

PLANNING, D&A AND HERITAGE STATEMENT

**LAND OFF RUDYARD ROAD
RUDYARD**

MARCH 2025

Site Address:

Land off Rudyard Road, Rudyard, Staffordshire, ST13 8PG

Applicant:

Mr. M. Farra

Proposal:

Erection of 9no. dwellings and associated works

Planning, D&A and Heritage Statement:

Date Issued: 28th March 2025

Job Reference: RDP/2025/029

Report Prepared By:

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1 Introduction

- 1.1 Rob Duncan Planning Consultancy Ltd. has been instructed by Mr. M. Farra to seek full planning permission for the erection of 9no. dwellings and associated works on a parcel of previously developed land adjacent to Lakeland Lodge, Rudyard Road, Rudyard.
- 1.2 The proposed dwellings will comprise of 8no. semi-detached dwellings and 1no. detached dwelling. There are levels changes across the site with the northwestern section occupying an elevated position above the southeastern section. The application proposes to site 5no. of the dwellings on the upper level of the site, arranged in a linear pattern, with the other 4no. dwellings located at the lower level, positioned either side of the former bowling green.
- 1.3 All of the dwellings will be two storey in scale, and will be constructed from coursed natural stone to their elevations, with blue slate tiles to their roofs. The accommodation of the dwellings will comprise of an open plan kitchen / dining room, living room with garden room, store, w.c. and hallway at ground floor, with stairs leading up to three bedrooms (one ensuite) and a bathroom at first floor. The gross floor area of each dwelling will be 98.7 square metres.
- 1.4 The dwellings will be accessed direct off the Rudyard Road via the existing vehicular access that serves the adjacent apartments at Lakeland Lodge. The access is to be widened on land owned by the applicant by way of removing an existing raised stone planter, and re-positioning of the existing timber gateposts. A dropped kerb is already in situ in this location, with the access surfaced with cobblestones. A total of 31no. parking spaces are to be provided on the site to serve the dwellinghouses, including the provision of EV charging points.

2 Planning History

2.1 Planning permission has previously been sought for the erection of 7no. affordable dwellings on the northern part of the site under application SMD/2019/0375. That application was refused on the following summary grounds:

- Proposal amounted to inappropriate development in the Green Belt as a demonstrable need for affordable housing in this location had not been demonstrated.
- Harm to the Conservation Area with particular concern raised about the design of the dwellings and their materials of construction.
- Impact of the development on trees surrounding the site and associated pressure for felling.
- Impact of shading from existing trees on the amenity of occupiers of the dwellings.

2.2 An appeal was subsequently lodged against that decision with the Planning Inspector concluding that whilst the principle of affordable housing on the site was acceptable, the housing mix would not be appropriate to meet the need in the local area. The Planning Inspector also concluded that the proposal would cause harm to the Conservation Area, and that the development would cause harm to protected trees and lead to pressure for future pruning or felling. The Planning Inspector also expressed concerns that an unacceptable degree of shading would arise.

3 Site & Surroundings

- 3.1 The application site lies on the southern side of the Rudyard Road, a short distance to the east of its junction with Dunwood Lane and Camrose Hill. It comprises a parcel of previously developed site located to the east of Lakeland Lodges, having formerly comprised the car park to the Railway Inn / Galleon Inn / Station Hotel (since converted to apartments and now known as Lakeland Lodge) as well as its associated bowling green, which lies at a lower level to the former car park. The hard surfacing remains on site, along with some portacabins that have been in situ on site for many years.
- 3.2 The northern boundary of the site is enclosed by a row of mature trees, beyond which runs (at a lower level) the Rudyard Road. Further vegetation encloses the site to the northeast/east, beyond which runs a canal feeder at a much lower level which connects Rudyard Lake with the Caldon Canal at Barnfields in Leek.
- 3.3 The site is located wholly within the North Staffordshire Green Belt and is also within the Rudyard Conservation Area. There are no statutory listed buildings located on, or near to the site. The site is located within Flood Zone 1 (low-probability of flooding).
- 3.4 Public footpath Horton 74 runs along the existing vehicular access into the site, but will be unaffected by the proposed development. Public Footpath Horton 70 lies at a lower level to the east of the site, and follows the path of the canal feeder.

4 Planning Policy

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the Development Plan taking into account any material considerations relevant to the application.

4.2 The Development Plan for this area comprises the Staffordshire Moorlands Local Plan (2020), of which the following policies are of relevance to the determination of the application:

4.3 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.

4.4 Policy SS3 of the Local Plan relates to '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 confirms that of that total provision, some 25% is to be accommodated within the rural areas.

4.5 Policy SS9 of the Local Plan relates to the 'Smaller Villages Area Strategy' and identifies Rudyard as 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.

The Council will meet community, social and economic needs by (amongst other measures):

- Enabling limited new housing development, including small infill schemes in accord with policy H1

4.6 Policy SS10 of the Local Plan relates to the 'Other Rural Areas Strategy' and states that these areas will provide only for development which has an essential need to be located in the countryside, supports the rural diversification and sustainability of the rural areas, promotes sustainable tourism or enhances the countryside. The policy states that the Council and its partners will achieve this through 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 H1
- 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
- Limiting uses which generate a substantial number of regular trips in areas that are not well served by public transport
- Encouraging measures which protect and enhance the biodiversity, geological resources and heritage of the District
- Maintain the Green Belt within Staffordshire Moorlands. Strict control will continue to be exercised over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy.

4.7 Policy H1 of the Local Plan relates to 'New Housing Development' and states that:

- 1) 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.
- 2) In line with Government legislation the Council will maintain and update a register of those interested in acquiring self-build / custom-build housing plots across the District. Where a demand exists, residential developments of 10 dwellings (or 0.5ha) or more will make an appropriate contribution towards this need in agreement with the Council. This will be negotiated on a case by case basis.
- 3) 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.

4.8 Policy H1 goes on to state that:

- a) Housing for special groups, particularly for older people and others as identified in the SHMA or successor document should be of a scale and in a location, which is appropriate to its needs.
- b) Housing proposals of 10 dwellings (or 0.5ha) or more will be required to provide a mix of housing in terms of size, type and tenure on the site unless

viability or other circumstances exist. The final mix will be negotiated with the developer based on housing needs as informed by the SHMA or successor document and other relevant factors such as available supply and market demand.

- c) 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.
- d) 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.
- e) 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.

4.9 Policy H1 adds that housing development on sites not allocated for such purposes, limited infill residential development will be supported provided that the development is well related to the existing pattern of development or a smaller village and will not create or extend ribbon development or lead to a sporadic pattern of development. Policy H1 goes on to state that in the rural areas 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.

4.10 Policy H1 also confirms that when development is located within the Green Belt, national Green Belt policy will apply.

4.11 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:

1. be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area;
2. 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;
3. create, where appropriate, attractive, active, functional, accessible and safe public and private environments which incorporate public spaces, green infrastructure including making provision for networks of multi-functional new and existing green space (both public and private), landscaping, public art, 'designing out crime' initiatives and the principles of Active Design;
4. incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of the development;
5. 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;
6. promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate;

7. provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use;
8. require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links;
9. ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed;
10. ensure, where appropriate, equality of access and use for all sections of the community;
11. be served by high speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.

4.12 Policy DC2 of the Local Plan relates to 'The Historic Environment' and states that:

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.

4.13 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 (amongst other measures):

- Conserving, and enhancing regional and locally designated sites. The Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests, unless it can be demonstrated that:
 - a) there is no appropriate alternative site available; and
 - b) all statutory and regulatory requirements relating to any such proposal have been satisfied; and
 - c) appropriate conservation and mitigation measures are provided; or if it is demonstrated that this is not possible
 - d) the need for, and benefit of, the development is demonstrated to clearly outweigh the need to safeguard the intrinsic nature conservation value of the site and compensatory measures are implemented.
- Expecting all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature,

size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.

4.14 Policy NE1 of the Local Plan relates to 'Trees, Woodland and Hedgerows' and states that the Council will protect existing trees, woodlands and hedgerows, in particular, ancient woodland, veteran trees and ancient or species-rich hedgerows from loss or deterioration. This will be achieved by:

- Requiring that existing woodlands, healthy trees and hedgerows are retained and integrated within a proposed development unless the need for, and benefits of, the development clearly outweigh their loss;
- Requiring new developments to provide tree cover that secures a good level of sustainability through tree retention, planting and soft landscaping, including where possible the on site replacement of any trees that are removed with sufficient tree planting to replace or increase the canopy cover on-site as appropriate. Landscaping schemes will also be required to mitigate against negative landscape impact and complement the design of new development and make provision for future maintenance. Where it is not possible to secure this new or replacement tree planting within the site, the Council will work with applicants to ascertain if a suitable site(s) can be found off-site for replacement planting in the locality;
- Resisting development that would directly or indirectly damage existing ancient woodland, veteran trees and ancient or species-rich hedgerows.

4.15 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:

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. Ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal
3. Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 2.
4. 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.

5 Other Material Considerations

National Planning Policy Framework (2024)

- 5.1 The National Planning Policy Framework seeks to secure the delivery of sustainable development, and sets out guidance, *inter-alia*, in respect of safeguarding the green belt, significantly boosting the supply of housing, securing high quality design, safeguarding heritage assets, promoting the re-development of previously developed sites and delivering a net gain to biodiversity. The content of the NPPF has been taken into consideration in the preparation of the application.

Staffordshire Moorlands Housing Land Supply Statement (to April 2023)

- 5.2 This document sets out the Local Authority's performance in respect of housing land supply and housing delivery. It confirms that the Local Authority has a deliverable supply of housing land equivalent to 3.58 years supply.

Staffordshire Moorlands Design SPD (2018)

- 5.3 This document sets out guidance aimed at securing the delivery of high quality design within the Moorlands. The content of the SPD has been taken into consideration in the preparation of this application.

Rudyard Conservation Area Appraisal (2016)

- 5.4 This document appraises the character of Rudyard and its environs, highlighting important features within the Conservation Area, key characteristics, as well as pressures and constraints. The content of the Conservation Area Appraisal was taken into consideration in the preparation of the application.

6 Planning Assessment

Impact on the Green Belt

- 6.1 The application proposes the erection of 9no. dwellings on a parcel of previously developed land located within the North Staffordshire Green Belt, on the fringe of Rudyard village. Policy SS10 of the Local Plan confirms that strict control will continue to be exercised over inappropriate development within the Green Belt, allowing only for exceptions as defined by Government policy.
- 6.2 Paragraph 154 of the National Planning Policy Framework sets out a list of types of development that are considered acceptable in the Green Belt, which includes:

*“limited infilling or the **partial or complete redevelopment of previously developed land** (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would **not cause substantial harm to the openness of the Green Belt.** (our emphasis)*

- 6.3 The site falls within the definition of previously developed land as it constitutes the former car park and bowling green to the Railway Inn / Galleon Inn / Station Hotel (since converted to apartments and now known as Lakeland Lodge).
- 6.4 It is respectfully submitted that the proposed development will not cause substantial harm to the openness of the Green Belt in this location. The site benefits from a high degree of natural enclosure afforded by the mature trees that enclose the northern, northeastern and eastern boundaries of the site.

The development will furthermore have a close physical relationship with surrounding built development, with Lakeland Lodge to its west, and dwellings located off The Drive to its northwest, such that it feels like part of the village.

6.5 The Local Authority's own Green Belt Review has furthermore concluded that this site makes a limited contribution in terms of checking the sprawl of built up areas and maintaining the separation of towns. The site was furthermore concluded to not make a contribution in terms of preserving the setting of historic towns and preventing encroachment. This led the Green Belt Review to conclude that the overall impact of development on this site on the purposes of including land in the Green Belt would be **limited**.

6.6 In consideration of this matter we also draw attention to the conclusions of the Local Authority in their assessment of the previous application on the site for the erection of 7 no. affordable dwellings. In refusing that application the Local Authority raised concerns that the type and tenure of affordable housing being proposed did not reflect local needs. This led the Local Authority to conclude that:

"I am not satisfied that the proposed development meets any of the exceptions to inappropriate development in the Green Belt and as such this application represents inappropriate development, contrary to Section 13 of the NPPF"

6.7 In carrying out the subsequent planning balance, the Local Authority raised no concerns that the proposal would give rise to any harm to the openness of the Green Belt concluding only as follows:

"The proposed development constitutes inappropriate development in the Green Belt. It is not considered that any very

special circumstances exist in this instance and as such, this application is considered to be contrary to section 13 of the National Planning Policy Framework and Policy SS6C of the Staffordshire Moorlands Core Strategy.

- 6.8 The Planning Inspector who conducted the subsequent appeal similarly did not raise any concerns that the development would have an unacceptable impact on the openness of the Green Belt, concluding as follows:

“34. I have found that the proposal forms inappropriate development in the Green Belt. National policy is clear. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight should be given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

“35. In this case heritage harm is another harm for Green Belt purposes because the less than substantial harm is not outweighed by the public benefits of the scheme. Furthermore, the harm to protected trees and the living conditions of future occupants weighs against the scheme”

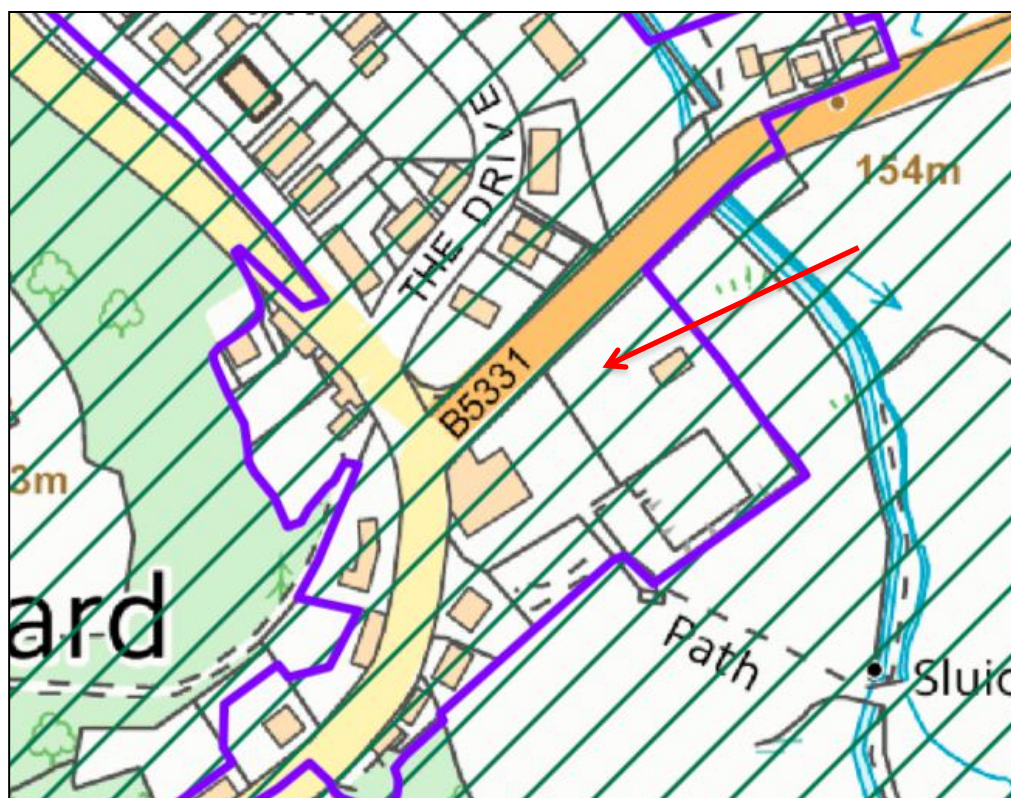
- 6.9 The lack of concern raised by the Local Authority and the Planning Inspector in respect of harm to openness arising from the development reinforces our assertion that the proposal will not result in substantial harm to the openness of the Green Belt – that being the test to be applied under paragraph 154 of the NPPF.

- 6.10 For these reasons we respectfully submit that the proposed dwellings amount to appropriate form of development within the Green Belt, in accordance with the provisions of paragraph 154 of the National Planning Policy Framework and policy SS10 of the Local Plan.

Rural Housing

- 6.11 The application site is located on the fringe of Rudyard village, within the rural area. The site itself was originally proposed to be allocated as a housing site within the draft version of the Site Allocations SPD, but the Local Authority subsequently moved away from allocating specific sites in favour of identifying residential infill boundaries for the smaller villages. The application site was subsequently included within the draft residential infill boundary for Rudyard within the Preferred Option Sites and Boundaries Consultation (April 2016), as shown in Figure 1 below.

Figure 1 – Extract of SMDC Preferred Options Map for Rudyard



- 6.12 The Local Authority nevertheless then changed its approach again, this time removing all of the proposed residential infill boundaries, and instead adopting a criteria-based policy approach within its new Local Plan (Policies SS9, SS10 and H1).
- 6.13 Both policies SS9 and SS10 of the Local Plan allow for the development of new housing within the smaller villages / rural areas where they accord with policy H1. Policy H1 confirms that proposals for the redevelopment of previously developed land for housing will be supported, provided that it is not of high environmental value.
- 6.14 The application site constitutes previously developed land on account of it comprising the former car park to the former hotel to the west of the site, along with its associated bowling green. The hardstanding associated with the former is clearly visible on the site, as are the storage containers that have existed on the site for an extensive number of years. The bowling green area, having been associated with the hotel, also amounts to previously developed land. Neither are held to be of high environmental value.
- 6.15 The redevelopment of the site for residential purposes is consequently held to meet the adopted housing strategy for the rural area, in accordance with policies SS10 and H1 of the Local Plan.

Design & Layout

- 6.16 The previously refused application on the site had encompassed the erection of two storey dwellings with dominant front projecting gables, and constructed from red facing brickwork with timber detailing to their elevations. This has prompted objections from the Conservation Officer.

- 6.17 To address these concerns the applicant has opted for a less imposing form of development, removing the front projecting gables and timber detailing in favour of a more simple, traditional style of design, with the dwellings to be finished in coursed stone with slate tiled roofs.
- 6.18 The two storey scale of the dwellings is appropriate for the site, and will reflect the scale of the nearby Lakeland Lodge. The dwellings will have strongly defined eaves and ridge lines, emphasised by gables, and a high solid to void ratio. Window proportions are generally similar throughout and are arranged harmoniously in columns, with traditional cill and header detailing incorporated. The resultant design of the dwellings is very much in keeping with the guidance set out within the adopted Design Guide SPD.
- 6.19 The layout has been designed to reflect the character of the area, with the dwellings fronting towards the highway. A linear form of development has been maintained as this is considered to best relate to the character of the village, which is otherwise characterised by linear patterns of development with dwellings fronting towards their respective highways. The high degree of natural screening afforded by the existing boundary vegetation will nevertheless serve to screen the majority of the development from the surrounding area, and features such as gardens, parking etc. have been discreetly tucked away in order to avoid having a dominant impact on the area.
- 6.20 Each dwelling will be provided with a large area of private amenity space to its rear, and which will be free from shading from nearby trees owing to the increased separation distances now incorporated (discussed in more detail below). The dwellings will furthermore have gross floor areas that exceeds the minimum standard required for a three bedroomed / five person dwellinghouse as set out within the DCLG Technical Housing Standards.

- 6.21 The side elevation of Plot 1 will lie circa 16m from the eastern elevation of Lakeland Lodge and thus exceed the minimum required separation distance of 14 metres. In doing so the development will avoid any adverse impact on the amenity of the neighbouring properties at Lakeland Lodge.
- 6.22 The resultant proposal is consequently concluded to be in keeping with the character and appearance of the surrounding area, and will provide a satisfactory level of amenity for both neighbouring occupiers of the development, and future occupiers of the dwellings. The proposal is therefore in accordance with the provisions of policies DC1 and SS1 of the Local Plan.

Heritage Impact

- 6.23 The application site is located within the Rudyard Conservation Area, and in determining the previous application on the site concerns were raised about the layout of the development and in particular the house types and palette of materials that were being proposed.
- 6.24 The site is located at the southern end of Rudyard village, and to the east of a cluster of buildings, including the former Railway Inn / Galleon Inn / Station Hotel (as it has been called over the years) which formed part of the hamlet known as Harpers Gate. The hamlet subsequently expanded over the course of the late 19th and early 20th Centuries, particularly to the north along Lake Road, and was subsequently renamed Rudyard.
- 6.25 The site lies to the northeast of the former Galleon which over the course of its more recent history was renamed as the Railway Hotel, and then subsequently the Station Hotel, reflecting the accessibility of the village at that time by the Churnet Valley Railway. It was then converted into apartments in the early 2000s and is now known as Lakeland Lodges.

- 6.26 The building appears on the 1879 Ordnance Survey map of the area, and comprised the westernmost section of building that abuts up to Dunwood Lane (see OS Extract in Figure 2 below). By 1899 however the building had expanded in a northeasterly direction across the site, resulting in a form and layout that is broadly consistent with that which exists today (see Figure 3 overleaf).
- 6.27 The land to the northeast of Lakeland Lodges, which forms the current appeal site, was free from development throughout this time, with the canal feeder clearly identified. The existing area of hardstanding that was used as the overflow parking area for the Station Hotel, along with its adjacent bowling green, do not appear on Ordnance Survey mapping until 1970.

Figure 2 – Extract of 1879 Ordnance Survey Map (Source: NLS)



- 6.28 The character of the village today is somewhat varied, with developments exhibiting a variety of scales and architectural forms, with a mixture of two storey and three storey dwellings observable. There is also a healthy mix of semi-detached and detached properties observable. The predominant palette

of materials in the immediate vicinity of the site is natural stone with slate or Staffordshire blue tiled roofs. The former Station Hotel (now Lakeland Lodge) is described as a building worthy of note within the Conservation Area Appraisal.

Figure 3 – Extract of 1899 Ordnance Survey Map (Source: NLS)



- 6.29 Paragraph 215 of the NPPF states that 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.
- 6.30 The dwellings are sensitively designed, utilising a complementary palette of materials, with parking discreetly located such that it will not dominate views into the site from the Rudyard Road. The layout takes its cues from developments in the surrounding area, which typically exhibit dwellings facing towards the highway, and furthermore ensures the development will have a southerly aspect to the rear, thereby maximising opportunities for solar gain. A shared rear parking area is proposed, which reflects the parking approach

utilised for Lakeland Lodges, and which will consolidate parking away from public view such that it will not appear dominant within its surroundings.

- 6.31 The two storey scale of the dwellings is appropriate for the site, and will reflect the scale of the nearby Lakeland Lodge, without appearing dominant or incongruous. The dwellings will furthermore have strong eaves and ridge lines, emphasised by gables, and a high solid to void ratio. Window proportions are generally similar throughout and are arranged harmoniously in columns.
- 6.32 The Conservation Appraisal notes that the area has been historically heavily wooded, and this is reflected by the perimeter vegetation to the application site which comprises a number of mature specimens. The accompany tree survey demonstrates that the development will not adversely affect these boundary trees (discussed in more detail below), and that consequently the well-vegetated enclosure of the site will be preserved. Such vegetation also serves to filter and soften views of the development when viewed from the public footpath to the south and southeast (Horton 74 and Horton 70).
- 6.33 The key characteristics of the site, that being the strong enclosure to the Rudyard Road and the canal feeder by mature vegetation, means that views of the site on approach along Rudyard Road will not be materially affected by the proposed development. The strong visual enclosure of the site will remain and thereby maintain the verdant appearance of the Conservation Area.
- 6.34 On approach to the site from the north along Camrose Hill, the presence of built development on this site will only become apparent upon arriving at the roundabout – likewise when approaching along Dunwood Lane. The development will maintain a wide gap between it and Lakeland Lodges, thereby preserving a sense of openness around that building and ensuring that the “picturesque assemblage of buildings” identified within the Conservation

Area Appraisal is preserved. For these reasons we submit that the proposed development will not give rise to any material harm to the character and appearance of the Conservation Area.

- 6.35 If the Local Authority were to conclude differently, and find that the proposal would lead to ‘less than substantial harm’, then we submit that the public benefits of delivering 9no. dwellings on a previously developed site, in circumstances where the Local Authority has a significant shortfall in housing supply (discussed in more detail below), clearly outweighs that harm. The proposal is consequently held to be acceptable in the context of policy DC2 of the Local Plan and guidance set out within the NPPF.

Impact on Trees

- 6.36 The previously refused application had raised concerns that the close proximity of the dwellings to existing trees along the northern site boundary in particular, would have led to pressure for felling and would have had an unacceptable impact on residential amenity as a result of shading from the trees.
- 6.37 The revised proposal has seen the dwellings on the upper level of the site (Plots 1 – 5) relocated further away from the trees along the northern site boundary such that a much greater separation distance is achieved (circa 14 metres). The previously refused scheme by contrast had shown the dwellings located circa 7 - 8 metres distant from those trees.
- 6.38 The accompanying Tree Survey and Arboricultural Impact Assessment has assessed the existing trees on the site and highlights that Group 2 and a number of Category C trees will need to be removed to accommodate the development and recommends the provision of new tree planting on the site as part of a landscape scheme to mitigate for their loss.

6.39 The Arboricultural Impact Assessment also serves to demonstrate that the dwellings will not impinge upon the root protection areas of any important trees on the site, and sets out a series of recommendations aimed at ensuring the associated car parking areas, access etc are constructed in a manner that safeguards the trees. It also confirms that the trees are to be safeguarded during the construction phase. These recommendations can be secured via planning condition.

6.40 The increased separation distance between the new dwellings (plots 1 – 5) and the trees along the northern site boundary, coupled with the path of the sun to the south of the site, means the proposed dwellings will not be unduly affected by shading from existing trees. The Arboricultural Impact Assessment concludes in this regard that”

“the proposed spatial relationship of the retained trees with the development should present no major long-term conflicts and their ongoing management should require no more than routine arboricultural maintenance”

6.41 We also draw attention to the layout of the proposed accommodation, which has been designed such that the ground floor accommodation is open plan in nature, thus affording the rooms therein dual aspects.

6.42 Having regard to the above considerations we conclude that the proposed development will not have an adverse impact on important trees in and around the site, will safeguard those trees during the construction phase. The development will furthermore not give rise to pressure to fell, and will be free from shading by existing trees. The proposal is consequently held to meet the requirements of policies NE2 and DC1 of the Local Plan.

Highway Safety

- 6.43 The site benefits from an existing vehicular access off the Rudyard Road which serves the parking area for the apartments in Lakeland Lodge. The applicant proposes to widen the existing access on land within his ownership by removing the existing raised stone planter and repositioning the existing gate post in order to ensure that two vehicles can pass one another.
- 6.44 Consequently the proposal will derive betterment to highway safety compared to the existing situation, as the existing occupiers of Lakeland Lodge currently utilise this driveway without the benefit of being able to pass one another on entry/egress. No objections were raised to these access arrangements in the assessment of the previous application.
- 6.45 The application also proposes the provision of 31no. parking spaces for use by occupiers of the proposed dwellings and their visitors. Associated manoeuvring space is also provided to ensure that vehicles are able to exit the site in a forward gear. The existing access benefits from good visibility on egress and consequently no significant or severe residual impacts to highway safety will arise as a consequence of the development. The proposed development is therefore in accordance with policy T1 of the Local Plan.

Biodiversity Net Gain

- 6.46 The application is accompanied by a BNG Report that assessed the biodiversity value of the site. It serves to demonstrate that a mixture of on-site and off-site biodiversity enhancement will be required in order to achieve a 10%+ net gain to biodiversity.
- 6.47 The applicant is currently in negotiations with Staffordshire Wildlife Trust to procure off-site habitat units within a woodland area near Biddulph Grange

and commits to entering into a S106 Obligation to secure those off-site biodiversity enhancement works.

- 6.48 Such off-site provision, coupled with the other biodiversity enhancements discussed within the BNG Report, will ensure that a 10% net gain to biodiversity is delivered. The proposed development is consequently held to meet the requirements of policy NE1 of the Local Plan.

Other Considerations

- 6.49 In consideration of this application, regard also needs to be given to the Local Authority's shortfall in housing. The Local Authority's housing policies are out-of-date on account of them being unable to demonstrate a five year deliverable supply of housing as required by the National Planning Policy Framework.
- 6.50 Paragraph 11 of the NPPF dictates that in such circumstances proposals should be determined in accordance with the presumption in favour of sustainable development (the so-called tilted balance) and that planning permission should be granted unless:
- i. the application of policies in this 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 this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed*

places and providing affordable homes, individually or in combination.

- 6.51 The proposal will not result in any conflict with policies in the Framework that protect areas or assets of particular importance, as it has been shown that the proposal amounts to an appropriate form of development within the Green Belt and will not result in harm to the character and appearance of the Conservation Area (paragraph 11(d)(i) of the NPPF refers).
- 6.52 It is furthermore submitted that no adverse impacts will arise as a consequence of this development to *significantly and demonstrably* outweigh the benefits of the development when assessed against the National Planning Policy Framework taken as a whole (paragraph 11(d)(ii) of the NPPF refers)
- 6.53 Social and economic benefits will be derived through the delivery of nine dwellings on the site. Policy SS3 of the Local Plan confirms that over the plan period 2014 – 2033 provision will be made for at least 6080 additional dwellings at an annualised rate of 320 dwellings per year. The policy also states that sufficient deliverable land will be identified to provide at least 5 years of development at all times. That however is far from the case.
- 6.54 The Local Authority has a long history of housing under-supply and the table in Figure 4 overleaf demonstrates that **at no point** since 2014 has the Local Authority delivered sufficient housing to meet the stated annualised housing requirement of 320 dwellings per annum.
- 6.55 The Local Authority's Housing Land Supply Statement (up to March 2023) confirms that the housing land supply in the District equates to just 3.58 years, and that the annualised housing requirement now stands at some 461 dwellings per annum.

Figure 4 – 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
2023/24	19	20	95	98	232
Total	511	235	488	633	1,867
Local Plan Target (%)	30%	20%	25%	25%	100%
Percentage % (to date)	27.4%	12.6%	26.1%	33.9%	100%

6.56 The development of nine dwellings on this site will therefore make a positive and valuable contribution towards meeting the Local Authority's chronic shortfall in housing land supply, and given the persistent under-delivery of housing within the District, and the focus that the NPPF places on previously developed sites, we submit that such benefits carry significant weight.

6.57 This proposal will also derive benefits of to the local economy, both to local tradesmen during the construction phase, and though the expenditure associated with the creation of two additional households. The Local Authority's 'Quantifying the Economic Impact of Development' Report (2017) confirms that each new house constructed in the District generates 4.3 jobs within construction or the associated supply chain, equivalent to 38.7 jobs in this particular case.

6.58 That same report also confirms that for each new dwelling constructed within the district, there will be a minimum initial one-off spend (in addition to the

construction of the dwelling) of £5,000, with a subsequent annual spend of £9,388 per year within the local economy. Those figures date from 2017 and when adjusted for inflation will be somewhere in the order £6500 for the initial one-off spend, and £12,300 spend per annum. The proposed development will therefore contribute circa £58,500 to the local economy in terms of one-off spend, along with an additional £110,700 *per annum* by way of ongoing annual spend. Such economic benefits lend further significant weight in favour of the proposed development.

- 6.59 The proposal will also deliver environmental benefits by delivering nine new dwellings on a previously developed site, in line with the objectives of paragraphs 124 and 125 of the NPPF which seeks to promote and support development of under-utilised land, especially if this would help to meet identified needs for housing where supply is constrained, as is the case with the Staffordshire Moorlands. Such environmental benefits lend further weight in favour of permission being granted.
- 6.60 The collective benefits of the proposed development are significant, and it is submitted that no adverse impacts will arise to *significantly and demonstrably* outweigh the benefits of the development when assessed against the National Planning Policy Framework taken as a whole.

7 Conclusion

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

- The proposal amounts to the redevelopment of a previously developed site, will not result in substantial harm to the openness of the Green Belt, and accords with the adopted housing delivery strategy for the rural area.
- The design and layout of the development will be in keeping with the character and appearance of the surrounding area, and will not give rise to any residential amenity concerns.
- The proposal will not result in harm to the significance of the Conservation Area as a heritage asset.
- The proposal will not result in severe residual impacts to highway safety.
- The proposal will not give rise to harm to important trees on the site, will not result in shading of the new dwellings, and will deliver a 10% net gain to biodiversity.
- The proposal will deliver a number of social, economic and environmental benefits that are not significantly and demonstrably outweighed by any adverse impacts.

7.2 The proposed development is consequently held to meet the requirements of policies SS1, SS3, SS10, H1, DC1, NE1, NE2 and T1 of the Staffordshire Moorlands Local Plan (2020) and guidance set out within the National Planning Policy Framework and Design Guide SPD.