

Planning Statement

Erection of self-build dwellinghouse and associated works
The Orchard, Lower Hill Farm, Draycott-in-the-Moors
For Mr. & Mrs. Finney

Contents		Page No
1.0	Introduction	3
2.0	Site Description	4
3.0	Planning Policy	6
4.0	Other Material Considerations	11
5.0	Statement of Case	12
6.0	Conclusion	21

1.0 INTRODUCTION

- 1.1. Hewitt & Carr Services has been instructed by Mr. & Mrs. Finney to prepare a Planning Statement to accompany an application by Hewitt & Architects for the erection of a self-build detached dwelling on land at The Orchard, Lower Hill Farm, Uttoxeter Road, Draycott-in-the-Moors.
- 1.2. The application represents a resubmission following the refusal of application SMD/2025/0302 which had also proposed the erection of a self-build dwelling on the site, but which was refused for the following reasons:
 1. Due to the significant land level change between the application site and neighbouring dwellings to the west/south-west, the proposed development would result in an unacceptable one-way overlooking relationship to the detriment of existing and future occupants of the dwellings identified as 'Clock Cottage' and 'The Cottage' on drawing number PL(0)06 Rev A. The application is therefore contrary to policies DC1 and H1 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework, including section 12 'Achieving well-designed places.'
 2. It has not been demonstrated that the scheme can deliver biodiversity net gain as required within policy NE1 of the Staffordshire Moorlands Local Plan and the NPPF, including section 15 'Conserving and enhancing the natural environment.'
- 1.3. This revised application has sought to address the concerns raised by the Local Authority in the previous application and incorporates a number of revisions, specifically:
 - Re-positioning of the dwelling closer to the northern and eastern site boundaries so that the property sits further away from the neighbouring properties to the west / southwest
 - Removal of south facing principal window serving primary bedroom which lay closest to southwestern site boundary.
 - Provision of new east facing window to bedroom 2
 - Formation of Biodiversity Enhancement Area to northwest corner of the site.
- 1.4. The dwelling will retain its proposed 'L' shaped form which will be part single storey and part two storey in scale. The two storey part of the dwelling will stand to a ridge height ranging between 7.2m and 7.5m (the difference owing to modest changes in levels across the site). The gross internal floor area of the dwelling will be 255.42 square metres.

- 1.5. The accommodation of the dwelling will comprise of an open plan lounge / kitchen / dining room, utility room, boot room, pantry, w.c. office and games room at ground floor with stairs leading up from a hallway to four bedrooms (one ensuite) and a family bathroom at first floor level.
- 1.6. The dwelling will be sited further towards the northeast corner of the site compared to the previously refused scheme, with a large area of private amenity space provided to south / southwest of the dwelling.
- 1.7. Vehicular access to the site will be taken via the existing track serving Draycott Nurseries to the north, which connects with the Cheadle Road further to the northwest.
- 1.8. To the south/southeast of the dwelling it is proposed to erect a detached double garage, occupying a floor area of 36 square metres and standing to a ridge height of 5.5 metres. The garage will be served by a new driveway that will run in front of the dwelling and broadly parallel to the southwestern site boundary.

2.0 SITE DESCRIPTION

- 2.1. The application site is located within the village of Draycott-in-the-Moors, on a parcel of land that is washed over by the North Staffordshire Green Belt. The site currently comprises a parcel of grassland that is sandwiched in between surrounding built development. The land is modestly elevated above the land to the west and south and is well enclosed by mature vegetation.
- 2.2. To the west / southwest of the site lie a pair of semi-detached cottages known as The Cottage and Clock Cottage. Those properties lie at a lower level to the application site but are largely screened from view from the site by existing boundary vegetation.
- 2.3. Further to the southwest and running along the southern boundary of the site lies the former Draycott Arms Public House (now a restaurant called Villa Verde) and its associated car park. To the southeast of the site lies Lower Hill Farm, whilst to the north and northeast lie buildings associated with Draycott Nurseries.
- 2.4. A protected tree is located towards the northwest corner of the site but no development is proposed in its vicinity. A further protected tree lies off site to the south, adjacent to the car park of Villa Verde.
- 2.5. The site occupies a sustainable location circa 2.5km from the centre of Blythe Bridge, which is acceptable on foot along the Uttoxeter Road, which benefits from illuminated footways along its length. There are also weekday bus services on the Uttoxeter Road to collect school children. Draycott Moor College and Draycott Sports Centre also lie within walking and cycling distance of the site.

3.0 PLANNING POLICY

- 3.1. Paragraph 11 of the NPPF confirms that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.2. 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:
- 3.3. 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.
- 3.4. 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.

3.5. Policy SS9 of the Local Plan relates to the 'Smaller Villages Area Strategy' and 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. This will be achieved via a number of actions, including:

- Enabling limited new housing development, including small infill schemes 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
- 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.

3.6. 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. This will be achieved via 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
- Maintaining the Green Belt. Strict control will continue to be exercised over inappropriate development in the Green Belt allowing only for exceptions as defined by Government policy.

3.7. Policy H1 of the Local Plan relates to 'New Housing Development' and states that outside the development boundaries, limited infill residential development of an appropriate scale and character for the Spatial Strategy will be supported provided that:

- The development is well related to the existing pattern of development of a smaller village and will not create or extend ribbon development or lead to sporadic pattern of development; and
- In all cases the development will not lead to a prominent intrusion into the countryside or have a significant adverse impact on the character and appearance of the countryside.

3.8. Policy H1 also states that:

- New housing 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.
- 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.
- 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.
- 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.
- All new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupants of the dwellings whilst respecting the privacy and amenity of occupants of existing dwellings.
- Housing development on sites not allocated for such purposes in Policy H2 will be supported within the development boundaries of the towns and larger villages subject to compliance with the Spatial Strategy and wider Local Plan policies
- When development is located in the Green Belt, national Green Belt policy will apply.

3.9. 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 (amongst other requirements):

- be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area

- 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
- 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
- promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate
- provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use
- require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links

3.10. Policy NE1 of the Local Plan relates to 'Biodiversity and Geological Resources' and states that the biodiversity and geological resources of the District will be conserved and enhanced by positive management and strictly control by, amongst other measures:

- By ensuring all development schemes have regard to the surveys and actions recommended by the Council's Extended Phase 1 Habitat Surveys and Local Wildlife Assessment, and include measures for protection and enhancement of site biodiversity and protection of any geodiversity as appropriate.
- 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.

3.11. Policy NE2 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.

4.0 MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 4.1. The National Planning Policy Framework (NPPF) seeks to secure the delivery of sustainable development and sets out policies, *inter-alia*, in respect of safeguarding the green belt, significantly boosting the supply of housing including the delivery of rural housing, securing high quality design, ensuring highway safety and achieving a net gain to biodiversity. The content of the NPPF has been taken into consideration in the preparation of this application.

SMDC Design Guide SPD

- 4.2. The adopted Design Guide SPD and its accompanying New Dwellings and Extensions SPG, seek to secure the delivery of high quality design within the District and includes guidance on new housing development. The content of the Design Guide SPD has been taken into consideration in the preparation of this application.

SMDC Space About Dwellings SPG

- 4.3. The adopted Space About Dwellings SPD provides a series of numerical standards that new development should seek to achieve in the interests of safeguarding residential amenity. The content of the Space About Dwellings SPG has been taken into consideration in the preparation of this application.

SMDC 5 Year Housing Land Supply Interim Statement April 2025

- 4.4. The Housing Land Supply Statement confirms that the Local Authority has a 2.95 year supply of housing against the five year requirement, and a revised annualised housing requirement of 461 dwellings per annum. Reference is made to the matter of housing land supply within the Planning Assessment.

5.0 PLANNING ASSESSMENT

Green Belt

- 5.1. The application site is located within the North Staffordshire Green Belt and comprises a parcel of vacant grassland that is sandwiched in the middle of a cluster of existing built development within the village of Draycott-in-the-Moors.
- 5.2. Policies SS9 and 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. Those exceptions are set out within paragraphs 154 and 155 of the National Planning Policy Framework.
- 5.3. Paragraph 154 of the Framework allows for:

“limited infilling in villages”
- 5.4. The proposal is considered to amount to limited infilling, as the site lies sandwiched in between The Cottage and Clock Cottage to the west of the site, Villa Verde to the southwest, Lower Hill Farm to the southeast and the cluster of buildings and associated development associated with Draycott Nurseries to the north and northeast. The proposed quantum of development furthermore amounts to a ‘limited’ amount of development.
- 5.5. The site is furthermore held to lie within the village of Draycott-in-the-Moors. The site and its immediate surroundings form part of a historic cluster of built development in and around the junction of the Uttoxeter Road and Cheadle Road. That development extends eastward and westwards from the site, as well as on the southern side of the Uttoxeter Road. Historic Ordnance Survey mapping of the area furthermore attests to the cluster of development around this junction comprising the historic core of the village (see image in Figure 1 below). The application site is therefore held to be located “in a village”.

Figure 1 – Extract of 1945 Ordnance Survey Map (Source: NLS)



- 5.6. Having regard to the above considerations it is concluded that the proposal amounts to limiting filling in a village, and as such constitutes an appropriate form of development within the Green Belt in accordance with paragraph 154(e) of the National Planning Policy Framework.
- 5.7. In assessing the previous application on the site, the Local Authority did not reach a conclusion as to whether the proposal amounted to limited infilling in the Green Belt. They instead found the proposal to amount to an appropriate form of development in the Green Belt on account of the proposal meeting the tests for grey belt development as set out in paragraph 155 of the NPPF. A copy of the Local Authority's delegated report is enclosed as Appendix A to this Planning Statement which I do not seek to repeat here. Nevertheless, the overall conclusion reached by the Local Authority on Green Belt matters was that:

*"From the above analysis it is concluded that the scheme meets the tests of paragraph number 155 and therefore **the principle of a new residential dwelling on this site is acceptable (not inappropriate)**"*
(our emphasis)

- 5.8. Those conclusions continue to apply to this latest application which encompasses the same general proposal and the same site as application SMD/2025/0302, and there has been no material change in circumstance since that application was determined.
- 5.9. The submitted proposal is therefore concluded to represent an appropriate form of development within the Green belt in accordance with both paragraphs 154(e) and paragraph 155 of the National Planning Policy Framework, and in turn meets the requirements of policies SS9, SS10 and H1 of the Local Plan.

Rural Housing

- 5.10. The site is located within the rural area and forms part of the built up area of the smaller village of Draycott-in-the-Moors. Both policies SS9 and SS10 of the Local Plan allow for new residential development in such areas where it accords with the provisions of policy H1 of the Local Plan.
- 5.11. Policy H1 of the Local Plan confirms that new residential development will be permitted within the rural area where the development is well related to the existing pattern of development of a smaller village and will not create or extend ribbon development or lead to sporadic pattern of development. Policy H1 also requires that development must not lead to a prominent intrusion into the countryside or have a significant adverse impact on the character and appearance of the countryside.
- 5.12. The submitted proposal is considered to be well related to the existing pattern of development of this smaller village, infilling an existing gap in amongst the clustered pattern of development that exists in and around the junction of the Uttoxeter Road and the Cheadle Road.

- 5.13. By virtue of its enclosure by surrounding built development and mature vegetation, the proposal will furthermore not lead to a prominent intrusion into the countryside or have a significant adverse impact on its character and appearance.
- 5.14. We consequently submit that the proposed development is in full accordance with the requirements of policy H1 of the Local Plan, and in turn also accords with the provisions of policies SS9 and SS10 of the Local Plan. The Local Authority raised no concerns in respect of such matters in its assessment of application SMD/2025/0302,

Design & Layout

- 5.15. The adopted Design Guide SPD and accompanying New Dwellings and Extensions SPG set out a number of parameters which development should seek to adhere to in order to deliver high quality design that is appropriate to the District. The guidance includes, *inter-alia*, the following requirements:
- **Buildings should sit comfortably in the landscape – best achieved by emulating the horizontal, ground-hugging form of traditional buildings with their strong eaves and ridge lines:** The proposed dwelling accords with this objective, comprising a dwelling with cottage-esque proportions, and being part two storey / part single storey in scale.
 - **A new dwelling should respect the scale of those surrounding it.** The surrounding area is characterised by two storey development which the scale of the proposed dwelling responds positively to.
 - **A balance of proportions between the overall shape of the walls and the openings they contain:** The proportions of the dwelling are appropriate, and achieve a two thirds elevation / one third roof approach which is traditional of the Moorlands.
 - **Using a similar size and proportion of opening throughout.** The proposed window sizes and proportions are generally consistent throughout.
 - **Limiting the number of openings to achieve a high solid to void ratio.** The proposed development will achieve a high solid to void ratio in accordance with this objective.
 - **Arranging the openings harmoniously, often in a formal, symmetrical manner:** The proposed development encompasses a simple arrangement of openings, with windows arranged in columns.
 - **Sited to maximise solar gain and increasing proportion of glazing on south facing elevations;** The proposed dwelling has been sited so that it will benefit from solar gain and provide good levels of natural daylight to its principal rooms.

- **The roof form should be simple with a dominant roof line and, where appropriate to the locality or the building, emphasised by gables:** The proposed dwelling encompasses a dominant roof line, emphasised by gable ends.
 - **The roof should span the shorter side where practicable:** The proposed roof spans the shorter side of the roof.
 - **Flat roofs should be avoided:** No flat roofs are proposed.
 - **The roof pitch and materials should match those of the locality:** The proposed roof pitch is consistent with the vernacular of the Moorlands and will facilitate the use of Staffordshire Blue plain clay tiles.
 - **Window patterns should be aligned in columns and storeys rather than randomly placed:** The proposed development accords with this objective.
 - **The emphasis should be on vertical proportions which is in keeping with the style and tradition of the locality;** Vertical emphasis is achieved by way of the arrangement of openings in columns and vertical emphasis to the majority of the windows.
 - **Window frames should be recessed by a minimum of 50mm to avoid a flat appearance to the elevation and to emphasise the solidity of the walls:** The applicant is agreeable to recessing the proposed windows to accord with this requirement, and this can be secured by way of an appropriately worded condition.
 - **Traditional surround to doors and windows should be incorporated, for example stone cills and lintels;** The proposed development encompasses the provision of stone cills and lintels, as well as utilised corbelled eaves.
- 5.16. The above assessment serves to demonstrate that the proposed development responds positively to the Local Authority's adopted guidance, and encompasses a design that will be in keeping with the character and appearance of the area and wider Moorlands vernacular.
- 5.17. In terms of layout, the dwelling has been carefully sited within the plot in order to maximise the availability of garden space and to achieve a southerly and westerly aspect to the main principal rooms. Its layout respects that of surrounding built development and will preserve the existing vegetative boundaries.
- 5.18. The gross internal floor area of the dwelling (254.42 square metres) will furthermore exceed the minimum required standard set out within the DCLG Technical Housing Standards. The proposed development will therefore provide an acceptable level of amenity for future occupiers of the dwelling.

- 5.19. In terms of wider visual impact considerations, the site is sandwiched in amongst surrounding development and screened by existing vegetation which will serve to minimise its impact on the character and appearance of the surrounding landscape.
- 5.20. The Local Authority arrived at similar conclusions in its assessment of application SMD/2025/0302, commenting that:

"There are no particular objections to the design of the dwelling. The gables, windows and doors are well- proportioned and there is a good solid to void ratio on all elevations. The use of eaves intersecting window design is acceptable as it allows a lower eaves level and visually better proportioned dwelling. No objections to the 'L' shaped footprint, and the varying ridge heights and proposed porch add visual interest. No objections to the proposed render and brick wall mix, both bricks and render type could be conditioned in the event of the application being approved" (our emphasis)

- 5.21. As the design of the proposed dwelling is largely unaltered from that previously considered, aside from some alterations to fenestration, the previous conclusions remain relevant. The re-siting of the dwelling further towards the northern and eastern site boundaries similarly does not lead to an alternative conclusion. The proposed development is consequently held to meet the requirements of policies SS1, SS9, SS10 and DC1 of the Local Plan in this regard.

Highway Safety

- 5.22. The proposed dwelling will be accessed via the existing driveway that also serves the adjacent Draycott Nurseries site. The junction of that access onto the Cheadle Road affords good visibility in both directions on egress and is wide enough for two vehicles to pass one another. It will continue to be a safe point of egress onto the public highway.
- 5.23. The proposal furthermore makes provision for the parking of at least three vehicles, thereby meeting the Local Authority's adopted car parking standards for a four bedroomed dwelling. Two of those will be accommodated within the detached garage that is to be built to the south of the dwellinghouse.
- 5.24. As a consequence of the above considerations, the proposed development will not give rise to any severe residual impacts to highway safety within the locality and accords with the provisions of the National Planning Policy Framework in this regard.
- 5.25. Both the Local Authority and the Local Highway Authority concluded likewise in their assessment of the previous application which encompassed the same site layout and means of access as this current application, No harm to highway safety will therefore ensue as a consequence of the development.

Impact on Trees

- 5.26. There is protected tree located in the far northwest corner of the site, but that specimen will be wholly unaffected by the proposed development since no works of construction are proposed within its vicinity. Similarly, the off-site protected tree to the south/southwest will likewise be unaffected by the development which will be located well away from that specimen. No harm to protected trees will therefore ensue. The Local Authority concluded likewise in its assessment of application SMD/2025/0302 with the Tree Officer raising no objections. The proposal is therefore concluded to meet the requirements of policy NE2 of the Local Plan.

Residential Amenity

- 5.27. The first reason for refusal of application SMD/2025/0302 cited concerns that the proposed dwelling could cause harm to the amenity of neighbouring properties to the west of the site, specifically The Cottage and Clock Cottage. They noted that there is clear change in land levels between the site and concluded that there would be overlooking from the new house of those properties, including their rear windows and garden areas.
- 5.28. Concerns were also raised by the Local Authority that the dwelling has the potential to be very imposing in its presence due to its proximity to those properties and its height. The Local Authority also comments that whilst the proposal meets the separation distances set out within the Space About Dwellings SPG, the standards recognise that on sloping sites, or sites with unusual characteristics, a greater distance is required.
- 5.29. In response to those concerns the scheme has been revised, including the removal of the closest first floor principal window in the southern and the provision of a new window in the eastern elevation to serve bedroom 2, such that the western facing window can be fitted with obscure glazing. The siting of the dwelling has also been revised so that the dwelling will now sit further away from the southwestern site boundary.
- 5.30. The site layout plan has also been updated to show the extent of the existing boundary vegetation (identified as Hedge H3 and Group G2 within the submitted Arboricultural Report). Additional hedgerow planting is also now proposed along the southwestern site boundary so as to further reduce the prospect of any overlooking of neighbouring properties.
- 5.31. As is evidenced from that section drawing, the existing Group G2 Ash Hedgerow provides a strong visual screen to the gardens beyond such that no overlooking of those properties will arise. By amending the design of the dwelling to remove the south facing window to the principal bedroom and providing obscure glazing to the west facing window of bedroom 2, no overlooking of neighbouring properties to the west / southwest will arise.

- 5.32. It is submitted that a suitably worded planning condition can be imposed to ensure that such landscaping is provided / retained in perpetuity. A condition can similarly be imposed to ensure that it is retained to a minimum height in the interests of safeguarding residential amenity in the long term. The vegetation in question is under the ownership of the applicant and within the red edge of the application site, and thus a condition of this nature would meet the tests for conditions.
- 5.33. Turning to the matter of the Space About Dwellings SPG and the minimum interface distances set out therein, it is noted that the usual required interface distance for a scenario where there are two principal windows facing one another would be 22 metres. In this particular case the facing principal windows will be at ground floor only, and there will be a minimum distance of 33.5 metres between the two buildings – far in excess of the recommended minimum and equivalent to an extra 2 metre per 1 metre change in levels. We submit that the distances involved is sufficient to account for the change in levels between the two sites.
- 5.34. The neighbouring properties are also noted to have long, fairly spacious rear gardens, which coupled with their distance from the proposed dwelling, the intervening planting that exist, and which will be retained, coupled with the reduction in ground levels proposed within the site itself (as shown on the section drawings) we submit that no overbearing impact will arise such that it would be deemed harmful to residential amenity.
- 5.35. It is consequently submitted that the revised proposals have served to address the first reason for refusal of application SMD/2025/0302 and that no harm to neighbouring amenity will ensue. The proposal is duly held to meet the requirements of policies DC1, and H1 of the Local Plan and guidance set out within the Space About Dwellings SPG and the NPPF.

Biodiversity Impact

- 5.36. The second reason for refusal of application SMD/2025/0302 raised concerns that whilst the proposal was exempt from statutory biodiversity net gain requirements, both policy NE1 of the Local Plan and the provisions of the NPPF seek to ensure that development achieves a net gain to biodiversity.
- 5.37. Policy NE1 of the Local Plan stipulates that the Local Authority will conserve and enhance the biodiversity of the District by a number of measures, including:
- “Expecting all development **where possible** seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development”*
- 5.38. The applicant has commissioned an updated Preliminary Ecological Assessment and Biodiversity Net Gain Report to accompany the application. A new biodiversity enhancement area is proposed in the far northwest corner of the site, which will enable a 0.11% net gain to be achieved. In doing so the development has addressed the second reason for refusal of application SMD/2025/0302 and is consistent with the provisions of policy NE1 of the Local Plan and the NPPF.

Other Material Considerations

- 5.39. 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 (2.95 years supply as confirmed by the recent report to the Growth and Economy Committee).
- 5.40. 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.*
- 5.41. 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 demonstrated that it amounts to an appropriate form of development within the Green Belt (paragraph 11(d)(i) of the NPPF refers). The Local Authority concluded likewise in its assessment of the previous application.
- 5.42. 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)
- 5.43. Social and economic benefits will be derived through the delivery of a new dwelling 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.
- 5.44. The Local Authority has a long history of housing under-supply and at no point since 2014 has the Local Authority delivered sufficient housing to meet the annualised housing requirement of 320 dwellings per annum, as set out in policy SS3 of the Local Plan.
- 5.45. The Local Authority's Housing Land Supply now stands at 2.95 years, which has given rise to an increased annualised housing requirement of some 461 dwellings

per annum as confirmed by its 5 Year Housing Land Supply Interim Statement April 2025. The proposed development, whilst only proposing one dwelling, will make a valuable contribution towards addressing that shortfall and as such is considered to carry significant weight in favour of permission being granted.

- 5.46. 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, and that there will also 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. Adjusted for inflation those figures will now be somewhere in the order of £6,500 for the initial one-off spend, and £12,300 spend per annum. Such economic benefits lend further significant weight in favour of the proposed development.
- 5.47. The site also constitutes a sustainable location for new development, as confirmed by the Local Authority in its assessment of application SMD/2025/0302. The site is within walking and cycling distance of day-to-day services and facilities on offer within the village and within the larger village of Blythe Bridge further to the west (2.5km distant). There is also a school pick up / drop off bus service nearby on the Uttoxeter Rod. Such environmental benefits lend further weight in favour of approval being granted.
- 5.48. It is submitted that these collective benefits are significant, and 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.

6.0 CONCLUSION

- 6.1. The proposed development amounts to limited infilling within a village, as well as the re-development of a grey belt site, and thus constitutes an appropriate form of development within the Green Belt.
- 6.2. The proposed dwelling will furthermore be well related to the existing pattern of development within this smaller village and will not create or extend ribbon development or lead to a sporadic pattern of development.
- 6.3. The design and layout of the development will be in keeping with Moorlands vernacular and not lead to any adverse impact to the character and appearance of the surrounding area.
- 6.4. The proposal is also acceptable from a highway safety and tree impact perspective.
- 6.5. The revised proposal has served to demonstrate that neighbouring residential amenity will be safeguarded by the proposal, and that a net gain to biodiversity can be secured, thereby addressing the reasons for refusal of application SMD/2025/0302.
- 6.6. The presumption in favour of sustainable development continues to be engaged by this proposal, and it is submitted that the proposed dwelling will derive a number of material benefits that will not significantly and demonstrably outweighed by any adverse impacts.
- 6.7. The proposed development is consequently held to meet the requirements of policies SS1, SS9, SS10, H1, DC1, NE1 and NE2 of the Staffordshire Moorlands Local Plan and guidance contained within the National Planning Policy Framework, Design Guide SPD and the Space About Dwellings SPG.
- 6.8. Planning permission should therefore be granted in accordance with the presumption in favour of sustainable development.