

PLANNING STATEMENT

**PEAK WILDLIFE PARK
WINKHILL**

JULY 2026

Site Address:

Peak Wildlife Park, Winkhill, Staffordshire, ST13 7QR

Applicant:

Peak Wildlife Park

Proposal:

Erection of 10no. visitor lodges, viewing platform and associated works

Planning Statement:

Date Issued: 22nd July 2026

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Report Prepared By:

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1. Introduction

- 1.1 Rob Duncan Planning Consultancy Ltd. has been instructed by Peak Wildlife Park to prepare a Planning Statement to accompany an application for the formation of 10no. visitor lodges and associated works on land at Peak Wildlife Park, Ellastone Road, Winkhill.
- 1.2 Peak Wildlife Park is a unique wildlife attraction that combines conservation, education and entertainment for visitors of all ages. The park has a commitment to preserving biodiversity and promoting sustainable practices and is a popular attraction within the Staffordshire Moorlands. Since acquiring the former Blackbrook Zoological Park, Peak Wildlife Park has grown into a significant family attraction, drawing visitors from both the local area and further afield.
- 1.3 The proposed visitor lodges will strengthen the long term resilience of the park by allowing a small number of visitors to stay overnight as part of their visit. This will diversify the Park's revenue stream, support continued reinvestment into the attraction, and help to facilitate more overnight stays within the District.
- 1.4 The proposed visitor accommodation is to be split into two areas of the site, namely:
- 4no. lodges around the Polar Bear enclosure (Polar Bear Lodges)
 - 6no. lodges to the west of Black Brook (Black Brook Lodges)
- 1.5 The proposed Polar Bear Lodges are to be arranged around the northeastern and northwestern fringes of the existing polar bear enclosure. They will be container-based in design, with the two smaller lodges formed from single 40-

foot containers, and the two larger family lodges formed from two 40-foot containers with a 20-foot viewing room positioned above.

- 1.6 The smaller Polar Bear Lodges will provide open plan accommodation comprising of a double bedroom, lounge area, dining table and kitchenette, with a separate shower room with toilet. The larger Polar Bear Lodges will comprise of 2no. ensuite double bedrooms, along with an open plan lounge / kitchen / dining area. On the terrace above there will be an external viewing deck.
- 1.7 The Polar Bear Lodges will have a galvanised metal/light grey finish and will be designed around an expedition-style theme, reflecting the character of the polar bear enclosure and providing a distinctive visitor experience. The external viewing deck to the larger family lodges will have an oversailing sinusoidal-profile metal roof supported on a timber frame.
- 1.8 The Black Brook Lodges are to be arranged in a linear form parallel to the Black Brook, with an access path located to the rear linking the lodges to the existing public right of way. These lodges will comprise of Nokken-branded cabin accommodation, with a simple, contemporary design, finished in timber. The smaller lodges will comprise of a double ensuite bedroom with kitchenette / dining area. The larger lodges will comprise of 2no. ensuite bedrooms with an open plan lounge / kitchen / dining area.
- 1.9 A series of associated works are also proposed, including new and extended bunds to help screen the site and reduce the visual impact of the development. A viewing platform is also proposed to the west of the polar bear enclosure, which will be available for use by guests staying in the lodges, providing elevated views of the enclosure. Alterations to existing fencing are also proposed.

- 1.10 The Park currently employs in the order of 65 members of staff over the spring / summer months, with that number reducing to 45 members of staff over the quieter autumn and winter periods. The applicant expects that the proposed development will generate an additional 5 jobs throughout the year.
- 1.11 This document sets out the case for planning permission to be granted having regard to local and national planning policy, and should be read in conjunction with the Design & Access Statement prepared by CTD Architects and the accompanying ecology documents prepared by Fauna Forest Ecology.

2 Site & Surroundings

- 2.1 The application site lies comprises a long established zoological park that lies on the western side of the Ellastone Road, approximately 250 metres south of its junction with the Ashbourne Road (A523). Vehicular access to the park is taken direct off the Ellastone Road and serves large swathes of car parking.
- 2.2 The proposed Black Brook Lodges are to be located to the west of the main complex of buildings on the site on an existing area of open land, and west of Blackbrook Farmhouse which comprises a Grade II Listed Building. A copse of trees extends to the south and southwest through which the Black Brook runs. Further to the south lies the southwestern part of the Park. To the west lies Little Paradise Farm and Alma Cottage which are also owned by the applicant. An existing service yard lies to the north.
- 2.3 The proposed Polar Bear Lodges are to be located around the northeastern, and northern flanks of the existing polar bear enclosure, which is located at the northern end of the Park. Open fields extend to the north, east and west, with the main area of the Park located to the south.
- 2.4 There are a number of public footpaths that run through the site, including Public Footpath Ipstones 87 which runs in a broadly east / west direction, and which crosses the site adjacent to where the Black Brook Lodges are proposed. Public Footpath Ipstones 90 runs in a north / south direction to the west of the Polar Bear enclosure. No alterations are proposed to these existing rights of way.
- 2.5 The site as a whole is located within the open countryside and forms part of the Churnet Valley Master Plan area. The site is identified as an 'Opportunity Site' within the Churnet Valley Master Plan SPD.

3 Planning Policy

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission 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 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 SS10 of the Local Plan states that the rural 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 Council and its partners will achieve this through a number of actions, including:

- Enabling the limited expansion or development of business for employment uses where a rural location can be justified
- 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;
- Supporting sustainable tourism developments and measures in the Churnet Valley in accordance with Policy SS11 and the Churnet Valley Masterplan SPD

3.5 Policy SS11 of the Local Plan states that the Churnet Valley is identified as an area for sustainable tourism and rural regeneration. The Churnet Valley Masterplan provides a comprehensive framework for development in the Churnet Valley and development should be in accordance with the Masterplan. Within this area particular support will be given to the following forms of development and measures:

- short stay and long stay visitor accommodation
- the expansion of existing tourist attractions and facilities and the provision of compatible new tourist attractions and facilities
- measures to enhance, protect and interpret the landscape character and heritage assets of the Churnet Valley
- measures to remediate and restore derelict land, buildings and features including the appropriate redevelopment of sites
- actions to protect and enhance the biodiversity of the valley, including the maintenance, buffering and connection of designated sites and actions to mitigate climate change
- measures that support and integrate the heritage transport infrastructure of the valley, sympathetically with enhancing and developing links to strategic footpaths, cycle and horse riding routes
- measures to improve connectivity and accessibility to and within the Churnet Valley by sustainable transport means having regard to the Green Infrastructure Strategy

3.6 Policy SS11 also states that any development should be of a scale and nature and of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features.

3.7 Policy E4 of the Local Plan relates to 'Tourism and Cultural Development' and states that new tourism and cultural development which complements the distinctive character and quality of the District will be supported having regard to the Area Strategies in Policies SS5 to SS10. In addition:

1. New tourist, visitor and cultural accommodation, attractions and facilities should be developed in locations that offer, or are capable of offering either:

A) good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling; or

B) in locations in or close to settlements where local services, facilities and public transport are available; or

C) in areas specifically identified for tourism development in the Churnet Valley Masterplan or other relevant documents.

3.8 Policy E4 goes on to state that new accommodation, attractions and facilities should support the provision and expansion of tourist, visitor and cultural facilities in the rural areas where needs are not met by existing facilities, and

that all development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area, enhance the heritage, landscape and biodiversity of the area and shall not harm interests of acknowledged importance

3.9 Policy DC1 of the Local Plan states that all development should 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 SPD. It goes on to state that 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

3.10 Policy DC3 of the Local Plan 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.

3.11 Policy NE1 of the Local Plan 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:

1. 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

2. Resisting any proposed development that could have an adverse effect on the integrity of an International site (or successor designation) alone or in combination with other plans or projects unless it can be demonstrated that the legislative provisions to protect such sites can be fully met. Any development with a potential to adversely affect a European site/s through construction activities should ensure that Ciria construction guidelines are followed including environmental good practice on control of dust and water pollution.
3. The Council will not normally permit any development proposal which would directly or indirectly (either individually or in combination with other developments) have an adverse effect on a Site of Special Scientific Interest. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.
4. 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.
5. 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.
6. Supporting opportunities to improve site management and increase public access to wildlife sites including supporting the objectives of the Staffordshire County Council Rights of Way Improvement Plan.
7. Ensuring development promotes the appropriate maintenance, enhancement, restoration and/or re-creation of biodiversity through its proposed nature, scale, location and design. The Staffordshire Moorlands Biodiversity Opportunity Map, in conjunction with the Staffordshire Biodiversity Action Plan, will be used to guide biodiversity enhancement measures to be included in development proposals as appropriate to the nature and scale of development proposed and other environmental

interest, in particular supporting opportunities to increase grassland and heathland habitats including supporting targets in the UK and Staffordshire Biodiversity Action Plan.

8. Protecting and enhancing habitats and species of principal importance for the conservation of biodiversity as identified in legislation, and recognising and implementing appropriate measures, including landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.
9. Recognising the value of the natural environment for sport and leisure activities and the need to manage such activities to ensure there is no conflict. Ensuring the provision and protection of green infrastructure networks in line with Policy C3.

3.12 Policy T1 of the Local Plan 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 a number of measures, including:

- Ensuring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development.
- Considering appropriate parking provision on a case by case basis with recourse to the parking guidance set out in Appendix 2.

4 Other Material Considerations

National Planning Policy Framework

- 4.1 The National Planning Policy Framework sets out the Government's approach to securing the delivery of sustainable development, and sets out policies, *inter-alia*, aimed at supporting a prosperous rural economy and securing high quality design. The content of this document has been taken into consideration in the preparation of this Planning Statement.

SMDC Churnet Valley Master Plan SPD (March 2014)

- 4.2 The Churnet Valley Master Plan identifies the Blackbrook Zoological Park (now Peak Wildlife Park) as an opportunity site. It notes that it comprises an existing zoological park where there are opportunities to enhance the attraction. The content of the SPD has been taken into consideration in the preparation of this application.

SMDC Tourism Strategy (2022-2027)

- 4.3 The adopted Tourism Strategy places an emphasis on raising the profile of the Staffordshire Moorlands so that it becomes a stronger destination as a place for both day visits and longer holidays, improving the current offer and unlocking the District's potential and boost the local economy. It places a strong emphasis on encouraging accommodation development. The content of this document has been taken into consideration in the preparation of this application.

5 Planning Assessment

Principle of Development

- 5.1 The application proposes the formation of 10no. visitor lodges and associated works to enhance the visitor offering at Peak Wildlife Park, which is a long established and popular tourist destination within the Staffordshire Moorlands.
- 5.2 The site is located within the rural area and also forms part of the Churnet Valley Master Plan area. Policy SS10 of the Local Plan allows for sustainable tourism developments in the Churnet Valley in accordance with policy SS11 and the accompanying Churnet Valley Master Plan SPD.
- 5.3 Policy E4 of the Local Plan likewise supports new tourism and cultural developments that complement the distinctive character and quality of the District in locations that offer good connectivity with other tourist destinations and amenities, or in areas specifically identified for tourism development within the Churnet Valley Master Plan SPD. The Churnet Valley Master Plan SPD is noted to identify Peak Wildlife Park [Blackbrook Zoological Park as was] as an 'Opportunity Site' with scope to enhance the attraction.
- 5.4 Paragraph 86 of the National Planning Policy Framework confirms that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development.
- 5.5 Paragraph 88 of the NPPF goes on to state that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas both through the conversion of existing buildings and well-designed new buildings, and should also enable sustainable rural tourism and leisure developments which respect the character of the countryside.
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- 5.6 Peak Wildlife Park experiences significant seasonal variation. Visitor numbers are strongest during school holidays, weekends and periods of good weather, while the quieter winter months and term time weekdays are more challenging. This creates pressure for a business which carries year-round responsibilities and costs, including animal care, staffing, maintenance, utilities conservation work and ongoing site management.
- 5.7 The proposed development will strengthen the long term resilience of the park, allowing a small number of visitors to stay overnight as part of their visit, and in doing so will also help to smooth some of this seasonal pressure by creating a more stable and varied income stream, while also broadening the park's appeal for short break visitors.
- 5.8 The proposal will also help to support continued reinvestment into the attraction, generating additional employment opportunities, whilst also safeguarding existing levels of employment. The Park currently employs some 65no. members of staff over the spring / summer months, with that number reducing to 45no. members of staff over the quieter autumn and winter periods.
- 5.9 The applicant forecasts that the proposed development will generate an additional 5 jobs throughout the year. The total level of employment on the site will therefore increase to some 70no. jobs during the spring / summer period and 50no. jobs over the autumn/winter period.
- 5.10 The ability for visitors to stay overnight in the park is a significant benefit of the proposed development, and aligns positively with the adopted Tourism Strategy. The Tourism Strategy seeks to secure further investment in attractions and accommodation in order to help Staffordshire Moorlands to become a year round destination attracting higher value visitors that create quality jobs.
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5.11 The Tourism Strategy also confirms that facilitating more overnight stays is a key objective, identifying a lack of accommodation investment and a dominance of day visitors as being a weaknesses of the tourism economy in the Staffordshire Moorlands. The Strategy goes on to set out a series of aims and objectives aimed at growing the tourism economy, including the following:

- Get visitors to stay longer in the area by developing itineraries that combine Alton Towers with other experiences especially ‘Activities’ and ‘Attractions’, moving from a day visit to an overnight, or a 1 night to a 2 night visit (pp.17)
- Encourage accommodation development – small scale, quality, catered & self-catered that keeps visitors in the local area (pp.18)
- Expand, improve and encourage the development of accommodation to attract visitors to stay overnight and keep their spending in the local area rather than losing it to neighbouring regions (pp.16)

5.12 The submitted proposal firmly accords with these aims and objectives, and will provide 10no. small-scale units of accommodation that will facilitate additional overnight stays within the District, in a location that is within the attraction itself, and which also benefits from ease of access to the nearby public footpath network so as to enable access to the surrounding landscape, which is another key attraction of the Staffordshire Moorlands (pp.9 of the Tourism Strategy refers).

5.13 Overall, it is submitted that the proposed development will make a positive and beneficial contribution to the local tourism economy within the Staffordshire Moorlands, supporting more overnight stays, generating additional employment and improving the resilience of the existing business.

Such benefits carry significant weight in favour of planning permission being granted.

- 5.14 The proposed development is consequently concluded to meet the requirements of policies SS10, SS11 and E4 of the Local Plan, the provisions of paragraphs 86 and 88 of the National Planning Policy Framework, and the objectives of the adopted Tourism Strategy.

Design & Layout

- 5.15 The application site is located within the Churnet Valley Master Plan area, wherein there is a focus on ensuring that new development respects, enhances and protects the positive aspects of the Churnet Valley. The site also lies within the rural area where similar objectives exist.
- 5.16 The proposed lodges are to be carefully distributed across two distinct areas of the park rather than concentrated into one single part of the site. This will allow the accommodation to be sensitively integrated within the existing landscape and surrounding visitor attractions. Existing vegetation, bunds and landform are to be retained and enhanced, ensuring that the development appears as a discreet addition to the wider park rather than an isolated new addition.
- 5.17 Both the Black Brook Lodges (Nokken-style lodges) and the Polar Bear Lodges (Container based lodges) are small scale structures, with a muted palette of materials that will ensure that they sit comfortably within their surroundings. The architectural approach furthermore reflects the Design Guide SPD's emphasis on delivering high-quality contemporary design that responds to its setting.
- 5.18 In views from the surrounding area the development will read as part of the existing cluster of buildings and attractions associated with the Park, rather

than appearing as an isolated or incongruous form of development within the landscape. The proposed development is consequently concluded to be consistent with the provisions of policies SS1, SS11, DC1 and DC3 of the Local Plan.

Residential Amenity

- 5.19 There are no immediate residential properties who will be adversely affected by the proposed development. The buildings will not derive any conflict with the Local Authority's minimum interface distances, and consequently the proposed development is considered to accord with the relevant provisions of policy DC1 of the Local Plan in this regard.

Highway Safety

- 5.20 Policy T1 of the Local Plan seeks to ensure that new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development. The application site benefits from an established means of vehicular access off the Ellastone Road, which serves substantial areas of car parking that are used by visiting guests and members of staff. Those established parking areas will be utilised by guests of the accommodation, rather than new parking spaces being created adjacent to the lodges.
- 5.21 It is submitted that the proposed development will represent a modest improvement to highway safety within the surrounding area, as it will serve to reduce daily vehicle movements associated with the site, as some guests will remain on site overnight, rather than departing at the end of the day like all guests are currently required to do.
- 5.22 The proposed development is consequently concluded to be acceptable from a highway safety perspective, and accords with the objectives of policy T1 of

the Local Plan and paragraphs 115 and 116 of the National Planning Policy Framework.

Ecology / Biodiversity

- 5.23 The application is accompanied by a Preliminary Ecological Assessment prepared by Fauna Forest Ecology which has assessed the existing habitats on the site. The Assessment concludes that no impacts on statutory or non-statutory designated sites are anticipated and that there will be no adverse impact on protected species.
- 5.24 The Assessment goes on to identify that the proposed development has the potential to significantly increase habitat diversity on the site, as well as strengthening ecological connectivity and providing additional foraging, nesting and shelter opportunities for wildlife. It also sets out a series of precautionary recommendations aimed at ensuring no harm to Great Crested Newts.
- 5.25 The application is also accompanied by a Biodiversity Net Gain Assessment prepared by Fauna Forest Ecology which demonstrates that the proposed development will achieve a 22.65% net gain in habitat units, and a 18.47% net gain in watercourse units on the site. The proposed development will therefore deliver a net gain to biodiversity that exceeds the statutory minimum requirement of 10%.
- 5.26 The recommendations set out within the Preliminary Ecological Assessment and the Biodiversity Net Gain Assessment can be secured via an appropriately worded planning condition and in doing so the development will meet the requirements of policy NE1 of the Local Plan and the associated provisions of the National Planning Policy Framework.

6 **Conclusion**

6.1 The submitted proposal constitutes a sustainable form of development having regard to the following conclusions:

- The proposal relates to an Opportunity Site within the Churnet Valley Master Plan area, and will facilitate the sustainable growth of the existing business and generate additional employment opportunities.
- The proposal constitutes an appropriate form of tourism development within the Churnet Valley that will help to facilitate more overnight stays within the District and enhance the local tourism economy.
- The proposal will not give rise to any material adverse harm to the character and appearance of the surrounding area or the wider landscape.
- The proposed development will not detract from the amenity of any neighbouring occupiers.
- The proposal will not give rise to any adverse impacts to highway safety within the locality.
- The proposal will safeguard protected species and deliver a 10%+ net gain to biodiversity.

6.2 The proposed development is consequently concluded to meet the requirements of policies SS1, SS10, SS11, E4, DC1, DC3, NE1 and T1 of the Moorlands Local Plan, and guidance set out within the National Planning Policy Framework and the Churnet Valley Master Plan SPD.