

Appendix 5

Assessment against the relevant policies of the Staffordshire Moorlands Local Plan (2020)

Proof of Evidence for Mr Robert (Bob) Phillips on behalf of Staffordshire Moorlands District Council

Relating to an appeal made by Laver Leisure (Oakamoor) Ltd

Description of development: Description of Development: Reserved matters application proposing details for the appearance, scale, layout and landscaping for phase 1 of the leisure development comprising 190 lodges; erection of a new central hub building (providing farm shop, gym, swimming pool, spa, restaurant, cafe, games room, visitor centre, hub management and plant areas): reuse and external alterations to the existing office building to provide housekeeping and maintenance accommodation (including meeting rooms, offices, storage, staff areas and workshop); children's play areas; multi use games area; quarry park; car parking; refuse and lighting arrangements; and managed footpaths, cycleways and bridleways set in attractive hard and soft landscaping.

Site Address: Moneystone Quarry, Eaves Lane, Oakamoor, Staffordshire, ST10 2DZ

LPA Ref: SMD/2019/0646

PINs Ref: APP/B3438/W/24/3344014

Date: 29 August 2024



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| Project name and number: |
| 24-016 Moneystone Quarry Appeal (SMDC) |
| Document name and revision: |
| SM Local Plan Review |
| Date of issue: |
| 29 August 2024 |

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The following document contains an assessment of the appeal scheme against the design policies of the SMDC Local Plan 2020.

An overall assessment has been given in the final column using the following colour coded system:

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| Performs well when delivering the criteria | Green |
| Delivers the criteria in a reasonable way | Yellow |
| Shortcomings in delivering the criteria | Orange |
| Ignores or fails to deliver the criteria | Red |

| Section / Policy test | Assessment | Delivered? |
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| Local Plan: Vision and objectives | | |
| Section 4 The Vision - Vision for the Rural Areas - "Well managed, sustainable tourism will be a major driver in regenerating the rural areas and enhancing their character and quality." | The Vision for Rural Areas emphasises the importance of sustainable tourism development that enhances character and quality. The appeal proposal has failed to analyse and in turn respond to the unique character and quality of the Churnet Valley and thus fails to enhance it. | |
| Section 5 Aims and Objectives - Spatial Objective 8 - "To promote local distinctiveness by means of good design and conservation, protection and enhancement of historic, environmental and cultural assets throughout the district". | The proposed development fails to promote local distinctiveness by offering a standard caravan product misleadingly termed 'lodges'. The 'lodges' do not comprise good design and fail to reinforce or reflect local characteristics within the district. It is acknowledged that there is no impact on heritage assets, wider landscape or biodiversity, however this aim is much wider and requires developments to 'enhance'. | |
| Spatial Objective 10 - "To deliver sustainable, inclusive, healthy and safe communities." | Due to the poor quality of the proposed design the development can not be said to meet Spatial Objective 10. | |
| Spatial strategy policies | | |
| Policy SS1 - Development Principles: Development is to contribute positively to social, economic and environmental improvement via key principles including maintaining the locally distinctive character of the Staffordshire Moorlands, supporting high quality, sustainable environments, and efficient and effective use of resources. | [This was a policy against which the application was refused] The proposal does not seek to maintain the locally distinctive character of the Staffordshire Moorlands due to its poor design and material quality. Failure to meet this policy is exacerbated as the proposal has not taken opportunities available to promote efficient and effective use of resources. The detail on energy efficiency and renewable energy sources within the application and appeal packages is inconsistent and unreliable. Many of the features detailed within the outline permission have not been carried through into this proposal for example, green roofs. | |
| Policy SS10 - Other Rural Areas Strategy: Enhancing and conserving the quality of the countryside by giving priority to the need to protect the quality and character of the area requiring all development respects and responds sensitively to the distinctive qualities of the surrounding landscape. | The proposed development does not protect the quality and character of the area. It fails to respond to local vernacular and local character - as set out within the Vernacular Study produced on behalf of the LPA – see Appendix 1. | |

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| <p>Policy SS11 - Churnet Valley Strategy: Sustainable tourism should be in accordance with the Churnet Valley Masterplan.</p> | <p>[This was a policy against which the application was refused]</p> <p>The Churnet Valley masterplan is tied into the development plan through this policy as is the requirement for new development in the area to demonstrate compliance with the masterplan.</p> | |
| <p>Development management policies</p> | | |
| <p>Policy SD1 - Sustainable use of resources: Locating development to minimise energy needs and take advantage of orientation, all major developments to demonstrate consideration of energy efficiency, water conservation, sourcing of construction materials and micro-renewables and reuse of construction waste materials, especially those sourced locally.</p> | <p>The proposed development has not been designed to minimise energy needs. The 'lodges' have not been designed for each plot. They have not been positioned or designed to make the most of passive solar gain or to ensure living accommodation is not unduly overshadowed. There are four caravan types and their window arrangement is due to the internal arrangement not the specific positioning of each unit and the immediate context of the site. No reference is made to locally sourced materials, another missed opportunity to ensure the development makes sustainable use of resources.</p> | |
| <p>Policy E4 - Tourism and cultural development: New tourism development must complement the distinctive character and quality of the district. New accommodation should be of appropriate quality, scale and character compatible with the local area.</p> | <p>[This was a policy against which the application was refused]</p> <p>No assessment of the distinctive character and quality has been made and therefore it cannot be demonstrated that the appeal proposal complements its surroundings. Based on the LPA's assessment the quality, scale and character of the development inadequately responds to local distinctiveness.</p> | |
| <p>Specific Design Policies</p> | | |
| <p>Policy DC1 - Design Considerations: "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.</p> <p>In particular new development should:</p> | <p>[This was a policy against which the application was refused]</p> <p>No assessment of local distinctiveness has been made and therefore it cannot be demonstrated that the appeal proposal reinforces local character. Based on the LPA's assessment the quality, scale and character of the development inadequately responds to local distinctiveness. A separate assessment against the SMDC Design Guide is included.</p> | |
| <p>1 – “be of a high quality, add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area.”</p> | <p>The proposal is of low quality and fails to incorporate creativity, detailing and materials appropriate to the local area. Due to there being no specification of the proposed materials the LPA are unable to assess the durability and longevity of the proposal, a key consideration especially given the rural locality. It is known that the proposal does not use locally common traditional materials such as stone, slate and brick which would not raise the same concerns necessarily. There is no detailing on the proposed elevations of the 'lodges' to reflect detailing found locally.</p> | |

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| <p>2 – “be designed to respect the site and surroundings and promote a positive sense of place and identity through its scale, height, density layout, siting, landscaping, character and appearance.”</p> | <p>The 'lodges' individually and cumulatively will not result in a positive sense of place or local identity. The proposed squat form, horizontal emphasis, shallow roof pitch, irregular fenestration arrangement and horizontal cladding all result in proposed structures which do not complement or reflect the existing local identity. The poor design and materials will result in a non-descript development that lacks character making wayfinding difficult.</p> | |
| <p>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”.</p> | <p>The bulk of this section of the policy is not directly relevant to this appeal. The appeal specifically relates to the ‘lodges’ themselves. Whilst the proposal as a whole meets some of these policy requirements well (for example, hierarchy and quality of public spaces and green infrastructure) the ‘lodges’ and space around them are not well defined. What is public, semi-private and private space for each ‘lodge’ is unclear and the relationship with the landscape of the site itself is poor.</p> | |
| <p>4 – “incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of development.”</p> | <p>The choice of caravans has not been underpinned by an ethos of sustainability in how this site comes forward and no evidence has been provided to demonstrate that the caravans offer a higher level of sustainability than other construction options. The proposal is not a sustainable design concept nor has any evidence been provided to demonstrate that it is the preferable sustainable construction technique for this site.</p> | |
| <p>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”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |
| <p>6 – “promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |
| <p>7 – “provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |

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| <p>8 – “require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |
| <p>9 – “ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where necessary enhanced, to enable the development to proceed”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |
| <p>10 – “ensure, where appropriate, equality of access and use for all sections of the community”</p> | <p>Whilst the wider proposal provides access to the wider community this is not directly relevant to this appeal as the appeal is focused on the design of the ‘lodges’. However, with regard to the ‘lodges’ themselves, there is no evidence that the ‘lodges’ can accommodate those with reduced mobility, those using a wheelchair or pram.</p> | |
| <p>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.”</p> | <p>This element of the policy is not directly relevant to this appeal.</p> | |