

Appendix 6

Assessment against the Churnet Valley Masterplan (2014)

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

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Project name and number:
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The following document contains an assessment of the appeal scheme against the relevant elements of the Churnet Valley Masterplan SPD 2014.

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

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?
Consistent reference throughout the document to the provision of high quality accommodation at key sites including Moneystone Quarry.	The LPA maintain that the proposed 'lodges' do not constitute 'high quality accommodation that the Churnet Valley Masterplan SPD and design guidance and policy require.	
2.0.4 Description of the Churnet Valley: 'The towns and villages each have their own sense of place and distinctive character with a strong local sense of community.... Oakamoor village has reminders of the valley's industrial heritage, whilst nearby Whiston is a small nucleated settlement with a large village hall and golf course.'	No assessment has been made of the unique characteristics of Oakamoor, or Whiston, in order to lead the final design of the 'lodges' to ensure they reinforce existing distinctiveness and character. The initial analysis of the locality has not been undertaken and the design proposed is entirely 'off the shelf' and does not relate to the character of the Churnet Valley.	
2.1 Challenges and Opportunities		
Opportunities: 'Achieving better quality tourism, that is 'distinctive' and utilising underused sites to represent an opportunity to realise new high quality leisure and tourism opportunities.	The masterplan seeks to raise the standard of tourism seeking high quality schemes that are distinctive to the locality. The development has not been designed for this site specifically and will result in a caravan park that could be anywhere in the country. This opportunity has not been taken.	
Threat: 'development which does not reflect local vernacular'	A key identified threat to the special qualities of the Churnet Valley is development such as the appeal proposal that ignores local vernacular. The 'off the shelf' 'lodges' has not been designed for this specific site or locality.	
4. A Vision for the Churnet Valley		
The area will be a fine example of sustainable, low carbon development that is of a high quality design and in-keeping with the landscape character of the area.'	The proposal fails to offer an intrinsically sustainable low carbon development, measures proposed are an 'add-on' are ill-defined and inconsistent. The scheme does not make the most of opportunities to utilise locally sourced materials, it does not provide renewable sources of energy nor ensure the accommodation requires as little energy input as possible (efficiency, positioning on site to ensure passive solar gain etc.).	
5. Sustainable Tourism and the Masterplan Principles		
5.1.1 Sustainable tourism as an ethos that underpins tourism activities rather than being an 'add-on'.	The appeal proposal cannot be described as 'sustainable' tourism. Sustainability is not an ethos that underpins this development and unfortunately the limited measures proposed (air source, solar panels) are very much an 'add-on' with no clear strategy for delivery in practical or high quality design terms.	
5.1.5 The Achieving Wise Growth vision includes reference to 'Visitors will enjoy enhanced experiences at authentic destinations. Residents will feel the benefits of tourism in a way that doesn't undermine their local sense of place.'	As the proposed 'lodges' are essentially 'off the shelf', the appeal scheme does lack authenticity and fails to recognise local identity and sense of place. There is little to reinforce the special character of the Churnet Valley to visitors nor to protect that character for existing residents.	

<p>5.1.11 Achieving Distinctiveness: This section centres on the importance of focusing on the customer experience in attracting and retaining visitors to the Churnet Valley area. The 2011 Staffordshire Moorlands Tourism Strategy names 'enhancing the accommodation stock' and 'going green' as two central cross-cutting themes.</p>	<p>The proposal is directly at odds with the aim of the Tourism Strategy to enhance the accommodation stock and to go green. The appeal scheme fails both of these tests due to poor generic design and accommodation that lacks permanence and long term quality.</p>	
<p>The Staffordshire Moorlands Tourism Strategy was updated in February 2023. The document prioritises a focus on sustainability and Net Zero carbon emissions and additional high quality visitor accommodation.</p>	<p>The new strategy discusses the need for alternative types of accommodation (pods, yurts etc.). It also has a real focus on sustainability across the board. The appeal proposal provides what is essentially a static caravan park that has some 'add-on' sustainability elements. It does not respond to the ethos of what the Tourism Strategy is seeking to achieve.</p>	
<p>5.2 Masterplan Principles:</p>		
<p>Overarching Principle: 'The overarching principle is one of sustaining and enhancing the natural, built and historic environmental quality of the area, its settlements and its hinterland through managed change which provides for rural regeneration largely based on sustainable tourism.'</p>	<p>The appeal proposal fails to sustain and enhance the built environmental quality of the area, its settlements and hinterland due to poor design that is not contextually responsive.</p>	
<p>Principle 2 - Respect, enhance and protect the positive aspects of the Churnet Valley: 'by seeking the highest levels of environmental and sustainable technologies and the highest standard of design for future developments'.</p>	<p>The appeal scheme does not seek the highest levels in terms of environmental and sustainable technologies nor the standard of design. The standard is not high enough in any of these key tests.</p>	
<p>Principle 5 - Deliver quality and sustainable tourism: 'by focusing on quality rather than quantity', 'by marketing and branding the Churnet Valley'.</p>	<p>The appeal proposal does not constitute a quality sustainable example of tourism development and would do more harm than good for the 'image' of the Churnet Valley.</p>	
<p>7.6 Moneystone Character Area</p>		
<p>Section 7.6.3 Key actions are set out that focus on the creation of a high quality new tourism and leisure destination.</p>	<p>The vision for Moneystone specifically refers to a high quality development. The LPA do not consider the appeal scheme to be of a high enough standard of design or build quality.</p>	
<p>7.6.5 Moneystone Quarry Opportunity Site: Concept Statement</p>		
<p>Overview: Recognition of the opportunity to create a high quality leisure venue to complement other recreational and leisure attractions an enhance the area.</p>	<p>The full opportunity to bring forward a high quality leisure venue has been missed and it will fail to enhance the area due to design shortcomings.</p>	
<p>Development strategy: Potential for a complementary renewable energy scheme on the site. Reference made to 'low impact holiday lodges' and 'limited sensitive development of holiday lodges'.</p>	<p>The proposed development cumulatively cannot be considered to be 'low impact' or 'sensitive' as the 'lodges' are essentially caravans sat atop skirting. They will appear poorly proportioned and on top of rather than sat into the landscape which would have reduced their visual impact. 190 (or 250 total on the site) poorly designed buildings cannot be considered 'low impact'.</p>	

<p>General Development Principles: Creation of a high quality, sustainable environment that will promote environmental awareness - use of sustainable building techniques, low carbon, low impact development with on-site energy generation, green technology, eco-lodges. To include water efficient development that includes renewable energy and energy efficient technologies where feasible.</p>	<p>The appeal proposal does not contribute towards this principle. It will not promote environmental awareness as it has failed to utilise sustainable building techniques and is certainly not proposing construction of 'eco-lodges'. Multiple opportunities to ensure this is a high quality energy efficient environmentally sensitive holiday park have been missed.</p>	
<p>Picture 7.6 an artist's impression of what zone 2 - quarry 2 of Moneystone Quarry could potentially look like.</p>	<p>The artists' impression communicates visually the high standard of design that the masterplan seeks. Whilst this image relates to Quarry 2 (not the subject of this appeal) the site as a whole is subject to the same outline planning permission and high standard required by policy. The image is very clearly not of a caravan but of a substantially permanent building that takes some design cues from the local vernacular. It has a roof pitch that reflects local character and uses materials prevalent within the surrounding area. The proposed development bears no resemblance to this image.</p>	
<p>8. Development and management principles</p>		
<p>8.3 Sustainable Tourism: "The provision of high quality all year round tourism opportunities is a key requirement of any proposal for new or extended tourist facilities and services."</p>	<p>Again the emphasis is on creation of a high quality of sustainable tourist destination which the appeal proposal fails to achieve (see previous comments).</p>	
<p>8.6 Green initiatives: "The use of sustainable construction methods and materials shall be encouraged that will blend into the landscape in order that development has a minimal impact on its surroundings."</p>	<p>The proposal fails to 'blend' into the landscape as it uses an inappropriate colour palette and materials and sits caravans on top rather than into the topography of the site. This is inconsistent with the relationship between other buildings and their surrounding landscape as observed elsewhere within the area and the result are 'lodges' which have a detrimental immediate visual impact and jar with the character of the site.</p>	
<p>8.7 Design Principles: All new development of high quality design will have been assessed according to how it respects the valued characteristics of the Churnet Valley including site context, wider setting, density, massing and materials. Based on this the design quality of proposals will be assessed using the following criteria (most relevant included): relationship to the site and wider setting, materials, fitness of purpose of the proposed architecture, composition, public realm, massing, height, local distinctiveness and site constraints.</p>	<p>The appeal scheme has not been assessed against the valued characteristics of the Churnet Valley and based on the LPA's own assessment fails to respect those characteristics. The existing context and setting have not been taken into account and the design is of a low quality that misses multiple opportunities to create a high quality sustainable well-designed holiday park. This reinforces the poor quality of the design process and justification put forward by the appellant for the 'lodges'.</p>	