



Planning Statement

**The Morgue, Birchtree Drive, St Edwards Park,
Cheddleton, Leek, ST13 7FE**

**Change of use of the derelict morgue
to a single holiday let**

October 2025

Introduction and Site Background

This statement is submitted in support of a full planning (and listed building consent) application made to Staffordshire Moorlands District Council on behalf of Joanna Raggett (the applicant) for change of use of the derelict morgue to a single holiday let (the proposal) at the Morgue, Birchtree Drive, St Edwards Park, Cheddleton, Leek, ST13 7FE (the application site).

The application site is accessed off Birchtree Drive with the general site context being demonstrated in figures 1 and 2 below.

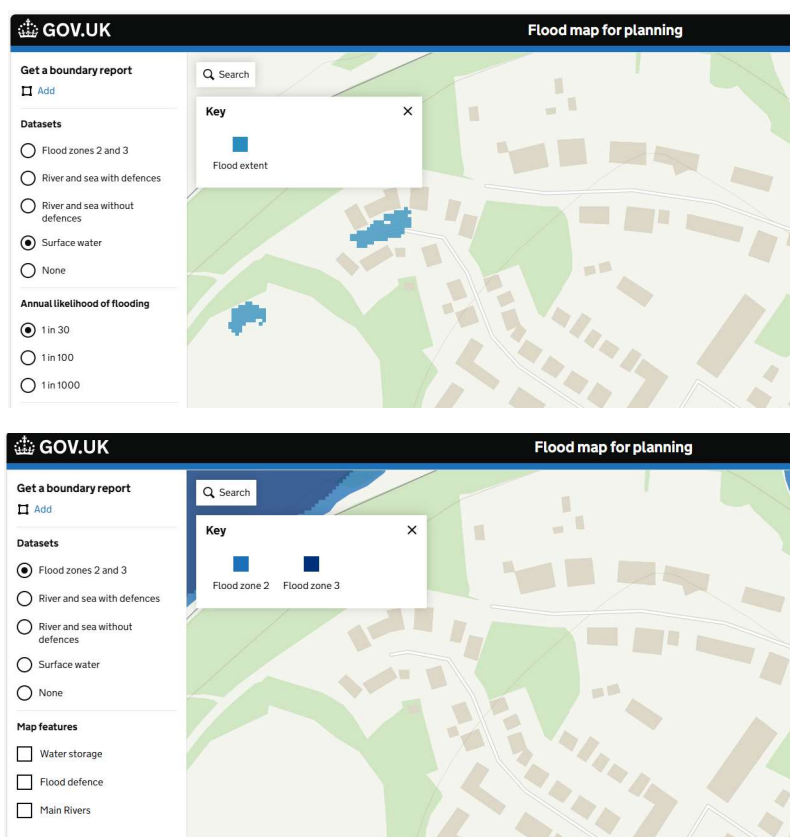


Figures 1 & 2 – Immediate and general site context

Landowner notices have been served on the relevant owners of the private roads from the A520 (Leek Road) as appropriate notifying them of the application in question. The entire site, within the applicant's ownership, shown by the blue line boundary extends to in the region of 0.41 acres (0.17 hectares) with the proposal seeking to change the use, along with restoration works, the former Morgue which was utilised as part of the original psychiatric hospital, built as the North Staffordshire Asylum which lies adjacent to the Grade II Listed Chapel.

The Government's Flood Map Information indicates that the site is solely within Flood Zone 1 and is not within an area prone to surface water flooding issues. There is, therefore, no increased risk of flooding as a result of reuse of a building as part of the proposals (with existing

hardstanding for parking provision already in place) and there is therefore no requirement for a site-specific Flood Risk Assessment.



Figures 3 & 4 – Flood risk maps

A search of Staffordshire Moorlands Public Access, for Planning Applications by postcode (ST13 7FE) shows no results, however search by “The Morgue” returns a list of applications relating to the site. These can, for the avoidance of doubt, be summarised as:

SMD/2009/1095 – Proposed new Hollington stone boundary wall and retaining walls – invalid application.

SMD/2009/1094 – Proposed new Hollington stone boundary wall and retaining walls – invalid application.

SMD/2006/0526 – Conversion of Morgue to dwelling – refused – June 2006.

SMD/2006/0525 - Conversion of Morgue to dwelling – refused – June 2006.

Appeal reference APP/B3438/A/06/2021789/NWF – appeal dismissed December 2006 (appeal to SMD/2006/0525)

SMD/2006/04272 – Conversion of a Morgue into a dwelling – invalid application.

SMD/2005/1332 – Conversion of Morgue into 3-bedroom residential units – application withdrawn October 2005.

Based upon the above planning history the majority of applications have been submitted in an invalid format/withdrawn.

The planning history for this site is acknowledged, however, since the determination of the previous applications planning policy has changed significantly as a result of a new Local Plan as well as provision of the National Planning Policy Framework 2024 which were not the case at the point of the refusals for the conversion proposal previously submitted in 2006. There should, therefore, be a clearly separate and fresh basis for assessment in terms of the acceptability for new proposals as submitted. The proposals are also materially different.

General points relating to the previously refused/dismissed proposals have been considered and taken into account, in basic terms, however the previous refusal reasons in part were due to a lack of information, for example, it is notable within the last application that no tree survey was submitted whereas the application which is now submitted is submitted alongside full arboricultural reports and an impact assessment.

Application Site and Proposal

The application site, as outlined, relates to a disused/former Morgue building off Birchtree Drive which benefits from existing access and parking off Birchtree Drive as seen from the submitted location plan and as officers will see as part of any site visit.

The building has been abandoned for many years and is now becoming a location utilised for anti-social behaviour, including drug use, despite multiple attempts to secure the building as required.



Figures 5-8 – Internal images

Officers will see, from any site visit, that the building is subject to break-ins which, combined with the historic significance of the building, further supports a general requirement for an alternative use for the building in terms of general amenity for the area but also to preserve the designated heritage asset itself.



Figure 9 – Street scene image

General, internal, photographs of the current condition of the building are included above for the benefit of case officers. The appeal site has the appearance of woodland with an unassuming single storey building hidden within it which the proposals intend to maintain. The proposal seeks to convert the building into a single holiday let which would provide two bedrooms (one with an ensuite), a bathroom and a kitchen and lounge area as demonstrated on the ground floor plan (proposed) prepared by Foster Architecture and Design for use as a holiday let as is the basis for submission can be appropriately controlled by condition.

Officers will see, from the existing and proposed elevations, that the external alterations to the elevations are minor and limited to an existing window being extended into a door in the side (north) elevation (for a storeroom only) and provision of an additional window in the side (south) elevation with all other openings and detailing being retained or utilised as part of the proposals.

The red line boundary for the site encompasses the whole site owned by the applicant, however, this red line is largely as a result of intending to manage and deliver Biodiversity Net Gain (BNG) as on-site provision as discussed below – not that the whole site is to be utilised as garden or similar. The actual impact of the proposal is restricted to a path around the building with the main doors in and out of the property are located and separated from nearest properties by trees (as well as the Morgue being at a lower slab level) (as can be seen from figure 7 above).

Planning Policy

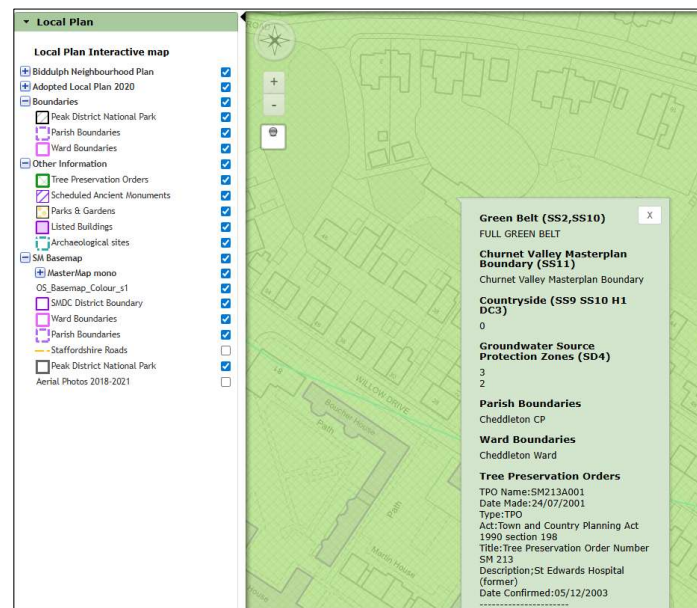
The starting point for determination of all applications is the Local Plan in accordance with section 38(6) of The Planning and Compulsory Purchase Act 2004. The relevant Local Plan in this case is the Adopted Local Plan (2014 – 2033) (LP) which was adopted in 2020 with the National Planning Policy Framework 2024 (the Framework) being a material consideration. We

are not aware of Neighbourhood Plan which could affect, or needs to be taken into account within, any application.

Site Constraints

The site, according to the Interactive Local Map, flags two site constraints. The first is that the site stands within an area subject to Tree Preservation Orders (TPO). The TPO appears to have been made in July 2001, having been confirmed in December 2003. The TPO name is SM213A001 (TPO number SM213) under the description of St Edwards Hospital (former).

The second key constraint is that the site stands with the Green Belt. The Green Belt status was noted, within previous applications, with the site being a major developed site in the Green Belt (Churnet Valley Masterplan) but it still shows, on the mapping, as countryside.



At this stage, no further constraints are shown, on the Council policy maps but I note from the planning history that the site has been treated on the basis of being listed. A search of the Historic England Mapping System shows nothing in direct relation to the site itself; however, St Edwards Hospital (Chapel) is Grade II Listed under list entry number 1272022.

St Edwards Hospital Chapel was first listed in July 1997, and the listing refers to it as the Chapel to the former North Staffordshire Asylum, now St Edwards Hospital. Within the previous applications for the site, at appeal, the Inspector noted that the appeal site lay within the curtilage of St Edwards Hospital which is, as noted, Grade II Listed (but is not separately listed) as well as it being stated to have been part of the setting of the adjoining Chapel.

The criteria for curtilage listing include the physical footprint and layout of the listed building and the structure in question, their ownership, both historically at the date of the original listing and the purpose or function of the relevant asset again both historically at the time of the listing. This, combined with the presence of listed building consent applications for the site, means I am of the opinion that any applications should be, and have been, presented on the basis of the building being curtilage listed with applications made for both full and listed building consent simultaneously.

The proposal is, therefore, supported by a Heritage Statement which considers the building itself as well as the evolution of the site and its relationship with the former hospital in order to understand the context and historic significance of both the building itself as well as the setting of the Grade II Listed building at St Edwards Hospital (Chapel). In that regard, it is also noted that the Chapel itself was previously granted permission for residential conversion.

Principle of Development

Green Belt

The site is washed over by Green Belt in a now built-up area. The site is surrounded almost entirely by built form, and residential development, and there would be limited external changes to the existing building, parking provision already available, as well as a clear intent to retain trees and minimise external development within the proposals as per the submitted documentation.

Paragraph 154 of the Framework confirms that development in the Green Belt is inappropriate unless a defined exception applies. Such exceptions include paragraph 154h (iv) the reuse of buildings provided that the buildings are of permanent and substantial construction. Such forms of development are not inappropriate, by definition, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

The proposal is supported by a structural survey and the building, by its very nature is evidently of permanent and substantial construction as a curtilage listed historic building. Some of the works proposed would, arguably, need undertaking in any case to preserve the building as a designated heritage asset but these could not be said to be new build. The structural report confirms that the building is structurally stable and suitable for conversion but that some maintenance and works will be required but it is considered that, overall, the building is one which is listed, and which should be preserved. The works noted will bring the building back into use, and make it weatherproof as a result of a viable use, given that it has been empty for now decades (since circa 2002) with no ongoing maintenance.

Utilisation of an existing building, and existing parking provision, would preserve the openness of the Green Belt both visually and spatially with parking provision, owned by the applicant, already in existence adjacent to more general parking for surrounding residential properties. Taking into account paragraph 143, of the Framework, the proposal would not conflict with the five purposes of including land within the Green Belt. Within the previous appeal the Inspector also stated that the proposed conversion would not have a materially greater impact on the openness of the Green Belt which supports this approach in basic terms with Green Belt being one of the longest standing planning policies still in place today.

Tourism and Visitor Accommodation

The Interactive Mapping System, when you hover over the building in question, also flags the Churnet Valley Master Plan Boundary (Policy SS 11) which in terms of a policy, identifies the area for sustainable tourism and rural regeneration. It states, as a policy, that support would be given to a list of development and measures which includes short stay and long stay visitor accommodation and measures to remediate and restore derelict land, buildings and features

including the appropriate redevelopment of sites. The proposal, as visitor accommodation and/or holiday let, however you label it, is consistent with these overarching objectives.

The key Policy for tourism related development is Policy E4 which has two parts which both need to be complied with. Part 1 allows tourist development including accommodation in locations that offer, or are capable of offering *either (my emphasis)*:

- 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 and facilities and public transport are available or
- c) In areas specifically identified for tourism development in the Churnet Valley Master Plan.

The Adopted Churnet Valley Masterplan Supplementary Planning Document (SPD) identifies 8 local character areas with the application site, looking at map 6.1, standing within Character Area 3 (Leek). This area is identified as a significant gateway to the Churnet Valley and the Peak District National Park from the north and west with one of the key actions relating to conserving and enhancing the town's heritage assets. The area also seeks to strengthen links to country parks such as Deep Hayes which is, evidently, not too far away from the site to the southwest. The proposal would be acceptable with c) as it is within an area identified for tourism development in the Churnet Valley Masterplan.

The proposal would offer a different, more niche, form of accommodation being self-catering within an attractive listed historic building creating a unique opportunity to provide visitor accommodation. The proposal would therefore diversify the range and type of accommodation on offer in the area which therefore helps to support the provision and expansion of tourist facilities/accommodation in this part of the Churnet Valley.

The proposal is for the conversion, but not enlargement, of an existing building with character, meaning the proposal would be compatible with the local area. Appropriate levels of amenity can be maintained with surrounding properties, and the proposal would help to restore and result in the long-term protection and maintenance of a Grade II curtilage listed building by bringing the vacant building back into use with minor works to the exterior being proposed which would improve and prevent the building falling into further disrepair. There would be net improvements to the heritage, landscape, and biodiversity of the area – with delivery of BNG.

Although the site does stand within a major developed site, it is still outside any recognised settlement boundary within the North Staffordshire Green Belt so LP Policy SS10 (Other Rural Areas Strategy) is also of relevance as this relates to the Green Belt outside development boundaries. LP Policy SS10 sets out an objective to enhance tourist opportunities by supporting sustainable tourism developments and measures in the Churnet Valley in accordance with LP Policy SS 11 and the Churnet Valley Masterplan SPD as well as allowing for small scale tourism developments in other areas (in accordance with LP Policy E4).

These have been discussed in detail above. Point 6 reiterates the Council commitment to maintaining the Green Belt within the Staffordshire Moorlands outlining that strict control would continue to be exercised over inappropriate development within the Green Belt allowing only for

exceptions as defined by Government policy. This confirms, therefore, a default to the Framework, as the national overarching policy, for development within the Green Belt itself for which there is support for re-use of buildings as previously outlined.

Policy H1 (albeit this is new housing development, not holiday lets so is not directly applicable) supports conversion of rural buildings where the building is suitable and worthy in physical, architectural and character for conversion or where such a development would represent optimal viable use of a heritage asset. It is considered that, overall, the principle of re-use of the building should be considered acceptable subject to consideration of more detail Local Plan policies as well as heritage implications.

Design

LP Policy DC1 requires development to 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, character and appearance. The Framework, in a similar manner, outlines what is expected of good design and required for the development of high quality, beautiful places, and provides for a high standard of amenity for existing and future users.

Overall, the proposal seeks to actively maintain and enhance the character and appearance of the building and the street scene within which it sits, with an emphasis on retaining trees, enhancing biodiversity and retaining the appearance of woodland with an unassuming single storey building hidden within it. The external changes to the building would be, as seen from the plans, limited and repair would be undertaken with materials matching and suitable for the building as a designated heritage asset. The character of the historic building would be wholly maintained, and enhanced, as a result of the proposal which would see restoration and enhancement of the building which has been vacant and deteriorating for several years.

The proposal would be consistent Design Guides set out by Staffordshire Moorlands District Council, and the Framework which support proposals that are well designed and reflects local design policies and Government guidance on design, For these reasons the proposal is consistent with LP Policy DC1, the Staffordshire Moorlands Design Guides and the Framework.

Heritage

According to the Historic England Mapping System there is nothing showing in direct relation to the site itself, however, St Edward's Hospital (Chapel) is Grade II Listed under List Entry number 1272022. St Edward's Hospital Chapel was first listed in July 1997, and the listing refers to it as the Chapel to the former North Staffordshire Asylum, now St Edward's Hospital. Within the previous appeal (2006) the Inspector noted that the appeal site lies within the curtilage of St Edward's Hospital (which is, as noted, Grade II listed) but it is not separately listed as well as it being stated to have been part of the setting of the adjoining Chapel.

The criteria for curtilage listing are the physical footprint and layout of the listed building and the structure in question, their ownership, both historically and at the date of the original listing and the purpose or function of the relevant asset again both historically and at the time of the listing. This, combined with the presence of Listed Building Consent applications for the site, means we

have presented the proposal of the basis of the building being curtilage listed (i.e. applications made for both full and listed building consent simultaneously). To approach in any other way would be contradictory to the planning history of the site and the that the proposals need to specifically be considered in relation to the heritage policies within both the Local Plan and the Framework.

The proposal is supported by a heritage statement, which outlines the site background and evolution, as a separate document for ease of reference alongside this planning statement.

The Morgue was part of the original Psychiatric Hospital, built as the North Staffordshire Asylum. c1895-1899, lies to the rear northwest of the site and adjacent to the Grade II Listed Chapel. LP Policy DC 2 (Historic Environment) outlines that the Council will conserve and wherever 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.

Protection will be given to designated heritage assets and their settings as set out in the Framework. Paragraph 205 of the Framework confirms that when considering the impact of the proposed development on the significance of the designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. It also notes that, in determining applications that Council's should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

It is considered that the proposal is fully consistent with LP Policy DC 2 as it seeks to conserve, and enhance, a designated heritage asset which is in disrepair and has been vacant for decades at the point of application. By finding a viable use the proposal will enable the building to be restored for future generations as a key part of the original St Edward's Hospital Site. Despite the development of the housing on site taking place from 2002, some 23 years ago, both The Morgue and The Chapel (as far as we are aware) remain the only two structures from the original hospital complex that have not been converted into alternative use.

Conditions can be utilised to secure appropriate materials as part of any listed building consent. As confirmed within the structural survey submitted the external brick work is only anticipated to need localised repair and any significantly spalled facing brick will be undertaken with matching bricks. The slate roof covering has held up but the proposal would ensure a roof covering repaired, utilising slate, to allow the building to become weatherproof again and cleared of debris with ongoing maintenance alongside reconstruction of the original vaulted section of the roof. The proposal would also allow for works done to improve structural integrity again conserving and enhancing the building as a designated heritage asset.

A new mesh reinforced concrete floor slab with appropriate damp proofing, insulation and finish would ensure that the building, combined with new fenestration appropriate to the building (details to be secured by condition with appropriate sectional drawings) will ensure that

the Morgue has a viable use and is retained as part of the historic setting of the site for the next 100 years.

The impact of the proposal, from a heritage perspective, can only be viewed as positive. The building has been abandoned for many years and is now becoming a location utilised for anti-social behaviour, including drug use, despite multiple attempts to secure the building as required since the applicant purchased the site. Officers will see, from any site visit, that the building is subject to break-ins which, combined with the historic significance of the building, further supports a general requirement for an alternative use for the building in terms of general amenity for the area but also to preserve the designated heritage asset itself.

Ecology, Trees and Biodiversity Net Gain

The site was subject to a Preliminary Ecological Appraisal and Preliminary Roost Assessment undertaken in February 2024. Stations of this survey can, of course, be followed and secured by condition as part of any planning permission granted but notably it flagged a requirement for Bat Emergency and Re-Entry Surveys (BERS). BERS were undertaken 2024 (three surveys) Which confirmed that the development will need to be permitted by a bat mitigation licence.

Due to the passage of time since the surveys, and submission of this application, a Material Changes Check Walkover was undertaken in August 2025. The MCC Confirms no change to the structure of the building in regard to works, however, brown long eared droppings and one common pipistrelle dropping were recorded internally which could pertain to an unrecorded common pipistrelle roost within the building. The previous surveys, and data, can remain valid for planning purposes under the relevant professional guidance but it is acknowledged that updated emergent surveys will be required prior to obtaining a bat licence, following a grant of planning permission, and prior to commencement of the development.

On the basis of above, as demonstrated by the supporting documentation, the proposal would be compliant with LP Policy NE 1 which seeks to conserve and enhance biodiversity resources of the District Having regard to relevant ecological evidence. The development scheme includes measures for protection and enhancement of site biodiversity and is overall consistent with the objectives of LP Policy NE 1.

In relation to trees, it is notable, within previous proposals for the site, that no tree survey was submitted. The Inspector concluded that given the number and position of trees very close to the building and within its curtilage and the lack of any tree survey or details to the proposed works, it was concluded that the proposal would likely harm the protected trees and, in consequence, harm the character and appearance of the area and the setting of the adjoining listed Chapel.

This current application is, by contrast, supported by an Arboricultural Method Statement (AMS) (Arbtech Consulting Ltd) along with an Arboricultural Impact Assessment and a Tree Protection Plan. The AMS confirms that no trees require removal to facilitate the proposals. The proposal is, therefore, appropriate for the site in the context of TPO SM213A001 (TPO number SM213) under the description of St Edwards Hospital (former). The proposal would be consistent with LP Policy NE2 which outlines that The council will protect existing trees, Woodlands and hedgerows, from loss or deterioration. This will be achieved by requiring that existing

Woodlands, healthy trees and hedgerows be retained and integrated within a proposed development unless the need for, and benefits of, the development clearly outweigh their loss.

The proposal is supported by a Biodiversity Net Gain (BNG) metric and report confirming that the proposals would deliver An uplift of 27.98%, on site, which means the proposal would be compliant with the environment act 2021 as a minimum biodiversity net gain of 10% is achieved for area based habitat units as well as all trading conditions having been satisfied.

Compliance with this requirement, to be secured through a pre-commencement condition with regard to the Habitat Management and Monitoring Plan (HMMP) and Biodiversity Gain Plan, would in turn ensure that the proposal would be compliant with LP Policy DC1 which promotes the maintenance, enhancement, restoration and recreation of biodiversity and geological heritage where appropriate, in accordance with LP Policy NE1 which relates to Biodiversity and Geological Resources. The latter policy largely mirrors the new legislation in requiring a net gain and ensures that any unavoidable impacts are appropriately mitigated for whilst promoting the appropriate approach to biodiversity as a result of proposals.

Residential Amenity

Paragraph 135 f) of the Framework seeks to secure a high standard of amenity for all existing and future occupants. LP Policy DC1 requires development to achieve a satisfactory relationship to adjacent development and to not cause unacceptable effects by reason of visual intrusion, overlooking, shadowing, overbearing effect, noise, light pollution or other adverse impacts on local character and amenity.

The Inspectors comments within the 2006 appeal (APP/B3438/A/06/2021789) were in relation to impact of future occupiers of the Morgue with the proposal then being for a three-bedroom domestic unit i.e. someone's full time residential unit, which is not the case with the proposal for a holiday let. No issue was raised with regard to adjacent occupiers or properties at that time. The ability to see from within the site boundary, including the building itself, into neighbouring residential properties (or vice versa) is negligible with boundary fencing (solid timber) already being in place around the site boundary between the application site building and properties to the north.

As noted above in the context of the red line boundary the actual impact of the proposal is restricted to a path around the building with the main doors in and out of the property are located to the south. The main doors in and out of the property are located and separated from nearest properties by trees (as well as the Morgue being at a lower slab level) (as can be seen from figure 7 above).

Due to the separation distances, general site levels, and established trees within the site (which would be retained and are protected by a TPO) it not considered that the proposals would result in unacceptable impact to neighbouring residential amenity. Parking and such activity would be in the context of wider parking for the site, and the proposal would provide appropriate levels of amenity for users as a holiday let.

Highway Safety/Access

The Framework states in that promoting sustainable transport should be considered from the earliest stages of plan-making and development proposals. It also advises that development should only be prevented or refused on highways grounds if there would be an unacceptable

impact on highway safety, or the residual cumulative impacts on the road network would be severe.

In terms of traffic and highway safety, the vehicle movement generated by a holiday let would not be significant enough to increase traffic problems on surrounding roads and the site should be able to provide sufficient parking provision within existing tarmacked areas adjacent to the site. The existing parking provision, for the Morgue, is more than sufficient for two vehicles as demonstrated on the proposed site plan with access being via an existing, wider, parking provision for the adjacent apartments/dwellings.

Policy T1 seeks to provide safe and sustainable access and ensure that development can accommodate the required vehicular parking, in line with Appendix 2. Holiday lets are not specifically considered, however, taking into account that hotels/hostels require one space per bedroom and dwellings (up to three bedrooms) require two spaces – it is considered that on balance, against the spirit of that guidance, the proposal can demonstrate sufficient parking provision on the basis of the plans showing a two bedroom holiday let unit.

The site is sustainably located with pavement links throughout the site and a number of local bus services off East Drive and Leek Road itself. The proposal would, overall, offer users of the accommodation genuine alternatives to the private car during their stay which can also be combined with, subject to condition, provision of facilities such as bike storage. The development scheme will have no material adverse impact on the safety or operation of the adjacent highway network. The development would not amount to unacceptable harm to the local highway network, nor represent a highway safety hazard.

The proposal would be consistent with LP Policy T1 which seeks to ensure that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development and that appropriate parking provision is provided on a case-by-case basis with recourse to the guidance in appendix 2.

Conclusion

The proposal would result in a holiday let within the Churnet Valley and would help safeguard the long-term future of a historic curtilage listed building with the improvements made being sympathetic to character and appearance both internally and externally. The character and appearance of the building, and the main listed building itself, would not be harmed as the curtilage would be maintained respectfully to accommodate the proposals.

The appeal site has the appearance of woodland with an unassuming single storey building hidden within it which the proposals intend to maintain. There are strong heritage benefits to the restoration and reuse of the building which is currently deteriorating and being utilised for antisocial behaviour which would be removed through positive reuse of the building as proposed.

The proposal should be approved subject to conditions as appropriate.