

PLANNING STATEMENT

**PROPOSAL : DEMOLITION OF AGRICULTURAL
BUILDING AND FORMATION OF NEW
VEHICULAR ACCESS AND DRIVEWAY TO
SERVE NEW DWELLING PERMITTED UNDER
APPLICATION SMD/2023/0212**

**ADDRESS : WRAGG HALL FARM, BIDDULPH PARK
ROAD, BIDDULPH, STOKE ON TRENT, ST8 7SJ**

APPLICANT : MR & MRS COTTON

DATE : JANUARY 2026 JOB No.: 2022-2674

CONTENTS:

1.0	INTRODUCTION
2.0	SITE DESCRIPTION
3.0	PROPOSAL
4.0	PLANNING POLICY
5.0	ASSESSMENT
6.0	CONCLUSION

INTRODUCTION

- 1.1 This statement is submitted in support of a full planning application which seeks consent for the demolition of an agricultural building and the formation of a new vehicular access and driveway to serve a new dwelling permitted under application SMD/2023/0212 at Wragg Hall Farm, Biddulph Park Road, Biddulph. The application has been submitted by Sammons Architectural Ltd on behalf of Mr & Mrs Cotton and is accompanied by drawing numbers 2022-2674-16E, 2022-2674-17J, 2022-2674-18C, Planting Schedule Rev A, an Activity Survey for Bats report undertaken by Absolute Ecology (July 2025), Arboricultural Report undertaken by Tree Heritage, Ecological Impact Assessment and Biodiversity Net Gain Report all of which should be read in conjunction with this report.
- 1.2 Permission was granted on the 13th January 2023 (DET/2022/0040) under Schedule 2 Part 3 Class Q of the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended) for the change of use of an existing building into a single dwelling with associated building operations. The dwelling approved under Class Q would comprise of two bedrooms, study, entrance hall, bathroom and store at ground floor and a master bedroom with ensuite, utility, w.c. hallway and open plan living, kitchen and dining room at first floor. Access to the prior approval dwelling was provided by the existing driveway which passed in front of the existing farmhouse and between a separate barn currently being converted to residential use by the applicant's daughter and son in law.
- 1.3 A subsequent scheme which essentially sought to trade off the previously approved class Q conversion scheme in lieu of a full planning application which sought consent for the demolition of the class Q building and the erection of a detached two storey dwelling on the basis of "betterment" was approved under application SMD/2023/0212 in June 2024. Again the access approved as part of the full application was the same as that as the previously approved class Q application which utilised the existing access point off Biddulph Park Road although some improvements to the existing access point were proposed as part of the application.
- 1.4 The applicants now wish to seek consent for the demolition of an existing agricultural building and the formation of a new vehicular access and driveway to serve the previously approved new build dwelling permitted under application SMD/2023/0212. Planning permission for a similar development was submitted to the council in September 2025 under application reference SMD/2025/0420 and refused for the following reasons:
 1. *The application is demonstrably not essential and is therefore not supported under Staffordshire Moorlands Local Plan Policy SS10 which supports only development for which there is an essential locational need in the countryside. Moreover Policy SS10 is to exercise strict control over inappropriate development within the Green Belt allowing only for exceptions as defined by Government policy. The proposal location is in the North Staffordshire Green Belt and constitutes inappropriate development meeting none of the exceptions provided for at paragraphs 154 and 155 of the NPPF and there are no very special circumstances to outweigh the harms identified. Substantial weight should be given to any harm to the Green Belt and any other harm and in this case there would be harm to openness; conflict with Green Belt purpose C to safeguard the countryside*

from encroachment; and harm to the character and appearance of the area by introducing a further and unnecessary access point to Biddulph Park Road at odds with the sparsely populated location which otherwise gives rise to relatively few access drives and road connection points. The proposal is thus found contrary to SMDC Local Plan Policies SS2, SS10 and DC3 and to the NPPF.

2. The road access junction fails to provide adequate visibility in terms advised by the Staffordshire County Highways Officer and is thus found contrary to SMDC Local Plan Policy DC1 and to the NPPF paragraphs 115 and 116 and is contrary to the interests of highway safety.

1.5 Whilst this application still seeks consent for the demolition of the agricultural building and the formation of a new vehicular access and driveway to serve the new dwelling permitted under application reference SMD/2023/0212 a number of amendments have been proposed to the current scheme in an attempt to satisfy the concerns previously raised. These will be discussed in detail below.

2 APPLICATION BUILDING AND ITS SETTING

2.1 Wragg Hall Farm is a working and established holding which extends to some 5.8 hectares. It lies on the eastern side of Biddulph Park Road where the ground rises generally in a north west to south east direction. It comprises of the main farmhouse, which has been extensively extended, along with two large traditional two storey outbuildings and a range of more modern portal framed buildings which are set around a loose courtyard setting.

2.2 For the purposes of this application the application building comprises of a single storey pre-fabricated structure which housed pigs up until circa 2002. It lies to the south east of the existing farmhouse and south west of the large 'L' shaped building which has consent for demolition and erection of a detached two storey dwelling with detached garage.

2.3 The site lies in an attractive rural area which is characterised by loose sporadic scatterings of dwellings and small farmsteads. For the purposes of the Development Plan the application site lies in the North Staffordshire Green Belt.

3. THE PROPOSED DEVELOPMENT

3.1 This is a full application which seeks consent for the demolition of the former pig building and the formation of a new access and driveway. The proposed access would be formed in the south western corner of the application site approximately 70m to the south west of the existing drive which would continue to serve the original farmhouse and a neighbouring barn which is currently being converted into a dwelling by the applicant's daughter and son in law. The proposed access and driveway is intended to provide the dwelling permitted under application SMD/2023/0212 with a dedicated and private arrangement rather than the shared arrangement available under the approved scheme.

3.2 The proposed access would be formed by removing a short section of the existing roadside drystone wall and providing a 2.0m x 2.0m splayed access delineated by a 0.6m high dry

stone wall. A 160m visibility splay shall be provided to the south and 200m to the north set back 2.4m from the highway as indicated. Flanking stone gate posts complete with a 5-bar double timber shall be provided 6.0m back from the highway edge. The proposed access would be formed from tarmac with a cobbled transition strip and a crushed stone driveway with timber edgings.

- 3.3 The proposed access arrangement would be contained entirely within an orchard which lies adjacent to the curtilage of the farmhouse. Whilst every attempt has been made to minimise the impact of the development on the trees contained therein a small number will need to be removed to accommodate the proposal.

4.0 PLANNING POLICY

- 4.1 Section 38(6) of the Planning and Compulsory Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application.

- 4.2 The National Planning Policy Framework (NPPF) which was published on 27th March 2012 and revised in February 2025 replaced a significant proportion of central government planning policy advice with immediate effect. It is the Government's clear intention that the document should be considered to be a material consideration and as such carries particular weight where development is not addressed by planning policies in the existing Development Plan.

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

- Chapter 2 - Achieving Sustainable Development
- Chapter 12 - Achieving Well Designed Places
- Chapter 13 - Protecting Green Belt Land
- Chapter 15 - Conserving and Enhancing the Natural Environment

- 4.4 The Development Plan for the Staffordshire Moorlands comprises of the Staffordshire Moorlands Local Plan which was adopted 9th September 2020. The most relevant policies contained therein are considered to be:

SS1 Development Principles
SS2 Settlement Hierarchy
SS10 Other Rural Areas Strategy
DC1 Design Considerations
DC3 Landscape and Settlement Setting
NE1 Biodiversity and Geological Resources
NE2 Trees, Woodland and Hedgerows
T1 Transport

4.5 For the sake of brevity these policies are not quoted in full but they are referred to where appropriate in the following section.

5.0 KEY PLANNING ISSUES

5.1 The key issues for consideration in the determination of this application are therefore considered to be:-

- The principle of development and whether the proposal is inappropriate development in the Green Belt;
- Impact on openness and landscape value
- Sustainability
- Design and appearance and amenity
- Highway safety
- Ecology

The Principle of Development

5.2 For the purposes of planning policy consideration the application site lies within the North Staffordshire Green Belt. Part 6 of Policy SS10 of the Staffordshire Moorlands Local Plan (the 'Local Plan') states that strict control will be exercised over inappropriate development in the Green Belt, only allowing for exceptions as defined in Government policy. In assessing the previous application the case officer considered that the proposed development did not accord with policy SS10 as it cannot be considered "essential" as the dwelling it would serve already has an approved means of access. Whilst it is accepted that access to the dwelling approved under application SMD/2023/0212 was indeed granted as part of that application via the existing driveway it is also clear that, notwithstanding the improvements secured as part of that application, it would still not meet the current full standards required by the Highways Authority, as admitted by them in their consultation response 13th October 2025.

The point of access proposed as part of this application is in the Highway Authority's own words "optimal for visibility" . The applicant does not wish to use what is considered to be a substandard access and therefore considers the proposed development essential to facilitate the dwelling permitted under application SMD/2023/0212.

It should be noted that the Local Plan was adopted in September 2020 and as it is now more than 5 years old policies contained therein can be considered out of date and paragraph 11 of the NPPF which applies the tilted balance approach is engaged. Furthermore, it is also recognised that the NPPF which was updated in February 2025 is more up to date and should accordingly be afforded more weight in circumstances such as this. This document sets out in paragraph 155 that engineering operations are not an inappropriate form of development in the Green Belt providing they preserve its openness and do not conflict with its purposes. Whilst the development does not therefore constitute inappropriate development in terms of the NPPF, this is qualified as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Openness and landscape value

Paragraph 142 of the NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belt are their openness and their permanence. Paragraph 135 of the NPPF also requires new development to

be sympathetic to the local character, including the landscape setting. LP Policy DC1 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 be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area; and be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance.

Local Plan Policy DC3 refers to Landscape Character and states that the Council will protect and where possible enhance local landscape and the setting of settlements in the Staffs Moorlands by supporting development which respects or enhances the setting of the settlement and conversely resisting development which would lead to a prominent intrusion into the countryside or have a significant adverse impact on the character of the landscape.

The proposed vehicular access would involve the removal of a section of roadside boundary wall and hedgerow and the provision of a reasonably short (126m) narrow (3.7m) access track which would meander through the site avoiding the existing trees and link the new dwelling which has previously been permitted with the public highway. The proposed access would be constructed from a tarmac apron with a cobbled transition strip leading to the access drive which would remain open and unfenced.

In assessing the previous application the case officer commented that "as regards impact on openness of the Green Belt a degree of judgement is involved but at c.130m this is not a short section of driveway creation. At the point of entry to the public road the development would lead to loss of drystone wall, loss of green hedgerow and create a visible broad exposure of the developed track as it climbs the gently rising gradient in its initial 60m or so from the new bell mouth to be created at the road. This would appear as development with attendant disruption and loss to openness."

In response to this the route of the driveway now proposed in the re-submission application offers a more direct route to the new dwelling whilst avoiding the root protection areas of the established trees. The length of the route has therefore been reduced by over 1/5 in length and is now 102m long rather than the previous 127m length. Furthermore, the realignment of the proposed driveway not only reduces its overall width but significantly improves its relationship with the neighbouring property to the south and means that as soon as you enter the driveway it winds to the north underneath the canopy of the trees. This significantly improves the visual amenity of the proposed development and reduces its visual impact as the open aspect along the southern boundary has now been omitted. Views of the proposed driveway from the bellmouth are therefore limited to a very short section of 4.5m before it disappears between the established trees on the site.

It should be noted that the roadside drystone wall could be removed and replaced with a stock proof fence without any prior consent and therefore the loss of the drystone wall referred to in the case officer's previous report should only be afforded minimal weight in the decision making process. In addition whilst the small loss of the roadside hedgerow is unfortunate this again is unprotected and its removal would not require any form of consent. Notwithstanding this a new hedgerow more than 4 times in length would be provided along the southern boundary as shown on the submitted plan.

The design of the driveway which would remain open on both sides and use of materials, crushed stone rather than tarmac would all serve to minimise the impact of the development on the openness of the area. The proposed gate posts and timber field gate are traditional and offer a low

key and understated approach which is in keeping with the rural setting and the development the access and driveway would serve. The overall design of the proposed entrance has taken its cue from the existing access and within this context the proposed vehicle access would not appear incongruous or out of keeping with the character and appearance of the area. The development would be modest in scale and would not appear excessively prominent. Whilst it is accepted that if approved the proposed development would result in three access points in close proximity the fundamental and overriding purpose for choosing this location within the ribbon frontage is purely down to the fact that it affords the optimal position from a highway safety viewpoint. It is noted that Melford Farm to the south has two access points serving a single dwelling. Although close to one of the accesses serving Melford Farm to the south it is not considered that this in itself would be sufficient grounds to warrant refusal of the scheme especially having regard to the fact that the existing access are similarly understated and subdued in nature. Furthermore, the alignment of the road and the bend on the corner means that it all likelihood, if approved the three accesses would not even be visible together and even if they were it would be for a very short section of highway.

Overall the proposed development would preserve the character and appearance of the area and would therefore accord with policy DC1 of the Local Plan which aims to ensure development respects the site and its surroundings, and Local Plan policy DC3 which seeks to protect the local landscape.

Highway Safety

LP Policy T1 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 by ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development. Paragraph 114 of the NPPF states that in assessing applications for development, a safe and suitable access should be achieved for all users. Paragraph 115 goes on to state that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The proposed access and driveway will provide the dwelling permitted under application SMD/2023/0212 with a dedicated and private arrangement rather than the shared arrangement previously proposed. Whilst the existing access arrangement would continue to serve the original farmhouse and barn to the north which is currently being converted to a separate dwelling by the applicant's daughter and son in law it would reduce the number of vehicles and households utilising this arrangement which passes in very close proximity to the principal elevation of the original farmhouse. The current access is not wide enough for two cars to pass, so in this scenario, a vehicle may be required to wait partially on the highway to allow a car to leave the access first. This is a very real and existing risk to highway safety and the improvements provided as part of the proposed development are a significant and material consideration.

Previously the existing access served a single dwelling. Recent applications at Wragg Hall Farm have resulted in two further dwellings being provided. Both of these dwellings are due to the size of the existing buildings to be converted sizeable in nature with both providing an additional 8 bedrooms in total. If separate accesses had been permitted for both the developments then a further two access points would be punctuated along Biddulph Park Road. The provision of a single additional access to serve the most rearward dwelling appears a logical response and would take pressure off the existing access which despite improvements secured as part of the previous consents would remain substandard. The applicant is willing to sign a unilateral undertaking which would restrict users of the proposed access and driveway to those associated with the new dwelling and its domestic use. All vehicular movements to the existing farmhouse

and the barn currently under conversion to the north would, along with all agricultural use of the site be served by the existing access arrangement.

Amenity

Local Plan Policy DC1 requires that all new development protects 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.. Paragraph 131 of the NPPF states that planning should create high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 states, amongst other things, that developments should function well and add to the quality of the area, be visually attractive, sympathetic to local character and history, establish a strong sense of place and create places that are safe, inclusive and accessible with a high standard of amenity for existing and future users.

Given the rural location of the site, the nature of the proposed development and its spatial relationship with the neighbouring residential properties it is not considered that the proposed development would be prejudicial to residential amenity or detrimental to any neighbouring land uses.

It is noted that during the processing of the previous application objections were received from the occupiers of Melford Farm. It is hoped that the realignment of the driveway away from the shared boundary and on the top side of the tree planting will along with the unilateral undertaking provide them with sufficient comfort that the proposed development will not adversely affect them. On this basis it is considered that the proposal is therefore considered to comply with LP Policy DC1 and paragraph 131 and 135 of the NPPF.

Trees

An arboricultural report has been submitted in support of the application. A total of 60 trees, 1 group and 3 hedges were included in the survey. To achieve the proposed new access and drive, it will be necessary to remove 4 trees. These are all Category C trees (T1, T2, T35 & T36). In addition, a small section from both hedges H1 and H3 will need to be removed to allow the new access to pass through the hedges. To achieve the required visibility splay it will be necessary to reduce hedge H3 to 0.6m in height. The submitted arboricultural report identified that the proposed access would result in some minor encroachment into the RPA's of some of the trees on the site (T6 & T34). The proposed drive has therefore been realigned marginally to ensure that the RPA's are respected. The amendments to the design of the proposed access arrangement will ensure that the requirement for special measures will be avoided. All retained trees will be protected during the construction work to make sure that they are not damaged. Subject to such safeguards, which can be secured via an appropriately worded condition, it is considered that the proposal will comply with adopted policy NE1 of the Local Plan and government guidance contained within the NPPF.

Ecology & Biodiversity

A bat activity survey has been submitted as part of the application. Whilst it is not the intention to replicate the results of that report in full here it should be noted that three dusk surveys were conducted. Whilst minor bat activity was recorded throughout each survey period no bats were seen exiting the building. However given that a bat roost is recorded in the buildings adjacent to the site it is considered that Reasonable Avoidance measures should be implemented. Again such safeguards can be secured via an appropriately worded planning condition.

In terms of biodiversity the application has been submitted with an ecological impact assessment and a biodiversity net gain report and accompanying calculation metric. The information provided shows that the application site has an existing pre-development value of 0.81 habit units and 0.06 hedgerow units and that post development these values will be increased by 14.73% and 14.31% respectively thereby meeting the trading rules. Such enhancement will be predominately secured through on site enhancement comprising of the improvement of an area of modified grassland to good condition lowland meadow and the improvement of a small area of poor condition mixed scrub to good. The submitted bat report also proposes a number of biodiversity enhancements in relation to the provision of appropriate bat and bird boxes and native planting. Again such ecological and biodiversity enhancements can be secured via an appropriately worded planning condition.

6.0 CONCLUSION

The application proposes an appropriate form of development within the Green Belt which would not harm its openness or visual amenity. Should the council disagree with this conclusion then it is considered that the benefit to highway safety in terms of providing a new and dedicated access and driveway arrangement to take pressure off the existing arrangement which would, despite the improvements secured as part of the previous applications be improved, still be substandard constitute very special circumstances which would override any harm. In addition it is considered that the realignment of the proposed driveway so that it is further north and away from the shared boundary with Melford Farm with a significant degree of existing and established tree planting between would also significantly improve the relationship with the neighbouring property and would when considered with the proposed unilateral undertaking which would restrict use of this access and driveway solely to the occupiers of the single new dwelling and not in use or connection with any of the other dwellings on the site or any agricultural use also provide additional comfort in this respect. Furthermore, it is considered that the access and its dimensions now meets the requirements from the Highway Authority and that the second stand alone reason has been also been overcome. Accordingly the proposal complies with policies SS10, DC1, DC3, T1 of the Staffordshire Moorlands Local Plan and guidance contained within the National Planning Policy Framework.