) was revised in December 2024. It is the Government's clear intention that the document should be considered to be a material consideration and as such carries particular weight where development is not addressed by planning policies in the existing Development Plan.

Whilst the recently published NPPF does not change the statutory status of the Development Plan as the starting point for decision making it does provide guidance to LPA's and is a material consideration in determining planning applications. The NPPF confirms that at the heart of the guidance is a presumption in favour of sustainable development (para 11) and that for decision making this means approving development proposals that accord with the Development Plan without delay unless material considerations indicate otherwise. The NPPF also sets out requirements in respect of supporting tourism and the rural economy whilst securing high quality design and protecting heritage assets. The following are considered to be the most relevant chapters:-

- Section 2 - Achieving Sustainable Development
- Section 4 – Decision Making
- Section 6 - Building a Strong and Competitive Economy
- Section 9 - Promoting Sustainable Transport
- Section 11 – Making Effective use of Land
- Section 12 - Achieving Well Designed Places
- Section 15 – Conserving and Enhancing the Natural Environment
- Section 16 – Conserving and Enhancing the Historic Environment

The Development Plan for the Staffordshire Moorlands comprises of the adopted Local Plan (September 2020) and the Saved Local plan Proposals Map / Settlement Boundaries (1998). The most relevant policies of the adopted Local Plan are considered to be S01 (Spatial Objectives), SS1 (Development Principles); SS1a (Presumption in Favour of Sustainable Development); SS2 (Settlement Hierarchy); SS9 (Smaller Villages); SS11 Churnet Valley Strategy (SS11); DC1 (Design Considerations); DC2 (Historic Environment); DC3 (Landscape and Settlement Setting) E3 (Existing Employment Areas and Premises); E4 (Tourism and Cultural Development), T1 (Development and Sustainable Transport) and T2 (Other Sustainable Transport Measures); NE1 (Biodiversity and Geological Resources). For the sake of brevity these policies are not quoted in full but they are referred to where appropriate in the following section.

5. ASSESSMENT

The main issues in assessing this proposal are considered to be:

- The principle of the development and whether the proposal would be inappropriate development in the Green Belt including its effect on the openness of the Green Belt and the purposes of including land within it, having regard to local and national policy;
- Whether any harm by reason of inappropriateness, and any other harm would be clearly outweighed by other considerations, so as to amount to the very special circumstances required to justify the proposal.

- Impact on character and appearance of area including conservation area; and
- Impact on residential amenity; and
- Impact on highway safety

Principle of Development

Paragraph 11 of the National Planning Policy Framework (NPPF, 2024) promotes a ‘presumption in favour of sustainable development’. For decision makers this means (c) approving development proposals that accord with an up-to-date development plan without delay; or (d) where there are no relevant development plan policies, or the policies which are more important for determining the application are out-of-date, granting permission, unless: i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. Paragraph 8 of the NPPF identifies three dimensions to sustainable development as being economic, social and environmental.

The application site lies within the North Staffordshire Green Belt where more restrictive development plan policies apply. The National Planning Policy Framework states at paragraph 142 that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” Paragraph 153 of the NPPF which deals with proposals affecting the Green Belt states that “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to openness. Inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The Framework further establishes that the construction of new buildings in the Green Belt should be regarded as inappropriate, subject to a number of exceptions as set out in paragraphs 154 and 155.

These include the provision of appropriate facilities (in connection with the existing use of land or a change of use) including buildings, for outdoor sport, outdoor recreation cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

In its general approach, in accordance with Local Plan policy SS1, the Council expects the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. This means that planning applications that accord with the policies in the Local Plan shall be approved without delay, unless material considerations indicate otherwise.

Importantly the proposed development would be contained within the confines of the existing site and the additional units proposed would be achieved through the reorganisation and better layout of the existing site rather than any encroachment into the Green Belt. Openness is an essential characteristic of the Green Belt and it is accepted that it has both a visual as well as a spatial aspect, which can be experienced on different scales.

The existing site is licensed for 40 units and these are currently laid out against the length and breadth of the site which is tiered. Whilst the additional units may have the potential to reduce the openness of the Green Belt through providing additional built development on site it should be

noted that the proposed static units are modest in terms of their overall size, scale, form and height and their simple design and often muted appearance further assist in mitigating any visual harm. In addition it is important to note that part of the proposal seeks consent for the demolition of an existing building on the site. Overall this structure has a greater bulk and mass than a replacement caravan and when weighed in the balance its removal to facilitate the re-development of the site means that the volume of actual additional built development would be minimal.

The internal re-organisation of the site would to all intents and purposes result in little if any visual impact on the openness of the Green Belt. Whilst the number of units would be increased they would be contained to the confines of the existing site. The proposed internal access roads are short and would be constructed from crushed stone and timber edgings which are considered appropriate to the site's rural setting. A similar treatment will be used for the parking areas proposed to serve the units and again these are considered to have little if any visual impact having regard to the existing site layout and the established use of the application site. Considering the above it is concluded that the proposal would be appropriate development in the Green Belt and would not result in any harm to the openness or visual amenity of the Green Belt. It is therefore considered that the proposal is compliant with the guidance contained in the NPPF and the council's own adopted Local Plan policies which seek to support sustainable development.

Very Special Circumstances

Notwithstanding the above, should the council reach a different conclusion and consider the proposal to amount to inappropriate development within the Green Belt, which is by definition harmful, then it is considered that the issues raised below represent very special circumstances which would be held to be sufficient to overcome any harm, perceived or otherwise.

Firstly the recent revision of the NPPF has introduced the concept of Grey Belt with paragraph 155 of the NPPF stating that "the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate" where, amongst other things "the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan". It is considered, for the purposes of determining this application that the application site comprises of previously developed land that does not strongly contribute to any of the three purposes set out in paragraph 143 of the NPPF and should therefore be considered grey belt as it accords with the definition of such in Annex 2.

Secondly the application site lies within the Churnet Valley Masterplan Area and is therefore covered by Local Plan Policy SS11 which states that "Any development should be of a scale and nature and of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features. Complementary and sensitive highway improvements to access routes and/or measures to support other alternative means of access will be required to serve any developments which generate significant additional demand for travel." The underlying tenets of the masterplan are to focus tourism development such as accommodation provision to identified locations and avoid a general or random dispersal of new development.

Policy SS10 of the Local Plan relates to the "Other Rural Areas Area Strategy" and confirms support for new tourism developments where they meet the requirements of Policy E4 of the Local Plan. Local Plan Policy E4 positively supports the important role that tourism and culture plays in the economy of the Staffordshire Moorlands and the contribution it makes to increasing physical activity and improving health and well-being. Policy E4 of the Local Plan would also provide

support for the proposal as it states that new tourist and visitor accommodation should be developed in locations that offer either:

- A) good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling; or
- B) in locations in or close to settlements where local services, facilities and public transport are available; or
- C) in areas specifically identified for tourism development in the Churnet Valley Masterplan or other relevant documents. Policy E4 goes on to state that new accommodation, attractions and facilities should support the provision and expansion of tourist, visitor and cultural facilities in the rural areas where needs are not met by existing facilities, and that all development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area, enhance the heritage, landscape and biodiversity of the area and shall not harm interests of acknowledged importance

The Council's recently published Tourism Strategy places an emphasis on raising the profile of the Staffordshire Moorlands so that it becomes a stronger destination as a place for both day visits and longer holidays, improving the current offer and unlocking the District's potential and boost the local economy.

Facilitating more overnight stays is a key objective of the Tourism Strategy which identifies a lack of accommodation investment and a dominance of day visitors being weaknesses of the tourism economy in the Staffordshire Moorlands. The Tourism Strategy sets out a series of aims and objectives aimed at growing the tourism economy in the Moorlands, including the following:

- Getting visitors to stay longer in the area by developing itineraries that combine Alton Towers with other experiences especially 'Activities' and 'Attractions', moving from a day visit to an overnight, or a 1 night to a 2 night visit.
- Encouraging accommodation development – small scale, quality, catered & self-catered that keeps visitors in the local area.
- Expanding, improving and encouraging the development of accommodation to attract visitors to stay overnight and keep their spending in the local area rather than losing it to neighbouring regions.
- Encouraging accommodation development in the towns/villages, at existing sites where services are already in place

The holiday park industry continues to respond to the developing needs of the UK holiday sector through the upgrading and improvement of parks, use of modern evolutions of the caravan in varying formats which are capable of use throughout an extended season. Despite concerns with the state of the global economy, the current domestic holiday market remains strong. Holidaymakers are tending to opt more for domestic breaks; the so-called 'staycation' with issues surrounding Brexit and the recent COVID-19 pandemic further reinforcing the staycation market.

One of the main factors limiting the ability of increasing staycation demand is the weather which if poor results in a shorter tourism season. The best way to deal with the relatively short tourism season is to create more all-weather packages, truly resilient to poor weather throughout the entire year. Rudyard Vale Caravan Park is ideally placed to do this by upgrading existing units with well insulated static accommodation whilst increasing the number of units on the site. The submitted proposals will not only encourage more visitors to the area but allow them to remain in the area and stay overnight, thereby helping to keep their spending within the local area. Direct spending by tourists creates multipliers in the local economy, providing vital additional income for small businesses, resulting in greater economic diversity and job creation. The proposed development

will therefore benefit the local economy. Such economic benefits are reinforced by paragraph 88 of the National Planning Policy Framework which states that planning policies and decisions should enable: “sustainable rural tourism and leisure developments which respect the character of the countryside.”

The Tourism Strategy acknowledges that countryside within the Moorlands as being ‘outstanding’ and identifies the landscape and gentle activity such as cycling and walking as being an area of strength within the Moorlands. The application site affords direct access to the local public footpath network which provides access to the surrounding countryside. Interestingly a photo of Rudyard Lake is provided as the background picture for the first chapter “Starting Point” of the Strategy and Rudyard Lake Hotel which lies in close proximity of the application site is acknowledged and referenced in the document.

The application site also lies relatively close to Leek, which is located well within the recognised 5km threshold for cycling where there is a wealth of local services and facilities. The application site can also be reached via public transport and opportunities also exist for shopping deliveries to be made to the site also thereby also contributing to minimising vehicular movements to and from the site. Even if journeys by car are made or required, these will be short in duration given the proximity of the site to the Churnet Valley and other tourist attractions in the local area. It is nevertheless clear that opportunities to access the surrounding countryside and local facilities by means other than the car do exist from this site.

In conclusion it is clear the proposal would support a prosperous rural economy through the expansion of an existing and established rural business. In addition it would promote rural tourism which in turn would support other local businesses and services. The increased number of caravan pitches would improve the accessibility of high quality open spaces, promoting health and well being and provide access to the countryside and its many amenities such as Rudyard Lake itself and the expansive network of local public rights of way. The site is consequently held to have good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling. Considerable positive weight should be afforded to these matters and would, if needed either singularly or cumulatively represent very special circumstances which would outweigh any harm resulting from the proposal. The proposal is therefore considered to accord with the provisions of the NPPF and the adopted Local Plan Policies SS1, SS10 and E4 of the Staffordshire Moorlands Local Plan. The principle of development is consequently concluded to be acceptable.

Impact on character and appearance of the area including the conservation area

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; and
- 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;

Local Plan Policy DC2 requires heritage assets and their setting to be enhanced and gives protection to designated and non-designated heritage assets. The Rudyard Conservation Area Appraisal (July 2016) identifies the application site as lying within character area 3 “Villas and Rudyard Vale”. It identifies the large houses of Horton Lodge and Fairview which sit in extensive grounds with Rudyard Vale below. It goes on to state that “Rudyard Vale, which was quite literally once a rural idyll, on a south east facing slope and the main open area of fields to the west of the lake, it has slowly over time become surrounded by trees and cluttered with ad hoc mobile homes, caravans and chalets.” It also goes on to reference the “muddle of structures “ and “lack of well defined space”. It is considered that “the sheltered position may have influenced the early construction of cottages along these slopes illustrated on the 1816 Horton Manor Map although there is little surviving physical evidence. Close to the land are the two Gothic style houses known as The Villa and Spite Hall, each with a vantage point over the Vale. The Villa was originally name Rudyard Vale and gave its name to the little valley building for Matthew Gaunt, a wealthy Leek solicitor, it was designed by William Sugden.”

It is clear from the above that the existing caravan site adds little to the character and appearance of the conservation area within which it is located. The proposed development provides an opportunity to redevelop the site, without extending the site area, and improve the character and appearance of the area through additional landscaping opportunities. The proposed caravans offer simple, low key accommodation with modest ridge heights limiting their visual bulk and massing. The use of standardised materials and colours also means that a degree of cohesion across the site is achieved and that visual impact and clutter is reduced. The additional units will have a close physical relationship with those being retained and will be contained entirely within the confines of the existing site boundaries with no encroachment into the open countryside. The provision of internal access roads and parking areas will be relatively limited, easily reversible, not out of keeping with those on the existing site and appropriate to the sites’ rural setting. Views of the site will, in reality, change little to that which currently exist. The proposed development will therefore not have a strident impact within its surroundings, and will safeguard the character and appearance of the area and the Conservation Area within which it is located. The proposed development is consequently held to meet the requirements of policies SS1, SS10, DC1 and DC2 of the Local Plan in this regard.

Impact on residential amenity

National planning policy dictates that at the heart of its core principles, planning should always seek to secure a good standard of amenity for all existing and future occupants of land and buildings paragraph 135(f). This is replicated in Local Plan Policy DC 1 which requires all development to, amongst other things, 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.

The application site is already in use as a successful and well established caravan site. Whilst the proposed increase in units does have the potential to increase the noise generated within the site due to an associated increase in number of vehicles and visitors it should be noted that the site’s attractiveness is that it is peaceful, quiet and tranquil.

It is well managed and historically there have been no issues regarding noise during the operation of the existing facility. It should also be noted that any additional noise would to a large degree be set against the background of the facilities provided (Visitor Centre and Boat House) at the neighbouring Rudyard Lake which lies in close proximity to the application site. The existing site is well landscaped and screened and therefore acts as a natural buffer in limiting noise transfer from the site to any noise sensitive receptors beyond. On the basis of the above it is not considered

that the proposed development would have any adverse impact on amenity enjoyed by any of the occupiers of the surrounding residential units or adjoining land uses.

Impact on highway safety

Chapter 9 of the NPPF which deals with the promotion of sustainable transport states at paragraph 115 that “in assessing sites that may be allocated for development in places or specific applications for development, it should be ensured that, amongst other things, safe and suitable access to the site can be achieved for all users.” Paragraph 116 states that “development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

Policy DC1 of the Local Plan requires developments to provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use whilst 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 measures):

- 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 and
- Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 2.

The application site benefits from an existing means of vehicular access onto Lake Road which has previously been considered and held to be acceptable by the Highways Authority. Each unit would be provided with their own dedicated parking area although as already set out the site is within a sustainable location and easily accessible by a range of transport modes. Having regard to the above and the established lawful use of the site it is concluded that there would be no adverse impact on highway safety and accordingly there is no conflict with LP policy DC 1 or T 1 or with the guidance of the NPPF.

CONCLUSION

The Framework sets out that there should be a presumption in favour of sustainable development and indicates that to achieve that, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

In this case the proposal would result in an amended site layout on an existing and well established caravan park. It represents an appropriate and acceptable form of development within the Green Belt without harm to its openness or visual amenity. The proposed development constitutes a sustainable form of development which has good connectivity with other tourist destinations and amenities, in particular by cycling and is located in close proximity to local public footpaths providing access to the surrounding countryside which itself is a tourist attraction. The proposal will facilitate longer stays in the area and associated participation and experience of other tourism activities, in accordance with the recently published Tourism Strategy for the District. The proposal would provide economic benefits through job retention and increased consumer spending and would safeguard the existing business and contribute positively to the rural economy. The increase in the number of static units on the site would be achieved through the redevelopment of the site entirely within the confines of the site and without any encroachment

into the Green Belt. The proposed static units are modest in terms of their size, scale, bulk and massing and have a simple and unobtrusive design which will not have an adverse impact on the character and appearance of the surrounding area. The proposed development will not be prejudicial or impact adversely on the amenity enjoyed by any of occupiers of the surrounding residential dwellings or neighbouring land uses. The proposed development would not be prejudicial to highway safety nor would it harm any established ecological interests on the site. Accordingly the proposal is considered to meet the requirements of policies SS1, SS10, SS11, E4, DC1 and T1 of the Staffordshire Moorlands Local Plan, and guidance contained within the National Planning Policy Framework.