

GREY BELT STATEMENT

LPA REF : SMD/2023/0147

APPLICANT : UPPERDALES DEVELOPERS LTD

**ADDRESS : FORMER NEW INN, DENFORD LANE,
LONGSDON**

**PROPOSAL : DEMOLITION OF EXISTING PUBLIC
HOUSE AND REDEVELOPMENT OF THE SITE TO
FORM FARM SHOP AND CAFÉ / RESTAURANT
WITH ASSOCIATED WORKS**

DATE : MARCH 2025

JOB No. : 2023-2796

1.0 INTRODUCTION

1.1 It is acknowledged that national planning policy has been updated since the time of the application submission. The purpose of this statement is to provide Staffordshire Moorlands District Council with commentary on the site in the context of the Government's most recent amendments (December 2024) to the National Planning Policy Framework with specific reference to the Government's Grey Belt and Green Belt policies with context on how these changes affect the application proposal. This statement should be read alongside the Planning Statement and all other accompanying documents, which were submitted and set out the main case for the application.

2.0 GREEN BELT & GREY BELT POLICY ASSESSMENT

2.1. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. On 12 December 2024, the Ministry of Housing Communities and Local Government (MHCLG) updated the NPPF. This included a selection of updates including regarding councils' housing supply, the Green Belt, and the introduction of the Grey Belt.

2.2 Chapter 13 of the NPPF sets out the importance and protection of the Green Belt, which has a fundamental aim of preventing urban sprawl and keeping land open. The Staffordshire Moorlands Local Plan does not contain a specific Green Belt policy although policy SS 10 deals with the "Other Rural Areas Strategy" which comprise the countryside and Green Belt outside of the development boundaries of the towns and larger villages and the open countryside surrounding the smaller villages. This policy confirms 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." It goes on to state that the council and its partners will achieve this through the following actions:

1. Meet housing requirements and specific needs by: 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 H 1; Allowing the conversion or replacement of an existing rural building in accordance with Policy H 1; Allowing extensions or additional domestic outbuildings to existing dwellings provided they are appropriate in scale and design and do not have a detrimental impact on the existing dwelling and the character of the rural area. The Council will assess schemes having regard to the original dwelling, in cases where cumulative change has occurred; Allowing suitable development which would secure the future conservation of a heritage asset in

accordance with Policy DC 2; Allowing rural exceptions housing (in accordance with Policies H 1 and H 3); Allowing community facilities where that need cannot be met in a settlement within the hierarchy. In such cases the development should be in a sustainable location close to an existing serviced settlement.

2. Sustain the rural economy by: Enabling the limited expansion or development of business for employment uses where a rural location can be justified Supporting the diversification of existing farm enterprises. Supporting the development of appropriate ICT and new means of communications to enable homeworking and small businesses reliant on e-technology;
3. Enhance and conserve the quality of the countryside by: 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; Ensuring renewable energy schemes are of an appropriate scale, type and location; Recognising and conserving the special quality of the landscape in the Peak District National Park (in accordance with Policy DC 3); Encouraging measures which protect and enhance the biodiversity, geological resources and heritage of the District.
4. Regenerate underused major developed areas in the countryside including: Bolton Copperworks, Froghall and Anzio Camp, Blackshaw Moor (in accordance with policies DSR 5 and DSR 6). Development of these areas shall be complementary to and not undermine the role of the towns and larger villages nor shall it undermine wider strategic objectives. It shall also avoid or minimise environmental impacts and congestion and safeguard and enhance natural and cultural assets. Facilitating the appropriate redevelopment of other major developed areas where the proposed development brings positive benefits to the area and any resultant environmental or highways concerns could be adequately addressed and minimised. Such proposals will be expected to provide supporting information that demonstrates clearly that the redevelopment will complement the overall development strategy for the District.
5. Enhance tourist opportunities by: Supporting sustainable tourism developments and measures in the Churnet Valley in accordance with Policy SS 11 and the Churnet Valley Masterplan SPD; Allowing for small-scale tourism developments in other areas (in accordance with policy E 4); Establishing strong linkages between recreational and tourist resources; Recognising and developing the close linkages to the Peak District National Park.

6. 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.

2.3 On 5 December 2024, MHCLG published the Local authority green belt statistics for England: 2023 to 2024 which confirmed that there was no net change in the area of land designated as Green Belt in the Staffordshire Moorlands.

2.4 Paragraph 143 of the NPPF states that the Green Belt serves the following five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.5. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans, per paragraph 145 of the NPPF. Therefore, currently, the only mechanism through which to alter Green Belt boundaries is through the local plan preparation, examination, and adoption process.

2.6 Accordingly, this planning application does not seek to remove land from the Green Belt or alter the Green Belt boundaries established within the plan; rather, it seeks to justify the development despite its Green Belt location.

2.7 When considering a planning application in the Green Belt, substantial weight is given to any harm to the Green Belt, including harm to its openness. However, footnote 55 of the NPPF states that this is not in the case of development on grey belt land, where development is not inappropriate.

2.8 The NPPF states that, generally, development in the Green Belt is inappropriate unless one of the exemptions set out at paragraph 154 applies. However, paragraph 155 introduces the concept of grey belt land where development in the Green Belt may not be considered inappropriate subject to a series of criteria. Grey Belt land is defined in Annex 2 of the NPPF as “land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets

in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

2.10 It is not considered that this site and or this development strongly contribute the purposes (a), (b), or (d) of paragraph 143 of the NPPF. Additionally the site itself does not fall within a Special Protection Area nor any of the areas or assets of particular importance listed at footnote 7. Thus, it may be concluded that the site is Grey Belt land.

2.11 Paragraph 155 of the 2024 Framework provides for the possibility of development in the Green Belt not being regarded as inappropriate subject to it meeting a series of criteria. Having established that the site meets the definition of grey belt land, it is necessary to consider the second element of criterion (a) of paragraph 155, namely whether its loss would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

2.12 It has already been set out above that the site does not contribute to Green Belt purposes (a), (b) and (d). By restricting development beyond urban boundaries Green Belt purpose (e) seeks to encourage the recycling of derelict and other urban land. As such all Green Belt land contributes to this purpose. The redevelopment of this site would therefore be compliant with this purpose. The only Green Belt purpose which could be breached by the proposal is (c) as the development would represent an irreversible encroachment of built form into open and undeveloped countryside. However this area contains the necessary parking and turning facilities for the development as opposed to actual buildings. The encroachment would be very limited and this element of the scheme has been designed to minimise its effect on the openness and visual amenity of the Green Belt through its design and materials. Open and undeveloped countryside would adjoin the site on all sides. Consequently the overall, effect on the countryside character of the remainder of this parcel of Green Belt land would be limited.

2.13 It therefore follows that the loss of the site to development would not fundamentally undermine the purposes (taken together) of the remainder of the Green Belt across the plan area. The site therefore complies with criterion (a) of Paragraph 155.

2.14 Criterion (b) of paragraph 155 states that there must be a demonstrable unmet need for the type of development proposed, in this case a farm shop and café / restaurant.

A recent study by Harper Adams University and the Farm Retail Association showed that Britain's farm shops generate a massive £1.4 billion in sales nationally, with the sector employing 25,000 workers. Farm shops have flourished since the pandemic, with 89 per cent of farm retailers reporting an increase in sales since 2019. Trust was built up through the pandemic as farm retailers could adapt quickly to introduce Covid safe measures and people felt safer shopping in smaller environments as opposed to large supermarkets. The pandemic

has changed many people's shopping habits with consumers preferring to shop and support local more than ever before. People have never been so interested in quality local food and how it is produced, in freshness and in traceability. Customers are seeking out specialist food producers and for some there is a desire to reduced food miles. There is little if any comparable provision within the District to that proposed as part of this application. The proposal would provide facilities which would accord with and be of an appropriate type to meet the demonstrable unmet need . The scheme would therefore accord with criteria (b) of Paragraph 155 of the NPPF.

c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; The site is considered to be in a sustainable location, in line with paragraphs 110 and 115 of the NPPF. The report presented to planning committee in March 2024 did not raise any issues on sustainability or highways grounds with regard to either of these paragraphs (or their former versions in the previous revisions of the NPPF). The proposed development is therefore acceptable in this regard and this condition is therefore met.

(d) Criteria (d) which refers to the "Golden Rules" to be applied to housing development are not relevant in this case.

For all of the reasons set out above it is concluded that the proposal would use grey belt land and would not fundamentally undermine the purposes of the remaining Green Belt across the plan area. It would help to meet the significant and demonstrable unmet need for a farm shop in the District and would be in a sustainable location for its purpose. It would therefore comply with the relevant criteria set out in paragraph 155 of the Framework and the proposed development should not be regarded as inappropriate development in the Green Belt.

3. CONCLUSIONS

3.1 This Grey Belt Statement has reviewed the Green Belt and Grey Belt policies set out within the NPPF and the context of Staffordshire Moorlands local plan and housing supply.

3.2. The site is considered to be Grey Belt land, which is land in the Green Belt which does not strongly contribute to the Green Belt's key purposes. The proposed development would utilise grey belt land and would satisfy all criteria of paragraph 155 of the Framework. For this reason the proposed development would not be inappropriate development.

3.3 The very special circumstances applied in favour of the development and the above further reinforce the acceptability of the proposed development since, in the planning balance, less weight shall be given to the protection of the Green Belt, since this is now not considered inappropriate development.