

[REDACTED]

Sent: 05 December 2025 13:36
[REDACTED]
Subject: Comment Received from Public Access
[REDACTED]

Application Reference No. : SMD/2025/0466 Site Address: The Morgue Villa Road Cheddleton Staffordshire
Comments by: Ben Schoop
From:

Birchtree Dr
Birchtree Dr
Cheddleton

[REDACTED]
Submission: Objection
Comments: To: Staffordshire Moorlands District Council Planning Department

From: Ben Schoop, Birchtree Drive, Cheddleton

Date: 5/12/2025

Application: Conversion of The Morgue, Birchtree Drive, Cheddleton, ST13 7FE, to Holiday Let / Change of Use

Subject: Formal Objection to Proposed Change of Use and Conversion of Listed Building: SMD/2025/0465 & SMD/2025/0466

Dear Sir/Madam,

I am writing to formally object to both the planning application for the change of use of The Morgue to a single holiday let unit and the associated Listed Building Consent application.

I also request that the consultation period be extended due to the inaccessibility of essential documentation on the planning portal, specifically the Statutory Biodiversity Net Gain (BNG) Metric.

1. Inaccessible Statutory BNG Metric (27.98% Claimed Gain)

The application references the document 'Statutory BNG Metric - The Morgue ST13 7FE - v2', which is not accessible on the planning portal. Without access to this document, it is not possible for consultees to:

Verify the claimed +27.98% biodiversity uplift,

Review habitat baselines and post-development conditions,

Assess BNG trading rules, or

Evaluate effects on woodland, scrub, and TPO-protected trees.

As the Council's letter dated 14/11/2025 (received by me on 1/12/2025) allowed 21 days for response, I respectfully request that the consultation period be extended until the BNG metric is made available online or reasonable time is provided to view a hard copy.

2. Unsubstantiated Claims of Antisocial Behaviour

The Planning Statement asserts that the building:

“has been abandoned for many years and is now becoming a location utilised for anti-social behaviour, including drug use,” and

“is subject to break-ins, supporting a requirement for an alternative use.”

Having lived directly overlooking the site for seven years, I have not personally observed drug use, antisocial gatherings, break-ins, vandalism, or emergency service attendance. These claims appear unsubstantiated unless supported by police incident logs, photographic evidence, crime reference numbers, or written confirmation from local policing teams. Assertions without evidence should not form part of the planning justification.

3. Heritage and Listed Building Concerns

The Morgue is a curtilage-listed building, historically linked to the Grade II listed chapel and the wider St Edward's Hospital estate. No independent Heritage Impact Assessment has been submitted.

Concerns include:

Potential physical impacts on the building fabric from conversion works

Changes affecting the setting of the wider historic hospital estate, including visual and activity-related impacts

Loss of tranquillity appropriate to a site of solemn historic interest

The building's former use as a morgue, which carries distinct heritage sensitivity

The BERS survey confirms that internal voids provide a high-value bat roost; works would inherently alter these features. This presents both an ecological concern and a heritage material consideration, as protected species within a listed building must be accounted for under planning law

No detailed heritage or ecological mitigation plan has been included to preserve the building's special architectural, historic, or ecological interest.

Policy Reference: NPPF Paragraphs 194-203; Staffordshire Moorlands Local Plan Policies DC2 and DC5. This fails to meet the requirements of: NPPF paragraphs 205-207 Local Plan Policy DC2 Statutory duties for listed buildings (Planning (Listed Buildings and Conservation Areas) Act 1990)

The proposal's heritage assessment is therefore at best incomplete.

The applicant's heritage statement includes claims that the derelict building is subject to anti-social behaviour, including drug use, as a rationale for conversion. These statements are outside the remit of a heritage assessment and are, without sufficient evidence, unsubstantiated.

Heritage significance should be assessed solely on historic, architectural, and ecological merits, not speculative behaviour or unauthorised activity. Reliance on such claims does not comply with NPPF paragraph 205 or Local Plan Policy DC2.

A full, independent Heritage and Ecological Impact Assessment is essential.

4. Green Belt Considerations (Conditional on Confirmation)

It is understood that the site may lie within the North Staffordshire Green Belt. If this is the case, development is strictly controlled to protect openness, rural character, and tranquillity. The proposed holiday let use would introduce:

Regular short-stay turnover of guests,

Multiple vehicle trips per group,

Night-time arrivals and departures, and

Outdoor activity and lighting.

Even minor alterations, including proposed pathways or changes to openings, could reduce perceived openness. The proposal would conflict with:

NPPF Paragraphs 137-148,

Staffordshire Moorlands Local Plan Policies SS6 and SS10, and

Previous refusals and appeals, including APP/B3438/A/06/2021789.

No very special circumstances have been demonstrated to justify potential harm to Green Belt purposes.

5. Ecology, Trees, Bats, and Biodiversity Concerns

The application relies on ecological documents, including the 2024 Preliminary Ecological Appraisal, Roost Assessment, and BERS report (Sally Hall BSc, August 2024), which confirm:

A brown long-eared bat feeding roost within the central void of B1,

Low numbers of common pipistrelle bats foraging and commuting,

Mature woodland with approximately 70% native composition,

Invasive species requiring management or removal, and

Tree cover protected under TPO SM213A001.

Despite these surveys, significant ecological concerns remain:

The BERS report indicates that conversion would disturb the confirmed brown long-eared bat roost and a Bat Mitigation Class Licence (BMCL) would be required,

Proposed mitigation measures (bat boxes, low-impact lighting) are not sufficiently detailed,

No lighting assessment has been submitted, and

Impacts of increased noise, visitor activity, and short-stay turnover on local biodiversity have not been assessed.

Policy Reference: NPPF Paragraphs 174-180; Staffordshire Moorlands Local Plan Policy DC3.

Without full mitigation and licensing strategies, the proposed development poses a material ecological risk.

6. Likely Guest Profile and Amenity Impact (Former Morgue as a Holiday Let)

It is commercially highly likely that a holiday let within a former morgue will be marketed on its macabre or 'quirky' appeal. This type of building naturally attracts a specific, higher-disturbance visitor demographic, including:

Likely Guest Types Groups of adults (25-40) seeking unusual or immersive weekend stays

Paranormal or 'ghost hunting' groups:

Stag/hen-style groups

Social media influencers seeking visually unusual accommodation (which can include an incredible amount of bright lighting and equipment being used)

Night-time investigation groups (e.g., paranormal vigils)

Visitors motivated by 'dark tourism' or atmospheric properties

Predictable Behaviour Patterns:

Late-night arrivals and departures

Outdoor gathering, smoking, talking, filming at night Increased noise, especially after 10pm

Filming, livestreaming, and bright light use after dark Multiple vehicles per group

Frequent weekend turnover with new parties arriving every Friday/Saturday

Impact on the Local Area:

This behaviour is entirely incompatible with:

Nearby residential properties less than approximately 30m away

The quiet, semi-rural environment

The solemn heritage of the former hospital complex

The tranquillity required within the Green Belt

The presence of bats and other wildlife sensitive to noise and lighting

No management plan, behaviour policy, noise mitigation strategy, or marketing control has been submitted. The likely visitor profile would therefore create a significant and unacceptable loss of residential amenity, contrary to Local Plan Policy DC1.

These activities are completely incompatible with nearby residential properties, the quiet semi-rural environment, and the tranquillity expected within a listed hospital estate

The current resident profile across the St Edward's Hospital estate is predominantly comprised of families and individuals who value the estate's unique character, tranquillity, and carefully managed residential and countryside setting, including its listed status. The introduction of a holiday let is fundamentally inconsistent with this established character, and granting permission for such a change of use would be contrary to the principles intended to preserve the estate's special qualities.

7. Highway and Parking Issues

The proposed parking and access arrangements have not been independently assessed. Concerns include:

Increased traffic from short-stay, high-turnover guests,

Multiple vehicles per group likely exceeding parking capacity,

Narrow internal roads and limited visibility, increasing collision risk,

No evidence of swept-path analysis

Insufficient provision for visitors, deliveries, cleaners, and maintenance staff.

The estate is a family-oriented area with established traffic patterns. Numerous tourist visitors unfamiliar with the site are likely to create additional safety risks, particularly for children.

Policy Reference: Staffordshire Moorlands Local Plan Policies DC1 and T1; NPPF Paragraph 111.

8. Previous Planning History and Precedent

Historical applications between 2005-2009 were refused, withdrawn, or dismissed at appeal, including APP/B3438/A/06/2021789, which cited:

Harm to protected trees,

Harm to the setting of heritage assets,

Insufficient justification for change of use, and

Impact on Green Belt openness.

The current application does not address these previous concerns. Approving it could set an undesirable precedent for conversion of unusual buildings within the Green Belt.

Policy Reference: NPPF Paragraph 14; Staffordshire Moorlands Local Plan policies on cumulative impact, precedent, and Green Belt protection.

9. Summary

The application fails to comply with multiple planning policies, including:

Inaccessibility of the BNG metric,

Confirmed bat roost disturbance without mitigation,

Unsubstantiated claims of antisocial behaviour,

Incomplete heritage assessment,

Potential Green Belt harm (if applicable), and

Insufficient parking and highway safety provision.

Recommendation: The application should be refused. Any future proposal should include:

Full, verifiable BNG calculations,

A detailed heritage mitigation plan,

Operational management controls for occupancy and potential antisocial impacts,

Comprehensive ecological mitigation for confirmed bat roosts, and

Compliance with Green Belt and highway policies.

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.staffs Moorlands.gov.uk/YourData>
