

Planning Statement

Erection of self-build replacement dwelling
and associated works
Bracks Farm, School Lane, Freehay
For Mr. L. Bagnall

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1.0 INTRODUCTION

- 1.1. Hewitt & Carr Services Ltd. Has been instructed by Mr. L. Bagnall to prepare a Planning Statement to accompany a revised full planning application for the erection of a new self-build dwelling at Bracks Farm, School Lane, Freehay.
- 1.2. The application represents a resubmission following the refusal of application SMD/2026/0045 which had also proposed the erection of a new self-build dwelling on the site. That application was refused for the following four reasons:
 1. Due to the prominent, exposed location of the site, a dwelling of this size and scale would be wholly inappropriate in the rural character of the countryside landscape. The existing outbuildings at the site are all single storey and therefore sit unobtrusively amongst the landscape. There can be no doubt that the proposed replacement dwelling would have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling, resulting in a prominent intrusion into the countryside. For these reasons there is conflict with Policies SS1, SS2, SS10, H1 and DC3 of the Staffordshire Moorlands Local Plan and the NPPF.
 2. The proposed demolition of the farmhouse would result in the total loss of significance of a non-designated heritage asset, which is illustrative of rural vernacular construction in the locality. There would be no heritage-related public benefits which would outweigh the total loss of the non-designated heritage asset. Therefore, the proposal cannot be supported from a conservation perspective as it would conflict with policy DC2 of the Council's Local Plan and section 16 of the NPPF.
 3. The proposed dwelling is of a considerably larger size and scale to the existing farmhouse, reading completely differently to the simple, small farmhouse and collection of associated outbuildings. The proportion of roof to elevation is too top heavy, which is considered off-balance and disproportionate. Furthermore, the proposed dwelling incorporates an excessively large amount of glazing. The glazing would illuminate the surrounding countryside and the dwelling would incongruously stand out amongst the isolated, rural landscape. For these reasons combined, the design of the proposed dwelling is considered inappropriate, contrary to policies DC1 and DC3 of the Council's Local Plan and section 12 of the NPPF.
 4. Insufficient information has been provided which definitively demonstrates that the proposed development would deliver mandatory biodiversity net gains, and that any net gain would be secured long term. The development is therefore contrary to Policies SS1, NE1 and DC1 of the Staffordshire Moorlands Local Plan.
- 1.3. This revised proposal has sought to constructively respond to the concerns raised within the previous application and has involved a complete re-design of the

property, such that it now entails a much smaller building or vernacular design and appearance.

- 1.4. The dwelling will have a rectangular plan form, with symmetrically designed front elevation, traditional header and cill detailing, and a high solid-to-void ratio. The dwelling is to be constructed from red/orange facing brickwork with a Staffordshire Blue tiled roof atop.
- 1.5. The proposed dwelling will have a gross internal floor area of 152.2m² which represents a substantial reduction of 430.7m² compared to the previously refused scheme. The ridge height of the proposed dwelling has also been significantly reduced, down from 9.7 metres to 7.54 metres – a reduction of 2.18 metres.
- 1.6. The accommodation of the dwelling will comprise of an open plan lounge / dining room, kitchen, utility, w.c, study and hallway at ground floor, with stairs leading up to four bedrooms (one ensuite) and a bathroom at first floor level.
- 1.7. To the east of the farmhouse lies a cluster of four outbuildings, with buildings 1, 2 and 3 used for storage, whilst building 4 is part used as an annex, with the remainder utilised for storage. Collectively these four buildings have a gross floor area of 461.08m². The application proposes the removal of buildings 1, 4 and part of building 3. Building 2 and part of building 3 is to be retained.
- 1.8. Vehicular access to the new dwelling is to be taken via a new driveway that is currently subject to a separate planning application currently under consideration by the Local Authority (SMD/2026/0160 refers). Parking for up to three vehicles to be provided to serve the dwelling.
- 1.9. The application also proposes a series of biodiversity enhancements including new tree and hedgerow planting and the formation of a new wildlife pond within the site.

2.0 SITE DESCRIPTION

- 2.1. The application site is located within the rural area and comprises a farmhouse and cluster of associated outbuildings located on the northern side of School Lane.
- 2.2. The existing vehicular access to the site lies approximately 67 metres northeast of its junction with Barkers Bank. The access lies close to an existing bend in the carriageway to the southwest.
- 2.3. A mature indigenous hedgerow encloses the southern and south-eastern site boundaries which front towards School Lane, save for a gap where the existing vehicular access is located. Open fields otherwise enclose the site on all sides.
- 2.4. Beyond the existing frontage hedgerows there is a wide highway verge with pedestrian footways that connects with the A522 further to the west and Freehay village to the northeast.
- 2.5. The application site is not located within a Conservation Area, nor are there any statutory listed buildings located in close proximity of the site. The existing farmhouse is nevertheless identified by the Local Authority as constituting a non-designated heritage asset. The site is located wholly with Flood Zone 1 (low-probability of flooding).

3.0 PLANNING POLICY

- 3.1. The Town and Country Planning Act 1990 (As Amended) 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 this 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, including starter 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 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. The

policy states that the Council and its partners will achieve this through 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.
- 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

3.5. Policy H1 of the Local Plan relates to 'New Housing Development' and states that in the other rural areas on the following types of development will be permitted:

- a) Affordable housing which cannot be met elsewhere, in accordance with Policy H 3.
- b) A new dwelling that meets an essential local need, such as accommodation for an agricultural, forestry or other rural enterprise worker, where the need for such accommodation has been satisfactorily demonstrated and that need cannot be met elsewhere.
- c) Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area.
- d) The conversion of rural buildings for residential use where the building is suitable and worthy in physical, architectural and character terms for conversion; or where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets.
- e) Proposals to redevelop previously developed land provided it is not of high environmental value.
- f) The subdivision of an existing residential dwelling provided it is not in an isolated location

3.6. Policy H1 also states that, in line with Government legislation, the Council will maintain and update a register of those interested in acquiring self-build / custom-build housing plots across the District. The policy also states that 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. The

policy also requires that all new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers of the dwellings whilst respecting the privacy and amenity of occupiers of existing dwellings.

- 3.7. 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:
1. be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area
 2. 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
 3. create, where appropriate, attractive, active, functional, accessible and safe public and private environments which incorporate public spaces, green infrastructure including making provision for networks of multi-functional new and existing green space (both public and private), landscaping, public art, 'designing out crime' initiatives and the principles of Active Design
 4. incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of the development
 5. 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
 6. promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate
 7. provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use
 8. require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links
 9. ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed
 10. ensure, where appropriate, equality of access and use for all sections of the community

11. be served by high speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.

3.8. Policy DC2 of the Local Plan relates to 'The Historic Environment' and states that:

1. The Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.
2. Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF .
3. All applications likely to affect heritage assets will require the submission of a heritage statement, including a qualitative visual assessment where appropriate.
4. Where development is likely to affect archaeology, both designated and undesignated, the Council requires the submission of a desk based assessment, and where appropriate, field surveys and trench evaluation by a qualified professional.
5. Where the loss of significance is unavoidable, recording should take place and this should be added to the Historic Environment Record as a minimum, held by Staffordshire County Council.
6. The Council will continue its proactive approach to heritage assets at risk and welcomes development proposals which would result in the sympathetic reuse of these assets in line with NPPF policy.
7. The Council will promote development which sustains, respects or enhances buildings and features which contribute to the character or heritage of an area and those interests of acknowledged importance through the use of Conservation Area Appraisals, Design Guidance and Statements, Archaeological Assessments, Characterisation Studies and Masterplanning.

3.9. Policy DC3 of the Local Plan relates to 'Landscape and Settlement Setting' and states that the Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands by:

- 1 Resisting development which would lead to prominent intrusion into the countryside or have a significant adverse impact on the character or the

setting of a settlement or important views into and out of the settlement as identified in the Landscape and Settlement Character evidence;

- 2 Supporting development which respects and enhances local landscape character and which reinforces and enhances the setting of the settlement as identified in the Landscape and Settlement Character evidence;
- 3 Supporting developments which conserve or enhance the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds;
- 4 Supporting opportunities to positively manage the landscape and use sustainable building techniques and materials which are sympathetic to the landscape;
- 5 Ensuring that development does not adversely affect the wider setting of the Peak District National Park.

3.10. Policy T1 of the Local Plan relates to 'Development and Sustainable Transport' and 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 and accommodates residual development traffic in line with the Integrated Transport Strategy. This will be achieved by (amongst other measures):

- Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 2.

3.11. Policy NE1 of the Local Plan relates to 'Biodiversity and Geological Resources' and states that the biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to relevant ecological evidence) by (amongst other measures):

- 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.

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 securing high quality design, encouraging the delivery of self-build dwellings, 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 sets out guidance aimed at securing the delivery of high quality new development within the District. The content of the Design Guide SPD has been taken into consideration in the preparation of this application.

5.0 PLANNING ASSESSMENT

Principle of Development

- 5.1. The application site is located within the rural area wherein policies SS10 and H1 seek to restrict new housing development to a limited number of specific categories. One of the types of development allowed for within the rural area is:

“Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area”
- 5.2. Policy H1 of the Local Plan also affords support for the delivery of self-build dwellings within the District, reflecting the objectives of paragraph 71 of the National Planning Policy Framework.
- 5.3. In determining the previous application on the site (SMD/2026/0045) the Local Authority expressed concerns that a dwelling of the size and scale proposed would have been wholly inappropriate to the rural character of the countryside landscape, noting also the prominent, exposed location of the site.
- 5.4. Concern was also raised that the proposal would have resulted in the existing unobtrusive simple farmhouse and single storey outbuildings being replaced with a dwelling of significantly larger size and scale, with large areas of glazing which would have appeared more prominent and suburban in character. Such concerns led the Local Authority to conclude that the proposal was not acceptable in the context of policies SS10 and H1 of the Local Plan.
- 5.5. In response to those concerns the size and scale of the proposed self-build dwelling has been dramatically reduced. The previously refused application would have resulted in a dwelling with a gross floor area of 582.9m², and a ridge height of 9.7 metres. By contrast this revised proposal will have a gross internal floor area of 152.2m², which represents a substantial reduction of 430.7m² compared to the previously refused scheme. The ridge height of the proposed dwelling has also been reduced, down from 9.7 metres to 7.54 metres – a reduction of 2.18 metres.
- 5.6. As discussed in more detail within the design and layout section later in this statement, the revised dwelling will also have a much less imposing, traditional style of design that assimilates positively with its rural surroundings, and which will not appear prominent or suburban in character. It will also occupy the same general position within the site as the existing farmhouse.
- 5.7. The proposed development also proposes the removal of some of the existing outbuildings on the site, including building 1 (GIA 145.9m²), building 4 (GIA 35.9m²) and part of Building 3 (115.4m²). Collectively the proposed demolitions amount to a reduction in floor area of some 297.2m². The removal of those buildings will

serve to enhance the appearance of the site compared to the existing and reduce the overall extent of built development across the site.

- 5.8. Having regard to the above considerations it is concluded that the revised proposal will not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling, and that consequently the proposal accords with the provisions of policies SS10 and H1 of the Local Plan.

Heritage Impact

- 5.9. The second reason for refusal of application SMD/2026/0045 was that the proposal would entail the total loss of significance of a non-designated heritage asset (the farmhouse) which was held to be illustrative of the rural vernacular of the locality. No heritage-related public benefits were identified to outweigh the loss of that asset.

- 5.10. The National Planning Policy Framework confirms in paragraph 216 that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”

- 5.11. The significance of the existing heritage asset is considered within the accompanying Heritage Statement. The statement concludes that the dwellinghouse on site hold little historic merit in regard to evidential, historic or communal value, with what value it does have is attributable to it comprising an example of a typical Victorian detached farmstead. That farmstead however has been significantly diminished by the C20 interventions and there is little value in the architectural features that remain.

- 5.12. The existing dwelling is also noted to have very poor thermal efficiency – having an EPC rating of G. Even if all of the recommendations set out within the EPC certificate were to be carried out, the best the dwelling could realistically achieve would be a rating of C. By contrast the proposed dwelling will be constructed to the latest building regulations requirements, achieving an EPC rating of A, and in turn will represent a much more thermally efficiency form of development. Those environmental benefits would furthermore be locked in for the lifetime of the development. By contrast, retaining the existing dwelling on site would lock in poor environmental performance for the rest of its lifetime.

- 5.13. Whilst it is recognised that the proposed development would result in the loss of this non-designated heritage asset, it is submitted that the public benefits of delivering a new, more thermally efficiency dwelling of vernacular design, serves to outweigh the loss of that asset. The proposal is therefore concluded to accord with the provisions of policy DC2 of the Local Plan and the National Planning Policy Framework.

Design & Layout

- 5.14. The third reason for refusal of the previous application raised concerns that the proposed dwelling would have been considerably larger in size and scale compared to the existing farmhouse, reading completely differently to the simple, small farmhouse and collection of associated outbuildings. Concerns were also raised about the top heavy proportions of the roof and the extensive amounts of glazing and an associated lack of a high solid-to-void ratio.
- 5.15. In response to those concerns, the scale and size of the dwelling has been extensively reduced. The gross internal floor area has been reduced by 430.7m² down to 152.2m², with the ridge height reduced from 9.7 metres to 7.54 metres – a reduction of 2.18 metres.
- 5.16. The revised design is also consistent with the adopted Design Guide SPD and its accompanying Design Principles for Development SPG in that:
- The building will sit comfortably within its plot and surrounding landscape and has strong eaves and ridge lines.
 - The dwelling incorporates a balance of proportions between the overall shape of the walls and the openings they contain, with similar window openings used throughout and a high solid-to-void ratio being achieved.
 - Windows are arranged in a harmonious manner and align vertically in columns with one another.
 - Traditional header and cill detailing is to be utilised to the windows
 - The windows are designed with a vertical emphasis and are to be recessed into the elevation by 50mm.
 - The roof form spans the shorter side, has a roof pitch that matches the character of properties within the surrounding area, and has a strong defined ridge line emphasised by gables.
 - The dwelling is to be constructed from a complementary palette of materials.
- 5.17. The submitted proposal also takes the opportunity to propose the removal of the existing outbuildings across the site, which contribute little to the character and appearance of the area, and which will reduce the extent of sprawl across the site. The buildings proposed for removal have a collective floor area of 297.2m².
- 5.18. There are no immediate neighbouring properties that will be affected by the proposed development, and no conflict with the adopted Space About Dwellings standards will arise.
- 5.19. It is consequently concluded that the revised design and layout of the development is acceptable and will not detract from the character and

appearance of the area or the amenity of neighbouring occupiers, and as such meets the requirements of policies SS1, SS10, DC1 and DC3 of the Local Plan and guidance contained within the adopted Design Guide SPD.

Biodiversity Net Gain

- 5.20. The fourth reason for refusal of the previous application cites concerns that insufficient information had been provided to demonstrate that the proposed development would deliver mandatory biodiversity net gains, and that any net gain secured would be long term.
- 5.21. The submitted proposal constitutes an application for a self-build dwelling and is consequently exempt from the statutory requirement to demonstrate a 10% net gain to biodiversity. The applicant is nevertheless very keen on biodiversity and the submitted plan shows substantial work to achieve enhanced biodiversity on the site, including tree and hedgerow planting along with the construction of a wildlife pond. Rainwater harvesting will also be incorporated which will be utilised to supply the new wildlife pond.

Highway Safety

- 5.22. The proposed dwelling is to be served by a new vehicular access off School Lane. That access is currently subject of a separate planning application under consideration by the Local Authority (SMD/2026/0160). That application will see the existing vehicular access point closed off and a safer, new access created further to the northeast.
- 5.23. The access will serve an area of hardstanding within the site where there will be space for the parking of up to 3no. vehicles which is sufficient to meet the parking requirement for a four bedroomed property. There will also be manoeuvring space provided so that vehicles may exit the site in a forward gear.
- 5.24. It is consequently submitted that no harm to highway safety will arise as a consequence of this development. The Local Authority shared this conclusion in their assessment of the previous application. The proposal is therefore in accordance with the provisions of policies SS1, SS10 and T1 of the Local Plan and guidance set out within paragraph 117 of the NPPF.

Impact on Protected Species

- 5.25. Owing to the proposed demolition of the existing buildings, the application has been accompanied by a Bat Survey and Preliminary Ecological Assessment. The bat activity surveys carried out did not reveal the presence of any roosting bats within the farmhouse or other buildings, and consequently no bat licence will be required to carry out the development. Whilst there is no evidence of bat activity, the applicant proposes to install bat and bird boxes within the adjacent woodland areas in line with the recommendations set out within the Preliminary Ecological Assessment which can be secured via an appropriately worded planning condition. In doing so the development will meet the requirements of policy NE1 of the Local Plan. No concerns were raised in this regard during the determination of the previous application.

6.0 CONCLUSION

- 6.1. The submitted proposal constitutes a sustainable form of development in that the scale and design of the development will not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling.
- 6.2. The loss of the non-designated heritage asset is acknowledged, but it has low historical significance, and the environmental benefits of the new development will outweigh that impact.
- 6.3. The revised design is substantial smaller than the previously refused application and encompasses a vernacular style of design that accords with the advice set out within the adopted Design Guide SPD and no harm to neighbouring amenity will arise.
- 6.4. The proposal will also be served by an appropriate means of vehicular access will ample parking provided on site to meet the adopted car parking standards. The proposal is furthermore exempt from statutory biodiversity net gain requirements on account of it comprising a self-build dwelling.
- 6.5. The proposed development is consequently held to meet the requirements of policies SS1, SS10, H1, DC1, DC2, DC3, T1 and NE1 of the Staffordshire Moorlands Local Plan and the provisions of the National Planning Policy Framework and the adopted Design Guide SPD.