Sustainability and Accessibility Statement

Supporting Applications for Planning Permission and Listed Building Consent

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Proposed Removal of the Holiday Occupancy Restriction
Creation of Private Residential Amenity Space
Alterations to the Grade II Listed Barn Approximately 20 Metres North of The Hermitage
Historic England List Entry No. 1189123



The Hermitage, Ipstones Bank
Froghall
Staffordshire
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Prepared on behalf of the Applicants July 2026

Table of Contents

1. Purpose of this Statement 3
2. Previous Appeal Context 3
3. Existing Site Context 3
4. Accessibility 3
5. Sustainability Assessment 7
6. Holiday Use Compared with Permanent Occupation 10
7. Why this Proposal Differs from a New Dwelling in the Countryside 11
8. Planning Policy 12
9. Conclusion 13

Sustainability and Accessibility Statement

Property: The Hermitage Farm, Ipstones Bank, Froghall
Application: Removal of Holiday Occupancy Condition, Creation of Rear Amenity Space and Associated Listed Building Works

1. Purpose of this Statement

This statement accompanies the planning application and responds specifically to the sustainability and accessibility concerns identified in the 2025 Planning Inspectorate appeal.

Its purpose is not to repeat the planning case but to provide a detailed assessment of the accessibility and sustainability considerations relevant to the proposal.

It should be read alongside the Planning Statement, Heritage Statement and Optimum Viable Use Assessment and focuses on why unrestricted residential occupation represents sustainable development.

2. Previous Appeal Context

The previous appeal accepted that removing the holiday occupancy restriction would not materially harm tourism provision and that permanent occupation would preserve the listed building. The appeal was dismissed primarily because suitable private amenity space was absent and because insufficient evidence had been provided to demonstrate the optimum viable use of the heritage asset. This application addresses those matters.

3. Existing Site Context

The proposal relates to an existing converted Grade II listed barn. No new dwellings are proposed. Existing access, parking, drainage, utilities and infrastructure remain. The proposal removes only the attached lean-to, reopens three existing historic openings and creates private amenity space.

4. Accessibility

4.1 Existing Accessibility

Although The Hermitage occupies a rural location within the Staffordshire Moorlands, it should not be regarded as an isolated development. The proposal relates to the continued occupation of existing converted accommodation that already benefits from established vehicular access, parking, utility infrastructure and access to local services.

The site is located approximately 1.3 kms from Ipstones, which provides a range of day-to-day services including a convenience store, primary school, nursery, community facilities and access to local healthcare. In addition, the property benefits from the Moorlands Connect demand-responsive public transport service, with collection available immediately outside the site.



4.2 Accessibility to Local Services

Service / Facility	Approx. Distance	Typical Travel Time	Comments
Moorlands Connect Bus Stop	**Adjacent to the site**	Less than 1 minute walk	Demand-responsive public transport available directly from The Hermitage.
Ipstones Village Centre	1.3 miles (2.1 km)	Approx. 5 minutes by car / 25–30 minutes on foot	Local community facilities and village services.
Village Convenience Shop	1.3 miles (2.1 km)	Approx. 5 minutes by car	Day-to-day grocery shopping.
St Leonard's CE (VA) Primary School	1.3 miles (2.1 km)	Approx. 5 minutes by car	Local primary education.
Nursery / Early Years Provision	1.3 miles (2.1 km)	Approx. 5 minutes by car	Local childcare facilities.
GP Surgery / Community Clinic	1.3 miles (2.1 km)	Approx. 5 minutes by car	Local clinic in Ipstones with access to wider GP services.

Service / Facility	Approx. Distance	Typical Travel Time	Comments
Blythe Bridge Railway Station	8 miles (12.9 km)	Approx. 15–20 minutes by car	Direct rail connections to Stoke-on-Trent, Derby and beyond.

Taken together, these facilities demonstrate that the site is not isolated but forms part of an established rural community with access to day-to-day services, healthcare, education and public transport.

4.3 Public Transport

Unlike many rural locations, The Hermitage benefits from direct access to the Moorlands Connect demand-responsive public transport service. This service provides pre-bookable transport linking rural communities with nearby villages, towns, healthcare facilities, shopping destinations and onward public transport connections.

The availability of this service improves accessibility for residents without reliance solely upon private vehicle ownership and should be taken into account when assessing the sustainability of the proposal.

4.4 Existing Travel Patterns

When considering the sustainability of the proposal it is important to recognise that the accommodation is already in active occupation throughout the year as holiday accommodation. The proposal does not introduce new buildings, additional accommodation or additional capacity. Instead, it changes the occupancy of existing units from short-term holiday accommodation to permanent residential use.

The existing holiday accommodation generates a range of regular vehicle movements associated with its operation. These include:

- Guest arrivals and departures, often concentrated on changeover days.
- Cleaning staff attending following each guest departure.
- Laundry collections and deliveries associated with bedding and towels.
- Routine maintenance visits between bookings.
- Deliveries associated with servicing and replenishing the accommodation.
- Management visits associated with guest arrivals, departures and operational requirements.

Unlike permanent residential occupation, holiday accommodation also experiences frequent turnover of occupants. Individual units may accommodate numerous different households

throughout the year, each making separate journeys to and from the site. This pattern of occupation can result in concentrated periods of vehicle activity associated with guest changeovers.

Permanent residential occupation would alter the nature of these movements rather than necessarily increasing them. Residents would establish predictable day-to-day travel patterns, while many of the operational vehicle movements associated with the holiday business—including routine cleaning visits, commercial laundry collections, guest management and frequent changeovers—would cease.

Furthermore, the applicants have operated the holiday accommodation business continuously since acquiring the property in 2021 and have first-hand experience of the operational demands associated with this use. It is their experience that the holiday accommodation model requires a significantly greater level of servicing and management activity than would be expected for permanent residential occupation.

Accordingly, whilst future residents would inevitably make journeys associated with everyday life, the proposal is not expected to generate materially greater transport impacts than the existing lawful use. In some respects, permanent occupation may reduce the frequency of operational and servicing trips currently associated with the holiday accommodation business.

The proposal should therefore be considered as a change in the pattern of travel rather than an intensification of transport impacts.

4.5 Rural Living

It is recognised that residents within the rural areas of the Staffordshire Moorlands often rely upon private vehicles for a proportion of their day-to-day journeys. This reflects the dispersed settlement pattern of the District and is a characteristic shared by many existing rural communities.

However, the current proposal must be considered in its specific context. It does not involve the construction of new dwellings in the open countryside or the introduction of residential development onto a previously undeveloped site. Instead, it relates to existing self-contained accommodation within a converted Grade II listed barn that already benefits from established vehicular access, parking, utility infrastructure and year-round occupation under the existing lawful use.

The proposal therefore represents the continued use of an existing building rather than the creation of additional residential development. Future occupiers will make use of infrastructure that is already in place, and the proposal does not require new roads, new access arrangements or additional public infrastructure.

Whilst many day-to-day journeys are likely to be undertaken by private vehicle, this reflects the established pattern of rural living throughout much of the Staffordshire Moorlands and should be considered alongside the wider sustainability benefits arising from the proposal. These include the reuse of an existing heritage asset, the efficient use of existing infrastructure, the provision of suitable residential amenity space, the absence of any significant harm to tourism provision and the securing of the optimum viable use of a Grade II listed building.

Taken as a whole, the proposal represents a sustainable and proportionate form of development that responds appropriately to its rural setting whilst ensuring the long-term conservation and occupation of an important heritage asset

5. Sustainability Assessment

The National Planning Policy Framework recognises that achieving sustainable development requires the consideration of environmental, social and economic objectives. These objectives are interdependent and should be pursued in mutually supportive ways.

The current proposal has been assessed against each of these objectives and demonstrates that the continued residential occupation of the existing converted accommodation represents a sustainable form of development.

5.1 Environmental Sustainability

The proposal represents the effective reuse of an existing building that has already been converted for residential-style occupation. No new dwellings are proposed and no extension to the existing built footprint is required, with the exception of the removal of the existing lean-to attached to the rear elevation.

The proposal makes efficient use of existing infrastructure, including:

- Existing vehicular access.
- Existing parking areas.
- Existing utility connections.
- Existing drainage infrastructure.
- Existing internal accommodation.

As a result, there is no requirement for significant new infrastructure or engineering works.

The proposal also retains and makes continued use of the existing historic building, thereby avoiding the environmental impacts associated with new residential construction elsewhere. The reuse of existing buildings is widely recognised as reducing embodied carbon when compared with demolition and replacement, while also avoiding unnecessary consumption of land and construction materials.

The proposal also avoids the environmental impacts associated with constructing equivalent replacement housing elsewhere, making efficient use of an existing building and reducing the demand for additional land and construction materials.

The applicants have also invested significantly in improving the efficiency and condition of the accommodation since acquiring the property in 2021. This has included replacement high-efficiency boilers, upgraded kitchens, improved lighting, new flooring and general refurbishment, helping to improve the long-term performance and sustainability of the accommodation.

Overall, the proposal represents an environmentally responsible use of an existing heritage asset whilst minimising the need for new development.

5.2 Social Sustainability

The proposal will provide stable, year-round residential occupation within an existing converted building.

Permanent occupation encourages greater integration with the local community than short-term holiday accommodation, allowing residents to make an ongoing contribution to local services, businesses and community life throughout the year.

The proposal also provides a significantly improved standard of residential accommodation through the provision of dedicated private outdoor amenity space. This directly addresses the principal concern identified within the 2025 Planning Inspectorate appeal and ensures that future occupiers will benefit from an appropriate standard of living conditions.

The continued occupation of the building will also assist in securing its long-term care and stewardship. Regular occupation provides ongoing oversight, routine maintenance and continued investment in the building, reducing the risk of deterioration and ensuring that the heritage asset remains in active and beneficial use.

5.3 Economic Sustainability

The accompanying Financial Performance Assessment provides a detailed assessment of the trading history, operational management, capital investment and commercial performance of the existing holiday accommodation business. That assessment demonstrates that the applicants actively pursued the authorised use through substantial investment, professional management and sustained personal commitment over more than four years before concluding that it was not capable of providing a commercially sustainable long-term future.

5.4 Efficient Use of Existing Resources

The proposal represents an efficient and sustainable use of existing land, buildings and infrastructure.

No additional development land is required, no new highway access is proposed and no additional public infrastructure is necessary to support the development. Existing parking, drainage, utilities and servicing arrangements remain unchanged.

The proposal therefore maximises the use of existing resources whilst securing the long-term future of an existing heritage asset.

5.5 Climate and Carbon Considerations

The reuse of existing buildings is recognised as an important component of sustainable development.

By retaining the existing building and making continued use of the existing structure, the proposal avoids the significant embodied carbon associated with demolition and new construction. It also reduces construction waste and makes continued use of existing materials and infrastructure.

The applicants' investment in improved heating systems and general refurbishment has also contributed to the ongoing environmental performance of the accommodation.

Whilst the proposal does not involve major energy efficiency alterations to the listed building, it represents a sustainable approach to the continued use and maintenance of an existing heritage asset in accordance with national planning objectives.

5.6 Overall Sustainability

When considered as a whole, the proposal performs positively against each of the three dimensions of sustainable development.

Environmentally, it reuses an existing building, makes efficient use of existing infrastructure and avoids unnecessary new development.

Socially, it provides improved living conditions, secures year-round occupation and promotes the continued stewardship of an important heritage asset.

Economically, it provides a viable long-term future for accommodation that has been actively operated but has proved commercially unsustainable as holiday accommodation despite substantial investment and management.

The proposal should therefore be regarded as sustainable development and should be assessed positively when considered alongside the wider public benefits identified within the accompanying Planning Statement.

5.7 Long-Term Stewardship of the Heritage Asset

The long-term conservation of designated heritage assets depends not only upon their physical condition but also upon their continued occupation and beneficial use. Buildings that are actively occupied, regularly maintained and capable of supporting ongoing investment are significantly more likely to be preserved than those retained in an economically unsustainable use.

The National Planning Policy Framework recognises that heritage assets should be conserved in a manner appropriate to their significance while enabling them to remain viable and capable of contributing to the social, cultural and economic life of their communities. Securing an appropriate long-term use is therefore a fundamental component of sustainable heritage management.

Since acquiring the property in 2021, the applicants have invested in excess of £100,000 in the maintenance, refurbishment and improvement of the accommodation. This investment was undertaken with the intention of establishing a successful holiday accommodation business capable of supporting the ongoing conservation of the listed building. However, despite substantial investment, active management and more than four years of operation, the holiday accommodation business has not proved capable of delivering a commercially sustainable long-term future.

The proposal therefore seeks to secure the optimum viable use of the listed building through unrestricted residential occupation. This would provide a stable and sustainable source of ongoing investment, ensuring that the building remains occupied, maintained and capable of continued conservation.

The proposal should not therefore be viewed simply as a change to an occupancy restriction. It represents an opportunity to secure the long-term stewardship of an important Grade II listed

building by placing it in a use that is capable of supporting its continued maintenance and preservation.

When considered alongside the heritage enhancements delivered through the removal of the attached lean-to, the reopening of existing historic openings and the provision of appropriate residential amenity space, the proposal will ensure that the building remains a well-maintained and valued part of the historic environment for future generations.

6. Holiday Use Compared with Permanent Occupation

The proposal does not involve the creation of additional accommodation or an increase in the number of residential units. Instead, it seeks to change the occupancy of existing self-contained accommodation from short-term holiday use to unrestricted permanent residential occupation.

When considering the transport and sustainability implications of the proposal, it is important to recognise that the existing holiday accommodation is already occupied throughout much of the year and generates a variety of regular vehicle movements associated with its operation.

The existing holiday use typically involves:

- Regular guest arrivals and departures, often concentrated on weekly changeover days.
- Cleaning staff attending following each guest departure.
- Commercial laundry collections and deliveries associated with bedding and towels.
- Maintenance and repair visits between bookings.
- Deliveries of consumables and replacement items required for the operation of the holiday accommodation.
- Management visits associated with guest check-ins, inspections and general business operations.

In contrast, permanent residential occupation generally results in more stable and predictable travel patterns. Whilst residents will inevitably make journeys associated with employment, education, shopping and leisure, many of the commercial vehicle movements associated with the operation of a holiday accommodation business would no longer be required.

The applicants have first-hand experience of operating the holiday accommodation business since purchasing the property in 2021. During this period they have managed guest arrivals and departures, arranged cleaning and maintenance, coordinated laundry services and undertaken regular management visits. Their experience is that the operational demands of a year-round holiday accommodation business generate a significant level of servicing activity beyond that normally associated with permanent residential occupation.

The proposal therefore represents a change in the pattern of travel rather than an intensification of transport impacts. Whilst the nature of vehicle movements will inevitably change, there is no evidence to suggest that unrestricted residential occupation would generate materially greater traffic than the existing lawful use.

It is also relevant that the proposal does not alter the existing access arrangements, parking provision or internal circulation within the site. The accommodation is already served by established infrastructure and the proposal does not require any changes to the local highway network.

Furthermore, permanent occupation is likely to reduce the concentration of vehicle movements associated with holiday changeover days, resulting in a more consistent pattern of activity throughout the week. This may also reduce the frequency of commercial servicing trips associated with cleaning, laundry and routine management of the holiday accommodation.

The proposal should therefore be viewed as a change in the operational characteristics of the existing accommodation rather than the introduction of a more intensive use. When considered alongside the environmental benefits of reusing an existing listed building, the efficient use of existing infrastructure and the long-term conservation of the heritage asset, the proposal represents a sustainable form of development.

7. Why this Proposal Differs from a New Dwelling in the Countryside

The current proposal should not be equated with an application for new residential development in the open countryside.

No new dwellings are proposed and no additional buildings are to be constructed. The proposal relates solely to existing self-contained accommodation within a Grade II listed barn that has already been converted for residential-style occupation under previous planning permissions. The buildings, access arrangements, parking areas, utility connections and servicing infrastructure are all established and have been in active use for many years.

Unlike proposals for new housing in rural locations, this application does not result in the loss of agricultural land, the extension of the built form into the countryside or the need for additional public infrastructure. There is no requirement for new highways, new drainage systems, new utility connections or other significant engineering works. The proposal simply enables the continued occupation of existing accommodation in a different form.

It is also important to recognise that the accommodation already generates year-round activity through its lawful use as holiday accommodation. The proposal therefore represents a change in the pattern of occupation rather than the introduction of residential activity to a previously undeveloped or unoccupied site.

The site forms part of an established group of buildings at The Hermitage and is not an isolated structure within the wider landscape. The principal farmhouse is permanently occupied, the adjoining farm remains in active agricultural use, and other residential properties exist within the immediate locality. The proposal therefore sits within an existing rural settlement pattern rather than creating a new isolated residential enclave.

Furthermore, the accommodation already benefits from established vehicular access, adequate parking, utility services, refuse collection, postal services and demand-responsive public

transport through the Moorlands Connect service. These facilities already support the lawful operation of the site and require no alteration as part of the proposal.

The proposal also differs from a conventional new housing development because it secures the continued use and conservation of an existing heritage asset. The reuse of existing buildings is a fundamental objective of sustainable development, avoiding the environmental impacts associated with new construction whilst ensuring that important historic buildings remain occupied, maintained and capable of supporting their long-term conservation.

In planning terms, the proposal should therefore be viewed as the continued and sustainable use of an existing converted heritage asset rather than the creation of new housing in the countryside. This distinction is fundamental to the assessment of the application and should be given significant weight in considering its overall sustainability.

The applicants have demonstrated that the holiday accommodation business has been actively operated since acquiring the property in 2021 and that substantial investment, in excess of £100,000, has been made in upgrading, maintaining and promoting the accommodation. This investment was undertaken with the clear intention of establishing a successful and sustainable holiday accommodation business. The applicants have given the existing authorised use a genuine opportunity to succeed, actively managing and marketing the accommodation for more than four years before concluding that it is not capable of delivering a commercially sustainable long-term future. The proposal is therefore not driven by convenience or personal preference, but by the need to secure the optimum viable use of an existing heritage asset. By enabling unrestricted residential occupation, the proposal will provide a stable and sustainable future for the listed building, ensuring that it remains occupied, well maintained and capable of continued investment, thereby safeguarding its significance for future generations.

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8. Planning Policy

A detailed assessment of the proposal against the National Planning Policy Framework (NPPF) and the policies of the Staffordshire Moorlands Local Plan is provided within the accompanying Planning Statement. This section should therefore be read as a complementary assessment, focusing specifically on the sustainability objectives that underpin national and local planning policy.

The National Planning Policy Framework establishes that the purpose of the planning system is to contribute to the achievement of sustainable development through the balanced consideration of environmental, social and economic objectives. These objectives are not intended to be considered in isolation but collectively, recognising that planning decisions should achieve positive outcomes across all three dimensions of sustainability.

The current proposal performs positively against each of these objectives.

From an environmental perspective, the proposal reuses an existing Grade II listed building, retains the existing built form, makes efficient use of existing infrastructure and avoids the need for new residential development elsewhere. The proposal also secures the long-term conservation of a designated heritage asset through its continued occupation and maintenance.

From a social perspective, the proposal provides suitable living conditions for future occupants through the provision of dedicated private amenity space whilst supporting the continued occupation of an existing rural building. Permanent occupation will also contribute to the local community throughout the year and provide ongoing stewardship of an important heritage asset.

From an economic perspective, the proposal provides a viable long-term use for accommodation that has been actively operated as holiday accommodation since 2021 but has not achieved a sustainable level of profitability despite significant financial investment. Continued residential occupation will ensure ongoing maintenance of the listed building and continued expenditure within the local economy through the use of local contractors, suppliers and services.

It is also important to recognise that the proposal does not involve the construction of new dwellings in the open countryside. Instead, it relates to the continued occupation of existing converted accommodation that already benefits from established access, parking, utilities and servicing infrastructure. The proposal therefore represents the efficient reuse of an existing building rather than the expansion of the built environment into the countryside.

The Planning Inspectorate has already concluded that removal of the holiday occupancy restriction would not result in unacceptable harm to tourism provision and would preserve the special interest of the listed building. The current proposal builds upon those findings by addressing the remaining concerns identified in the previous appeal through the provision of suitable private amenity space and the submission of significantly enhanced evidence regarding the long-term viability of the existing holiday accommodation use.

When viewed as a whole, the proposal represents sustainable development that is consistent with the overarching objectives of the National Planning Policy Framework. It secures the optimum viable use of an existing heritage asset, makes efficient use of existing buildings and infrastructure, and delivers environmental, social and economic benefits that should be afforded significant weight in the overall planning balance.

For these reasons, the proposal is considered to accord with the sustainability objectives of national planning policy and should be supported when read alongside the detailed policy assessment contained within the accompanying Planning Statement.

9. Conclusion

Taken together with the accompanying **Planning Statement**, **Heritage Statement** and **Optimum Viable Use Assessment**, this proposal demonstrates that unrestricted residential occupation represents a sustainable and appropriate long-term use of the existing converted accommodation.

The proposal makes effective use of an existing Grade II listed building, reuses established infrastructure, preserves the historic fabric of the heritage asset and provides the private outdoor amenity space previously identified by the Planning Inspectorate as necessary for permanent residential occupation. No new dwellings are constructed, no additional land is developed and no significant new infrastructure is required. Instead, the proposal secures the continued beneficial use of an existing building that has already been converted and occupied for many years.

The proposal has also been informed by the findings of two Planning Inspectorate appeal decisions. It retains those aspects of the earlier schemes that were expressly accepted by the Inspectors, including the principle that removal of the holiday occupancy restriction would not result in unacceptable harm to tourism provision and that permanent occupation would preserve the special architectural and historic interest of the listed building. At the same time, it directly addresses the principal concerns that led to the dismissal of the previous appeals through the provision of suitable private amenity space and the submission of significantly strengthened evidence demonstrating that unrestricted residential occupation now represents the optimum viable use of the heritage asset.

The applicants have invested in excess of **£100,000** since acquiring the property in **2021** and have actively operated the holiday accommodation business for more than four years. That sustained investment and operational experience demonstrate that the existing authorised use has been given every reasonable opportunity to succeed before seeking an alternative long-term solution. The proposal is therefore not driven by convenience or personal preference, but by the need to secure the continued occupation, maintenance and conservation of an important listed building through a viable and sustainable use.

From an environmental perspective, the proposal reuses an existing building, retains established infrastructure, avoids unnecessary new development and promotes the long-term conservation of a designated heritage asset. From a social perspective, it provides appropriate living conditions for future occupants, supports year-round occupation and contributes to the continued vitality of the local community. From an economic perspective, it secures a sustainable future for accommodation that has proved commercially unviable as holiday accommodation despite substantial investment and active management, while continuing to support local businesses and services.

Whilst it is recognised that the site occupies a rural location, the proposal should be considered in its proper context. It does not introduce a new isolated dwelling into the countryside but relates to existing converted accommodation that already benefits from established access, parking, utility infrastructure and public transport provision through the **Moorlands Connect** demand-responsive service. The proposal therefore represents a change in the pattern of occupation rather than the creation of new residential development in an unsustainable location.

When considered as a whole, the proposal performs positively against the environmental, social and economic objectives of sustainable development set out within the **National Planning Policy Framework**. It secures the optimum viable use of an important heritage asset, addresses the specific concerns identified in the previous appeal decisions, makes efficient use of existing buildings and infrastructure, and provides a realistic and sustainable long-term future for the listed barn.

Accordingly, when read alongside the Planning Statement, Heritage Statement and Optimum Viable Use Assessment, it is concluded that the proposal represents sustainable development, addresses the concerns identified in the previous appeal decisions and provides a realistic and appropriate long-term future for this important Grade II listed building. Planning permission and Listed Building Consent are therefore respectfully requested.