APPENDIX 1

Design Statement

Proposed Leisure Development (Phase 1)

Moneystone Park

On Behalf of Laver Leisure (Oakamoor Ltd)

May 2024

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Final Statement: Job No: 1733/R7 V4 – 01.05.24

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1.0 Executive Summary

1.1 The Reserved Matters Appeal Scheme at Moneystone Park is in compliance with the Outline Approval (Ref: SMD/2016/0378) and was refined over a two-year period during which there was extensive dialogue with Staffordshire Moorlands District Council (SMDC) planning and technical officers, resulting in numerous alterations to the proposals in order to respond to the comments raised. This resulted in the Planning Officer recommending the Application for Conditional Approval. Several of the proposed Conditions required submission of further information for Approval as the development progressed on site, which would ensure ongoing involvement of SMDC in monitoring the expected high quality of development. I consider that the Appeal Scheme will create a secluded, sustainable, premium leisure development, which is of high-quality design and is available to both holiday guests and the general public in what is currently an inaccessible, inhospitable quarry, albeit that I recognise that the baseline is that of the restoration plan for the quarry.

2.0 Introduction

2.1 This Statement of Case has been prepared on behalf of Laver Leisure (Oakamoor) Ltd in respect of an appeal against SMDC's decision to refuse reserved matters planning application ref: SMD/2019/0646 for Phase 1 of the leisure development ("the Appeal Scheme") at the former Moneystone Quarry, now known as Moneystone Park, ('the Appeal Site').

2.2. The purpose of this Statement is to address the reason for refusal in relation to the design of the proposed lodges in the context of the reason for refusal. This Statement should be read in conjunction with the additional Design Statement of Case prepared by Bratherton Park Consultants

2.3 I am Andrew Bunce and I studied at Manchester University from 1976 to 1982 and obtained a BA Hons and BArch. I have worked in the UK holiday industry for 35 years with a significant proportion of the major UK holiday operators across the quality spectrum from budget to luxury, such as Haven, Park Resorts, Hoburne, Darwin etc. Those projects have included built accommodation, caravan sites, caravan parks and lodge retreats and during that time I have seen significant changes within the industry. The type of holiday has changed from what used to be 2 weeks in the summer to a tendency towards more shorter breaks of 3-4 days throughout the year. This has influenced both the type of accommodation available and the way in which it is laid out on site.

2.4 The design evidence which I have prepared and provide for this Appeal in this Statement of Case is true and has been prepared, and is given, in accordance with the guidance of my professional institution and I can confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

3.0 Background

3.1 Pre-Application Discussions

3.1.1 There was an extensive dialogue with the LPA over a period of approximately 2 years prior to the submission of the Reserved Matters Application. During this period several alterations to the proposals were proposed by the LPA many of which were incorporated into the final submission. These discussions resulted in the lengthy and well-reasoned LPA Committee Report recommending the application for Approval. It should also be noted that the proposal at Moneystone Park is in accordance with the Churnet Valley masterplan SPD (2014) and the Staffordshire Moorland Design Guide, a detailed assessment of which is contained within the Planning Statement of Case prepared by Asteer.

3.2 Reason for Refusal

3.2.1 The reserved matters planning application was refused contrary to officer's advice at SMDC's planning committee on 26th October 2023.

3.2.2The reasons for refusal were specified in the Decision Notice as follows:

'It is considered that the proposed lodges, which are little more than caravans with cladding, fail to deliver the required high standard of design. Owing to the proposed materials and lack of any green roofs, lack of creativity and detailing the lodges could not be said to be of an appropriate high quality nor do they add value to the local area. They have not been designed to respect this sensitive site or its surroundings, noting that it is in part adjacent to the Whiston Eaves SSSI'

For these reasons the proposal fails to comply with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework including but not limited to Chapters 12 which says that good design is a key aspect of sustainable development and Chapter 15 which says that planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity"

4.0 Outline Planning Approval SMD/2016/0378 dated 26th October 2016

4.1 Description of Proposal

4.1.1The outline planning permission (Ref: SMD/2016/0378) was granted by SMDC on 26th October 2016 for the following development:

'Outline application with some matters reserved for the erection of a high quality leisure development comprising holiday lodges; a new central hub building (providing swimming pool, restaurant, bowling alley, spa, gym, informal screen/cinema room, children's soft play area, cafe, shop and sports hall); cafe; visitor centre with farm shop; administration building; maintenance building; archery centre; watersports centre; equipped play areas; multi-sports area; ropewalks; car parking; and managed footpaths, cycleways and bridleways set in attractive landscaping and ecological enhancements (re-submission of Planning Application SMD/2014/0682).'

4.2 Condition 8

4.2.2 Condition 8 of the outline planning permission states:

'No more than 250 lodges shall be developed on the site within the broad areas identified for Holiday Lodges on the Parameters Plan (dwg ref PL1088.M.110 rev 6) hereby approved.'

4.3 Lodges

4.3.1 The Appeal Scheme proposes Phase 1 of the overall development and includes the erection of a leisure development comprising 190 lodges, a new central hub building, children's play areas, multi-use games area, quarry park, parking facilities, site infrastructure and associated landscaping. The only issue of concern to the Council is the detailed design of the individual lodges.

4.3.2 The lodges proposed are to be constructed within specialised manufacturing facilities to BS3632:2015. This British Standard lists the design criteria ensuring that all models of holiday lodges and residential park homes are fit for their specific purpose.

4.3.3 BS3632:2015 ensures focus upon high levels of thermal insulation, ventilation, stability of the home once it has been sited and the room size. Once manufactured the lodges are delivered to the park as completed units on low loaders with minor finishing works on site.

4.3.4 The lodges will as a matter of fact be designed to comply with the criteria established under The Caravans Sites Act 1968. This is because the Lodges will have a chassis which will enable them to be moved from a low loader to a predefined position on a concrete base. This Act dictates fundamental aspects of the shape and size of the Lodges.

4.3.5 This method of procurement is more efficient and reduces embedded carbon, waste, on site construction time, noise, number of deliveries etc and is therefore beneficial to all parties. Whilst the proposed Holiday Lodges fall under the definition of the Caravan Sites Act they are not Static Caravans nor are they Touring Caravans. It essentially means that they are structures constructed off site and are capable of being moved as individual units.

5.0 Lodges Compared to Conventional Caravans

5.1 Lodges

5.1.1 What is proposed through the Appeal Scheme at Moneystone Park is Holiday Lodges, and whilst they will have a chassis and technically fall under the requirements of the Caravans Sites Act 1968, they will bear no relationship with a Static Caravan and once the skirt is fitted around the base will appear visually to be no different to permanent structures.

5.1.2 The lodges, as proposed under the Appeal Scheme, are considerably heavier than Static Caravans due to the quality of finishes internally, including fully fitted kitchens, extensive ceramic tiling increased wall thickness and double glazing etc. This means that Lodges do not need to be chained down (to prevent them moving during high winds), whereas Static Caravans usually need to be chained in place. The information submitted with the Reserved Matters Application clearly indicated the type of high quality, lodge accommodation proposed which was considered to be acceptable by SMDC Officers in their assessment of the Reserved Matters Application and their recommendation for approval, but the Members at the Planning Committee ultimately seem to have misinterpreted the proposals as being static caravans on basic caravan pitches, which is simply not the case.

5.2 Lodge Exteriors and Forms

5.2.1 Externally the proposed Lodges at Moneystone Park are either single modules (up to 14' wide) or twin modules bolted together (up to a maximum 22' wide) and up to 45' long. The way they are planned and detailed leads to a variety of forms and they are clad in a selection of materials including timber (invariably cedar or Larch). See examples below:

Figure 1: Mono Pitched Lodge Roof, with contrasting section of cladding

Figure 2: Lodge with raised and chamfered Lounge Roof

5.3 Lodge Interiors

5.3.1 Lodge interiors are of a much higher quality than caravans. Walls are clad in timber or plasterboard, kitchens are to an excellent domestic standard, bathrooms have all ceramic sanitary ware and are lined with ceramic tiling. Living areas have freestanding furniture and bedrooms are of a generous size, often having en suites and dressing rooms. Windows are invariably large and double glazed creating an open spacious interior. See examples below:

Figure 3: Example of Lodge Interior with ceiling following line of mono pitched roof

Figure 4: Example of Lodge interior ceiling following pitched roof, loose furniture

5.4 Caravan Exteriors and Forms **(Not proposed under the Appeal Scheme)**

5.4.1 By contrast to lodges, Static Caravans are rectangular metal or plastic clad modules up to 14' wide, typically in pastel colours, with a simple shallow pitched roof. External walls are approximately 60mm thick and contain minimal insulation and windows are single glazed. Often the wheels and chassis are exposed, which makes them look temporary, exposing the concrete slab. See examples below:

Figures 5 & 6: Typical Static Caravan Layout in regimented rows with no skirts (not proposed under the Appeal Scheme)

5.5 Caravan Interiors (Not proposed under the Appeal Scheme)

5.5.1 Internally caravans have fitted furniture, bench seating, very small bedrooms, plastic panel lined walls and invariably horizontal or very shallow pitched ceilings. See examples below:

Figures 7 & 8: Typical Static Caravan interiors, with fixed furniture and 'plastic', light weight finishes. (Not proposed under the Appeal Scheme).

6.0 Quality of Development

6.1 The proposed development at Moneystone Park takes careful account of all sections outlined in the National Design Guide (NDG) including Context, Identity, Built Form, Movement, Nature, Public Spaces, Uses etc.

6.1.1 Context

6.1.1.1 Moneystone Park develops what was a series of inaccessible quarries to create a facility for both holiday guests and local people to enjoy. The proposal uses the quarry walls and features to create a low density, low impact, high quality holiday lodge park and leisure facilities that enhances the local rural environment with large areas of open space and extensive indigenous planting, whilst also being of very low visual impact from anywhere beyond the site boundary. All of the proposed lodges and other buildings are low lying and laid out to follow the contours of the quarry remediation. The lodges will be powered by renewable electricity, with heating and hot water produced by air source heat pumps and, where appropriate photo voltaic panels will be included on the roofs, as set out in further derail in the Energy and Sustainability Statement of Case. Parking areas will be created using local crushed stone contained within a geogrid. The main hub building will be partially clad in local stone and includes a 'green' sedum roof, however individual lodges will not have similar roofs.

6.1.2 Identity

6.1.2.1 To enhance the rural, woodland context the lodges will be clad in timber with 'slate' effect roofs, the hub and facilities buildings are proposed to be clad in a mixture of timber and local stone. All proposed buildings and lodges are low key in design terms to minimise visual impact. Main link roads will be tarmac with a rolled edge, avoiding formality created by kerbs.

6.1.3 Built Form

6.1.3.1 The proposed holiday lodges are arranged in three distinct areas (Quarry 1 West, Quarry 1 East and Quarry 3) that formed the locations of the original quarry excavations. All Holiday Lodges are low level, with a maximum height of 3.0m above floor level and will soon become surrounded and enclosed by the indigenous landscaping as it matures. The hub building is designed as an organic form with curved roofs following the contours of the remediated ground around the lip of the capped Quarry 1. The Activity Building reuses a pre-existing former 'Laboratory' Building to create a range of indoor leisure facilities which has been approved separately under Planning Application ref SMD/2019/0716 on 10th January 2024. The Park is arranged to encourage outdoor activity with a network of pedestrian routes both within the Park boundary and linking into adjacent Public Footpaths.

6.1.4 Movement

6.1.4.1 The Appeal Site has a single entrance from Whiston Eaves Lane which leads directly to the Hub Building and informal gravel parking areas. Within the Park there is a hierarchy of roads leading to the three lodge areas, this hierarchy becomes gradually more informal. Crushed stone car parking bays are included adjacent to each lodge. There will also be a network of pedestrian/cycle routes throughout the Park which provide links into adjacent Public Footpaths and cycle ways.

6.1.5 Nature

6.1.5.1 Extensive indigenous planting is included throughout the park to encourage biodiversity. A variety of habitats are included including cliff faces, woodland and aquatic planting around the retained water bodies.

6.1.6 Public Spaces

6.1.6.1 The park will be open to the public and there are centralised public spaces around the hub building and retained water bodies, which include outdoor activities. As noted above the extensive formal and informal footpath and cycle network will also integrate with Public Footpaths which run adjacent to the Park.

6.1.7 Uses

6.1.7.1 At present the area is a series of redundant remediated quarries that are inaccessible to the public. The proposed development will encourage both visitors to stay in a high-quality park development and the general public to access and enjoy what is currently an inaccessible area. The Park will create leisure facilities including a swimming pool and MUGA and provide a range of activities, which are not currently available locally.

6.2 Lodges – Details of Design

6.2.1 Variation in Form and Cladding Materials

6.2.1.1 As noted above the form, shape, style and materials of high-end luxury lodges can be significantly varied, with differently angled pitched roofs mono pitch and flat roofs. External cladding may be fitted horizontally or vertically and stained in different colours to create variety, whilst working within a limited palette to ensure a degree of commonality. The images below relate purely to the forms of the lodges and not the surrounding decks. The size and shape of decks at Moneystone Park will be predetermined and agreed with the LPA.

Figure 9: Example of a Lodge with a staggered Pitched Roof

Figure 10: Example of a Lodge with a simple pitched Roof

6.2.2 Details of Examples of comparable ‘high-end’ styles of Lodges and cladding materials as Submitted under Reserved Matters Application

Typical Monopitch Timber (Vertical & Horizontal) Clad Lodge. Pale Grey Powder Coated Aluminium Frames. Galvanised Rainwater Goods. Pressed Metal roof. Timber Skirt and Deck Posts

Typical Monopitch Timber (Vertical & Horizontal) Clad Lodge. Black Powder Coated Aluminium Frames. Black Rainwater Goods. Pressed Metal roof. Black Skirt & Deck Posts

Typical Pitched Horizontal Timber Clad Lodge. Pale Grey Powder Coated Aluminium Frames. Galvanised Rainwater Goods. Pressed Metal Roof. Timber Skirt and Deck Posts

Vertical Timber Cladding

Horizontal Timber Cladding, Dark Grey Frames

Roof Finish: Tile ‘Lookalike’ Pressed Metal Trays. Dark Grey Matt Finish

Figure 11: Sheet of Examples of comparable ‘high end’ lodges submitted as part of Reserved Matters Application

6.3 Lodge Setting, Decking/Terraces and Skirting

6.3.1 Equally important to the actual lodge is the way in which they are integrated with the surrounding landscape. At Moneystone Park this has been carefully considered and the layouts and spacing have been designed to suit each particular area. The lodge layouts within Quarry 1 West (Q1W) and Quarry 1 East (Q1E) are located on a filled and capped quarry. A lake has formed within a depression in Q1W and this is retained as a feature. Both areas are relatively flat and are backed to the north by the remaining quarry cliff face. These two areas will both create a woodland edge setting, with the scale of the proposed landscaping increasing as it approaches the cliff face. The third lodge area is around Quarry 3, which is a steep sided unfilled rock faced excavation within which a large lake has formed. An access road will be constructed around the perimeter of the lake, with the majority of the lodges facing directly onto the water. Where the levels allow a limited number of lodges have also been positioned overlooking the lake on ‘shelves’ around the quarry face. The lodges around the lake are separated by aquatic planting.

6.3.2 Lodge Setting

6.3.2.1 Within Q1W and Q1E the extensive naturalised landscaping is designed as a hierarchy working away from the circulation routes, being relatively formal grass and low-level planting adjacent to the road and becoming more naturalised and denser the greater the distance away. Trees and taller shrubs will be carefully positioned to ensure that PV panels located on the roofs of lodges will not be shaded. Crushed stone car parking bays are located adjacent to each lodge. Within Q3 the lodges are generally adjacent to the lake and gravel car parking spaces are immediately behind or adjacent, allowing the views over the water from within the lodges to be uninterrupted. This will create a distinct feeling of quality, in contrast to low-quality residential park type developments, which invariably have 'manicured' grass throughout, with limited soft landscaping. A further detailed assessment of the lodge setting within the landscape is set out in the Landscape Statement of Case prepared by Planit.

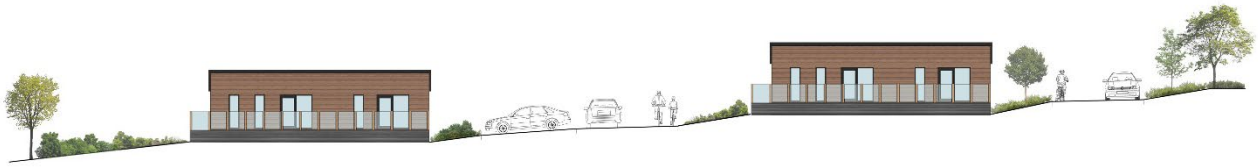


Figure 12: Typical Section through Lodge Area within Q1W

Figure 13: Visual of Proposed Lodges within Q1

6.3.2.2 As noted previously, the lodges will be all electric and where appropriate (to suit roof pitch, orientation and sun angles), photo voltaic panels will be incorporated into appropriately positioned lodge roofs to generate electricity and reduce electrical demand. Air Source Heat Pumps (ASHP) will be used to generate hot water for general use and central heating within the lodges. Each lodge will have its own ASHP. The ASHP's will be positioned butting up to the lodges, and concealed behind a slatted timber screen that compliments the lodge cladding.

6.3.2.3 The parking bays adjacent to the lodges will incorporate the facility to enable trickle charging of EV cars.

6.3.3 Lodge Decking/Terrace

6.3.3.1 Terraces are included enclosing at least two faces of each lodge. These will consist of a raised deck (generally at the floor level of the lodge) constructed from composite timber decking boards and timber post and glass balustrades.

Figure 14: Images of a Single Lodge with end Terrace

Figure 15: Images of Waterside Twin Lodge with side Terrace

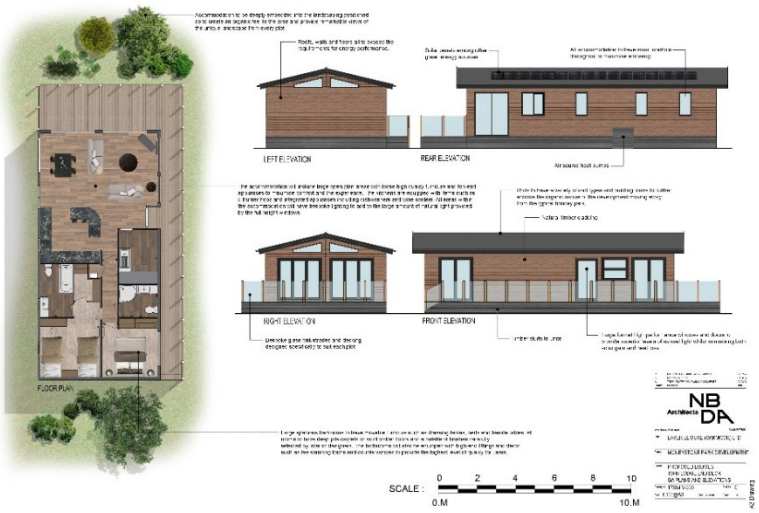


Figure 16: Twin Lodge End Terrace

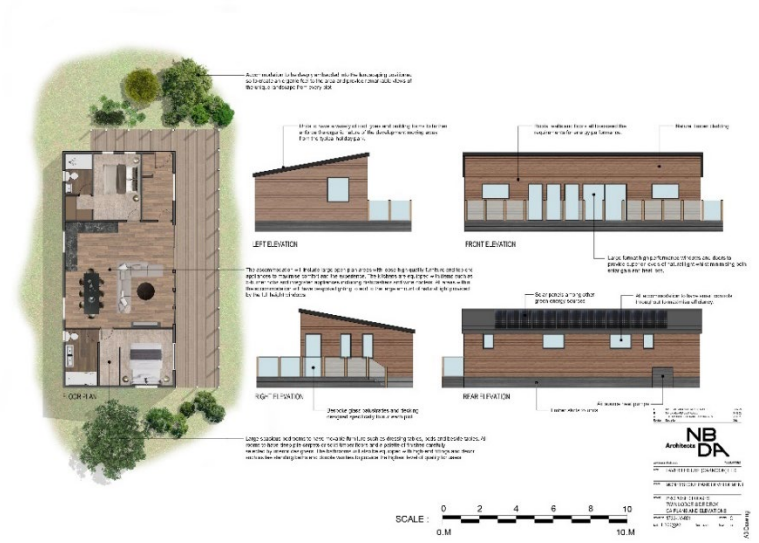


Figure 17: Twin Lodge Side Terrace

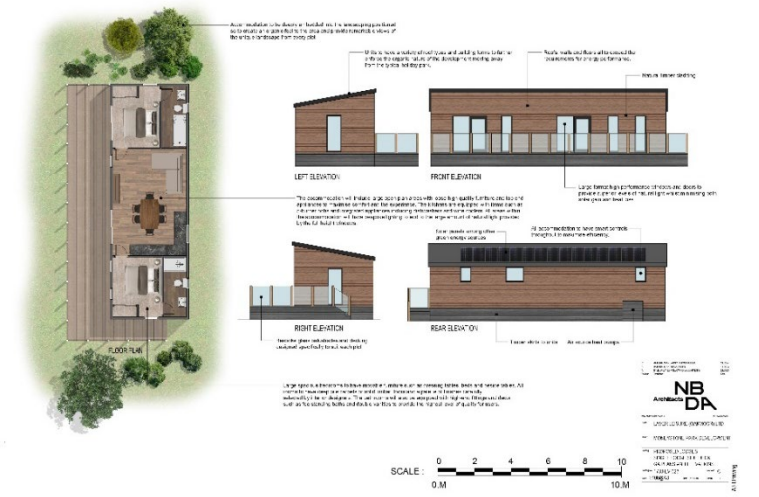


Figure 18: Single Lodge Side Terrace

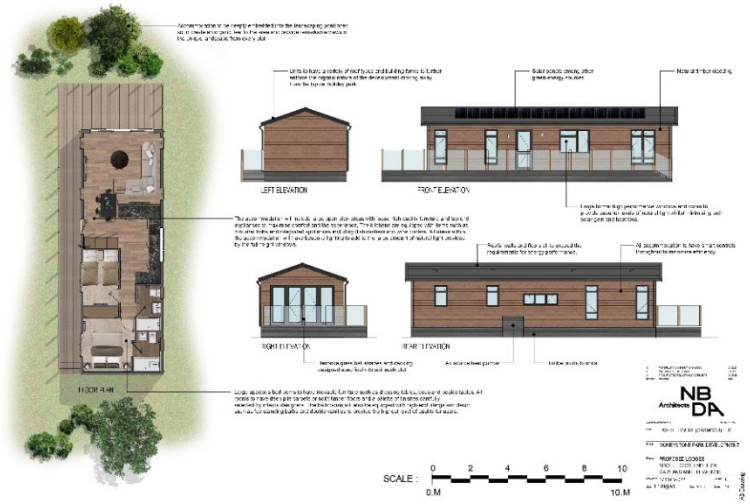


Figure 19: Single Lodge End Terrace

6.3.4 Lodge Skirting

6.3.4.1 The lodge floors are elevated above ground level by approximately 600mm (actual height depends upon individual manufacturer and lodge weight) to facilitate transportation and the gap between the internal floor level and external ground level will be infilled to create the impression that the lodges are permanent buildings constructed on foundations rather than giving any appearance of them being mobile homes. This infill is common within high quality lodge parks and is known as the skirting and there are various means of achieving the desired 'permanent' appearance. Where gas pipework is included below the lodge floors legislation (Gas Safety – Installation and Use – Regulations 1998) dictates that the void below the lodges needs to be ventilated. However, at Moneystone Park, to improve the sustainability of the development the decision has been made to have electricity throughout. Therefore, solid skirtings will be included either in cladding to match the lodge or a contrasting finish. See Examples below:

Figure 20: Typical Lodge Skirtings

6.4 Procurement and continuity.

6.4.1 Factory made lodges, enable faster more efficient, higher quality, off site construction, that has excellent quality control and greater continuity than traditionally on site-built lodges/chalets which are constructed in a variety of weather conditions over a much longer period of time. Lodges are delivered to site on low loaders as completed elements, positioned on a pre allocated concrete slab and bolted together at a time to suit completion of groundworks and services. As set out within the Planning Conditions and the Committee Report a palette of materials will be agreed with the LPA. Furthermore, it is intended that the detail of the design of each lodge type manufactured and sited on the park would be submitted to and approved by the LPA in order to ensure quality is maintained throughout the lifetime of the development.

6.5 Lodge Layout – High quality informal and organic as against low quality orthogonal.

6.5.1 High-Quality Low-Density Informal

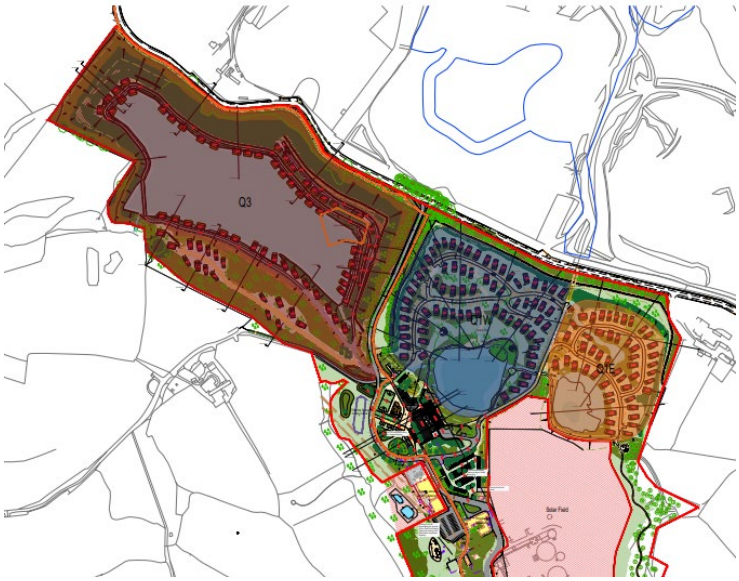


Figure 21: Moneystone Site Plan Extract Indicating locations of Q1W, Q1E and Q3

6.5.1.1 At Moneystone Park within Q1W and Q1E a natural organic layout has been adopted following the principles set out at the outline stage with lodges set at different angles to avoid regimentation and spaced at considerably greater separation than the minimum dictated by Model Standards as dictated under the above Act. Also, the lodges are staggered and angled such that they face into the gaps between any lodges in front to create longer views and greater privacy on decks and within the living spaces.

6.5.2 Low Quality High Density Orthogonal **(not proposed under the Appeal Scheme)**

6.5.2.1 Unlike in the appeal proposals, in a typical residential park licensing requirements will be met to ensure minimum separation distances are secured, but otherwise layouts tend to be quite dense and regimented with far more limited public space around the lodges than is proposed here.

6.5.2.2 Below is an example of a low-quality rigid formal, layout with lodges in parallel rows to maximise density. This may be unfavourably contrasted to the low density informal layout, which is proposed at Moneystone Park, which will be far more respectful to its setting.

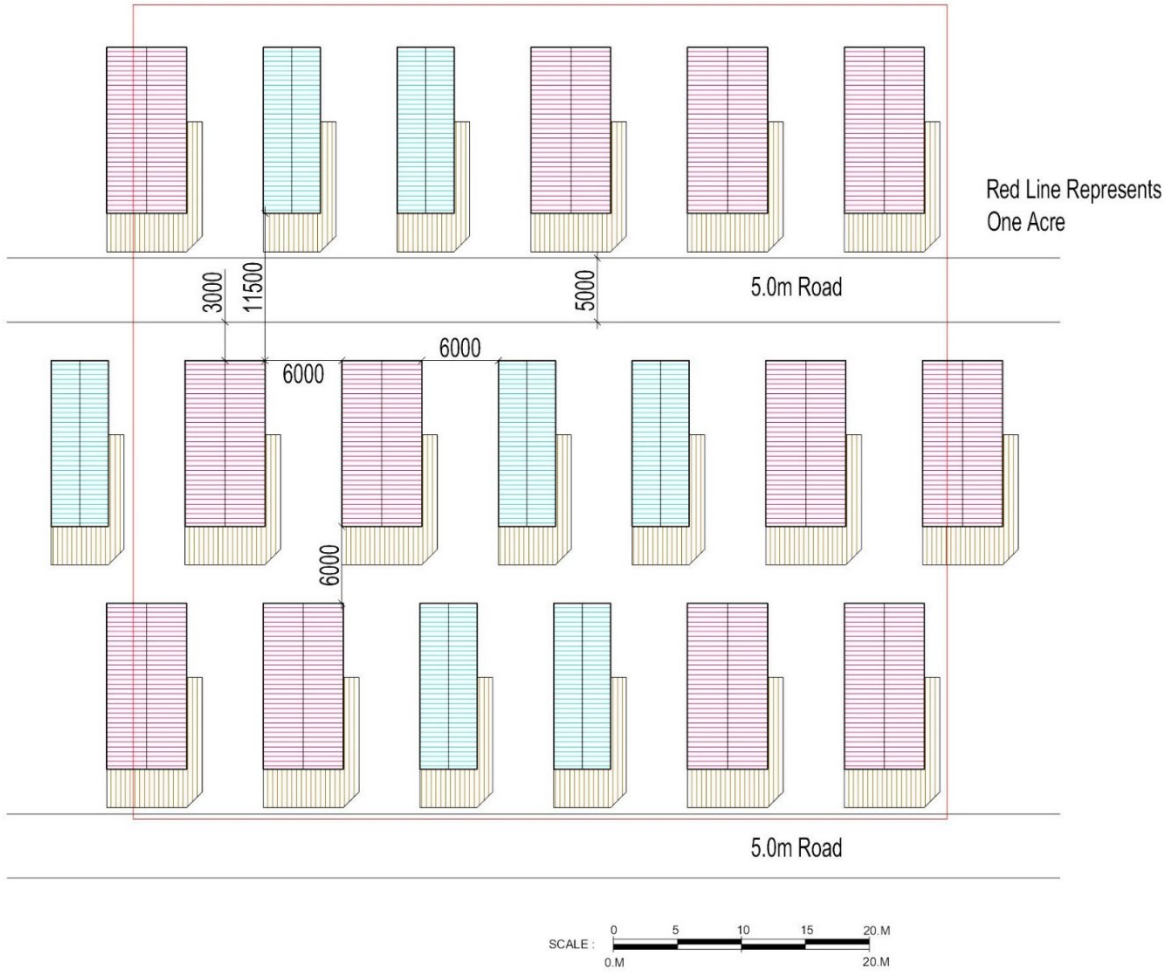


Figure 22: Example layout of Low-Quality High Density Orthogonal layout (not proposed under the Appeal Scheme)

Figure 23: Example of lodges set out in straight rows with no soft landscaping included (not proposed under the Appeal Scheme)

6.6 Park Facilities

6.6.1 It should be noted that design of the non-lodge buildings at Moneystone Park including the Hub Building were accepted by the LPA and are not in dispute in the reason for refusal, however details are included within this statement to indicate the client's intent to create a high-quality development overall. The quality of the proposed development at Moneystone is also enhanced by the facilities that are to be included for both those staying on the park and day visitors. These facilities are provided within three separate buildings: the Hub Building, the Activity Centre and the Water Sports Centre.

6.6.2 Hub Building

6.6.2.1 Facilities included within the proposed Hub Building are as follows:

- Accommodation check in area
- Reception Toilets
- Hub Management
- Farm Shop
- Gym
- Spa Including 3No. Treatment Rooms, Relaxation Suite, Nail & Pedicure
- Swimming Pool, including Toddler Pool with Associated Changing and Viewing Area
- Pool Plant Room, General Plant Room
- Café Lounge
- Restaurant
- Lounge Bar
- Games area
- Central Bar Servery
- Toilets
- Kitchen, Cellar, Dry Store
- Associated Plant
- Covered external area to provide weather protected walkway

6.6.2.2 The new build Hub Building has been split into three elements. The Upper Ground Floor, the front section of the Lower Ground Floor and a Link Element. The Upper and Lower Floors are staggered in plan and the Link Element is slightly recessed and also treated differently elevationally to create a visual separation. Both Upper and Lower Floors have a local Gritstone Plinth, but at Lower Level the stone is taken to the 'top' of the windows, whereas at the Upper Level it is only taken partially up the height of the windows. Above the stone, vertical board and batten cladding is used up to eaves level. The Link Element is clad with vertical and horizontal timber cladding, the upper part of which will be stained black to emphasise the separation between the elements. The eaves and fascia's and rainwater goods are to be dark grey powder coated aluminium. The exposed curved roofs have a Sedum roof finish. The recessed flat plant room roof will be finished with a single ply membrane.

Figure 24: Sketch layout indicating arrangement of central area around Hub Building

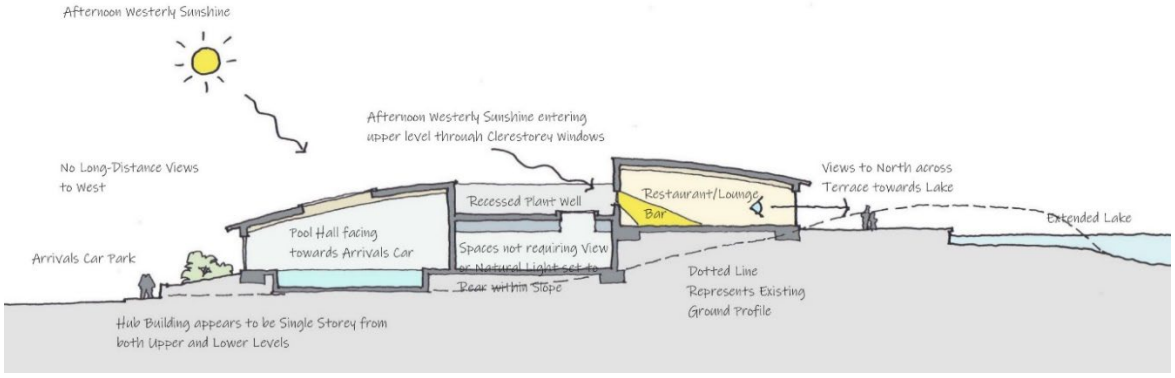


Figure 25: Section through Hub Building indicating use of existing contours

Figure 26: Materials proposed for Hub Building

Figure 27: Visual of gable end of Hub Building

6.6.3 Activity Building

6.6.3.1 The building reuses existing former 'Laboratory' buildings constructed by Sibelco, the quarry operator. The change of use of this building has been approved by SMDC under a separate change of use application (Ref: SMD/2019/0716) granted on 10th January 2024 and does not form part of the Appeal Scheme but will form part of the leisure development if and when it is delivered. Whilst the built form remains approximately as existing, external cladding will be replaced using materials that complement/match the rest of the development including timber cladding.

6.6.3.2 Facilities included within the former 'Laboratory Building' are as follows:

- 2 No. Lane Bowling Alley
- Children's Indoor Soft Play Area
- Sport's Hall (Including Indoor Climbing Wall)
- Café Servery to Viewing Areas
- Informal Screen Room
- Craft Room
- Bike Hire
- Associated Viewing Areas, Stores, Management Offices and Plant Rooms

Figure 28: Sketch Layout of central area indication relationship of Activity Centre to Hub Building.

Figure 29: Proposed cladding materials to Activity Building (Reused 'Laboratory' Building)

Figure 30: Proposed Elevations to Activity Building

6.6.4 Water Sports Building

6.6.4.1 The Water Sports Building does not form part of the Appeal Scheme but is proposed under a separate reserved matters application for Phase 2 of development (Ref: SMD/2023/0532) which was submitted to SMDC in October 2023 and is pending determination. The Water Sports Building is set on a steeply sloping part of the site above the largest retained water body. It is a two-storey building, set into the slope of the ground, overlooking the lake with 11no. dedicated parking spaces. The upper floor provides level access from the circulation road around the lake and contains a café with both internal and external seating resulting in 56no. covers which overlook the lake. The lower level has changing facilities, toilets and space for the storage of equipment. The lower level can be accessed by both a ramp and stairs. Aesthetically, the building will match the surrounding lodges on the top level and have a dry-stone wall finish on the lower level to both blend in with the bank behind and to limit deterioration due to the damp environment at the water side.

Figure 31: Sketch visual of proposed Water Sports Centre

7.0 Reserved Matters Application

7.1 Compliance with Outline Approval

7.1.1 The Appeal Scheme complies with all criteria set out within the Outline Approval in terms of numbers and heights/scale of lodges proposed within each of the designated areas set out on the approved Parameters Plan. Similarly, all proposed buildings are in compliance with the Conditions of the Outline Approval using built forms and materials that are sympathetic to the location.

8.0 Summary and Conclusions

8.1 The Reserved Matters Application fully complies with the Outline Approval and will comprise high quality design. The drawings and documentation submitted under the Reserved Matters Application have been developed over a long period of time through extensive dialogue with SMDC Officers and consultees resulting in a leisure park of a high-quality design. It should also be noted that the Planning Conditions attached to the Planning Officer's Recommendation for Approval will ensure that the LPA are involved throughout to monitor the high quality of holiday lodge design, setting and layout from commencement to completion of the redevelopment. The Appellant's proposed approach to conditions is set out in the Planning Statement of Case at Chapter 12.

8.2 The Appeal Scheme will create a high-quality leisure and activity destination for both holiday guests and the general public in what is currently an inaccessible remediated quarry. The lodges will be of high quality, clad in timber with a limited palette of materials, they will also be all electric with heating and hot water provided via air source heat pumps and where appropriate photovoltaic panels will be incorporated into the roofs. The lodge layouts and settings have been carefully considered to create an organic low density informal arrangement set within extensive indigenous soft landscaping (see Landscape Statement of Case prepared by Planit). It is clear that the design proposed for Moneystone Park will be comparable or better than other existing high quality Holiday Lodge Parks referenced within 'Bratherton Park Design Consultants Design' Statement of Case (Appendix 5). I consider that the Moneystone Park proposal will create a unique high quality leisure development that will enhance the area, with minimal visual impact from beyond the boundary of the Park.

8.3 Having considered the reason for refusal, I believe it to be wholly wrong because the proposed lodges are far from 'caravans with cladding', as established in this Statement of Case. The proposed Holiday Lodges once sited will appear to be substantial timber clad buildings set within a carefully designed landscaped setting, that will complement and enhance the area.

8.4 The proposed lodges will be of a high quality and will readily meet the requirements of the CVP to secure an overall high end leisure proposal in the heart of the district.

Appendix 1

Definitions under the Caravan Sites Act 1968c

Appendix 2 – Definition of a caravan

Section 29 of Caravan Sites and Control of Development Act 1960:

"caravan" means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted, but does not include—
(a) any railway rolling stock which is for the time being on rails forming part of a railway system, or
(b) any tent;

Caravan Sites Act 1968 Section 13 – definition of twin unit caravans as amended by the Caravan Sites Act 1968 and Social Landlords (Permissible Additional Purposes) (England) Order 2006 (Definition of Caravan) (Amendment) (England) Order 2006

(1) A structure designed or adapted for human habitation which—
(a) is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and
(b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), shall not be treated as not being (or as not having been) a caravan within the meaning of Part 1 of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be so moved on a highway when assembled.

(2) For the purposes of Part 1 of the Caravan Sites and Control of Development Act 1960, the expression "caravan" shall not include a structure designed or adapted for human habitation which falls within paragraphs (a) and (b) of the foregoing subsection if its dimensions when assembled exceed any of the following limits, namely—
(a) length (exclusive of any drawbar): 65.616 feet (20 metres);
(b) width: 22.309 feet 6.8 metres);
(c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 10.006 feet (3.05 metres).

(3) The [Secretary of State] may by order made by statutory instrument after consultation with such persons or bodies as appear to him to be concerned substitute for any figure mentioned in subsection (2) of this section such other figure as may be specified in the order.

APPENDIX 2

Bratherton
PARK DESIGN CONSULTANTS

DESIGN QUALITY REVIEW STATEMENT OF CASE

By John Bratherton, B. Eng, C. Eng., M.I.C.E.

Proposed Leisure Development
(Phase 1) Moneystone Park

On behalf of Laver Leisure

(Oakamoor) Ltd Dated: 01/05/24

CONTENTS

1.0 INTRODUCTION

1.1 I am John Bratherton and the Director of Bratherton Park Design Ltd. I am a Chartered Civil Engineer and formed the Company in 1989.

The company

1.2 Bratherton Park Design Ltd specialises in the design and development of Leisure Parks, Holiday Parks, and Residential Parks throughout the UK. I am personally involved in every park assessed by my firm. When requested by clients to do so, my firm will project manage the delivery and opening of the parks. These parks range from the top end luxury lodges to the more ordinary static caravan parks.

1.3 Our work involves interface with all other specialists involved in the obtaining of planning consents including Planning Consultants, Architects, Landscape Architects, Ecologists, Highway Consultants, and others where necessary.

1.4 We are recognised as leading specialists in the design of holiday and leisure parks and respond to particular needs of our clients with regard to quality of the parks depending upon the location, local environment, end user profile and commercial viability.

My Role

1.5 I have been instructed as an Expert Witness in the case of Moneystone Quarry by Laver Leisure (Oakamoor) Ltd to present opinion on the Reason for Refusal of Reserved Matters Application SMD/2019/0646 dated 14th November 2023 and the quality of the overall proposed development and the proposed holiday accommodation units described as lodges.

1.6 This Statement should be read in conjunction with the separate Design Statement of Case prepared by Andrew Bunce of NBDA. Andrew Bunce has been involved in this Reserved Matters Application since the start as Principal Architects and Designers of the park as a whole, advising on the types of lodges to be used and the detailed designs of the proposed buildings. I have provided this Design Statement of Case to critique the overall lodge park design and the proposed lodges since I come from a long period of experience within the entire range of leisure parks.

1.7 The design evidence which I have prepared and provide for this Appeal in this Statement of Case is true and has been prepared, and is given, in accordance with the guidance of my professional institution.

2.0 REASONS FOR REFUSAL OF PLANNING APPLICATION SMD/2019/0646

2.1 The reasons for refusal are as follows:

This site lies within the Churnet Valley which is an area of significant landscape, wildlife, and heritage value. Policy SS11 of the Staffordshire Moorlands Local Plan (adopted September 2020) sets out the strategy for the Churnet Valley. It says that all 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. The consideration of landscape character it says will be paramount in all proposals, in order to protect and conserve locally distinctive qualities and sense of place and to maximise Page 4 opportunities for restoring, strengthening, and enhancing distinctive landscape features.

It is considered that the proposed lodges, which are little more than caravans with cladding, fail to deliver the required high standard of design. Owing to the proposed materials and lack of any green roofs, lack of creativity and detailing the lodges could not be said to be of an appropriate high quality nor do they add value to the local area. They have not been designed to respect this sensitive site or its surroundings, noting that it is in part adjacent to the Whiston Eaves SSSI.

For these reasons the proposal fails to comply with Polices SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework including but not limited to Chapters 12 which says that good design is a key aspect of sustainable development and Chapter 15 which says that planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity.

2.2 Contrary to the assertions within the reason for refusal, I have examined the proposed Masterplan 1733-MS-019 by NBDA and conclude that this is a well-designed high-quality layout which recognises and responds to the natural setting and scale of the site. I will comment further on this aspect in Section 3.0 of this Statement.

2.3 I have noted from the Reasons for Refusal the suggestion that "*the proposed lodges…. are little more than caravans with cladding…*" and that there is a "*lack of creativity*". I have reviewed the proposed lodges put forward in the Planning Application SMD/2019/0646 and concluded that this is an entirely erroneous characterization of the proposed lodges. The proposed lodges are very much more than caravans with cladding furthermore the proposed lodges are carefully designed with a high level of creativity in terms of how they will sit within the landscape, how energy consumption will be minimized, their functionality and also, how they will be perceived. Design is much more than just aesthetics. I will comment further on this aspect in Section 4.0. This matter is also covered within NBDA's Design Statement of Case at Section 6.0

2.4 The definition of a static caravan in the Caravan Sites and Control of Development Act does not mean that a reasonable decision maker ought to infer that the proposed holiday lodges are traditionally clad static caravans. The definition within that Act is to control the size limitation criteria of the accommodation units and their method of transportation for a lodge built of any style so long as it complies with those criteria.

2.5 Reference is made in the Reasons for Refusal to the "lack of creativity and detailing of the lodges" owing to the proposed materials and lack of green roofs and that they are considered not to be of an appropriate high quality. I will comment further on these points in Section 4.0.

2.6 The Reasons for Refusal state that the holiday lodges do not "add value to the local area". I will comment further on this point in Section 6.0.

3.0 PROPOSED PARK LAYOUT AND DENSITY

3.1 I make reference to Masterplan no. 1733-MS-019 Designed by NBDA and referred to as Figure 1 Proposed Masterplan, shown below.

Above: Fig. 1 Proposed Masterplan no. 1733-MS-019

3.2 This design presents a very high-quality layout of holiday lodges which respects fully the existing landform created by the previous use of the site as a quarry for extracting sand and gravel.

3.3 The quarry workings have created attractive aspects to the original landform which such as the significant water body or lake to the west and the similar smaller two water basins to the east. This very much lends itself to the sort of use proposed – namely a well designed lodge park which seeks to work with and not against the existing landforms of the site.

3.4 The steep sided nature of the largest water body lends itself to skillfully located lodges around the water's edge and therefore automatically a very low density and exclusive setting for these.

3.5 The less challenging areas of the two basins to the east of the layout contain a very low-density layout of lodges using the existing topography to obtain attractive views over the water bodies and also to have a southerly aspect which is always desirable.

3.6 All areas of the lodge layout respond to the existing landform and nestle well within that in such a way that they also benefit from the three-dimensional nature of the site and the pleasing and private setting this presents.

3.7 I am of the opinion that this layout presents a varied and very high-quality lodge-based leisure development which is very far from the sort of typical static caravan park that I infer was in the mind of Councilors when they endorsed the Reasons for Refusal.

3.8 Andrew Bunce in his Statement in clause 7.5.2 refers to low quality, high density, and rigid caravan parks of the old type of layout.

3.9 By way of example, below are images of some existing typical static caravan parks around the UK.

Above: Parkdean-Southview Holiday Park, Skegness (not proposed under the Appeal Scheme)

Above: Haven-Primrose Valley Holiday Park, Filey (not proposed under Appeal Scheme)

Above: Hayling Island (not proposed under Appeal Scheme)

3.10 The Caravan Sites and Control of Development Act lays down the maximum density of static caravans as 60 per hectare. The above examples vary between 38 and 45 caravans per hectare. The Act also dictates the minimum spacing between caravans to be limited to 5m in any direction or 3.5m from corner to corner if laid out in a diagonal form. The image in Paragraph 3.8 above shows caravans typically of those minimum spacings.

3.11 Andrew Bunce in his statement in clause 7.5.1 refers to the high-quality low density informal layout they have designed for this site.

3.12 To expand on this fact, below is an extract from the Proposed Masterplan with red lines around the two eastern areas of holiday lodges. The densities of the layout of these lodges have been carefully calculated as 17 per Ha. for the westerly group excluding the water and 13 per Ha. including the water. Similarly, the easterly group has 25 lodges per Ha. excluding the water and 19 per Ha. including the water. This puts the scheme at the higher quality end of the market and that with landscaping it will be very different to the sort of development that Councilors appear to have had in mind when refusing the application.

3.13 The distance between the lodges has been carefully measured across both of these areas and found to vary between 6 and 9m compared with the minimum standard of 5m. The lodges positioned around the westerly large lake are similar distances and, in many cases, far greater.

3.14 This proposed layout on Masterplan 1733-MS-019 is therefore considered to be a very low-density layout which in turn adds to the quality of the park and its appeal to the end user.

3.15 The setting and layout of the lodge groups as proposed responds to the natural setting presently by the existing site and therefore its attractiveness to the end user. The retention and enhancement of the natural features provides an environment for holidaymakers which is quiet and attractive. My experience over many years of designing and developing holiday parks which respond similarly to natural setting leads to the end user being respectful to that setting and extending their enjoyment by venturing out further into the local area with footpath and cycle links.

3.16 It is very clear by comparison with the example of layouts of typical static caravan parks shown in Paragraph 3.9 that those parks are the total opposite with regards to layout, setting and opportunities for enhancement.

3.17 I consider that it is relevant to demonstrate this difference based on my experience related to the design and development of holiday parks for one of our major clients, Darwin Escapes, with parks located around the UK. Darwin's business model was to purchase existing parks with typical static caravans laid out at high density and to convert the parks into high end lodge parks. This involves a substantial reduction in density and to exchange typical static caravans for high quality holiday lodges.

3.18 Some typical before and after examples of these parks are shown below:

Above: Cheddar woods Resort and Spa – Extract of Before and After Aerial Photo (Layout)

Above: Cheddar woods Resort and Spa – Before and After Photos (Appearance)

Above: Keswick Reach Lodge Retreat – Before and After Aerial Photo (Layout)

Above: Keswick Reach Lodge Retreat – Before and After Photos (Appearance)

Above: Rivendale Lodge Retreat – Before Aerial Photo (Layout)

Above: Rivendale Lodge Retreat –After Aerial Photo (Layout)

Above: Rivendale Lodge Retreat – Before and After Photos (Please note that the landscaping between the lodges had just been planted at the time of this photograph and would mature to soften the overall landscape effect). (Appearance)

3.19 North Lakes Caravan Park became Keswick Reach and is located in the Lake District National Park. Rivendale is located in the Peak District National Park and is a quarry setting but of a smaller total area than the Moneystone site. Nonetheless its location within a National Park is notable – given that it comprises a nationally important landscape.

3.20 The Keswick Retreat Park was laid out to work with the existing landforms in a river valley and was welcomed and highly acclaimed by the Lake District National Park Authority. It has attracted holidaymakers who enjoy the quiet local setting and venture out into the wider countryside.

3.21 Rivendale was a development brought together by closely working with the Peak District National Park Authority over the layout, types of holiday units, choice of materials and in particular its connectivity with the wider environment for walking and cycling, typically connecting with the Tissington Trail.

Above: Rivendale Lodge Retreat – Masterplan by Bratherton Park Design

Anecdotally, this park has been welcomed and highly acclaimed by the Peak District National Park Authority. Examples of this acclamation are:

a) Frances Horsford, Peak District National Park Authority ecologist, said: "Here in the Peak District, we have a rich tapestry of habitats that support a lot of wildlife and it's great to be working alongside Rivendale to provide positive gains for biodiversity through the planning process.

"The site has made a real positive contribution to providing flower rich sites in the White Peak and there's opportunity to work together providing further areas of nectar rich grasslands here in the future." Loffreda, D. (2021)

b) Rivendale was nominated in the 2023 Peak District, Derbyshire & Derby Tourism Awards for Camping, Glamping and Holiday Park of the Year and was awarded the Bronze award. Noton. A (2023)

c) Rivendale was nominated in the 2024 Peak District, Derbyshire & Derby Tourism Awards for Camping, Glamping and Holiday Park of the Year and was awarded the Silver award. Noton. A. (2024)

3.22 Each of these examples plus other parks within the Darwin Escapes portfolio have been recognised within each region as offering an extension to the existing features which attract holidaymakers to a particular area and also demonstrate how they contribute strongly to the local economy.

3.23 There is an obvious potential business synergy between the Moneystone lodge park and the nearby Alton Towers which would clearly lead to holidaymakers being attracted to the park for accommodation and an extension to their experiences within the theme park. This in turn would lead inevitably to a greater spend in the local economy and an awareness of the attractive location within easy access from the local main transport routes. However, there are many other local attractors for the tourist market.

3.24 The sensitivity of the site and its surroundings will not be damaged by this development but with suitable interpretation and educative labelling around the park, it will lead to an appreciation of the site and what the surroundings offer.

4.0 HOLIDAY LODGE DESIGN

4.1 The Reasons for Refusal state that the proposed lodges are "little more than caravans with cladding" and fail to deliver the required high quality of design. The reason for refusal does not make any reference to the layout or density of the park as a whole being in any way unacceptable, and yet this is an important part of the overall design.

4.2 As to the specific design criticism of the individual lodges I consider this to be a grossly unfair comparison for several reasons and this has also been picked up by Andrew Bunce in his statement where he thoroughly describes the distinct difference between traditional static caravans and the proposed high- quality lodges. At Section 6 of his Statement.

4.3 The first reason is the inferred similarity between a static caravan and the proposed holiday lodges. Over many years I have had the opportunity to observe the production of caravans and lodges in the factories. The reasons for this are many ranging from reporting on the construction of caravans and their fixed contents relating to Value Added Tax to quality control and inspection of high-quality lodges for clients and the design expectations.

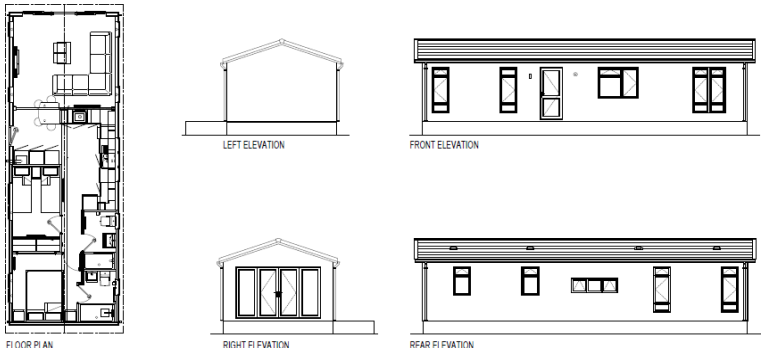
4.4 Static caravans have traditionally been manufactured on a moving production line very similar to a car production plant with many units rolling out from the production line each day on a continuous cycle. The holiday lodges manufacture is vastly different with individual lodges being built in a bespoke style and in a static state until moved to other stages within the process.

4.5 The distinct difference between a production line static caravan and holiday lodge is that the static caravan has a standard model reference similar to a motor car and an external and internal specification which is consistent with that particular model whereas the holiday lodge is designed more specifically for the purchaser with regards to external appearance, internal layout and its fixtures and fittings.

4.6 The second reason is the reference to the cladding in the inferred similarity. Static caravans have a traditional external appearance of metal or Canexel cladding. The latter is a recycled material with the finish of timber grain but quite often misses the mark of comparison with timber cladding.

4.7 The lodge units proposed for Moneystone are natural timber and not metal or Canexel.

4.8 The third reason is the inferred failure to deliver the required high quality of design. I have noted that in the document list included within the Refusal of Reserved Matters Ref: SMD/2019/0646 determined on 14th November 2023 the Lodge Design documents are the NBDA line drawings no's 1733-LV-020, 021, 022 and 023 typically as shown below:



Above: NBDA Drawing No 1733-LV-022

4.9 However further visual design information was provided in drawings 1733-LV-010, 011, 012 and 013 typically as shown below: (these are to be replaced with updated CGis)

Above: NBDA Drawing No 1733-LV-010

Above: NBDA Drawing No 1733-LV-011

4.10 I am of the opinion that these images demonstrate a high quality of design, creativity and detailing to the Proposed Lodges which were unfortunately not presented to Members at the Planning Committee meeting for the Reserved Matters application in October 2023.

4.11 Below is a photograph of the preferred type of lodge for the Moneystone development. This is clad in natural cedar and manufactured by an acclaimed high-quality manufacturer, Retreat.

4.12 Below are two further photographs of the typical interior appointment of this preferred lodge type. These clearly demonstrate a high quality of interior design and appointment closely resembling an attractive home interior and distinctly different from the fixed seating and tables in a typical static caravan.

5.0 SUSTAINABILITY

5.1 I am commenting on aspects of sustainability appertaining to this development because I consider this to be an intrinsic part of the quality of design. Also, aspects of sustainability associated with lodges as distinct from static caravans assists in emphasising the distinct differences between them.

5.2 Considerations of sustainability extend to the design of the lodges and also to the parkwide design and construction methods. These include, but are not confined to, energy usage, material sources, transportation, and many other aspects of delivery of the project and its operation.

5.3 It has been stressed that the definition of a caravan applies to the holiday lodges only in terms of size limitations and transportation from the factory to the site and around the site for final positioning and setting. If the lodges were not required to be factory made and brought to the site in only one or two sections, then different methods of construction would be required such as on-site construction. This would attract more transportation movements, larger workforces with associated transportation and more lengthy development periods. The factory- built units are therefore more sustainable.

5.4 Static caravans are notorious for poor insultation and therefore high energy consumption. This is worsened by the fact that the typical period of occupancy for a holiday park used to be from March through to October and thereby avoiding the cold winter months. Periods of occupancy have extended over recent years to 11 months or in many cases 12 months which in the case of static caravans leads to greater impact from energy inefficiency.

5.5 Holiday lodges have to conform with British Standard BS 3632 for their design and construction and this introduces greater insulation requirements. This in turn improves the energy efficiency of the lodge and therefore its sustainability.

5.6 In addition, many manufacturers are introducing Structural Insulated Panels (SIP) into the lodge construction, and this substantially increases the thermal value of the walls of the lodges thereby improving the energy efficiency. Static caravans with cladding do not offer that potential and this accentuates the difference between these and the proposed high-quality lodges.

5.7 Details of the Energy and Sustainability Strategy for the Appeal Scheme are set out in the Energy and Sustainability Statement of Case prepared by Mr Paul Young.

6.0 CONCLUSIONS

6.1 I conclude that the Council is wholly wrong to characterise the proposed lodges as little more than caravans and do not fail to deliver the required standard of design. They offer a high standard of design and detailing typical of other acclaimed high quality lodge parks across the UK.

6.2 I further conclude that the proposed layout of the lodges represents a high quality of layout which is entirely appropriate for the setting and environment presented by the existing site.

6.3 This layout in conjunction with the sensitive landscape approaches presented in the overall design respects the local environment and assists in restoring, strengthening, and enhancing the existing site and its distinctive landscape features which is contrary to the suggestion otherwise within the Reasons for Refusal. This in turn attracts the appropriate type of holidaymaker to stay at the park and appreciate these aspects of its quality, location, and environment.

6.4 These factors come together to lead to increased spending in the local economy and businesses, which has been well demonstrated in other areas of the UK where similar high-quality destinations are provided. Please refer to the Economic Benefits Statement prepared by Darren Wisher.

APPENDIX A

Moneystone Quarry View 01 - Lake

APPENDIX B

Moneystone Quarry View 02 - Lodges

APPENDIX C

Moneystone Quarry View 03 - Brook

APPENDIX D

Moneystone Quarry View 04 - Hub

APPENDIX 3

Landscape Design Statement of Case
Proposed Leisure Development (Phase 1)
Moneystone Quarry

On behalf of Laver Leisure (Oakmoor) Ltd

Planit Landscape Architecture

Appeal Reference:

Document Reference: PL1088-00-WO-001-06

Date: 01-05-24

Revision: P06

Status: Final

Contents

Appendices

1. Introduction

Purpose and background

1.1 This Landscape Statement of Case has been prepared on behalf of Laver Leisure in relation to the appeal against the decision of Staffordshire District Moorlands Council to refuse the reserved matters planning application for Moneystone Quarry (ref. SMD/2019/0646).

1.2 The application was considered by Committee on 14th November 2023 and was refused by Members contrary to Officer recommendation. The Reasons for Refusal (RfR) of relevance to landscape and visual matters are:

1) *This site lies within the Churnet Valley which is an area of significant landscape, wildlife and heritage value. Policy SS11 of the Staffordshire Moorlands Local Plan (adopted September 2020) sets out the strategy for the Churnet Valley. It says that all 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. The consideration of landscape character it says will be paramount in all 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.*
2) *(the lodges) have not been designed to respect this sensitive site or its surroundings, noting that it is in part adjacent to the Whiston Eaves SSSI.*
3) *For these reasons the proposal fails to comply with Polices SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework including but not limited to Chapters 12 which says that good design is a key aspect of sustainable development and Chapter 15 which says that planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity.*

Qualifications and Experience

1.3 This Landscape Statement of case has been jointly written by, Rob Moore, Studio Director, John Willerton, Principle Urban Designer and Maisie Irlam Senior Landscape Architect at Planit IE (Landscape Architects and Urban Designers).

1.4 **Rob Moore, BA (Hons) Dip LA CMLI – Studio Director**

Rob is a Chartered Member of the Landscape Institute with over 20 years' experience, supporting the Directors in overseeing and managing landscape teams across the Manchester and Leeds Studios. Rob has extensive experience in the design and delivery of complex schemes as part of multidisciplinary projects, both urban and rural. Recent projects include Oldham Town Centre Regeneration - a new linear park in the heart of the town centre; Penrhos Leisure Village – balancing ecological enhancements and development aspirations; Symphony Park Knutsford – New housing within an historic park and sensitive landscape setting.

1.5 **John Willerton, BA (Hons) Dip LA CMLI – Overall Site Masterplan & LVIA assessor**
John is a Chartered Member of the Landscape Institute with over 25 years' experience and leads one of the Urban Design teams within Planit, overseeing the design and delivery of complex and challenging schemes including Landscape and Visual Impact Assessments. Recent projects have included delivering Godley Green Garden Village, Woodford Aerodrome and Penrhos Leisure Village- all of which involved challenging site constraints, sensitive locations, and close neighbours, where a clear LVIA narrative was required to guide the evolution of the masterplan.

1.6 **Maisie Irlam, BA (Hons) MA CMLI – Senior Landscape Architect**
Maisie holds a BA hons and Masters in landscape architecture and is a chartered member of the Landscape Institute. Maisie has over 10 years' experience as a landscape architect working at both a masterplan level and detailed design, varying from inner city public realm projects to rural landscape led schemes.

1.7 The evidence which we have prepared and provided for this statement is true to the best of our knowledge. It has been prepared and is given in accordance with the code of practice of the institute of environmental management and assessment and I confirm that the opinions expressed are my true and professional opinions irrespective of by whom we are instructed.

Planning History

1.8 The approved outline application was submitted with a comprehensive Landscape and Visual Impact assessment undertaken by Planit IE in 2016 which is referenced in the document. We have reviewed this work in preparation of this report and confirm that we stand by its content. The landscape design at this stage was shown on an Illustrative Masterplan and a Parameters Plan to set the zones for proposed development.

1.9 The reserved matters application was submitted in October 2019 following extensive consultation with the LPA with full details of landscape design that are in accordance with the principles of the Parameters Plan that was submitted and approved with the outline application.

Scope and Structure of the Statement of Case

1.10 This Statement focuses on the landscape matters contained within the above RfR, in particular relating to the quality of the design of the proposed landscape. This document has been set out as follows:

- Review of relevant background and context
- Overarching approach to landscape design
- Sensitive landscape design in consideration of wildlife and habitats
- Landscape approach to new infrastructure
- Lodge landscape setting
- Managements and Maintenance
- Landscape and Visual Impact
- Conclusions

2. Review of Relevant Background and Context

Former use

2.1 The site was originally a working quarry, owned by Sibelco UK. Silica sands have been quarried at the site since the late 1960's, mainly to produce container glass and ceramics.

2.2 Quarry activity ceased on March 31st 2011. Thereafter, the site was purchased by Laver Leisure with the intention of delivering a high-quality leisure scheme for the Churnet Valley.

2.3 The site comprises of quarried areas, woodland, waterbodies, and a central area of buildings, all of which have been demolished apart from two: the Sibelco lab building and an administration block.

2.4 A large solar farm has subsequently been developed on parts of the land operated by the quarry.

Site and Surrounding Area

Figure 1: Site Aerial

2.5 The site has a number of interesting geological and landscape features which have been created by its industrial past; Evidence of the former quarry are apparent from how the landscape has been carved up with large areas of exposed rock, bare ground, and dramatic changes in level. Since the quarry was closed the site has naturally self-seeded in places with tree and scrub planting in many areas. Much of the boundary to the site consists of mature tracts of woodland.

Quarry 1

2.6 An existing tarmac lane from Whiston Eaves Lane provides access into the site. The road leads southwards to an area which was previously a cluster of quarry buildings and associated machinery. Currently there is an area of hardstanding here, along with rubble from the demolished buildings. Two buildings remain, the Sibelco lab (within an area which is not subject to this appeal), and an administration building.

2.7 Further south from this area, a road leads down the hill as the ground drops away towards the old Churnet Valley Railway line at the bottom of the valley. To either side of the road are areas of woodland and ponds.

2.8 Directly to the south of Eaves Lane the ground dramatically drops away to the base of Quarry 1, with areas of woodland planting around the back of the quarry and an existing lake to the south. The second basin to the west in Quarry 1 is slightly higher in elevation with a small embankment leading up to another large lagoon. Young, self-seeded scrub woodland and bare earth covers most of the bottom of the quarry, with a more established tree line formed at the base of the quarry walls. Surrounding the lagoon are established areas reed beds and native marginal planting.

Quarry 3

2.9 A track leads down into the old quarry from the existing access road. The quarry walls drop at a steep gradient into a lake which now fills much of this part of the quarry. There are numerous narrow shelves cut into the quarry wall that formally provided plant access. These run around the quarry at approximately the same height all the way around. Vegetation

around the quarry walls has now begun to establish into a low native scrub, although there are still areas of exposed scree and rock face. There is an existing landscape bund which runs most of the length of the top of the quarry adjacent to Whiston Eaves Lane, where a grassland meadow has formed.

Environmental designations

2.10 There are several sites if interest located near the site, however there are none within the application boundary itself. Two areas of ecological designation lie immediately to the west of the site, Ashbourne Hey SSSI (Site of Special Scientific Interest) and an area of SBI (Site of Biological Interest). Refer to Figure 2 below for locations.

2.11 Little Eaves Farm and Barn are located beyond the site boundary and are grade II listed buildings.

2.12 The site is surrounded by comprehensive network of public footpaths, bridleways, and cycle routes. A public footpath currently enters the site at the main quarry site entrance and forms a connection to Key Wood to the south.

2.13 The Staffordshire Way is a long-distance recreational route through Staffordshire. It is located to the south-west of the site. Staffordshire Moorlands Walks are a series of 16 self-guided walks defined by Staffordshire District Council through the Staffordshire Moorlands. The site lies within close proximity to "Route 11: Woods and Ways – Oakamoor", which lies to the east of the application site. Refer to Appendix H map to footpath cycleway and bridlepath plan.

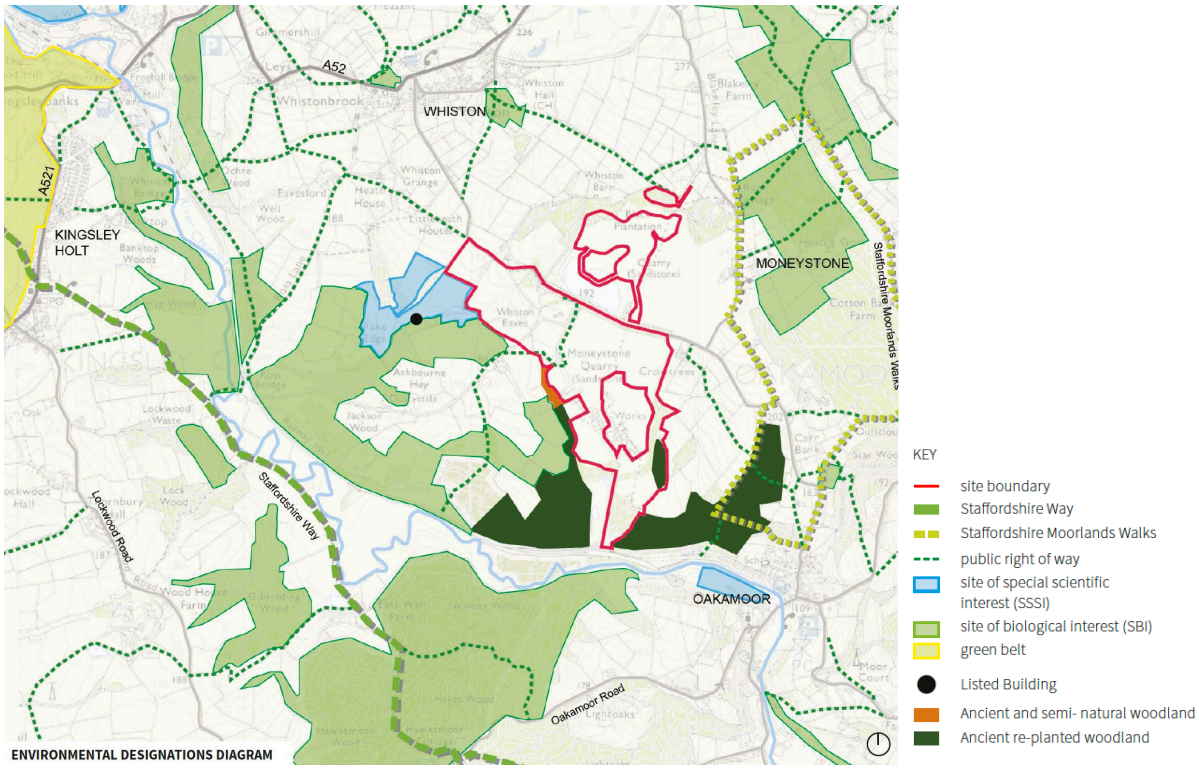


Figure 2: Environmental Designations Diagram

Landscape Design SPDS

Staffordshire Moorlands Local Plan (2020)

2.14 Staffordshire Moorlands Local Plan Policy SS1 'Development Principles' seeks to ensure that development contributes to the social, economic, and environmental improvement of the district including development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions.

2.15 Staffordshire Moorlands Local Plan Policy SS11 'Churnet Valley Strategy' provides specific guidance on the land use strategy for the Churnet Valley, identifying the area for sustainable tourism and rural regeneration. This policy seeks to ensure 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 and demonstrate strong sustainable development and environmental management principles. The consideration of landscape character has been paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximize opportunities for restoring, strengthening, and enhancing distinctive landscape features.

Churnet Valley Masterplan Supplementary Planning Document

2.16 The Churnet Valley Masterplan SPD (CVM) (Figure 3) was adopted by the Council in March 2014 and has a major influence on future planning decisions and strategies affecting the area. It is an important material consideration in the determination of this application and has steered the design of this development, including the landscape layout.

2.17 The CVM identifies key opportunity sites, including Moneystone Quarry. It provides an overview of the site, the constraints and opportunities associated with creating a high-quality leisure development and a development strategy.

2.18 The CVM actively encourages high quality design in all new development which respects the valued characteristics of the Churnet Valley in terms of its site context, including the wider setting, density, massing and scale, impact on close and distant views, impact on streetscape and materials.

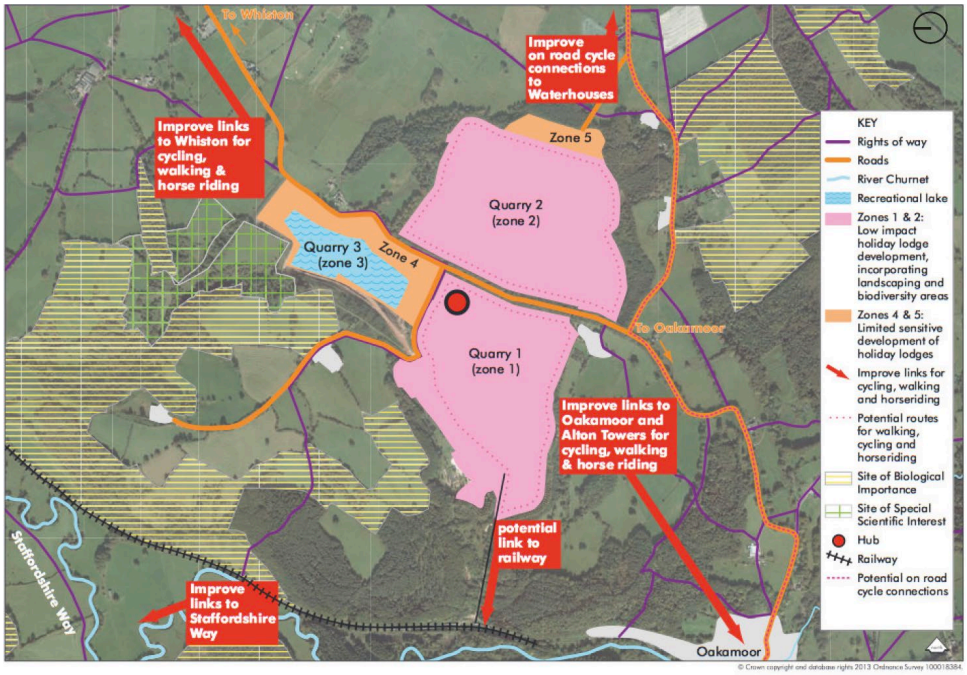


Figure 3: Extract from the CMV - Moneystone Quarry Concept Plan

Restoration Plan

2.19 In tandem with the CVM, Staffordshire County Council approved a Revised Restoration Plan for the site in March 2014. Were the site not to be developed for the consented leisure development then this Restoration Plan would govern how the site would need to be addressed. Accordingly, this restoration plan has formed the baseline to be considered as part of the proposals (Appendix A).

3. Overarching Approach to Landscape Design

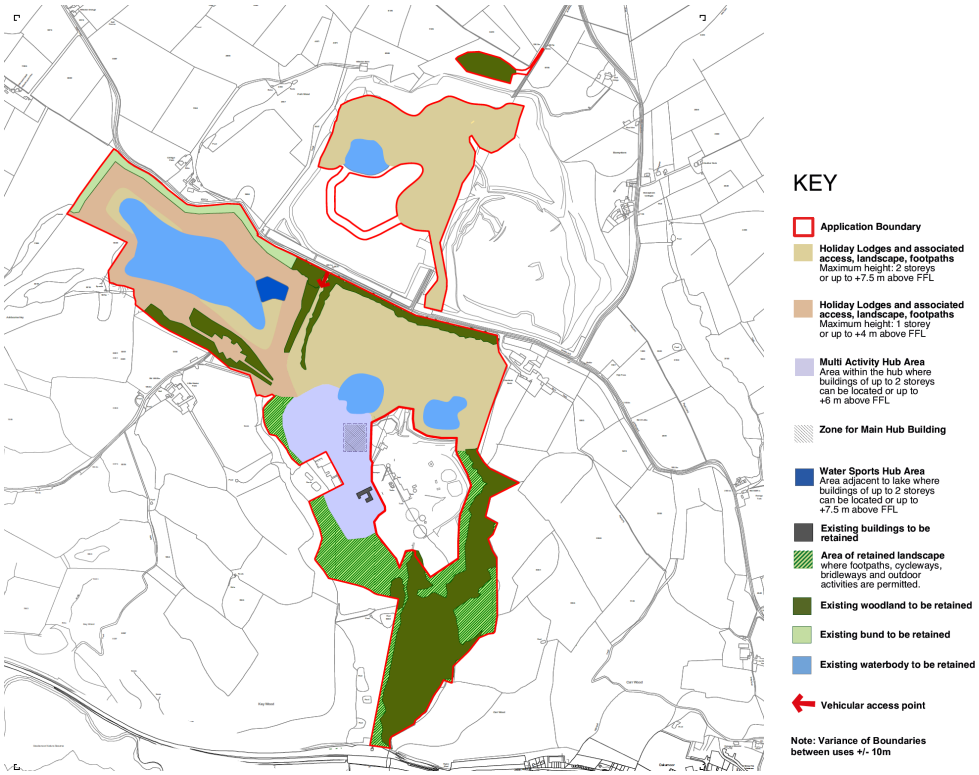


Figure 4: Parameters Plan approved under Outline Planning Permission

3.1 The landscape masterplan has been developed in accordance with the approved Parameters Plan. Proposals look to retain and enhance the existing landscape character and features of the site where possible. Any new areas of landscape have been sympathetically designed incorporating native species and taking inspiration from the surrounding landscape and Restoration Plan.

3.2 Within the scope of the consented outline planning consent, six key ordering elements were considered that ensure the masterplan is sensitive to its landscape setting, these were carried forward into the detailed landscape design:

- **Visual Impact** - Sensitively locating development within areas of least visual impact. The site is well screened by existing trees and woodland in the majority. Continuous review of the masterplan against the key views in the LVIA process have informed the development of the masterplan so that lodges and facilities are located in areas of least visual impact within the site. This includes retaining & substantially enhancing existing landscape features, such as the existing bund along Whiston Eaves Lane and areas of existing woodland. Refer to LVIA chapter 8 of the ES and appendices 8.2 for the photomontages submitted with the outline application.

- **Hydrology** - existing watercourses and waterbodies respected - and used for placement of lodges to give water edge views.
- **Ecology & Habitats** - development is located on areas of least ecological impact. Existing habitats are to be retained and enhanced. The creation of new habitats is a key priority while including objectives of the original Restoration Plan where possible.
- **Landform** - working with the land, avoiding areas of unstable and steep ground to minimise disturbance.
- **Operation** - The Hub Building is conveniently located centrally within the site to serve all lodge areas, promote walking / cycling on site and provide a wider off the surrounding community.

- **Movement** - existing site access and road infrastructure retained - visitor/ long term parking provided to reduce traffic through the park. Sustainable transport methods are promoted within and to the site through the inclusion of a new network or routes and upgrading of existing paths o site.

3.3 Work has been carried out to analyse the condition of the existing landscape; Looking to where areas can be retained and how these can be enhanced to provide a high-quality landscape structure that creates a setting for the new development as well as enhancing wildlife habitats, and sensitively opening up the site for the public.

3.4 The proposed masterplan is shown below and included in Appendix B

Figure 5: Landscape Masterplan

4. Approach to development in habitat sensitive areas

4.1 We worked in coordination with Bowland Ecology to ensure the landscape design was thoroughly considered and existing habitats respected. The location of new development was carefully considered from review of the site surveys and baseline information.

4.2 Across the masterplan, the lodges have been laid out to preserve as much of the developing habitats and areas of scrub/woodland planting as possible, whilst allowing clear and safe access and a natural setting to the lodges.

Quarry 1

4.3 New development will be positioned so there is minimum disturbance to the existing rock faces and emerging woodland at their bases. The existing lagoon and surrounding reed beds and scrub vegetation will be retained in place with sensitive

placement of new pathways and decking to provide access to the water's edge. The existing dense conifer woodland to either side of Whiston Eaves Lane will be retained and reinforced where appropriate to maintain an evergreen buffer to the site. New native tree planting will reinforce the buffer along the north-western edge of the site, strengthen the wildlife corridor.

Quarry 3

4.4 The lodges to the southern banks of the quarry have been laid out to preserve as much of the developing scrub woodland as possible, whilst allowing clear and safe access. Significant areas of planting between lodges will be retained where possible; these will be enhanced by selective clearance of any invasive species and new native planting, to provide structure and habitat links. Lodges to the northern banks of quarry 3 will meet the water's edge with lodge decks being set into the marginal vegetation. Management of the woodland will improve the habitat value and contribution to the wider landscape structure in the mid to long term.

4.5 Pre-established coir roll planting and plug planting will visually soften the water's edge and provide a new habitat opportunity.

Ancient Woodland

4.6 Within the south of the site are areas designated as Ancient Woodland. The landscape has been designed and management practices set out to protect and enhance these areas of value. No formal paths are to be proposed within the ancient woodlands. Informal routes are to be discouraged using natural features, such as felled timber to block natural desire lines.

4.7 A buffer zone of a minimum of 10m is to be created around the ancient woodland to restrict access. Within this area invasive/ornamental species will be removed which could become established and compromise the biodiversity value of the ancient woodland.

5. Approach to New Infrastructure

5.1 The proposed foot and cycle pathways across the site, will employ several different surface finishes and construction build ups, most of the materials will be natural, site won where feasible to reflect the character of the site and minimise any impacts on the existing landscape. Anticipating visitor use, some of the new pathways, especially, around the hub will require more hard wearing and long-lasting finishes.

5.2 To minimise the ecological and habitat impacts, it is proposed that where at all possible, pathways will employ permeable surfacing such as bound gravel and compacted stone, which allows for natural drainage and minimises the need for sub surface pipe runs and pits, reducing surface water run-off whilst responding to the rural context.

5.3 Where pathways are located in sensitive woodland/ planting areas, 'no dig' construction methods will be employed to reduce damage to root zones, and pathways will be routed to avoid any high value areas. Within woodland areas, pathway widths will be varied to suit the site conditions and space available and potentially using wood chip surfacing as a natural 'light touch' finish. Refer to Appendix C and D for construction details and hardworks plan.

5.4 The approximate location for the paths was marked on site in 2018 in consultation with SMDC. The exact location of the proposed paths within the woodlands and more sensitive areas will be confirmed on site with consultation with arboriculturist, ecologist and landscape architect, but will be consistent with the approved management plan or similar.

Approach to Soft Landscape

5.5 We have worked in coordination with Bowland Ecology, Urban Green Arboriculturists and SMDC to ensure the landscape approach for the site and species selection for new planting is appropriate for the site and is in accordance with the overarching proposals.

5.6 Several meetings were held with SMDC and SWT (Staffordshire Wildlife Trust) and email correspondence in late 2020 and early 2021 to discuss the landscape and ecological proposals.

5.7 The updates to landscape plans in response to comments from SWT and the Arboricultural Officer at SMDC were as follows:

- Species list has been amended to remove Beech from proposals as suggested by SWT. Oak species were originally excluded due to Oak Processionary Moth disease but have been re-introduced on the last revision of drawings based on SWT comments.
- Reuse of substrates for grassland, meadow, and heathland rather than imported topsoil. Only imported topsoil to be used for tree pits, hedgerow trenches.
- Additional annotation to clarify, as shown on the plans, that the existing vegetation at the base of the rockface on Q1 will be retained and enhanced, subject to any required regrading of landform.
- Annotation to note existing vegetation along the boundary of Eaves Lane to be retained and Enhanced. Plans updated to show any gaps in the boundary supplemented with new planting to achieve a full swathe of structural vegetation.
- Review of road surfaces; plans updated to show loop roads and cul-de-sacs serving the lodges as crushed stone to be in keeping with the naturalistic approach. Re-use of any suitable material on site to be used where possible.
- Grassland/ wildflower mix - specification amended to use local seed or hay from an existing meadow where possible.
- Scrub planting mix – Guelder rose, and buckthorn removed and replaced with dog rose and gorse.
- Shade tolerant meadow species included for scrub areas.
- Aquatic edge planting- Typha latifolia removed.
- Ornamental planting- Updated to include pollinators and more bulbs.

5.8 The soft landscape plan and schedule (Appendix E and F) details the proposed new planting.

Figure 6: Quarry 1 Landscape Masterplan

Quarry 1

5.9 In quarry 1 bands of new native tree, scrub planting and heathland vegetation are designed to weave across the site to create a mosaic of new habitats and dense wildlife corridors. These have been located to link into the woodland on the boundary to the site and into the wider network of green infrastructure.

5.10 These bands of vegetation include scrub, heathland and meadow planting that together builds a rich mosaic of habitats. These also sit on the edge of the site and bound the rockface.

Figure 7: Quarry 3 Landscape Masterplan

Quarry 3

5.11 The landscape and layout for Quarry 3 has been designed around the water body, steep changes in level and exposed rock faces. The lodges located on the waters edge are set amongst new aquatic planting and small trees. Existing high quality tree planting has been maintained where possible, including some of the self-seeded gorse and birch that has recently established high on the northern quarry side.

5.12 The swathe of structural tree planting along Eaves Lane will be retained and enhanced with improved management and supplemented with new tree planting to infill and gaps.

5.13 In the south of Q3 the lodges will be nestled into the existing woodland, that will be retained and enhanced with improved management and new tree planting where necessary.

Landscape Strategy

5.14 The soft landscape proposals can be defined by nine landscape components together create a diverse vegetation structure and habitat. Each of these have specific aims in terms of design and management. These are listed below and shown on figure 8. The specific management objectives and tasks detailed within the Structural Landscaped Strategy (Appendix G).

- Existing woodland to be retained.
- Structural Landscape
- Aquatic vegetation
- Mosaic

- Scrub land.
- Boundary features
- Heathland
- Semi natural grassland
- Area to colonise naturally

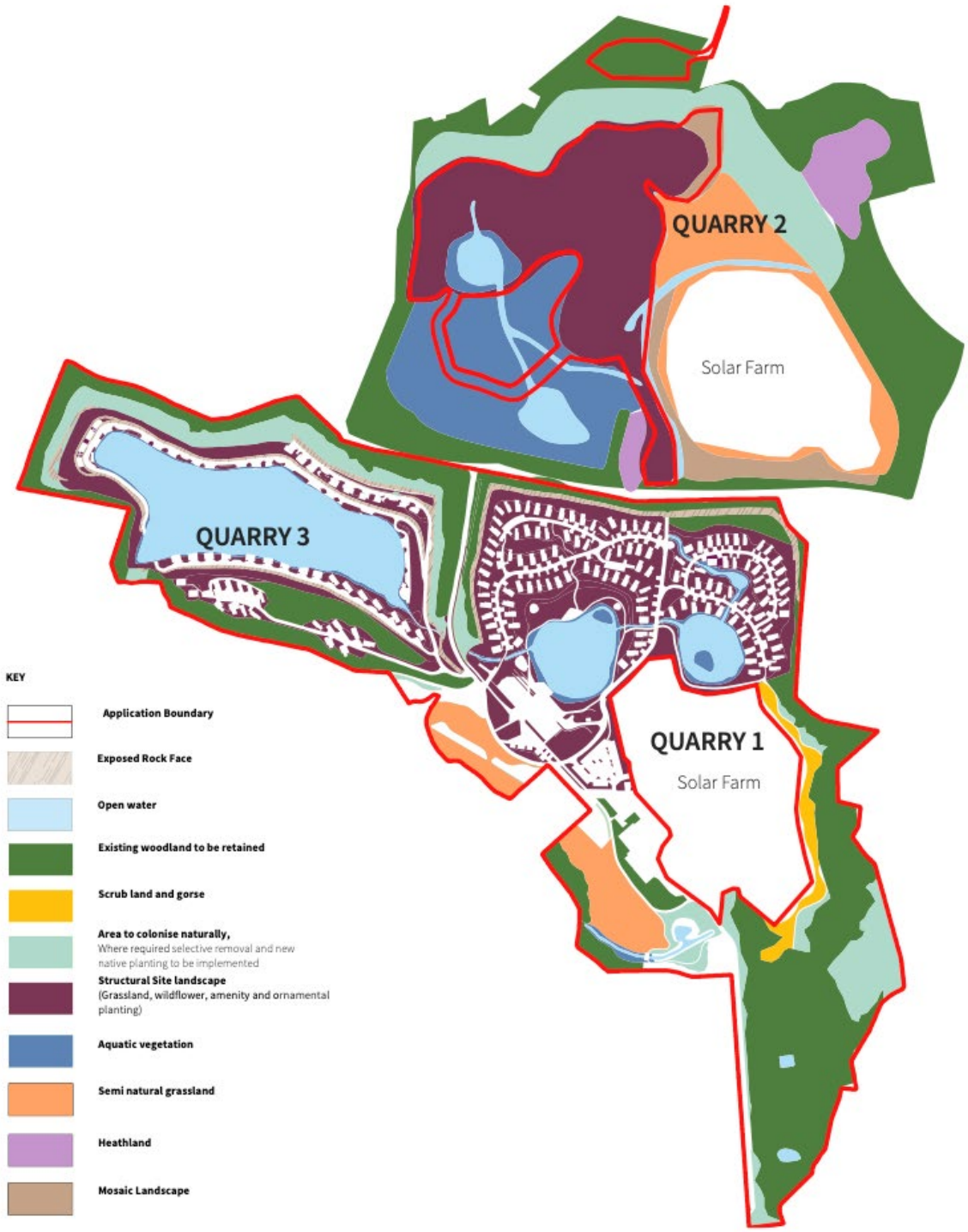


Figure 8: Structural Landscape Plan

Woodland

5.15 Existing high-quality woodland is to be retained and enhanced where possible, these areas are to be managed in form of coppicing and thinning of selective species. Woodland management will help improve its structural diversity and prevent the eventual degradation of this habitat.

5.16 To protect and enhance habitats for native fauna within woodland. To provide high quality interpretative facilities to ensure the biodiversity value of woodland is recognised.

5.17 Natural regeneration to be encourage in order to improve woodland structure by allowing a shrub layer to develop.

5.18 Traditional woodland management methods such as coppicing and pollarding of suitable species such as e.g. Ash, Willow and Hazel will encourage ground-flora and shrub development.

Boundary Planting

5.19 The existing planting to the boundary will be retained and reinforced where required to enhance wildlife connectivity and to help integrate the proposals within the landscape, providing a screen and to help reduce the visual impacts.

5.20 A new native hedge is to be planted along the southern boundary of Quarry 3. Any new planting or infill planting will reflect the surrounding habitat and comprise native species such as Gorse, Broom and Holly.

5.21 This type of boundary planting is typical of the surrounding landscape character and will provide a high-quality landscape.

Aquatic Vegetation

5.22 Due to the former use of the site several voids/ quarried areas have filled with water. Within Quarry 3 the steep sided quarry void that has filled with water although there is limited or no aquatic/emergent vegetation development to date. The proposals look to provide a new habitat opportunity with the implementation of pre-established coir rolls to the perimeter of the water's edge.

5.23 Within Quarry 1 the two larger water bodies will be enhanced with management that improves opportunity for habitats and biodiversity. This will include management of the open water, marginal vegetation and surrounding rough grassland, if additional plug planting is required this will be of similar species.

5.24 The waterbodies within the existing woodland currently have no aquatic vegetation, these are to be improved with thinning of selective trees or scrub cover around the ponds to improve light levels and will be undertaken using hand tools.

5.25 Ponds will be monitored, and corrective management implemented if issues such as invasive species presence are highlighted.

Structural Site Planting

5.26 Structural Landscape vegetation type is located in areas that will be disturbed by construction activities. Whilst described as structural the proposed planting is focused on native species, habitat creation and enhancement. Whilst also providing an attractive, high quality and naturalistic setting to the new lodges and infrastructure.

5.27 The key aims for these areas are to provide and maintain a high quality residential and leisure environment and promote the use of the visitors and residents of lodges. This will include successfully integrating the development into the site, provide a high quality, durable and safe external environment for residents and recreational users of Moneystone Park Development whilst increasing its environmental and ecological value. This will be achieved through several ways:

- Ensure that maintenance tasks are sensitive to the annual cycle of activity of birds, bats, and other fauna present or that may establish on the site.
- Provide a mechanism for monitoring and review of the principles.
- Planting new native trees to replace those lost due construction.

- Areas of open grassland are proposed through the site and will need to follow a strict maintenance operation to ensure its intended use.
- Ensure the continuing health of proposed vegetation.

6. Lodge Landscape Setting

Quarry 1

6.1 The layout of the lodges has been set out in an organic arrangement, rather than being positioned in a grid arrangement, this references the rural nature of the site and allows for the lodges to successfully integrate within the soft landscape.

6.2 The existing trees in the north and east of Q1 will be retained and enhanced providing a mature wooded backdrop to these lodges. Bands of new tree planting will link from the existing woodland between the lodges and further into the site, providing filtered screening and feeling of seclusion between the lodges while also creating new wildlife corridors. The swathes of planting have been designed to include a hierarchy of native species that will provide screening at a variety of heights. Spaces for cars are located adjacent to the lodges, the lower to mid height scrub planting will help to mitigate views of cars across the site.

6.3 A variety of tree sizes has been specified; the semi mature, and extra heavy standard trees will provide some instant screening and structure on day 1 while the smaller bare-root stock will allow for these to establish over time and adjust and grow to their environment. This is particularly important given the former use of the site and ground conditions.

6.4 The landscape has been designed to also include areas of open grass land and meadow, typical of this landscape character area. The maintenance aim of these areas is to promote a rich habitat for wildlife and a high-quality naturalistic setting to the lodges. Refer to the Structural Landscape Strategy document (Appendix G) that includes a maintenance regime for each vegetation type.

6.5 Hard surfaces have been kept to a minimum where possible. Crushed aggregate is to be used for all the secondary roads leading to the lodges, site won material will be used if deemed suitable. This is in keeping with the surrounding landscape character and reinforces the naturalistic approach.

6.6 Street furniture and lighting has been kept to minimum to reduce clutter and light pollution within the landscape.

6.7 Smaller species trees are located sporadically to the front and sides of the lodges to provide intermittent screening and filtered views between the lodges for privacy, while also helping to further integrate the lodges into the landscape.

6.8 The sections below show how the planting and trees will mature overtime to create high quality naturalistic setting.

6.9

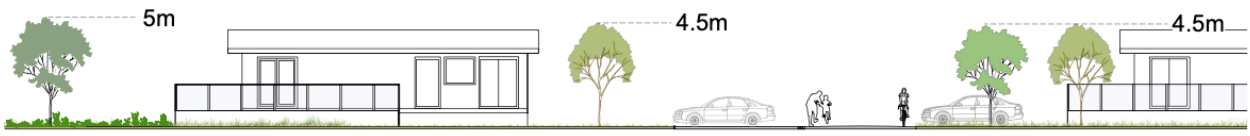


Figure 9: Landscape section day 1

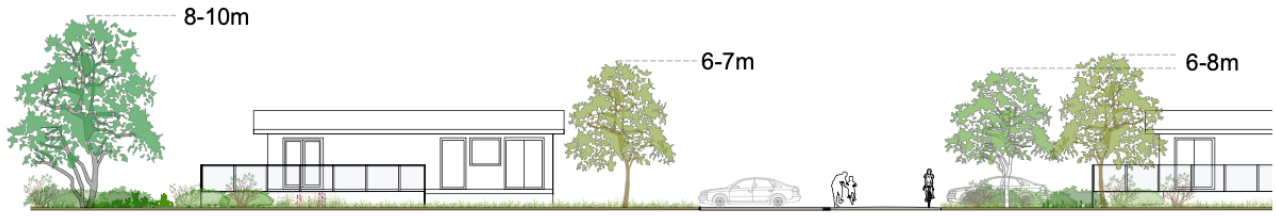


Figure 10: Landscape section year 15

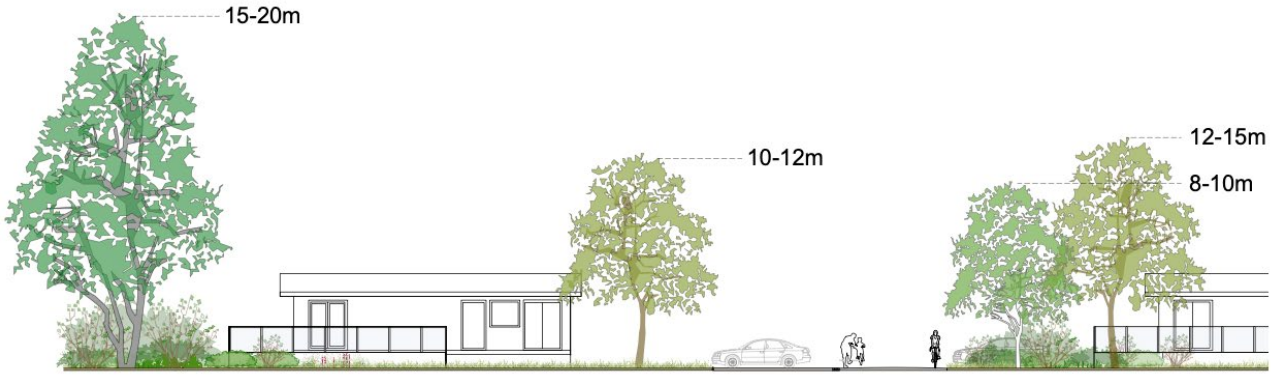


Figure 11: Landscape section year 30

Quarry 3

6.10 The existing swathe of woodland on the northern boundary along Eaves Lane provides a dense screen that will be enhanced with management and supplemented with additional native tree and scrub planting. This, along with new tree planting on the eastern boundary and the lodges being set at a much lower level means the development is predominantly hidden from view outside of the site.

6.11 Due to the steep sided nature of the quarry areas of exposed rockface and existing vegetation are to be retained and enhanced with selective clearance and removal of invasive species. Self colonisation is promoted to encourage locally native species.

6.12 The lakeside lodges will be in a more open, water's edge setting separated by tree and scrub planting. This denser planting will give some privacy between the lodges whilst helping to integrate the lodges into the landscape.

6.13 The seeded coir rolls on the banks of the lake will help to establish aquatic planting on the water's edge, softening the transition between water and rock face whilst also providing shelter and habitats for new wildlife.

6.14 The decked areas of the lodges will look to be floating amongst the taller aquatic vegetation which will help to provide some privacy at the lower level.

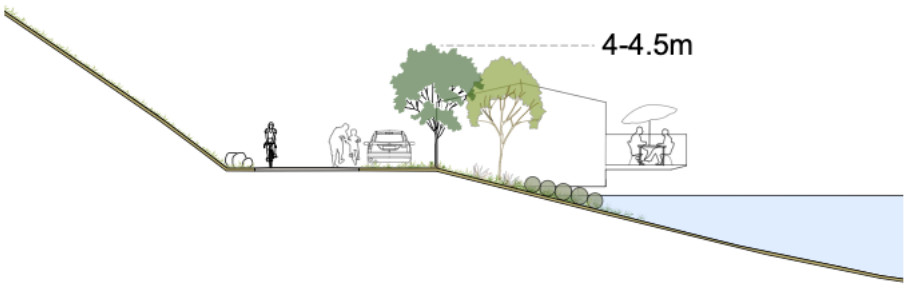


Figure 12: Landscape section day 1

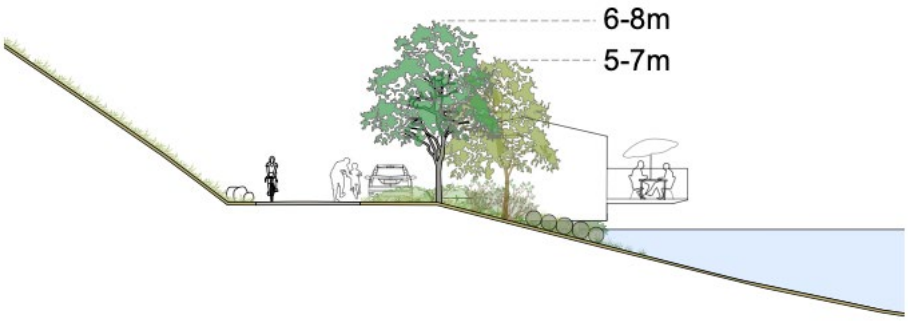


Figure 13: Landscape section year 15

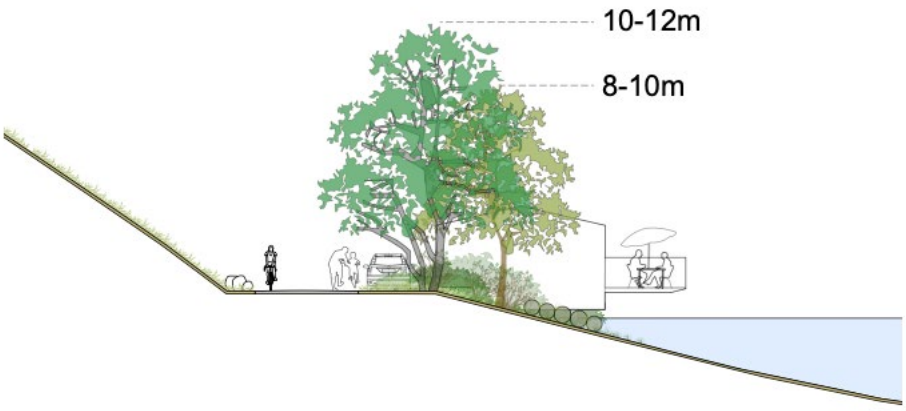


Figure 14: Landscape section year 30

7. Management and Maintenance

7.1 The future success of the site for both wildlife and recreational use is dependent on the ongoing maintenance. The Structural Landscape Management plan (Appendix G) sets out the management tasks that will be carried out initially and

over the next 20 years to ensure the establishment of the habitat and vegetation types and these will continue to benefit both wildlife and users of the site.

8. Landscape and Visual Impact (LVIA)

8.1 The LVIA chapter assessed the impact of the proposed development on the landscape and views. It considered the potential effects on landscape character of both the site and surrounding area.

8.2 The chapter was supported by a range of photoviews and montages to demonstrate potential visual impacts and embedded mitigation features. The assessment assumed a baseline, where the approved site restoration strategy had been implemented – to represent a 'best case' scenario of the baseline sensitivity.

8.3 A critical element of the assessment in relation to high quality design and layout within the proposed development was the embedded mitigation features. A summary of mitigation measures which have been 'designed in' to the proposals to reduce or where possible, avoid landscape and visual impacts was provided.

Mitigation measure	**Effect**
Lodge Design	
One-storey high lodges have been proposed in potentially more visually sensitive locations.	Potential visual impacts reduced and/or avoided.
The proposed lodges will be designed to a high standard in order to achieve a quality overall development	Potential landscape and visual impacts reduced and/or avoided.
The use of timber, timber cladding and glazing on the lodges where appropriate, along with sensitive positioning of lodges with careful consideration of topography.	Potential landscape and visual impacts reduced and/or avoided.
Incorporation of new structure planting around lodges.	Potential landscape and visual impacts reduced and/or avoided. Potential positive contribution to landscape character.
General Landscape	
Additional planting proposed as part of the masterplan will provide further screening and softening of proposed development and will also contribute to the overall habitat and ecological value of the site.	Potential landscape and visual impacts reduced and/or avoided.
Reduction in FFL of hub building, as defined within the parameters plan PL1088 M110 Revision 5. Maximum 2 storey height (reduced from 3) or up to +6m above FFL (reduced from +12m above FFL). Refined area within with hub buildings can be located	Potential visual impacts reduced and/or avoided.
Integrate built form into the existing topography wherever possible in order to minimise further re-grading works which could result in loss of valuable areas of woodland and/or planting.	Potential landscape and visual impacts reduced and/or avoided.
Larger areas of proposed parking are softened and integrated into surrounding landscape areas with new tree planting and limited use of metalled surfaced roadways. Parking is located in lower areas that are well screened from sensitive viewpoints.	Potential landscape and visual impacts reduced and/or avoided.
An extensive network of footpaths and cycle routes will be developed as part of the masterplan proposals, with some publicly accessible routes that connect up to the wider footpath, cycle route and bridlepath network.	Potential positive contribution to footpaths, cyclepaths and bridlepaths at the local level.

Mitigation measure	Effect
A new park, Quarry Park, is proposed as part of the masterplan vision. Public parks do not currently form a feature of the surrounding landscape character, however the proposed naturalistic design and location at the heart of the site will ensure the park has little visual or landscape impact.	Potential positive contribution to local landscape character.

Residual impacts

8.4 A number of construction phase adverse impacts were recorded through site operations, on both landscape character and potential visual receptors. These ranged from minor to moderate adverse and were medium term in duration.

8.5 The summary of potential landscape operational effects concluded that the development would result in minor beneficial effects to the local landscape character. The scheme worked alongside the approved restoration plan to provide a landscape setting, screen potential views of development and to contribute positively to habitat potential through the introduction of new landscape features and additional areas of tree cover and planting. The proposals include additional restorative measures to the quarried areas that will enhance their landscape quality, visual appearance and potential habitat and ecological value, thus contributing more positively to defining and restoring landscape character. This has resulted in potential minor beneficial effects being recorded with regard to national and local landscape character, minor beneficial effects on tree cover and moderately beneficial effects on footpaths, cycleways and bridleways.

8.6 The LVIA assessment acknowledges the adjacent sensitive environments including the adjacent Whiston Eaves Site of Special Scientific Interest (SSSI) and Site of Biological Interest south west of Rake Edge. These represent some of the best semi natural habitat in the County and are sensitive to change. The assessment identifies that these areas are not subject to works as part of the approved Restoration Plan or proposed development, to protect their special qualities. There is potential for direct minor benefits on this receptor from enhanced management and stewardship proposals and indirectly from the additional proposed surrounding matrix of ecological planting. It was recorded that the predicted impact on these designated landscapes would be however, negligible.

8.7 It was also concluded that views of the proposed scheme would be extremely limited due to the landform, existing trees/ new tree planting in conjunction with the approved restoration plan, as well as the careful positioning of the proposed development to avoid areas of visual sensitivity. The photomontages demonstrated the degree of screening available, and how lodges were unlikely to be visible from the majority of viewpoints. As a result, recorded effects were predominantly negligible in significance with only 4 of the 17 assessed views being adverse in nature where either long range, or partially screened views of development were available that could alter the view composition or character.

9. Conclusions

9.1 It has been shown through the landscape drawings and supporting documents submitted as part of the Reserved matters application and further explained in this Statement of Case that the design of the landscape has been very carefully considered and designed to a high quality. Extensive site surveys and assessments have informed the proposed layout of development, arrangement of landscape features and species of new vegetation.

9.2 Detailed site surveys such as the ecological and arboricultural surveys and soil analysis have informed the species selection and design of proposed planting and landscape design. We have worked in coordination with Bowland Ecology, and TEP, the SMBC Landscape Officer and Staffordshire Wildlife Trust to ensure the landscape proposals meet the requirements and are of the highest quality.

Sites of Interest

9.3 Given the location of the SBI and SSSI sitting outside of the site boundary, the workings will not directly affect these areas. Furthermore, the landscape adjacent to these sites has been sensitively designed to enhance the setting to these areas of interest:

- Existing high-quality trees and vegetation to the boundary has been retained where possible.
- Self-colonisation of the land has been proposed to encourage locally native species.
- Improved landscape management of these vegetation types will increase habitat opportunities, such as removing invasive species, thinning of trees to allow light to the ground layer.

Churnet Valley Masterplan Supplementary Planning Document (CVM SPD)

9.4 The landscape has been designed to be in line with the proposals as set out in the Churnet Valley Masterplan SPD. A key aim of the design has been to conserve and enhance the existing landscape through sensitive design that improves the biodiversity of the site. Sections 4, 5 and 6 of this document have set out the rationale of the high-quality design.

9.5 The CVM SPD states the proposals should extend and improve walking and bridle way network. This has been implemented by the inclusion of a new bridle path that runs through the site and will connect from outside of the site boundary adjacent to the National Trail, Staffordshire Moorlands walks and tie in with the existing Bridle Route (Sabrina Way), refer to drawing 1088.4-PLA-00-XX-DR-L-0005 Appendix H. The existing PRoW within the site will be retained and enhanced with new surfacing and widened. New recreational routes are proposed through the woodland, these will be sensitively located, and the exact location decided on site to avoid existing high-quality trees and restrict access to the ancient woodland.

9.6 Other recreational opportunities such a non-motorised water sports are proposed for the lake in Quarry 3. A zone for the future water sports building has been allocated in on the plans in this application and has been detailed in the Phase 2 application (Ref: SMD/2023/0532) which is pending determination .

9.7 The proposed roads within the site have been designed to be in keeping with the surrounding countryside. Width of roads are kept to a minimum to reduce the amount of hardstanding and improve natural drainage. A simple palette of materials is proposed that is typical of the surrounding area; tarmac is used for primary routes whereas site won crushed stone is prosed for secondary routes.

Landscape Design

9.8 The design and specification of the landscape proposals submitted as part of the Reserved Matters Application complies fully with the Outline Approval. The proposals represent an exemplary design response that will deliver extensive landscape and ecological benefits associated with the creation of the high-quality leisure destination. Best practice habitat management will ensure the establishment and long-term success of the landscape proposals (associated with the leisure development) are realised. Long term stewardship of the site will be controlled over a 30-year period through the Landscape & Habitat Management Plan; 25years longer than the period defined under approved Restoration Plan.

9.9 The masterplan, layout and landscape structure has been developed collectively with ecologists, hydrologists, architects and LVIA experts and landscape architects. The result is a high-quality, sensitively designed arrangement of wooded areas, diverse meadows and open waterbodies to which lodges, buildings, roads, and pathways are carefully placed. The organic lodge positioning will visually integrate the lodges into the landscape whilst the spacing between lodges preserves wildlife corridors across the development.

9.10 The proposals will improve the overall appearance of the site from its previous industrial setting, whilst enhancing the landscape and biodiversity above that set out in the Restoration Plan. Trees, shrubs, and species rich meadows have been selected to be of local provenance to preserve and enhance the biodiversity and nature conservation value of the proposals.

9.11 The proposal will provide access through the extensive green Infrastructure, providing an opportunity for park residents and the public to engage with a network of connected green corridors and spaces that are currently inaccessible.

9.12 Having considered the reason for refusal – I consider that the Moneystone Park Reserved Matters application does achieve a high-quality and sensitively designed landscape setting for the leisure development that enhances the sense of place within the Churnet Valley. The landscape design is exemplary in layout, materials specification, species selection and best

practice ecological management. The LVIA study demonstrates the minimal visual impact the development will have from beyond the site boundary.

APPENDIX 4

Ecology Statement of Case

Proposed Leisure Development (Phase 1)
Moneystone Park

On behalf of Laver Leisure (Oakamoor) Ltd

May 2024

Contents

1. Introduction

1.1. This Ecology Statement of Case has been prepared on behalf of Laver Leisure (Oakamoor) Ltd (hereafter referred to as "the Appellant") in respect of an appeal against Staffordshire Moorlands District Council's ('SMDC') decision to refuse reserved matters planning application ref: SMD/2019/0646 ('the Reserved Matters Planning Application') for Phase 1 of the leisure development ("the Appeal Scheme") at the former Moneystone Quarry, now known as Moneystone Park, ('the Appeal Site').

1.2. With regards to ecological considerations related to the Reasons for Refusal relating to SMD/2019/0646 Reserved Matters (RM), reference is made to the design of lodges not being sensitive to the site or surroundings and note that the development in part is adjacent to Whiston Eaves SSSI.

1.3. It should be noted that Natural England (the Government Agency responsible for Sites of Special Scientific Interest), or the Staffordshire Wildlife Trust (ecological advisors to SMDC) have not objected to RM Application.

1.4. I have been responsible for the ecological aspects associated with the Appeal Site since 2009. This has included undertaking site surveys and providing technical input to the design process and application as part of the wider technical team. I am very clearly of the view that there will be no adverse effect upon the Whiston Eaves SSSI as appears to be alleged in the reason for refusal.

Professional Credentials

1.5. I am Jeremy James BSc (Hons), MSc, Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM), Chartered Ecologist (CEcol) and Chartered Environmentalist (CEnv). I am a Director of Bowland Ecology a practice that I established in 2005 to provide ecological planning and design advice to the public and private sectors. I have more than 30 years of applied ecological experience in both the public and private sector. I am an experienced botanist and protected species ecologist.

1.6. The evidence which I have prepared is true and is given in accordance with the guidance of the professional institutions of which I am a member (CIEEM and Society for the Environment). I confirm that the opinions expressed are my true and professional opinions irrespective of by whom I am instructed.

2. Legislation and Planning Policy

Legislation

2.1. The principal wildlife legislation of relevance are:

- Habitats Regulations 2019 (the Conservation of Habitats and Species Regulations 2017 (as amended). Under this legislation, European Protected Species derogation licences need to meet strict tests before they can be issued:
    - the purpose of the licence has a valid basis (preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment);
    - that there is no satisfactory alternative; and
    - that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.
- Wildlife and Countryside Act 1981 (as amended) (WCA).
- Protection of Badgers Act 1992.
- Natural Environment and Rural Communities Act 2006 (NERC Act) (esp. Section 41).

2.2. Biodiversity Net Gain became a mandatory requirements on the 12th of February 2024. If a planning application for a development was made before day one of mandatory BNG on 12 February 2024, the development is exempt from BNG[1]. Nonetheless the aim to conserve and enhance biodiversity remains one which has been at the heart of planning decisions for the last 2 decades and has informed the evolution of these proposals from the outset.

NPPF

2.3. National policy is set out within the National Planning Policy Framework (NPPF) 2023 paragraphs 180-194. Chapter 15 'Conserving and Enhancing the Natural Environment' includes policies in respect of 'Habitats and Biodiversity'. Paragraph 186a sets out the key biodiversity test to be applied which is that of where 'significant harm to biodiversity' cannot be avoided, mitigated or compensated then planning permission should be refused.

2.4. In addition to avoiding significant harm to biodiversity, the NPPF at paragraph 186d encourages opportunities to be taken up to incorporate biodiversity benefits into developments especially where this can secure net gains for biodiversity.

[1] https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments#existing-planning-applications

Staffordshire Moorlands Local Plan

2.5. Policy NE1 relates to Biodiversity and Geological Resources and whilst not referenced in the reason for refusal, of particular relevance are the following:

- Conserving and enhancing any Sites of Special Scientific Interest. The Council will not 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.

- 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 including ancient woodland, unless it can be demonstrated that: there is no appropriate alternative site available; and all statutory and regulatory requirements relating to any such proposal have been satisfied; and appropriate conservation and mitigation measures are provided; or if it is demonstrated that this is not possible 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.

- 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.

- Ensuring development where appropriate produces a net gain in biodiversity, and ensuring that any unavoidable impacts are appropriately mitigated for.

- 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.

- 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.

- 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.'

Churnet Valley Masterplan SPD

2.6. Section 6 sets out the Spatial Strategy which is one of 'Balanced Development' across the whole of the area. Eight character areas are identified. Moneystone Quarry is identified as a key opportunity site within the Moneystone Character Area. Section 8.1 of the document sets out principles in relation to Natural Heritage, of relevance to this application are the following:

2.7. Proposals and associated infrastructure measures should not be detrimental to the sensitive ecology and geology of the area.

2.8. Opportunities should be sought to ensure the management of land for nature conservation and the enjoyment of areas of wildlife and geological interest and to create links between sites of nature conservation.

2.9. Where appropriate, development should create a net gain in biodiversity and encourage habitat connectivity informed by a natural landscape conservation strategy. This should be informed by the Staffordshire Moorlands Biodiversity Opportunity Map and Staffordshire Biodiversity Action Plan.

2.10. There should be recognition of the wider benefits of ecosystem services. There are links between biodiversity and heritage features such as dry stone walls and these links should be given consideration. With regard to areas under SSSI designation the landowners and planners have a legal duty to comply with a site’s legal protection.

3. Application Process

Sensitive Design

3.1. The consented outline application [SMD/2016/0378] adopted a collaborative approach to design involving all relevant experts from the outset. This process began in 2009 and used information gathered from extensive site surveys, desk study and consultation.

3.2. The layout of the proposed development has carefully **avoided** the areas of highest value habitat including woodland and grassland and included maintaining a buffer to the **Whiston Eaves SSSI** and committing to long term management and enhancement of the SSSI and reinstating suitable hydrological conditions.

Outline Consent [SMD/2016/0378]

3.3. Outline Planning Permission with some matters reserved was granted in 2016, the outline permission requires discharge of several key conditions in relation to the protection and enhancement of wildlife interests associated with the site (Conditions 18 Construction Environment Management Plan, 19 Habitat Management plan and 20 Lighting Scheme of SMD/2016/0378, see para 7.34.). These conditions require discharge prior to site stripping and operation. Ecological matters were therefore fully considered at the outline planning stage with outstanding matters to be addressed by several key conditions: 18-20 as discussed.

3.4. The only remaining considerations in respect of ecology relate to; condition 9 which is considered below (paragraph 3.7), and condition 12. Condition 12 relates to the provision of further detail including ecology in respect of a bridleway in the north of Q2. Condition 12 requires discharge prior to the commencement of any phase of development. Conditions 36-40 make reference to 'ecological systems' but in respect of the requirement for further contamination assessment information, conditions 26-40 are pre-commencement conditions.

Outfall Application [SMD/2019/0725]

3.5. Planning consent to construct a new permanent outfall to Whiston Eaves SSSI was granted during 2019. The application was supported by a Discretionary Advice Service (DAS) agreement between the applicant and Natural England. The DAS agreement included joint site meetings, joint online meetings and consultation over documents including an ecological assessment and hydrological assessment to reach agreement regarding the location of the outfall structure. The application was granted permission with no objection from Natural England.

3.6. The outfall consent is subject to a range of conditions that require the preparation of further information in the form of a SSSI protection method statement (to be agreed

with Natural England), monitoring methods and other protective measures to ensure that beneficial hydrological conditions can be restored to the SSSI.

Reserved matters (RM) application [SMD/2019/0646]

3.7. With regards to ecological considerations, the RM Application required discharge of Condition 9 of SMD/2016/0378 Outline permission for the erection of a high quality leisure Development. Condition 9 required the following:

'Any development or activity proposed including ***any footpaths, cycleways, bridleways and outdoor activities in the areas noted as 'Area of Retained Landscape'*** *on the approved Parameters Plan (dwg ref PL1088.M.110 rev 6) shall be informed by an Ecological and Arboricultural Assessment, identifying the nature of the development/activity proposed and an assessment of its impact, and such assessments shall be submitted as part of any future reserved matters applications for this part of the site.*

Reason:- In the interests of the character and appearance of the area, ecology and tree protection in accordance with Policies NC1, DC1 DC3 and the National Planning Policy Framework.'

3.8. To begin to address condition 9, a joint site walkover was undertaken in autumn 2018 with arboricultural consultants (Urban Green) and Landscape Architects (Planit-ie). The aim of the walkover was to make a detailed assessment of the least damaging routes for paths/cycle routes within woodland (referred to as W1 in the Ecology Chapter of the Environmental Statement, also shown on the plan at Appendix 4).

3.9. Additionally, a site visit with SMDC and Staffordshire Wildlife Trust was undertaken during October 2020.

3.10. The scope of ecological information required to discharge Condition 9 focused on the proposed design of access use of retained landscaped areas within Phase 1 as shown by drawing PL1088.M.110 (Appendix 5).

<u>Reasons for Refusal</u>

3.11. With regards to ecological considerations related to the Reasons for Refusal relating to SMD/2019/0646 Reserved Matters (RM), reference is made to the design of lodges not being sensitive to the site or surroundings and note that the development in part is adjacent to Whiston Eaves SSSI. No more specificity has been provided in this regard.

Sites of Special Scientific Interest (SSSIs) safeguard England's most important areas of natural heritage. The Wildlife & Countryside Act 1981 and subsequent amending legislation places a legal duty on Natural England to act for the benefit of SSSIs and take reasonable steps, consistent with the proper exercise of its functions, to further the

conservation and enhancement of the special scientific interest of SSSIs. Specifically, a SSSI is an 'area of land is of special interest by reason of any of its flora, fauna, or geological or physiographical features'.

4. Ecological Studies

4.1. Development proposals at Moneystone Quarry have been informed by the review, collection and update of comprehensive ecological information over a significant period of time between 1994 to the present.

1994-2006

4.2. The approach to surveys was initially informed by available information from previous planning applications relating to the site, notably the ecology chapter from an Environmental Statement prepared in 1996 (informed by baseline surveys that commenced in 1994); and a further Environmental Statement prepared in 2006. The 2006 ES was prepared in respect of the proposed northern extension and Quarry 3 extension. The scope of ecology surveys at that time included:

- Desk studies.
- General botanical survey of vascular plants across all habitats in both sites.
- NVC survey of semi-improved or unimproved hay fields in the Quarry 3 extension
- site.
- Hedgerow survey applying Hedgerow Regulations 1997 criteria.
- Aquatic invertebrate sampling in areas with standing or flowing water.
- Great crested newt survey.
- General appraisal of the bird community in all habitats.
- Breeding bird survey in the woodland in the Northern Extension site.
- Badger sett survey.
- Bat survey.

2010-present

4.3. A detailed desk study was carried out in 2010 and 2011 and included consultation of the following resources:

- Staffordshire Moorlands District Council.
- Staffordshire County Council.
- Natural England.
- Staffordshire Ecological Record (the key ecological data holder).
- Staffordshire Wildlife Trust.
- Staffordshire Badger Conservation Group.
- Staffordshire Mammal Group.
- Multi-Agency Geographic Information for the Countryside (MAGIC).

4.4. The aim of the desk study was to gather available ecological data and agree the scope of ecological information required to support a future planning application. Following the desk study, the sequence of surveys between 2010-2011 involved:

- an initial Phase 1 habitat survey of the full land holding plus a buffer area of 500 m to identify ponds. I undertook this survey during April 2010 and this was further updated during other surveys carried out in 2011; and
- further targeted surveys of vegetation and species including:
    - Detailed vegetation surveys including hedgerows, heathland mapping and Phase 2/NVC vegetation surveys.
    - Reptiles & Amphibians.
    - Breeding birds including considerations of crepuscular species and raptors.
    - Badger.
    - Otter & Water vole.
    - Bats.
    - Additional fauna – white-claw crayfish, polecat, pine marten and dormouse.

4.5. Further habitat surveys were conducted as part of ecological assessments prepared by FCPR during 2013. These assessments were prepared to support a planning application [SMD/2015/0220] for the installation of Solar PV panels; one area in the south east corner of Quarry 1 and another area within the south east corner of Quarry 2. This application was approved and the SPV panels have been installed and are in operation.

4.6. Updating surveys were carried out in 2014 to re-check baseline conditions, these surveys included habitat surveys (including checking National Vegetation Classifications) and faunal surveys. Faunal surveys involved 2 surveys visits within the optimal season for bats, amphibians and breeding birds. The surveys followed standard methodology but with a reduced scope based on the availability of comprehensive data recorded during 2010-2011.

4.7. Further updating surveys were again carried out in 2016 including habitats, birds, bats, and amphibians. The 2016 update faunal surveys mirrored those from 2014, 2 surveys visits following standard methodologies were conducted in the optimum survey season for bats, amphibians and breeding birds.

4.8. Regular site visits have been undertaken in the intervening period in relation to various specific aspects of the development. Most notably:

- Habitat walkovers of the whole site during March 2017 to inform the ongoing management requirements of the Approved Restoration Plan associated with the previous minerals consent for the quarry.
- An updating walkover survey carried out on Tuesday the 19th of September 2017 to verify baseline conditions.
- Habitat walkover surveys October-November 2018 to reassess baseline conditions and a separate walkover of the site with landscape architects and an arboricultural consultant to inform the sensitive design of paths through woodland habitats.

- Site walkover during 2019 with a specific focus on the outfall area in Quarry 3.
- Site visits during 2020 with a focus on the outfall area in Quarry 3, this also included a survey of laboratory buildings within Quarry 1.
- Site survey in September 2021 to provide an up to date description of ecological features within the area affected by the proposed outfall application for Quarry 3.

5. Baseline Description

5.1. Figure 1 below shows the site split into 3 red edged areas (Figure 1) which represent the former mineral extraction areas (Quarry 1 – Q1, Quarry 2 – Q2 and Quarry 3 – Q3). An area of the applicant's landholding considered in respect of the overall leisure development proposals extends beyond the quarry boundaries and includes a series of fields to both the west and south of Quarry 3 (outside the red dashed boundary and edged blue in Figure 1).

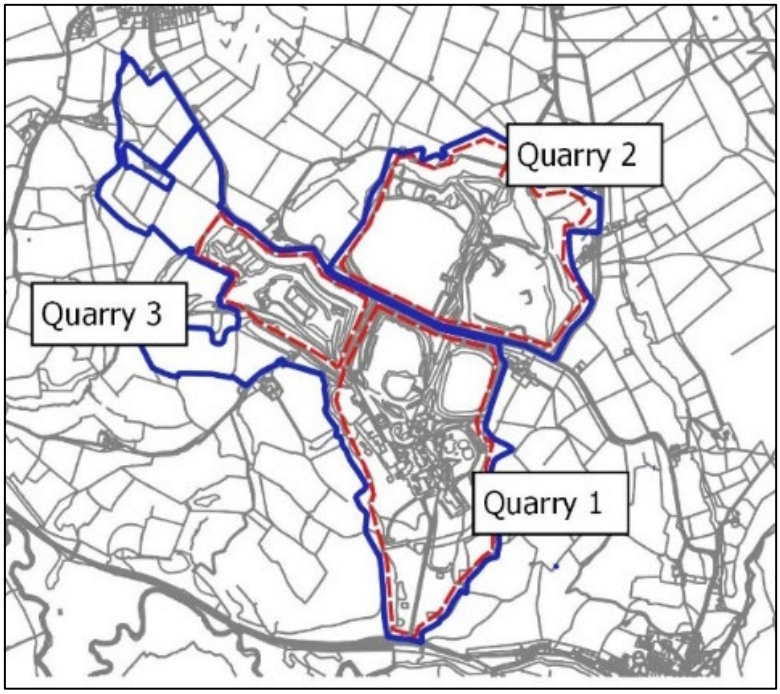


Figure 1 Illustration of Quarry and additional land

5.2. The site is located in a predominantly rural area dominated by pastoral agriculture landuse. The River Churnet and the eastern spur of the Churnet Valley Railway line forms the southern and western border of the site. Carr Wood forms the eastern border of the site beyond which is a steeply sloping and densely wooded valley. The northern border of the site is formed by dense coniferous woodland planted on the outermost section of the former quarry workings.

5.3. Appendix 1 is a summary plan showing the main ecological features of consideration for the site.

5.4. In terms of the baseline position, the ecological assessment took account of both the current ecological interests of the site at the time of the application, and those that would be provided by the future Approved Restoration Plan. The rationale for this was that unplanned ecological interests (habitats and species) developed naturally following cessation of mineral extraction, and these were also taken into account in the assessment, in addition to the Approved Restoration Plan.

Designations

5.5. With regard to **statutory nature conservation designations,** Whiston Eaves SSSI, located adjacent to the site (approximately 30 m at its closest point – south eastern edge of Q3), is designated due to the presence of certain habitats and the fish bullhead within the associated streams (small tributaries of the River Churnet). More specifically [extract from SSSI citation] *'the site encompasses a series of species-rich meadows, all of which have been traditionally managed as either hay-meadow or grazing pasture…Although consisting predominantly of semi-natural grassland, the site does include areas of rush pasture, scrub and running water'.*

5.6. There are two non-statutory (Sites of Biological Importance, SBI) wildlife sites in proximity to the site. The closest Ashbourne Hey (SBI Ref: 04/36/71) is immediately south of Q3, and Little Eaves Farm (Ref: 04/35/64) is adjacent to woodland on the western side of Q1. Both SBIs are noted for the presence of lowland grassland habitats.

5.7. Key Wood is an **Ancient Woodland** within the south western boundary of the site extending north to Little Eaves Farm. The northern extent is listed as ancient and semi natural whilst the remainder of this woodland is listed as ancient replanted. Frame Wood within the south eastern boundary of the site is a small area of this woodland listed as ancient replanted woodland. Carr Wood is adjacent to the south eastern boundary of the site and is listed as ancient replanted woodland. No development or works will take place within 10 metres of Ancient Woodland.

Habitats

5.8. A mature **woodland/tree belt** is present within the site to the south of Whitson Eaves Lane. More mature areas of scrub/secondary woodland are present within the north-eastern and northern boundaries of the site. Black Plantation is planted **woodland** dominated by Scot's pine with a species poor ground flora within the northern section of the application site. The **invasive species** Himalayan balsam is present around the edges of Black Plantation and sparse stands of rhododendron are also present. Species poor planted broadleaved woodland occurs above Frame Wood in Q1 and is dominated by alder with very dense bramble and occasional elder.

5.9. Areas of dense and scattered **scrub** form part of the mosaic of habitats within the application boundary. Areas of mature dense scrub form part of Key Wood within the south-western boundary of the site. Scattered **trees** are present as part of the neutral grassland habitats on site. Dominant species include; willows, oak, ash and silver birch. These trees are generally semi-mature/immature specimens.

5.10. A range of different **grassland** communities are present and described according to the following broad categories: neutral grassland, acid grassland and secondary grassland. Areas of more species rich grassland occur within Q1 comprise: an area attributed to the

National Vegetation Classification community MG5 *Cynosurus cristatus – Centaurea nigra* grassland; and areas of MG6 *Lolium perenne – Cynosurus cristatus* grassland. The remaining areas of neutral grassland on site are considered to be 'secondary grassland' habitats associated with quarrying and areas of re-seeding/restoration. Secondary grassland in Q1 is moderately species rich with an abundance of common spotted orchids present throughout. An area of re-seeded acid grassland is present within the northern section of Q2 to the north-east of Lagoon 7 upon a steep mound/embankment. Species diversity is low in this area.

5.11. One **small tributary of the River Churnet** flows from the east of the application site and through Carr Wood within the southern section of the site. Soft rush occurs intermittently within this feature, with other 'aquatic and emergent species' occurring less frequently. The stream is very shallow and heavily shaded within the wooded areas.

5.12. The previously areas of working quarry and adjacent habitats within the site support a range of permanent standing **water bodies** including settling lagoons and ponds. These water bodies vary in their nature (locations shown on the plan at Appendix 1). Lagoon 7 in Q2 has an area of open water towards the southern end of the lagoon and two areas of pooled water towards the north end of the lagoon. Stands of reed have developed around the edges of the pools. Q3 is currently a relatively large lake which has formed in the former quarry void. The lake is currently largely devoid of aquatic and emergent vegetation. Within Q1, a large restored pond (P6) has stands of common reed and a rocky edge with adjacent scrub and grassland. Two ponds on the western side of Q1 (P9 and P10) are artificial butyl lined ponds. Emergent vegetation has developed around the northern edge of P9. Five ponds are situated within the habitats in the southern section of the site (P7, P8, P11, P12 and P13). None of the water bodies support particularly diverse emergent or aquatic vegetation.

5.13. With regard to **other habitat;** bracken forms dense stands as part of the woodland habitats (Key Wood) within the southern and south-western sections of Q1; a mosaic of scrub and degraded heathland is present along the northern boundary of the application site and adjacent to the tunnel entrance to Quarry 2; and ephemeral vegetation is present along/adjacent to the existing and former quarry tracks along with areas of bare sand/mud within Quarry 2 around the perimeter of Lagoon 7.

5.14. Of specific relevance to the **RM application** are Frame Wood (paragraph 5.7), MG6 grassland (paragraph 5.10) and lagoon P6 (paragraph 5.12) these areas are illustrated on the plan at Appendix 1.

Species

5.15. Three species of **reptile** were identified across the site including a small population of grass snake; and a medium population of slow worm and common lizard. No adders

were identified during the surveys; however, the data search provided historic records of adder from 1976. A previous assessment undertaken specifically for adder in 2008 of the working quarry site did not identify any adders. Therefore, it is likely that if adders are present, they are only present in very low numbers.

5.16. Of ten ponds surveyed in 2010 that were deemed relevant to the site at that time, seven were found to support populations of **amphibians.** Of the seven ponds which supported amphibians, three were found to support a medium sized population of great crested newts (GCN's) and smooth newts. Update surveys of 2014 and 2016 assessed 8 ponds within the application boundary. Three small populations of GCN were found within P6, P10 and P11 forming a combined medium sized population. It was noticeable that this species was recorded in a settling lagoon (P 11) in the southern part of Q1 during the update surveys. It is considered that a cessation of mineral workings has, in relation to P11, increased the availability of potential great crested newt breeding habitat locally. It was however also noticeable that great crested newt counts were significantly lower in previously identified ponds. This could be a consequence of this species being more widely distributed throughout habitats at the site as a result of mineral extraction ceasing. The site supports 5 species of amphibian, including common toad (UK Bap/S41 species) and a medium sized population of great crested newts (UK BAP/S41 NERC and county BAP species).

5.17. Surveys in 2010 and 2011 covered the landholding at that time which was a much larger area than the site boundary shown in Appendix 1. The surveys recorded a diverse breeding population of **birds**. There were several areas with a high concentration of breeding territories, especially in habitats closer to the River Churnet (Q1). Overall, 69 species of bird were recorded at the site. Of these, 62 species are thought to be either 'breeding', 'probable breeding' or 'possible breeding. Four species of bird afforded higher protection under Schedule 1 of the Wildlife and Countryside act 1981 (as amended) where recorded within the site including goshawk, peregrine and kingfisher and a pair of little ringed plover. Eight species recorded at the site are included on the RSPB Red List of 'Birds of Conservation Concern' (RSPB, 2004) including lapwing (also a BAP/S41 NERC species), willow tit, starling, song thrush, spotted flycatcher, house sparrow, tree pipit and linnet.

5.18. During the most recent targeted bird surveys in 2016 a total of 38 species of bird were recorded at the site all of which were recorded to be either 'breeding', 'probable breeding' and 'possible breeding'. Little ringed plover, afforded higher protection under Schedule 1 of the Wildlife and Countryside act 1981, was confirmed as 'breeding' with two territories over Lagoon 7 in Q2. Five RSPB 'red list' species were recorded including lapwing, linnet, song thrush, tree pipit and wood warbler (Species of Principal Importance). The update surveys were broadly consistent with the baseline surveys from 2010, albeit with a reduced scope.

5.19. **Otter** activity was identified along the River Churnet and along a small, unnamed watercourses within Whiston Eaves SSSI. The results of the surveys echo the information received during the data search which provided records of otter on the River Churnet near Oakamoor between 1990 and 2009. It is likely that the River Churnet is a linear habitat connection for otter between the River Dove to the west and the River Trent to the east. The use by otter of the unnamed watercourses within the woodland at Whiston Eaves is likely to be occasional investigation of various tributaries off a main territory (the River Churnet) for food sources and resting places.

5.20. The habitat potential assessment for **water vole** was carried out at the same time as the otter surveys, these surveys confirmed that no waterbodies provide suitable habitat for water vole within the study area or within the immediate vicinity. All watercourses were either too steep sided with rocky banks or too deep and fast flowing with unsuitable bank habitat such as along the River Churnet. No signs of water vole including burrows, feeding remains, grazed lawns or droppings were identified during the otter survey.

5.21. Fifty nine trees were considered to be of high to moderate suitability as **bat** roosting habitat in the wider land holding surveyed in 2010 and 2011. Of these, seven potential bat roost trees occurred within or close to the outline application boundary. An assessment of the buildings, undertaken in 2011, within Q1 concluded that they provided suitable roosting opportunities for bats. No bats were seen to emerge from any of the buildings. These buildings have now been demolished.

5.22. **Bat activity** surveys undertaken during 2014 confirmed the use of the site as foraging/ commuting habitat. Five species of bat; common pipistrelle, soprano pipistrelle, noctule, Daubenton's and brown long-eared were confirmed. Pipistrelle bats were recorded regularly during surveys, particularly along Eaves Lane where mature trees provide an important foraging, commuting and roosting resource. Noctule bats were recorded regularly during site surveys and it was noticeable, from static deployment, that this species was recorded travelling from north of Q2 after dusk, to forage around woodland and habitats associated with the Churnet Valley, before returning to the north of Q2 before dawn. The extensive open water habitat of Q3 was found to support regular foraging by Daubenton's bats. Brown long eared bat is known to roost in buildings adjacent to the application site (e.g. Crow Trees farm, a single bat confirmed roosting in a barn at this site). This species will forage and commute along woodland along Eaves Lane and within the Churnet Valley.

5.23. With regard to **other mammals**, data searches revealed a record for one adult polecat identified in 2004 within a 1km grid square which is located approximately 300m to the south east of the southernmost extent of the site. The site could support a population of polecat should their population increase in this area. The Staffordshire Mammal

Group provided records of a sighting of a pine marten in Consall Country Park from 2007, there were no further sightings/ evidence of this species between 2007-2014. No evidence of the presence of this species was identified during surveys. No records were received for dormouse either within the site or within a 2km radius of the site. The Staffordshire Mammal Group supplied information relating to a nestbox survey within a number of woodlands within the Churnet Valley which has been ongoing for five years. No evidence of dormouse has been identified during this time. The majority of habitat within the application site is of relatively recent occurrence and as such it is considered to be suboptimal for dormouse. However, it is considered possible that this species is present within the Churnet Valley and may at some point utilise habitats within the application site.

5.24. Surveys carried out in 2011 identified the presence of invasive signal **crayfish** in the tributary of the River Churnet at the site. This tributary is not currently suitable for native white clawed crayfish due to the presence of the invasive species.

5.25. Of specific relevance to the RM application are the following, which where relevant are illustrated on the plan Appendix 1:

- the presence of potential reptile foraging/basking habitat on the south western edge of Q1 (Reptile Habitat Area D on the plan at Appendix 1);
- amphibian foraging and refuge habitat associated with MG6 grassland, Frame Wood and areas of habitat within Q1;
- nesting bird habitat provided by a range of habitats within Q1 including trees and shrubs associated with Frame Wood;
- potential bat roosting habitat in trees within Frame Wood; and
- bat commuting and foraging habitat provided by grassland, woodland, scrub and ponds/lagoons within Q1.

6. Impacts on Ecology

Designated Sites

6.1. Sites of Special Scientific Interest (SSSIs) safeguard England's most important areas of natural heritage. The Wildlife & Countryside Act 1981 and subsequent amending legislation[2] places a legal duty on Natural England to act for the benefit of SSSIs and take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the **special scientific interest** of SSSIs.

6.2. Specifically a SSSI is an '**area of land is of special interest by reason of any of its flora, fauna, or geological or physiographical features**'[3].

6.3. The **Whiston Eaves SSSI** is located adjacent to the southern edge of Q3. The site is designated as it '*encompasses a series of species-rich meadows, all of which have been traditionally managed as either hay-meadow or grazing pasture … Although consisting predominantly of semi-natural grassland, the site does include areas of rush pasture, scrub and running water*. '

6.4. The closest location of the SSSI designation to the development proposals is the south west corner of Q3 where drainage works may impact upon the boundary of the SSSI. The ES concluded that:

'In this area habitats comprise scrub, bare ground and secondary grassland along the edge of Q3. It is therefore considered that the designation features of the SSSI (neutral grassland) will be unaffected at the construction phase as direct impacts to these sensitive habitats have been avoided. Furthermore, impacts are likely to be localised and short term, and existing vegetation along the southern edge of Q3 will provide a buffer to the SSSI. It is considered that impacts from dust generation will be negligible as the SSSI is on land above Q3 and development activity within Q1 and Q2 are small scale. Refer to Chapter 14: Air Quality for detailed assessment. Therefore, the impact of the construction phase is likely to be negligible.

No impacts on the Whiston Eaves SSSI are anticipated as a result of the completed development. No impacts as a result of increasing visitor pressure are envisaged as the network of new and/existing footpaths divert around or away from the site. Therefore impacts as a result of the completed development are considered to be negligible.'

6.5. The most recent Condition Assessment information for Whiston Eaves SSSI dates from 2011 (Site feature condition (naturalengland.org.uk)), and records the SSSI as being in 'unfavourable' condition. The Condition of the SSSI has declined in respect of meadow

[2] The Wildlife and Countryside Act 1981 was amended by the Countryside Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006.
[3] S28 of the Act

habitat, a reflection of farming practice at that time and not as a consequence of mineral extraction. Additionally, there has been an impact on a watercourse 'Stream A' that runs through the SSSI. A branch of stream A historically ran through the land that is now the void formed by the excavation of Quarry 3. Excavation of Quarry 3 partially removed the upstream source of this watercourse causing a period of drawdown of water levels in the upper reaches of the SSSI during mineral extraction from Q3. This flow was temporarily supplemented by an artificial discharge during mineral extraction. Following cessation of mineral extraction, a temporary siphon has been maintained in Q3 to ensure flows are maintained to Stream A within the SSSI. Supplementary flows to the SSSI were installed downstream of the original source of flow into the SSSI. A permanent solution to restore hydrological conditions to as close to the pre-extraction state has only recently been agreed in conjunction with Natural England. The solution is the installation of a permanent, soft engineered, outfall at the highest point practically possible in the SSSI so that the most near natural flow conditions recover, this solution was granted planning permission [SMD/2022/0014]. This represents a significant benefit to the SSSI once it is implemented.

6.6. Historic mineral extraction and farming practices are the biggest threats to the SSSI. The leisure development seeks a sensitive approach to design which avoids any direct impacts to the SSSI and seeks to manage the site to achieve at least favourable condition. Further the leisure proposals will bring adjacent land into favourable management that will extend and further protect the biological interests of the SSSI.

6.7. Non-statutory wildlife sites and ancient woodlands have been avoided.

Habitats

6.8. The proposed development will only directly impact upon habitats that have formed naturally following mineral extraction within the former quarry areas (Q1, Q2 and Q3) which predominantly comprise developing grassland, ephemeral habitats, scrub, wetland habitats and areas of planting. Areas of mature **woodland** and more species rich well established **grassland** were deliberately avoided.

6.9. As the site had been subject to previous mineral extraction, the ecological impact assessment took account of the previously Approved Restoration Plan. Implementation of this plan was a requirement of the previous minerals consent for the site. The proposed leisure development if implemented would fragment the previously **Approved Restoration Plan**[4] [Appendix 2] and introduce disturbance to the site which would also negatively affect the function of the proposed Approved Restoration Plan. The ecological impact assessment took account of the future baseline conditions that would have been achieved should the Restoration plan have been fully implemented.

[4] Required by Condition 35 of planning permission SM.96/935 relating to a revised restoration plan. Condition 35 required a 5 year aftercare period only.

6.10. A quantitative approach was taken to assessing impacts to habitats in the ES and this is summarised below:

- Areas of the Approved Restoration Plan which were considered to be significantly affected by the development (19.78 ha).
- Areas with minor negative effects on the Approved Restoration Plan - these areas will provide habitat and ecological value following development (13.59ha).
- Areas with negligible effects upon the Approved Restoration Plan and still providing ecological value following development (20.44 ha).
- Habitats to be created / (29.2 ha) plus 1080 m of hedgerow planting.

6.11. It's clear that substantially more habitat will be created and enhanced than would be impacted by the development. Beyond the quantitative analysis, a key opportunity that the development provides is the potential to deliver off site habitat enhancement within the landowner's ownership. The focus of this is the restoration of lowland grassland habitat and the consequent strengthening of habitat value associated with statutory and non-statutory wildlife designations. Figure 1 illustrates the extent of lowland meadow that will be managed and enhanced as a result of the development. Areas labelled A are currently of low species diversity and offer substantial potential gains for wildlife. Areas labelled B and C are currently of moderate value with scope for further enhancement.

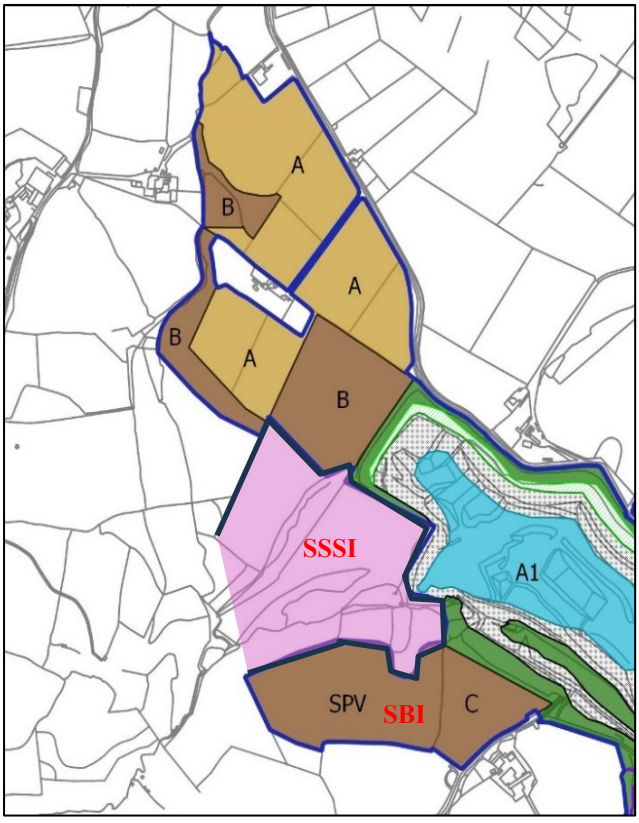


Figure 1 Off site grassland enhancement

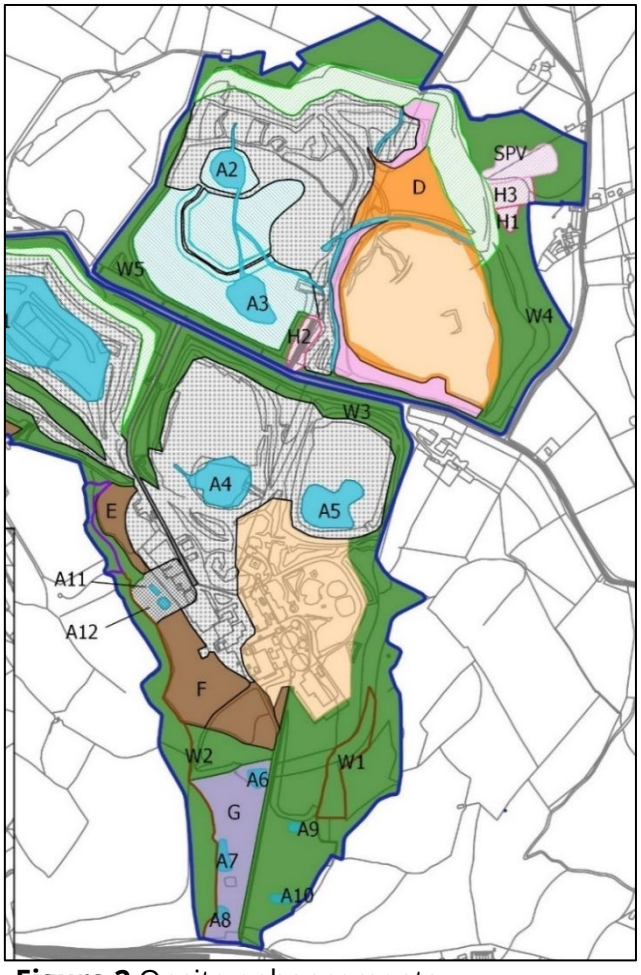


Figure 2 Onsite enhancements

6.12. Within the former quarry areas, Figure 2 shows areas of woodland (W1-W5) which are currently unmanaged and in poor condition, the presence of dense bramble (see Figure 3 overleaf) through much of the underlayer of these woodlands is a simple indicator of neglect and the scope for enhancement through appropriate management which the development will deliver.

6.13. Likewise Figure 2 also shows the presence of various lagoons and ponds which were previously used for silt management, along with other features these too will be brought into favourable management for wildlife as a consequence of the development.

Figure 3 Showing dense bramble within the woodland groundlayer in Q1

6.14. Taking impacts to existing habitats and approved restoration habitats into account, an holistic approach was adopted in respect of future habitat creation and management. This applies to the former quarry areas and extends to additional land outside of the former quarry and restoration areas.

6.15. Appendices 2, 3 and 4 show the evolution of the **Integrated Wildlife Habitat Management Plan** from the previously approved restoration plan. The integrated plan provides the framework for the delivery of much larger scale habitat benefits alongside a nature sympathetic leisure development design.

6.16. Overall, this provides benefits to habitats within the site and the wider landscape including both statutory and non-statutory wildlife designations. A further major benefit of the scheme will be to deliver c. 15.4ha of enhanced lowland grassland habitat in the local area a shown on Figure 1 (Areas A, B and C).

Fauna

6.17. Potential impacts to **reptiles** include loss of habitat, disturbance and killing and injury. Common lizard, slow worm and grass snake have been identified within the neutral grassland and scrub habitat present within the southern section of Q1, therefore potential impacts will be greater within these areas. These species will be directly impacted by the construction of a grassland activity area, adventure play area and climbing facilities. There is an abundance of suitable habitat for reptiles in the wider area; therefore it is considered that construction activities within these areas will be small scale. Landscaping proposals for the scheme include habitat creation in the form of heathland (Q2), wood/scrub and grassland habitats. Connectivity between habitats will be improved by the woodland planting which will allow the increased colonisation of habitats by reptiles.

6.18. A medium sized population of **great crested newts** has been found in ponds surveyed in 2010, 2014 and 2016. In addition, smooth newt, palmate newt, common frog and common toad have also been recorded at the site. The construction phase of the project has the potential to kill, injure and disturb amphibian populations if they are present within the proposed development areas. The highest risk of this occurring is likely to be the removal of terrestrial habitats such as scrub and potential refugia. The most significant location for where these impacts are likely to occur is during lodge and hub construction in Q1. Given the abundance of available breeding and terrestrial habitat in the surrounding area, it is considered that impacts to this species will be temporary. As part of the landscaping proposals for the scheme habitat creation will be undertaken in the form of wood/scrub, grassland and wetland habitats. This will improve the terrestrial habitats on site along with improved connectivity to the wider landscape.

6.19. The construction phase has the potential to impact upon breeding and non-breeding populations of **birds**. The loss of breeding bird nesting and foraging habitat will occur during the initial site clearance works. The breeding bird habitat to be lost includes woodland, scrub, grassland, areas of bare shallow substrate and disturbance to the existing silt lagoons. Of particular note is the presence of the Schedule 1 species little ringed plover and the RSPB red listed lapwing were recorded as breeding on the southern side of Lagoon 7 within Q2. Additional red list species recorded at or close to the site included; grey wagtail, linnet, mistle thrush, song thrush and woodcock. Sufficient areas of habitats will be retained to ensure that breeding and foraging habitat for these species is sustained at the site. The loss/disturbance of such habitat will be temporary, as breeding bird habitat will be retained and incorporated into the new development as part of the landscaping proposals.

6.20. The impact on the breeding bird population upon the completed development is likely to be restricted to disturbance. Areas of valuable habitat within Q2 which provide breeding habitat for little ringed plover and lapwing will remain largely undisturbed.

Disturbance will occur in Q1, Q2 and Q3 due to the proximity of lodges and associated development to breeding bird habitat. This will include increased noise and the increased presence of pedestrians and dog walkers. However, it is likely that increased breeding bird habitat will be available through new woodland, scrub, wetland, heathland and grassland habitats, and protected by careful management of proposed formal and informal routes to avoid such areas. The improved diversity and structure of the habitats on site will benefit breeding birds.

6.21. No signs of **otter** have been found within the application boundary. A small tributary to the River Churnet is situated along the south eastern boundary of the application site. Due its small and shallow nature impacts to otter are considered to be unlikely during the construction phase. Construction within the adjacent Frame woodland will be minimal with the use of low impact methods to create a series of footpaths/cycle routes. This species is largely nocturnal and crepuscular and so less affected by this phase of the development. The potential impacts on otters upon completion of the proposed development are those associated with the increased disturbance from dog walkers on the River Churnet and unnamed watercourses within the Whiston Eaves woodland complex. There is an abundance of undisturbed habitat in the wider landscape and therefore potential impacts to otter are negligible.

6.22. No potential **bat** roost trees will be directly impacted by the proposed development. The site is considered to be valuable for foraging and commuting bats, particularly along the woodland edges, open water habitats and mosaic of habitats including grassland, scrub and open water. Key features of value include the large open water body in Q3 and the mature tree line along Eaves Lane. The water body in Q3 provides a valuable local feeding resource for Daubenton's bat; it is considered that this foraging resource will not be affected during construction assuming that sufficient unlit areas are retained. The tree lines along Eaves Lane provide foraging, commuting and potential roosting habitats for brown long eared bats and pipistrelle bats, it is considered that this feature will be largely unaffected by construction. There will be no severance of linear features or habitat links with the wider landscape.

6.23. Indirect impacts may occur if night work is required using artificial lighting, which has the ability to intercept or disrupt foraging/commuting behaviour. There are no significant roosts within the application site, however any lighting could potentially interfere with foraging. The abundance of available suitable habitat in the surrounding area reduces potential impacts to local bat populations to a negligible level.

6.24. The effects of the completed development on bats are those associated with lighting in the vicinity of potential important commuting routes and foraging areas (Eaves Lane and Q3). However, it is likely that foraging habitat will be improved through the planting of woodland, hedgerows, creation of wetland/scrub vegetation and grassland habitats as

part of the landscaping proposals for the site. Therefore, it is considered that in the long term, the operational phase of the development is likely to have a moderate beneficial impact for bats.

6.25. Overall, impacts to fauna will be small scale, localise and largely temporary but will in any event be subject to management so as to minimise disruption. There will be an increased risk of disturbance to fauna in some parts of the site due to increased visitor level. However, with the implementation of suitable mitigation, management and enhancement measures it is fully expected that fauna will benefit as a result of the development.

7. Avoidance, Mitigation, Compensation and Enhancement

7.1. The approach to the leisure proposals sought to avoid impacting the most valuable ecological features and therefore to site proposed lodges and associated paths within areas of lower ecological value. The design process covered a considerable period, included collaborative design between technical teams and engagement with key consultees (SMDC, Staffordshire Wildlife Trust and Staffordshire County Council Ecologist).

Designations

7.2. The leisure development **avoids** any direct impacts to SSSI, Ancient Woodland and SBI designations. Further the leisure proposals will bring adjacent land into favourable management that will extend and further protect the biological interests of the Whiston Eaves SSSI and SBI designations.

7.3. The main impact during the operation of the site is the risk of disturbance from increased visitor pressure at the site and the local area. The management and enhancement of land immediately adjacent to the **Whiston Eaves SSSI** and **Ashbourne Hey SBI** will increase the extent and value of this resource. This additional land will also act as a buffer to the designated sites. As set out in the Outline Habitat Management plan, one of the key objectives of woodland management is to maintain the areas of ancient woodland in a state of low recreational disturbance by managing formal and informal recreation. This will be further detailed in the Habitat Management plan that will be secured by Condition 19 of the outline planning permission.

7.4. Therefore, the overall impact of the completed development on the designated sites is considered to be beneficial.

Habitats

7.5. No irreplaceable habitats will be lost or directly impacted by the proposals. Areas of valuable woodland have been avoided by careful design. Protective fencing will be erected for adjacent retained sensitive vegetation during the construction works including **woodland** and **scattered trees**. The fencing will ensure vehicles, machinery or materials are not stored in these areas. Further to this, measures to protect adjacent trees/woodland habitats will also be implemented in accordance with the British Standards for root protection zones (British Standard 5837: 2005 - Guide for Trees in Relation to Construction).

7.6. Extending woodland planting will provide some buffering of the existing woodland on site and it may be possible to encourage the establishment of native flora and increase the extent of bluebell. The implementation of habitat management and maturation of

new landscape planting and woodland planting will offset the impacts of potential increased recreational activity. The impacts to the existing areas of woodland are therefore considered to be beneficial.

7.7. Existing areas of disturbed woodland are generally species poor and it is expected that newly planted areas, with careful management, and a sufficient period of maturation, will be of higher ecological value than those lost. The impacts of the completed development on existing disturbed woodland are therefore considered to have a long term beneficial gain.

7.8. Impacts upon Frame Wood will be mitigated for by the provision of significant areas of new woodland planting within the landscape proposals for the application. Sensitive working will also be adopted where pathways are located in woodland in proximity to Frame Wood. This will include 'no dig' construction methods to avoid damage to root zones, and routing of pathways to avoid high value ground flora areas to ensure there are no tramping effects on valuable vegetation as a result of access. Natural England standing advice[5] recommends a minimum 15m buffer from ancient woodland for development to allow for root protection; however access within a buffer is appropriate if this does not cause damage by tramping. There will be no access into Frame Wood other than to undertake habitat management activities to enhance this area of neglected woodland. Access to woodland adjacent to Frame Wood has been carefully designed to minimise impacts by avoiding sensitive areas of groundflora, maintained a suitable buffer. The buffer is at a minimum of 10 m to allow for micro-siting of very short lengths of path, otherwise a minimum buffer of 15 m is secured.

7.9. Woodland management will also be undertaken as part of the mitigation and enhancement scheme for the site, which will improve structural diversity and prevent degradation of this habitat. Planting of species-rich hedgerows around the field boundaries to the north-west of the application site will enhance the local ecological network thus improving habitat connectivity. The detail of woodland management will be set out in the Habitat Management required by Condition 19 of the planning permission, this will not only encompass the habitat management measures to achieve improvements in ecological function but will also include the measures to manage the effects of visitor pressure. The natural topography of the site to a degree limits the risk of disturbance from visitors i.e. steep slopes, nonetheless suitable measures including monitoring and corrective actions will be detailed in the Habitat Management Plan for the site.

7.10. Protective fencing will be erected for adjacent retained sensitive vegetation during the construction works including the **MG6 neutral grassland**. The fencing will ensure vehicles, machinery or materials are not stored in these areas.

[5] Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

7.11. The permanent loss of neutral grassland habitats (open grassland according to the Approved Restoration Proposals) will be mitigated for by the incorporation of species rich grassland and open grassland habitats included within the landscaping proposals for the site. The enhancement to significant areas of low-value grassland to the north-west of the application site will be undertaken along with the management of grassland considered to be of moderate species diversity at present. This will also include management of a species poor unit within the Ashbourne Hey SBI designation adjacent to the southern edge of Q3.

7.12. Areas of the MG6 grassland will be retained following construction and mitigation. The management of scrub within the area of MG5 grassland will create moderate beneficial gains, preventing the eventual degradation of this habitat and allowing it to colonise over larger areas. The inclusion of species rich and open grassland habitats within the landscape proposals will also offer the potential for substantial gains. The management of moderate and low value grassland habitats outside of the application boundary to the north-west will provide significant gains long term with regards to neutral grassland habitats within the local area.

7.13. With regards to aquatic habitats (**lagoons, ponds** and **watercourses**), managing run-off and pollution is a key consideration for development and it is expected that there will be negligible impacts from run off or increased discharges when the site is completed. This will require implementation of the standard pollution prevention methods by following Environment Agency Guidance (Working at Construction and Demolition Sites: PPG6). Details of this are outlined in Chapter 12 of the ES: Drainage & Flood Risk and will be implemented via a Construction Environmental Management plan as required by Condition 18 of the outline planning permission.

7.14. No significant adverse impacts are anticipated with regards to the landscaping/re-grading works to the existing silt lagoons on site. The inclusion of pond management in the form of scrub thinning within the southern section of the site will provide enhancements in the form of allowing more light to reach the pond allowing a more marginal/aquatic plant species to colonise.

7.15. Other retained habitats of interest include tall herb, wetland and riparian vegetation. It is expected that there will be a slight increase in the extent and quality of these vegetation types. The impacts of the completed development on the remaining retained habitats on site are considered to be beneficial.

Species

7.16. There is potential for construction activities, if not carefully managed, to cause the spread of **Himalayan Balsam**. Causing the spread of this species would breach

legislation (Wildlife and Countryside Act, 1981 (as amended)). Works should therefore be undertaken in accordance with best practice which can be implemented throughout the construction phase of the development. Other non-native species present include rhododendron and Turkey oak which are present within woodlands at the site. The selective removal of these species will enhance woodland habitats.

7.17. Three species have reptile have been confirmed at the site, comprising a small population of grass snake and medium populations of slow worm and common lizard. During construction, it would be essential to take reasonable steps to avoid killing or injuring **reptiles** in accordance with the requirements of the protection afforded to them under the Wildlife and Countryside Act 1981 (as amended). Targeted vegetation management and removal of suitable refugia under a method statement and supervision will be undertaken within the areas of suitable impacted habitat.

7.18. The provision of habitat creation as part of the landscaping proposals for the site in the form of open grassland, scrub/woodland, heathland and scrub/wetland habitat, is considered to improve the quality of habitats for reptiles on site, as well as overall connectivity for dispersal in the wider landscape.

7.19. A medium sized metapopulation of **great crested newts** has been found in ponds surveyed in 2010, 2014 and 2016, situated in or within 250 m of the application site. It is considered that a licence will be required from Natural England for the areas of highest impact in high value habitat, particularly where lodges and access roads are proposed in Q1. These areas will require careful standard mitigation as set out in the ES.

7.20. No ponds will be lost as a result of the proposed application. Proposed mitigation/enhancement works to the existing silt lagoons/ ponds along with planting and/or scrub management will improve the quality of the habitats for amphibians. It is considered that with mitigation and compensation measures, there will be no negative impacts upon the Favourable Conservation Status of this species as a consequence of development of the site. To the contrary, the development provides the opportunity to manage aquatic habitats (by maintaining areas of open water - removing scrub) to ensure that great crested newts and other amphibians benefit as a consequence of the scheme.

7.21. No significant adverse impacts upon amphibians are expected if the outlined mitigation measures are implemented. Long terms beneficial gains are anticipated in the form of planting of marginal/aquatic species and thinning of scrub around shaded ponds. The maintenance of open water habitats, provision of refugia/hibernacula and a range of optimal terrestrial habitats within the landscaping scheme such as woodland/scrub, species rich and open grassland will also provide benefits for amphibian populations.

7.22. The **bird assemblage** is considered to be of Borough/District value; the species recorded are moderately diverse and a range of woodland/scrub species and ground nesting species are represented. As far as possible, all woodland and scrub habitat will be retained, with new planting replacing any affected areas. New nest boxes will be provided within woodland habitats to provide opportunities for a range of birds including barn owl and planting will include berry bearing species (e.g. rowan, holly and hawthorn) to provide a food source for birds.

7.23. The Wildlife & Countryside Act (1981, as amended) gives general protection to all wild birds from killing, injuring or taking; destroying, damaging or taking nests in use or being built; and taking or destroying eggs. Birds listed on Schedule 1 of the Wildlife and Countryside Act (1981, as amended) are afforded additional protection by a penalty system. It is illegal to disturb any wild bird listed on this Schedule while it is nest building, or at a nest containing eggs or young, or disturb the dependent young. As little ringed plover were previously identified to be 'confirmed breeding' on Lagoon 7 in Q2 it will be necessary to conduct a check of suitable habitat prior to the commencement of work if programmed to be carried out during the breeding season. If this species is confirmed to be present within any working areas during the breeding season a suitable exclusion areas will need to be established to ensure that this bird is not disturbed during the breeding season.

7.24. Other breeding bird habitat (trees and scrub) removal should preferably take place outside of the breeding bird season which runs from late February until September. Any vegetation not cleared during the bird breeding season will be subject to a pre-clearance bird survey. No vegetation will be cleared within 5m of an identified nest until the young have fledged and are no longer returning to the nest site. Vegetation will only be cleared when the scheme ecologist has declared the nest clear of dependant young.

7.25. No significant adverse impacts to birds are anticipated if the outlined mitigation is implemented. Any impacts during construction are considered to be temporary and the provision of additional nesting habitat in the form of woodland, scrub and nest boxes will provide gains for a range of species along with providing suitable habitat for the inclusion of the Schedule 1 species little ringed plover which was recorded on site. The implementation of a bird box scheme within the woodland habitats to the south (Key and Frame Wood) will provide an abundance of additional nesting opportunities for birds. It is considered that overall there will be beneficial gains for birds.

7.26. No potential **bat** roost trees will be directly impacted by the proposed development. The site is considered to be valuable for foraging and commuting bats with a range of species confirmed to be utilising the site for foraging. Potential lighting impacts will need to be managed during construction and operation of the site. The design will need to avoid

direct lighting and overspill into woodland or into potential foraging habitat such as woodland, water bodies and tree lines.

7.27. New artificial bat roost sites will be installed into selected new structures. Roosts will be appropriate to each individual structure and will include bat bricks or in built crevices/voids which are suitable for bat use. Bat friendly building design will be incorporated into new buildings - this will be targeted towards buildings with a south/south-east elevation overlooking or close to water and/or woodland habitats.

7.28. A range of bat boxes will be installed within Key Wood as part of the ecological mitigation and enhancement for the site. This will create additional roosting opportunities for a range of bat species on site.

7.29. No significant impacts to bats are anticipated if the mitigation proposals are implemented. The current site status suggests that the site is of value for foraging and commuting bats. It is therefore reasonable to expect that with the mitigation outlined above that the availability of roosting habitat will increase providing beneficial gains for bats and foraging behaviour should not be significantly affected.

7.30. No significant impacts to **otters** or **other mammals** are anticipated as a result of the proposed development.

7.31. When the site is operational and with maturation of newly established habitats it is expected that species groups including bats, birds, amphibians and reptiles will reoccupy large parts of the site. Areas of low disturbance may well benefit grass snake. It is certain that bat species such as Pipistrelle sp. and Daubenton's will benefit from the provision of extensive new roosting features, the creation of the new wetland features and the strengthening of commuting routes. New landscape planting, the provision and sensitive management of land for ground nesting birds and the provision of barn owl boxes will provide a wide range of new nesting opportunities for birds. The long term impacts upon protected species are therefore considered to be beneficial as a result of the completed development.

Implementation

7.32. To manage future mitigation, maintain and enhance wildlife interests at the site, a **Habitat Management Plan** (HMP) will be prepared for the site, which will be in place throughout the operational period of the site, enforced by condition. The plan will include the management required for all retained vegetation and newly created habitats. This will be submitted to Staffordshire Moorland District Council (SMDC) for approval in respect of Condition 19 of the outline permission. An Outline Habitat Management Plan, including an integrated wildlife habitat plan (see Appendix 4), supported the outline application and provided an overarching strategy for habitat

management that relating to the planning applications for the leisure scheme and consented solar schemes within Q1 and Q2 in combination; this approach was developed in consultation with Staffordshire County Council's ecology officer.

7.33. The detailed HMP (Condition 19) will also include the management and monitoring arrangements for notable species at the site including breeding birds, reptiles, amphibians and bats.

7.34. The implementation of the above controls and management plans are secured by Conditions 18, 19 and 20 of SMD/2014/0682:

- 18. No phase of the development as agreed under Condition 5, including demolition, site stripping and any other preparatory work, shall be commenced until a Construction Ecological Management Plan for that phase has been submitted to and approved in writing by the Local Planning Authority. The plan shall have regard to the prevailing British standard for 'Biodiversity – Code of Practice for Planning and Development and shall be based on the amended Outline Construction Ecological Management dated June 2016 prepared by Bowland Ecology and included at Appendix 9.3 of the Environmental Statement. The development phase shall thereafter be carried out in full accordance with the approved plan.

- 19. No development including demolition, site stripping and any other preparatory work shall be commenced until a Habitat Management Plan, relating to the area edged blue on the Integrated Wildlife Habitat Plan attached at Appendix 1 of the Outline Habitat Management Plan dated June 2016 prepared by Bowland Ecology (Appendix 9.4 of the Environmental Statement) has been submitted to and approved in writing by the Local Planning Authority. The plan shall be based on the design and management principles set out in the submitted Outline Habitat Management Plan and include details of habitat creation, phasing mechanisms, roles and responsibilities for implementation of the plan, its review and monitoring. The development shall thereafter be carried out in accordance with the approved plan.

- 20. No phase of development agreed under condition 5 shall be brought into use until full details of the proposed lighting scheme (including floodlighting, street lighting and security lighting) for that phase has been first submitted to and approved in writing by the Local Planning Authority. Such details shall be broadly in accordance with guidance set out in the Institute of Lighting Engineers (Reduction of Light Pollution)(2011) and be accompanied by evidence that it is approved by a qualified ecologist in relation to its impact on bats. There shall be no external lighting at the development other than in accordance with the approved scheme.

8. Reasons for Refusal

8.1. Detailed consideration has been given to identifying, retaining, protecting and enhancing the key ecological features for the whole site and wider area. In terms of the **Reasons for Refusal** reference is made to the design of lodges not being sensitive to the site or surroundings and note that the development in part is adjacent to Whiston Eaves SSSI.

8.2. In referencing the SSSI within the Reasons for Refusal it appears that the purpose of SSSI designation is misunderstood. Sites of Special Scientific Interest (SSSIs) safeguard England's most important areas of natural heritage. The Wildlife & Countryside Act 1981 and subsequent amending legislation[6] places a legal duty on Natural England to act for the benefit of SSSIs and take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the **special <u>scientific</u> interest** of SSSIs.

8.3. Specifically a SSSI is an 'area of land is of special interest by reason of any of its flora, fauna, or geological or physiographical features'[7] only. With regards to Whiston Eaves SSSI, this site is <u>only</u> designated due to the presence of certain habitats and the fish bullhead within the associated streams (small tributaries of the River Churnet). More specifically [extract from SSSI citation] 'the site encompasses a series of species-rich meadows, all of which have been traditionally managed as either hay-meadow or grazing pasture…Although consisting predominantly of semi-natural grassland, the site does include areas of rush pasture, scrub and running water'. **<u>This is clearly not a designation based upon appearance, setting or visual impact.</u>**

8.4. Impacts to the SSSI were considered in the Environmental Statement, there are no objections to the Outline Permission and the RM application from Natural England (the statutory body for designating SSSI) or the Staffordshire Wildlife Trust who provide planning advice to the LPA.

8.5. The development will bring land outside of the former minerals operating areas (Q1, Q2 and Q3 the areas of proposed lodges) and adjacent to the SSSI into favourable management. By not giving consent to the RM application, beneficial management to habitats that that are connected to the SSSI and thus beneficial for the SSSI will not be achieved.

8.6. The key impact to the SSSI occurred during mineral extraction when drawdown of water levels in the SSSI occurred. The applicant is seeking to restore this situation and provide

[6] The Wildlife and Countryside Act 1981 was amended by the Countryside Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006.
[7] S28 of the Act

further beneficial management through development of the site. Linking refusal to the SSSI is therefore wholly irrelevant in the context in which it has been used.

9. Conclusions

9.1. A number of studies dating from 2006 have been undertaken to gather ecological information relating to the site. A wide range of detailed ecological surveys were initially carried out in 2010 and 2011. Updating surveys were carried out in 2014 and 2016 to re-check the baseline conditions previously recorded.

9.2. The site is dominated by former quarry workings with additional woodland, grassland and hedgerow habitat within the wider area. Of particular interest are areas designated as SSSI and SBI, remnant ancient woodland, broadleaved woodland and grassland habitats. The assessment of baseline conditions, impacts and mitigation took account of Quarry Restoration Proposals approved by Staffordshire County Council in December 2013.

9.3. A sensitive approach to design was adopted following the review of existing information and extensive site surveys. This approach ensure that the proposed development locations were located within areas of low ecological value and valuable ecological features were avoided.

9.4. The ecological assessment supporting the consented outline application concluded that the proposed development will impact upon habitats that have formed within the former quarry areas (Q1, Q2 and Q3) which predominantly comprise developing grassland, ephemeral habitats, scrub and areas of planting (trees, hydra seeding). In addition, the development will fragment the Approved Restoration Plan and introduce disturbance to the site which will also negatively affect the function of the proposed Approved Restoration Habitats.

9.5. To mitigate and compensate for these impacts a strategic approach was adopted. The key elements of which are the enhancement/restoration of lowland grassland, planting new woodland and management and enhancement of existing woodlands. Further measures included planting of new hedgerow to enhance the ecological network value of the area (green infrastructure) and retention and management of the Approved Restoration Habitats within the application site.

9.6. With regards to fauna, the site is of interest for reptiles, amphibians including great crested newt, bird species and bats. Standard mitigation techniques can be implemented to avoid potential effects to species during construction and to avoid other potential impacts such as run off and lighting. Species interests would also be incorporated into the long term management objectives for the site.

9.7. Ecological matters were comprehensively considered at the outline planning stage, outstanding matters will be addressed by several key pre site stripping and operation conditions 18-20. The only remaining considerations relate to condition 9 (dealt with

during the RM application) and condition 12 a pre-commencement requirements which relates to the provision of further detail for a bridleway at the northern edge of Q2.

9.8. Overall the development will deliver substantial benefits for wildlife by:

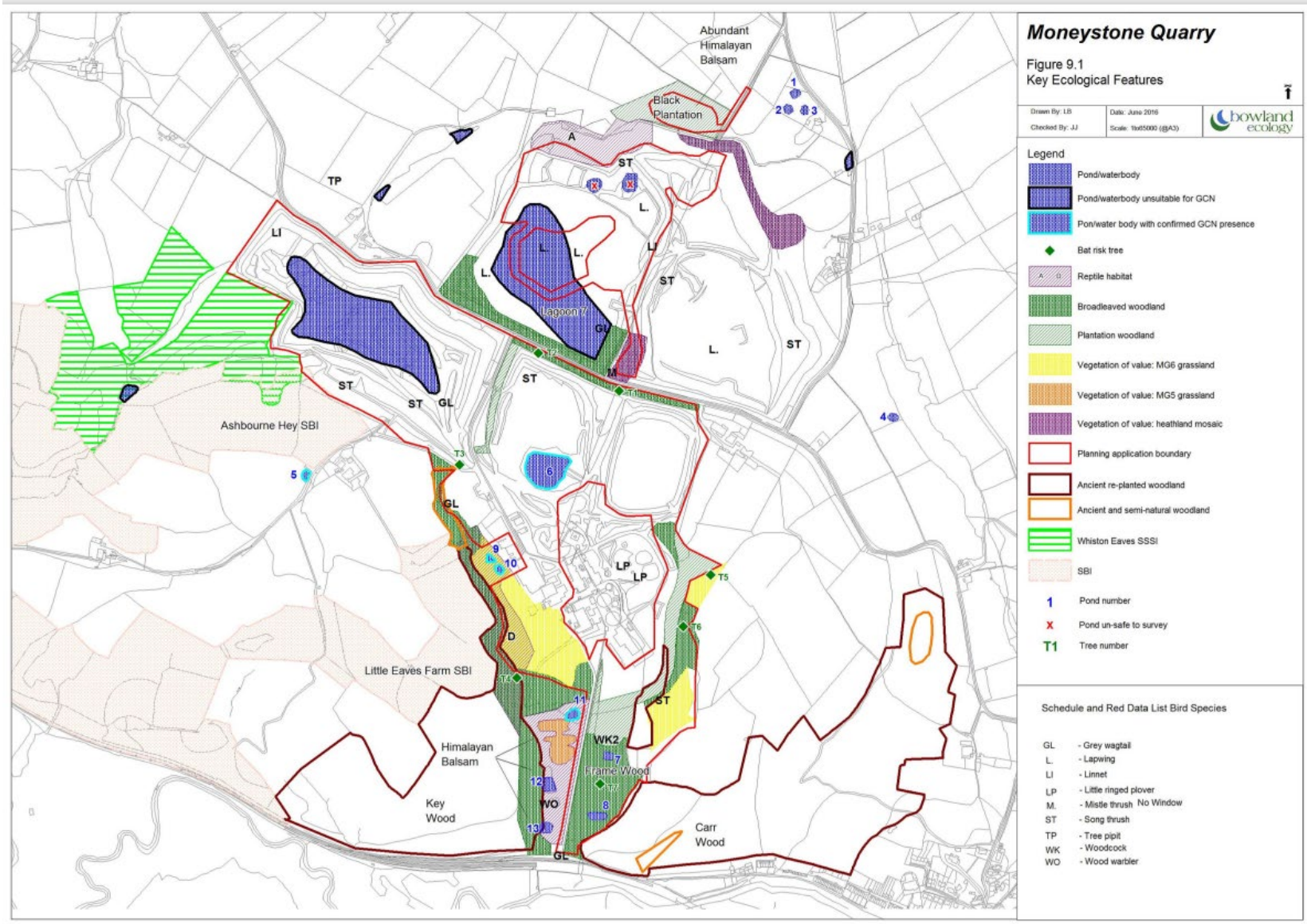
- enhancing extensive areas of grassland within and beyond the proposed development site;
- bringing extensive areas of neglected broadleaved woodland, including ancient replanted woodland, into favourable management;
- protecting and enhancing SSSI and SBI designations as a consequence of grassland and woodland management;
- creating and enhancing other habitats within the former minerals extraction areas including wetland habitats;
- creating opportunities for a wide range of species associated with the site (e.g. bird and bat boxes, refuge habitat for amphibians/reptiles); and
- delivery of a long term monitoring strategy secured by planning condition, compared to the previous 5 year after care period associated with quarry restoration.

9.9. With regard to the Reasons for Refusal, SSSI designation does not relate to appearance or setting and is solely relate to scientific interest. Reference to the SSSI is therefore irrelevant in the context in which it has been used. Natural England did not object to the Reserved Matters Application.

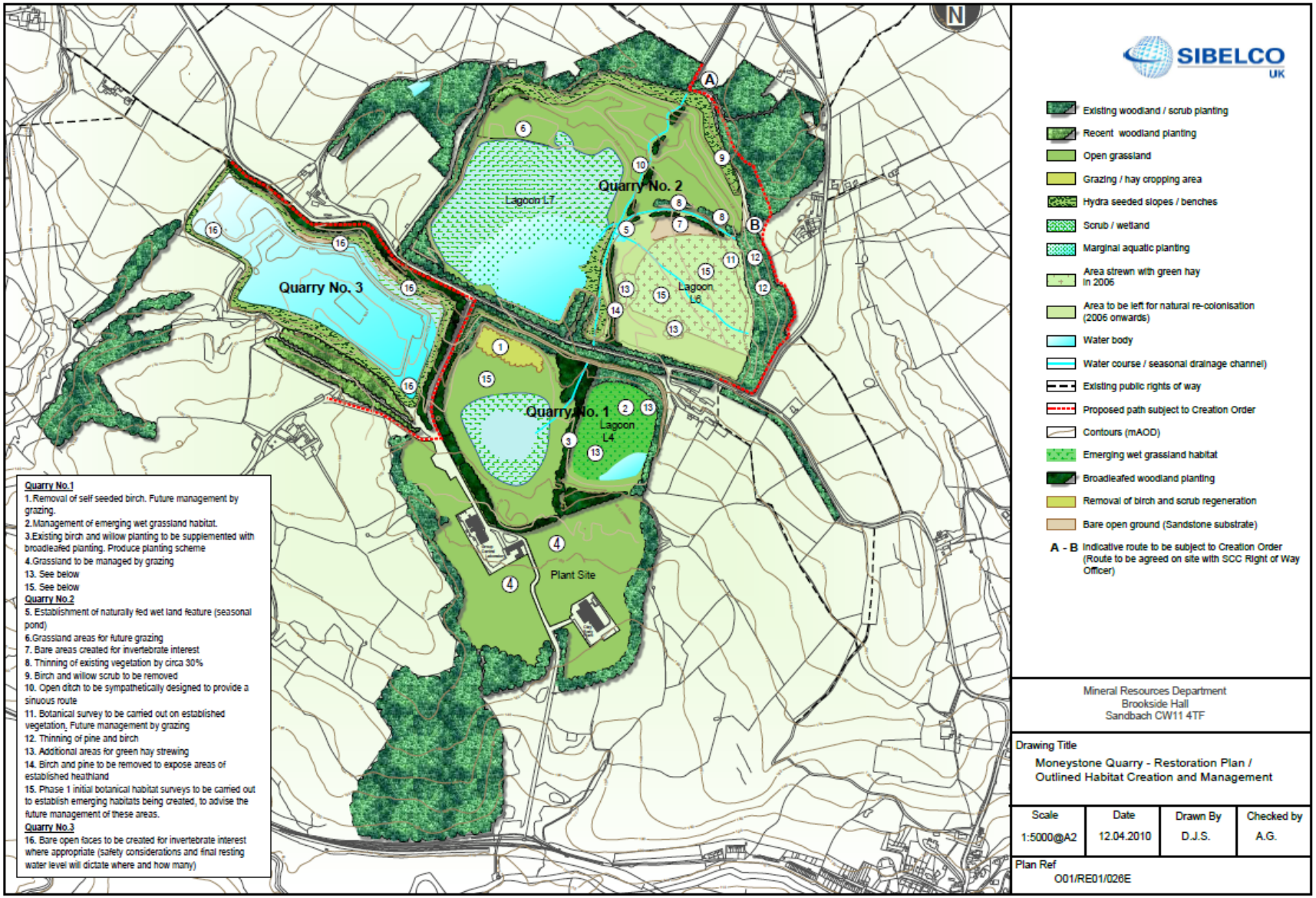
9.10. By refusing the RM application significant benefits to wildlife including the SSSI will not be delivered.

Appendices

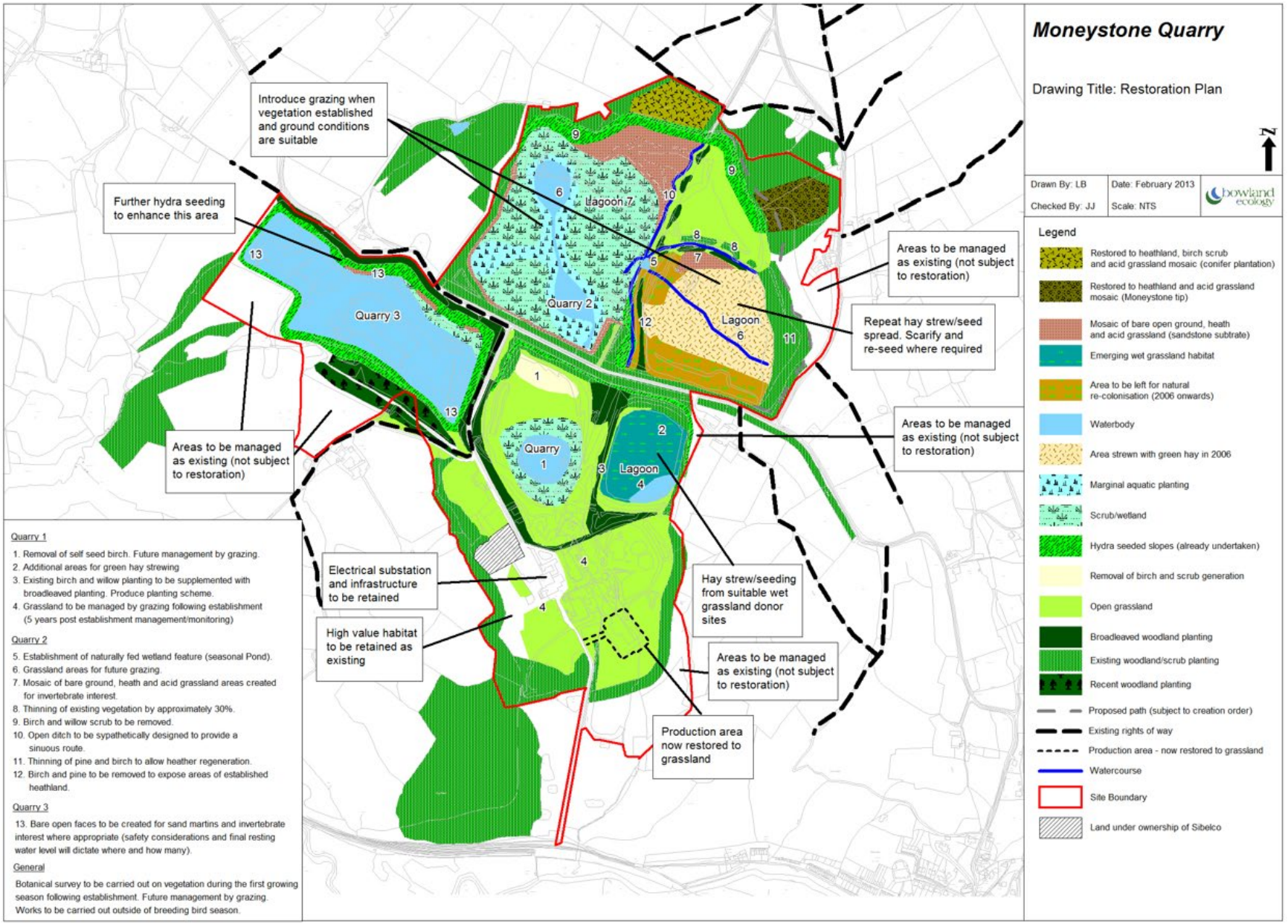
Appendix 1 Ecological Features Plan



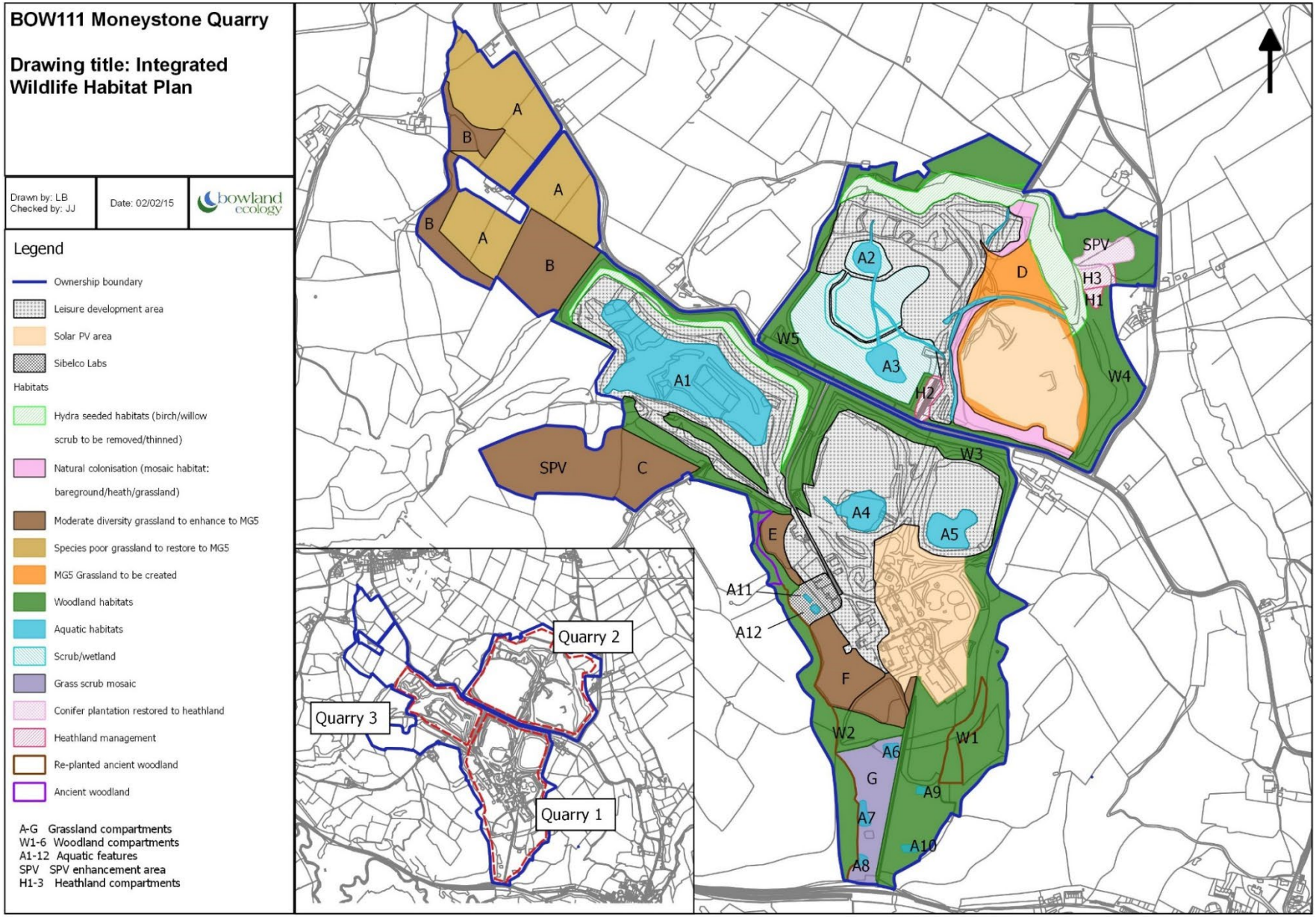
Appendix 2 Sibelco Approved Restoration Plan



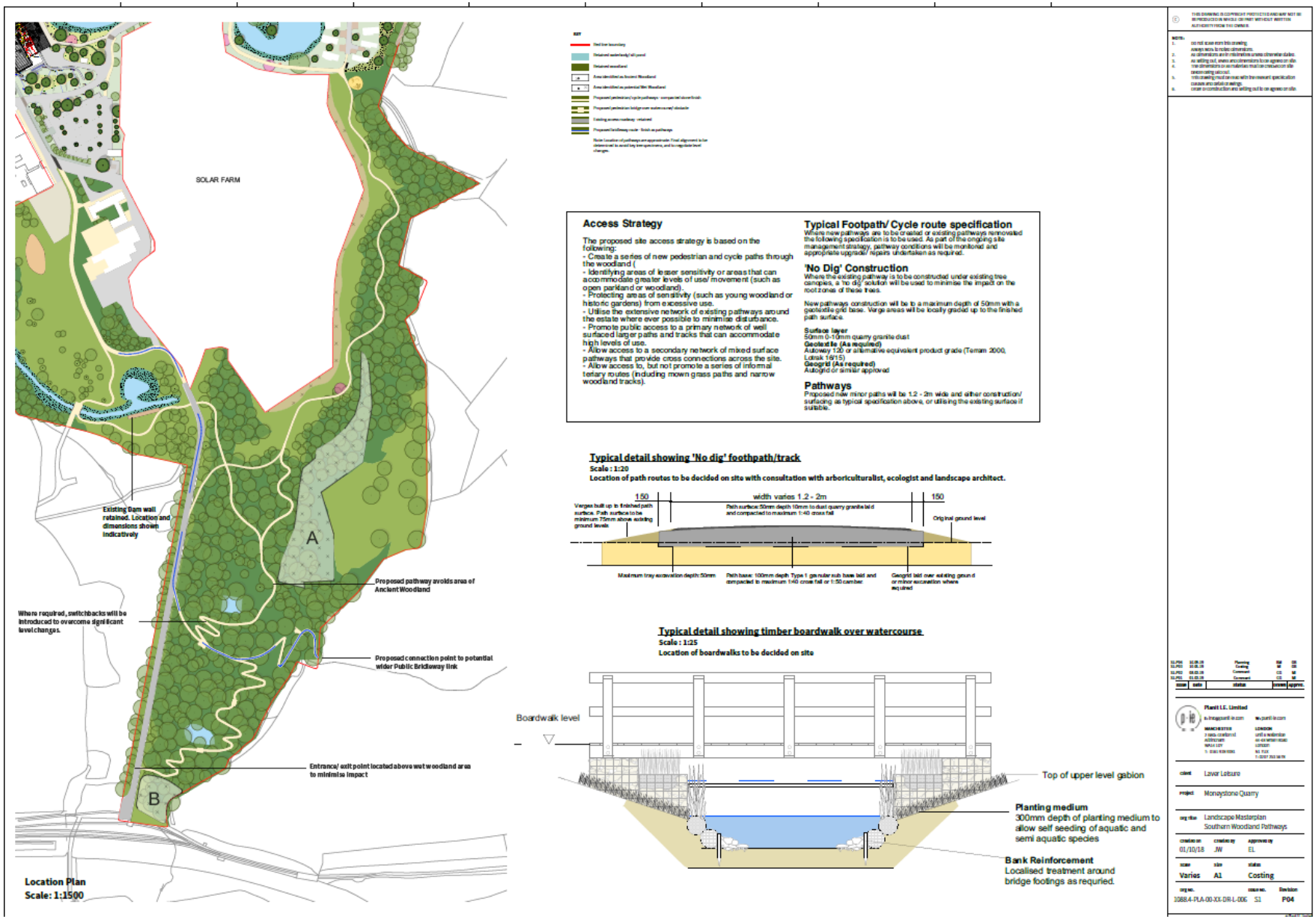
Appendix 3 Updated Approved Restoration Plan



Appendix 4 Integrated Wildlife Habitat Plan



Appendix 5 Design of access use of retained landscaped areas



APPENDIX 5

DESIGN ENGINEER SUSTAIN

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Energy Strategy - Statement

Proposed Leisure Development (Phase 1)

Moneystone Quarry

On behalf of Laver Leisure (Oakamoor) Ltd

Appeal Reference:

Document Reference: P7700-FS-XX-XX-RP-M-002

Date: 01-05-24

Revision: P04

Status: DRAFT

Contents

Section 1 – Introduction

1.1 This Statement has been prepared on behalf of Laver Leisure (Oakamoor) Ltd in respect of an appeal against Staffordshire Moorlands District Council's ('SMDC') decision to refuse reserved matter planning application ref: SMD/2019/0646 ('the Reserved Matters Planning Application') for Phase 1 of the leisure development ("the Appeal Scheme") at the former Moneystone Quarry, not known as Moneystone Park, ('the Appeal Site').

1.2 I am Paul Young BEng(Hons), Chartered Engineer of the Engineering Council (CEng), Full member of Chartered Institution of Building Services Engineers (MCIBSE) and Fellow of the Institute of Healthcare Engineering and Estate Management.

1.3 I am an Associate Director of Futureserv Ltd, a practice established in 2009 to provide Energy Strategies to support planning applications to comply with Local and National policies governing energy and carbon emissions. I have more than 22 years of applied building services experience in both the public and private sector.

1.4 I believe that the facts stated in this statement and its annexes are true.

1.5 The document supersedes and updates the WSP Energy Strategy issued in June 2016. In particular, due to the update in the Core Strategy Development Plan, Building Regulations Approved Document Part L and the enhanced requirements to reduce carbon emissions for the development.

1.6 The relevant policies that the energy statement considered when the report was submitted were:

- Approved Document Part L of Building Regulations 2021;
- Churnet Valley Masterplan Supplementary Planning Document (SPD) (26th March 2014);
- Staffordshire Moorlands – Local Plan Document (Adopted September 2020);

KEY CONSIDERATIONS/LOCAL POLICIES

1.7 Staffordshire Moorlands Core Strategy document contains two specific policies relevant to the development.

1.8 SD1 "Sustainable Use of Resources" requires all development to make sustainable use of resources and adapt to climate change. With regards to energy use it is required that "development is located and designed to minimise energy needs and to take advantage of maximised orientation to achieve energy savings in line with policy SD3".

1.9 DS3 covers carbon saving measures and states that the Council "will support developers proposing to exceed the thermal efficiency standards required by law at the time of the application

1.10 The Moneystone Quarry development is considered within the Churnet Valley Masterplan SPD. The concept statement for the site details the "creation of a high quality, sustainable environment which will promote environmental awareness – use of sustainable building techniques, low carbon, low impact development with on-site energy generation, green technology and eco-lodges".

1.11 Whilst no specific targets are contained in the CVP (such as a minimum use of renewable energy on site) this strategy recognises the aims of local policy in that it assesses the feasibility of technologies for inclusion in design. It is important to note that the Reason for Refusal of the reserved matters application refers principally to the design of the lodges. It does not allege that the proposals conflict with either Policy SD3 or DS3 which relate to energy and sustainability. Nevertheless, the sustainability credentials of the scheme are an important element of its design quality, and therefore this statement has been prepared. Energy minimisation is an integral part of the overall design and has been considered from the outset.

1.12 The strategy is essentially based on the reduction of energy consumption by use of passive construction measures, fabric first approach alongside active energy efficient equipment in conjunction with renewable energy generation such as a Photovoltaic array.

1.13 To maintain the quality of the development, the energy statement was prepared to treat the lodges as they were fixed dwellings to comply with

Approved Document Part L Building Regulations, which would not otherwise apply. This will ensure the fixed buildings services proposals comply are aligned with Building Regulations to encourage energy efficiency. Compliance with the energy strategy is expected to be secured by the imposition of conditions.

1.14 This Energy Strategy has been prepared to evidence the environmental aspects of the proposed development highlighting the Energy/Carbon emission profile, to assess the options available for reducing energy consumption and associated CO_2 emissions in accordance with Staffordshire Moorlands district council's policies and guidelines.

1.15 This statement will also demonstrate how the proposals have been brought forward in the context of a strong commitment to sustainability and will not only show achievement of policy compliance as per the Guide to Development in Staffordshire Moorlands Local Plan, but also that sustainability objectives form an integral part of the Applicant's aspirations for this development.

1.16 Grid electricity has now seen significant decarbonisation since the last update to AD Part L 2013 driving the need to change the energy strategy in the development from Gas fired to all electric space heating. The reduction in carbon factors relating to grid electricity is mostly due to the closure of coal fired power stations and the implementation of grid connected renewable energy technologies.

1.17 This improvement in carbon factors reflects the shift from gas fired fuelled systems to lower carbon systems, thus making electric powered systems more viable and in reality, less carbon intensive than solutions such as gas fired boilers which were previously promoted.

1.18 The active building services are to be designed to minimise direct energy consumption and CO_2 emissions, with particular emphasis on the following;

- Increased hot water generating efficiencies
- Reduced standing losses from pipes and cylinders
- Energy efficient LED lighting
- Improved lighting controls
- Low energy motors in pumps and fans
- Enhanced heating controls
- Combined natural and mechanical ventilation systems

1.19 The proposed lodges perform well and show potential for a reduction in emissions with 2021 Building Regulations Part L1. This equates to a 64% reduction over PartL1A 2010 and is well in excess of the improvement as required by the planning policy documents.

1.20 This will improve over time as the UK electricity grid continues to decarbonise.
In line with Staffordshire Moorlands Local Plan, a feasibility study was carried out to outline which Low or zero technologies could be included in design to reduce carbon emissions and generate renewable energy to meet the onsite demand.

1.21 The following technologies were considered in the renewable energy study:

- Wind Turbines
- Photovoltaic
- Solar Thermal
- Biomass boilers
- Ground/Air Source Heat Pumps
- Gas Combined Heat and Power (CHP)

1.22 The use of wind turbines has been rejected due to the visual presence of the structure, given the particular visual sensitivities of the landscape and the ethos of the scheme being to work within this context.

1.23 For the lodges, Gas CHP and Biomass boilers have both been ruled out given the requirement for both to feed a district network and the low predicted thermal demand of individual units and overall thermal density.

1.24 The utilisation of a ground source heat pump may not be deemed the optimum solution as lodges do not have a sustained heat load throughout the

year and also considering the intrusive nature of drilling the necessary bore holes and installation of equipment.

1.25 Photovoltaics panels are considered feasible for the development given availability of some of the roofs orientated from south-east to south-west. These technologies could be applied on the suitably orientated roofs at the development and have the potential to reduce carbon emissions significantly.

1.26 Whilst the energy demand from non-domestic units has not been modelled as being particularly high, the swimming pool will require a significant and relatively constant thermal demand and Gas CHP or Air Source Heat Pumps are recommended for further consideration at the detailed design stage of that part of the project.

1.27 In December 2015, a circa. 5MW solar farm on adjacent land received planning permission (Reference: SMD/2015/0220) and was constructed at a later date.

1.28 Solar farms do not emit Greenhouse Gases or air pollutants, which contributes to reducing the carbon footprint and mitigating the adverse effects of climate change. They encourage local energy production, which reduces transmission and distribution losses, increasing energy efficiency.

1.29 The 5MW solar farm was installed on adjacent land not used for the leisure development, to provide renewable energy generation in a manner complimentary to the development, and significantly offset the power consumption from the power grid.

1.30 All matters related to the detailed energy strategy are reserved for future determination in the detailed design stage of the development.

Figure 1 – overview site plan

Section 2 – Development Proposals

2.1 This stage of the development shall consist of 190 holiday lodges that will typically be single storey and will average 6m x 12m in dimension. These will form phase 1, with a further 60 lodges proposed to be added in phase 2.

2.2 Non-residential units proposed include a visitor centre, Lake Café, Leisure Hub building, Central Hub building, Swimming pool, children's play areas, multi-use games area, Quarry Park, maintenance/housekeeping building, parking facilities, site infrastructure and associated landscaping.

Indicative single lodge with end terrace

Indicative waterside twin lodge with side terrace

2.3 This Energy Strategy has been prepared to assess the environmental aspects of this stage of the proposed development highlighting the Energy/Carbon emission profile and to assess the options available for reducing energy consumption and associated CO_2 emissions, in accordance with Staffordshire Moorlands district Council's policies and guidelines.

2.4 Assessing against future net zero targets help to determine the future potential magnitude of change when compared to industry net zero benchmarks. This development has been designed targeting The London Energy Transformation Initiative and Royal Institute of British Architects best practices for whole life embodied carbon and operational energy for 2025 and 2030. See table below for information.

Sustainable Outcome Metrics	Business as Usual	2025 Target	2030 Target
Whole Life Embodied Carbon ($kgCO_2e/m2$)	1,200	< 800	< 625
Operational Energy ($kWh/m^2/year$)	120	70	35

2.5 Futureserv Consulting Engineers have collaborated with the design team to provide a holistic solution for the buildings that will provide an efficient envelope and contain intelligent building services reducing the environmental impact of the development whilst providing comfortable living accommodation.

Section 3 – Approach to The Energy Strategy

Lodges

3.1 To demonstrate efficient building specification & compliance to the building regulations Part L, a Standard Assessment Procedure (SAP) analysis was carried out for a typical single lodge of the development to prove the high-quality of the development in sustainability terms.

3.2 A representative lodge was modelled using the SAP methodology based on an average unit determined from the Schedule of Accommodation for the proposed development. Being permanent buildings, the lodges would be treated as dwellings under Part L of the UK Building Regulations.

3.3 The output of this software allowed the assessment of whether the building specification chosen achieved compliance with both the Target Emissions Rate (TER) and Target Fabric Energy Efficiency (TFEE) of Part L of the Building Regulations 2021. Compliance with Building Regulations was assured as specifications as detailed in Part L of Building Regulations were used as a minimum. The output of this software allowed for an estimate of total site energy consumption and emissions to be calculated through extrapolation.

3.4 These Lodges do not require comply with the Building Regulations, however using this voluntary approach to the Lodges ensures the units are built to the highest quality and adheres to the local and national policies promoting energy efficiency throughout.

Hub/Amenity Buildings

3.5 A further model was developed using Simplified Building Energy Model (SBEM) software to represent the non-domestic elements. The fabric and systems applied to the building model were those as detailed in Part L2A of Building Regulations.

3.6 The fabric and systems applied to building models were those as detailed in Part L2a of Building Regulations. The SBEM does not account for process loads, such as the swimming pool, and whilst this is not relevant for consideration in relation to building regulations it is an important factor in the design of the overall energy provision on site.

Solar Farm

3.7 In December 2015, a circa. 5MW solar farm on adjacent land received planning permission (Reference: SMD/2015/0220) and was constructed at a later date.

3.8 Solar farms do not emit Greenhouse Gases or air pollutants, which contributes to reducing the carbon footprint and mitigating the adverse effects of climate change. They encourage local energy production, which reduces transmission and distribution losses, increasing energy efficiency.

3.9 The 5MW solar farm was conceived and installed to significantly off set the power consumption for the leisure development and the proposed Development will benefit from receiving power from the adjacent Solar farm.

Site-wide Considerations

3.10 As set out in further detail in the Planning Statement of Case, the scheme includes a range of existing and new footpaths and bridleways which will connect into the existing footpath network, enhancing the accessibility of the site and creating opportunities for walking, cycling and horse riding.

3.11 In addition, a Travel Plan was approved by the Outline Planning Permission which secured a range of measures to promote sustainable transport modes and improve connectivity within the Churnut Valley.

3.12 As set out in the Design Statement of Case and Landscape Statement of Case, both the materials for the buildings and the hard landscaping have been selected to be of a high quality, including natural stone and timber from accredited sources.

Section 4 – Policy and Legislation

4.1 There are a number of planning policies both national and local that apply to the proposed development.

4.2 The UK government has signed up to a legally binding agreement to reduce Carbon emissions by 34% based on 1990 levels before 2020 and by 80% before 2050, this responsibility is being discharged using the Climate Change Act 2008.

4.3 The National Planning Policy Framework (NPPF), offers specific guidance which highlights the UK's aspiration to support a transition to a Low Carbon future in a changing climate and in particular, to encourage the use of renewable resources such as Renewable Energy and states, at paragraph 157;

Planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and effects of climate change through policies which reduce energy use and emissions, promote development of renewable energy resources, and take climate change impacts into account in the location and design of development.

Local Policies

4.4 The proposed development is within Staffordshire moorlands district Council's Centre. This means that Staffordshire moorlands Local Plan Document applies to this development.

4.5 The development must aim to meet the requirements of the Staffordshire Moorlands Local plan 2020.

4.6 Development must follow the principles of the Energy Hierarchy, being designed:

- to reduce the need for energy through design features;
- to reduce the need for energy through energy efficient features; and
- to meet residual energy requirements through the use of low or zero carbon energy generating technologies.

Renewable Energy Generation

1. Proposals for the installation of renewable and low carbon energy technologies, including both building-integrated and standalone schemes will be promoted and encouraged, provided that:

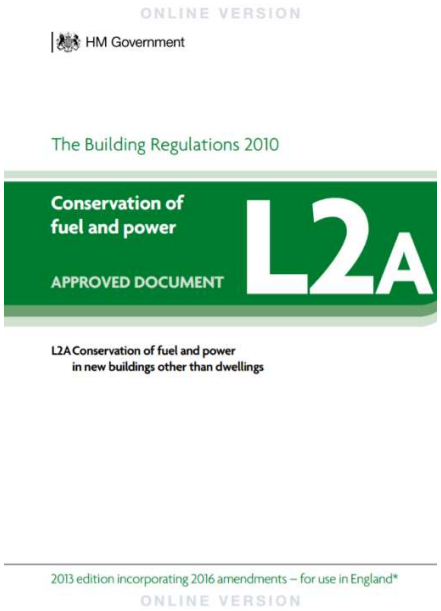
    a) any significant adverse impacts can be mitigated;
    b) where biofuels are to be utilised, they should be obtained from sustainable sources and transportation distances are minimised;
    c) any energy centre is suitably located and designed to a high quality such that it is sympathetically integrated with its surroundings; and
    d) all proposals are consistent with any relevant Policies in this Plan.

4.7 Renewable energy can be supplied at a national level from sources such as large offshore wind farms, solar farms, or hydroelectric schemes. Although not a source of renewable energy, nuclear power is a major low carbon source. Locally, smaller, and on-site renewable energy schemes include solar photovoltaic, solar thermal, ground source and air source heat pumps and, where fuelled by biomass or biogas, district energy schemes and combined heat and power plants (CHP).

Building Regulations Part L (2021) Compliance

4.8 As part of the design process it has been decided to treat the proposed lodges as if they were 'dwellings' and therefore designed to comply with the Building regulations approved document Part L1A & L2A, 2021 edition to prove the high quality of the development. These approved documents took effect from 15th June 2022.

4.9 The scheme will comply with the criteria of Building Regulations (2021) Part L1A for residential and Part L2A (2021) for the non - residential units.

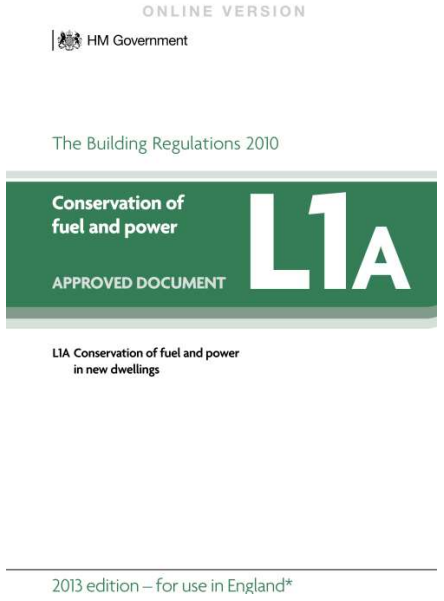


4.10 The main changes in these approved documents from the previous revisions are that;

- The notional building used to determine carbon dioxide targets is the same size and shape as the actual building, constructed to a concurrent specification. The Part L2a 2021 specifications have been strengthened to deliver **27%** carbon dioxide savings across the new non-domestic building mix relative to part L 2010. The Part L1a 2021 specifications have been strengthened to deliver **39%** carbon dioxide savings across the new domestic buildings relative to part L 2010.

4.11 The improvements to Part L demonstrate the already significant improvement. Our baseline assessment will be to meet these targets, as a result the initial assessment will be a vast improvement on the regulations that Staffordshire Moorlands District Council's local plan aims for.

4.12 The goal will be to further improve upon current regulations.



Section 5 – Energy Strategy

5.1 - Baseline Energy Assessment

5.1 Futureserv Ltd have conducted analysis for this stage of the development on the current design of the Lodges to show compliance with the Building Regulations Part L1A & L2A:2021, therefore setting a reference baseline. This was carried out in order to understand the development's Carbon emissions without any Carbon Emission mitigation measures.

5.2 This baseline energy assessment has been developed, producing a preliminary Simplified Building Energy Model (SBEM) calculation & SAP calculations (Standard Assessment Procedure) for the building. The baseline models have been created to provide Target Emission rates (TER). The calculations then in turn produce Building Emission rates (BER) & Dwelling Emission rates (DER) which are equal to or lower than that of the TER.

5.3 SBEM & SAP are the standard assessment methods for the carbon emission levels of a building. This considers the fabric properties of the building, the method of heating/cooling/ventilating/hot water etc and produces an estimate of carbon emissions.

5.4 If the building does not pass the Part L criteria, then it is an iterative process to add renewable/low carbon technologies, to lower the overall carbon emissions.

5.2 - Passive Design Improvements

5.5 On the completion of the model and establishment of the Target Emission Rates (TER), the dwelling emissions have been reduced through judicious passive design. This has involved an assessment of non-energy consuming design decisions to create a fabric first approach to energy efficiency.

5.6 Passive fabric measures across all the building include improvements to the thermal performance and air tightness above Part L requirements of the Building Regulations and this effectively allows the building envelope to attenuate external conditions without recourse to active Building Services.

5.2.1 – Fabric First Approach

5.7 A **'fabric first'** approach to building design involves maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems. This can help reduce capital and operational costs, improve energy efficiency and reduce carbon emissions. A fabric first method can also reduce the need for maintenance during the building's life.

5.8 Buildings designed and constructed using the fabric first approach aim to minimise the need for energy consumption through methods such as:

- Maximising airtightness.
- Using Super-high resistance insulation.
- Optimising solar gain through the provision of openings and shading.
- Optimising natural ventilation.

5.9 Focussing on the building fabric first, is generally considered to be more sustainable than relying on energy saving technology, or renewable energy generation, which can be expensive, can have a high embodied energy and may or may not be used efficiently by the consumer.

5.10 Having energy efficiency integrated into the building envelope can mean occupants are required to do less to operate their building and not have

to adjust their habits or learn about new technologies. This can result in less reliance on the end user regarding the buildings energy efficiency.

5.11 Fabric first building systems can be constructed off site, resulting in higher quality and so better performance, reduced labour costs and an increased speed of build.

5.2.2 - Fabric Values

5.12 The table below shows the proposed material specification that will be incorporated within the building design to limit heat losses and ensure efficient operation of the proposed development.

5.13 An airtightness of 3 $m^3/hr/m^2$ @50Pa is targeted for this development in order to minimise uncontrolled ventilation. An improved air tightness reduces heat losses and energy demand of the development.

Construction Element	Building Regulation Specification	Hub Buildings Specification	Improvement over Part L1a Building Regulations
Floor	0.25 W/m^2K	0.13 W/m^2K	48% improved
External Wall	0.30 W/m^2K	0.18 W/m^2K	40% improved
Roof	0.20 W/m^2K	0.13 W/m^2K	35% improved
Window	2.0 W/m^2K	1.2 W/m^2K	40% improved
Air Permeability	10 $m^3/h/m^2$	3 $m^3/h/m^2$	70% improved

Construction Element	Building Regulation Specification	Lodge Specification	Improvement over Part L1a Building Regulations
Floor	0.25 W/m^2K	0.10 W/m^2K	60% improved
External Wall	0.30 W/m^2K	0.14 W/m^2K	53% improved
Roof	0.20 W/m^2K	0.10 W/m^2K	50% improved
Window	2.0 W/m^2K	1.1 W/m^2K	45% improved
Air Permeability	10 $m^3/h/m^2$	3 $m^3/h/m^2$	70% improved

These values comply with the requirements of Part L and also provides a significant improvement over maximum allowable fabric values.

5.3 - Energy Efficiency Improvements

5.14 In addition to the Passive design measures described in the preceding Section to improve the building envelope performance, the Active Building Services are to be designed to minimise direct energy consumption and CO_2 emissions, with particular emphasis on the following;

- Increased hot water generating efficiencies
- Reduced standing losses from pipes and cylinders
- Energy efficient LED lighting
- Improved lighting controls
- Low energy motors in pumps and fans
- Efficient heat recovery in relevant systems
- Enhanced heating controls with Wi-Fi enabled

5.15 All internal lighting installations will make use of low energy technologies combined with presence and absence detection in conjunction with timed setbacks. 100% low energy lighting provision will be included within the development. Photo switching and automatic dimming will be specified to the communal areas of the building in order to improve the efficiency of the lighting system.

5.16 All fans, motors and pumps shall be specified to incorporate ECA accredited technology and appropriate controls.

Lodges

5.17 Lodges are proposed to have pressurised hot water cylinders the heating demand for these will be fed by either an ASHP system or an electric emersion heater.

5.18 Two space heating options have been assessed in line with the hot water solutions. Either the demand will be met via electric panel heaters or by the ASHP system. These will be complete with thermostatic and time controllers. These units will also have enhanced central enabled controls.

5.19 The ventilation will be via localised extract fan units. These will provide extract ventilation to kitchens and bathrooms. Purge ventilation will be via openable windows, giving the occupants the final control over the environment in their homes.

Construction Element	Specification
Ventilation	Natural Ventilation supplemented with Extract
Lighting	100% low energy fittings
Space Heating	ASHP or Electric panel heater
Heating Control	Thermostatic and time controlled
Water Heating	Electric cylinders or ASHP fed cylinder

Hub Building

5.20 The Hub building is proposed to have an underfloor heating system which is to be fed by an air source heat pump system. The hot water demand will also be met by a hot water storage system that is fed by the ASHP system.

5.21 The ventilation system has been designed to be supplied by Local MVHR which will provide heat recovery as well as balanced ventilation supply. Purge ventilation will be via openable windows, giving the occupants the final control over the environment.

5.22 A gas fired CHP may be incorporated to provide the process operational energy not covered under the AD Part L regulations such as heating the swimming pool.

Construction Element	Specification
Ventilation	MVHR
Lighting	100% low energy fittings
Space Heating	Air Source Heat Pump (ASHP)
Heating Control	Thermostatic and time controlled
Water Heating	Air Source Heat Pump (ASHP)

5.4 - Renewable Energy Improvements

5.23 In order to comply with Staffordshire moorlands Local Plan, which aims to utilise renewable or low carbon technologies, there are a number of options to consider. All currently acknowledged and commercially available technologies have been considered and assessed with the conclusions summarised below.

Ground Source Heat Pumps

5.24 The ground below buildings remains at a constant temperature of around 10°C to 12°C offering the ability to extract energy in the winter and discharge energy in the summer from cooling with the energy exchange being achieved via open or closed loop systems linked to heat pumps.

Ground Source Heat Pump Installation

5.25 The inclusion of Ground Source Heat Pumps is not applicable for the site selected and has been discounted for this development.

Air Source Heat Pumps

5.26 Air source heat pumps provide a solution for using renewable energy taken from ambient air to heat a building in the winter and discharge heat from cooling in the summer.

Typical External Condenser Unit

5.27 The hub communal area of the development, refrigerant based air source heat pumps will be utilised in the form of a VRF system to heat and cool the areas, due to the higher concentration of occupancy.

5.28 The Lodges are proposed to use ASHP as a solution for the space and hot water demand.

Solar Photovoltaic Panels

5.29 The option to utilise roof mounted or Building Integrated Photovoltaic panels to generate electrical energy is a renewable energy method of generating Carbon free electrical power.

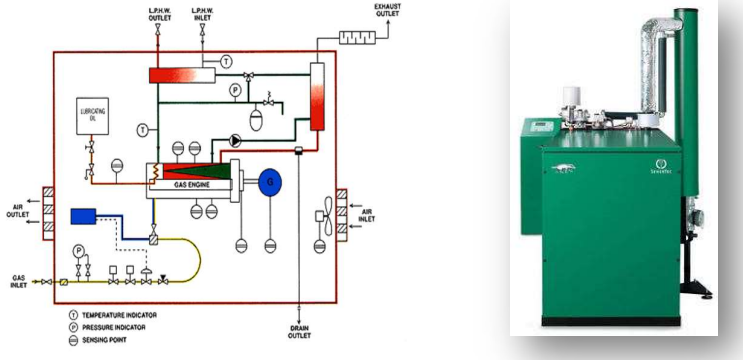
5.30 Due to the extent of occupancy within the development, there is likely to be a fairly constant base electrical load prevalent on the building which may be mitigated in part by the use of Solar PV.

PV System components

5.31 The system would help reduce carbon emissions from grid electricity and feed into the grid in low demand periods contributing to the decarbonisation of the grid through grid export capability. This technology has been selected as an option and is being considered for the Lodges.

Combined Heat and Power (CHP)

5.32 On-site generation of electricity and the utilisation of waste heat from this process within a building can create a beneficial arrangement whereby the transmission losses of grid supplied electricity can be omitted. The use of CHP tends to require a steady and continuous heat demand therefore the large quantities of domestic hot water associated with lodges would not satisfy this requirement.



Diagrammatic layout of CHP unit

5.33 However, the integration of Combined Heat and Power technology has been discounted due to utilising decarbonised grid electricity over traditional fossil fuel heating systems.

5.34 A gas fired CHP may be incorporated for heating the swimming pool.

Solar Thermal Collectors

5.35 The use of flat plate & evacuated tube thermal panels has been identified as a potential method of harnessing renewable solar energy by pre-heating domestic hot water provision.

5.36 The introduction of the renewable Heat Incentive may further improve the financial viability for the technology.

Example of Solar Thermal unit

5.37 However, there is a conflict between the use of local independent water heaters within each lodge and a central solar thermal collector array.

5.38 Interconnecting solar thermal panels with remote lodges cylinders is not conducive or efficient due to extended distribution losses. Furthermore, the restricted flat roof areas available negate the inclusion of a panel system offering any significant contributions. Therefore, without being able to offer a good contribution of renewable energy alongside the logistic and strategy issues, the installation of solar thermal panels has been discounted for the development.

Wind Turbines

5.39 Wind energy can be a cost-effective method of renewable power generation and turbines can produce Carbon neutral electricity with outputs ranging from watts to megawatts.

5.40 The most common design is for three blades mounted on a horizontal axis, which is free to rotate into the wind on a tall tower. The blades drive a generator either directly or via a gearbox (generally for larger machines) to produce electricity.

5.41 The electricity can either link to the grid or charge batteries. An inverter is required to convert the electricity from direct current (DC) to alternating current (AC) for feeding into the grid.

5.42 There are a variety of wind turbines on the market ranging from smaller turbines that can be attached directly to a buildings structure to larger stand-alone turbines. City centre and sub-urban locations generally experience poorer yields for electricity output from small and medium scale wind turbines, due to obstructions and variations in local topography.

Wind Turbine Installation

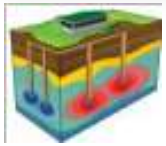
Biomass

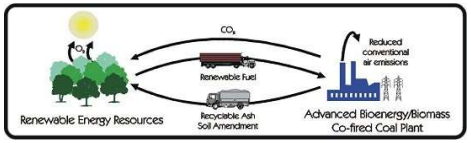
5.43 Some success on other projects has been made with the implementation of wood fuelled energy equipment forming a Carbon Neutral heat source.

5.44 Although, it is carbon neutral overall, but there would still be significant emissions in the area it is utilised, which would be onerous to treat and achieve comply with the Clean Air Act. Biomass would have to be installed as a centralised system, with pipework to each lodge. Due to the low heat demand of each lodge and the low occupation density of the site overall, this would be an inefficient method of providing heat overall. This has led to a dismissal of this technology.

Summary of Systems

5.45 The following table provides an overview of the systems and their suitability for this project:

Proposed Technology	Image	Comments
Air Source Heat Pumps **SELECTED**		Refrigerant Air Source Heat Pumps will be utilised for the main non-residential areas and amenity areas of the development, where cooling as well as heating will be required due to the higher occupancy concentration. Hot water for the lodges has the potential to utilise heat pumps to meet demand, each lodge will have a pressurised hot water cylinder. The Hub building will have underfloor heating and hot water served by an ASHP.
Solar Photovoltaic **SELECTED**		The roof areas of the lodge buildings which could be used to accommodate such a system. Therefore, being able to offer a good contribution of renewable energy the installation of photovoltaics has been considered for the development. This will help to offset emissions from grid electricity.
Ground Source Heat Pump **DISCOUNTED**		The inclusion of Ground Source Heat Pumps is not an option for the site selected and has been discounted for this development.
Solar Thermal **DISCOUNTED**		There is a conflict between the use of local independent water heaters within each lodges and a central solar thermal collector array. Interconnecting solar thermal panels with remote lodges cylinders is not conducive or efficient due to extended distribution losses. Furthermore, the view is taken that the roof space would better be utilised to offset electricity emissions through the use of a photovoltaic system.

Biomass Boilers **DISCOUNTED**		Biomass boiler solutions have been discounted at this location due to potential clean air issues and deliverability logistics.
Wind Turbines **DISCOUNTED**		Wind turbines have been discounted due to the resulting visual/noise impact from the equipment, and relatively poor performance of the solution when used within Urban and Sub-Urban locations.
Combined Heat and Power **DISCOUNTED**		The integration of Combined Heat and Power technology has been discounted due to utilise decarbonised grid electricity over traditional fossil fuel heating systems.

5.5 - Energy Generation and Distribution Systems

5.46 As a consultant, Futureserv has an over-arching philosophy delivering design of a truly sustainable nature, employing widely recognised methods.

- Be Lean – **Fabric First Approach -** Reduce demand wherever possible utilising passive measures.

- Be Clean - Where energy is used, then it should be optimised to operate at the highest efficiencies practical.

- Be Green - Take advantage of renewable options to reduce fossil fuel energy sources.

5.47 The proposed development will be designed to be served by electric heating throughout the lodges, utilising the ever-increasing clean electricity provided from the UK grid and the electricity produced from the PV array.

5.48 All plant and equipment would be equipped with energy control measures incorporating variable speed drives, with low energy motors provided on ventilation fans and hydraulic pumps.

5.49 The development will equip all sanitary appliances with low water flow devices.

5.6 – Carbon & Energy Performance Calculations

5.50 To demonstrate the environmental benefits associated with the energy hierarchy, approved SAP software has been used to generate the proposed carbon reductions for the development. The Hub building has been assessed using IES against current Part L (2021) regulations.

5.51 The table below indicates the carbon emissions for the development following the Be Lean, Be Clean, Be Green design approach in the form of Target Emission Rates and Building Emission Rates (Kg CO2/m²/annum).

Lodge Building

	All electric solution + PV	**ASHP solution + No PV**
Average TER	14.01	14.01
Average DER	3.70	6.85
% improvement over Part L	**73.59**	**51.11**
Average TFEE	58.4	58.4
Average DFEE	53.77	51.35
% improvement over Part L	**7.93**	**12.07**
Average TPER	75.05	75.05
Average DPER	73.45	71.84
% improvement over Part L	**2.13**	**4.28**

Hub Building

Non-Residential Hub building Average Target Emissions Rate	**13.9 kg/CO2/m²**
Average Non-Residential Hub building Emission Rate	**9.80 kg/CO2/m²**
Carbon Reduction from Target Emission Rates Part L 2021	**29.50% reduction over Part L 2021 emissions**

5.52 The Part L 2021 specifications have been strengthened to deliver 39 per cent carbon dioxide savings relative to part L 2010 therefore the development emissions rate is a **72.1% improvement** on the Part L 2010.

Section 6 – Conclusions

6.1 The Reason for Refusal for the reserved matters application does not refer to energy and sustainability matters as a reason for refusal. However, this Statement has been prepared to demonstrate the Energy Strategy for the development and show how it will be high quality in sustainability terms.

6.2 I conclude, to maintain the quality of the development, the lodges are treated as fixed dwellings to comply with Approved Document Part L Building Regulations. This will ensure the fixed buildings services proposals comply are aligned with Building Regulations to encourage energy efficiency and will exceed SMDC's policy requirements.

6.3 This Energy Strategy addresses the planning requirements of Staffordshire Moorlands district council as set out in Staffordshire Moorlands Local Plan adopted September 2020.

6.4 This statement has also demonstrated how the proposals have been brought forward in the context of a strong commitment to sustainability and will not only show achievement of policy compliance as per the Guide to Development in Staffordshire Moorlands Local Plan, but also that sustainability objectives form an integral part of the Appellant's aspirations for this development.

6.5 A feasibility study was carried out to outline which Low or zero technologies could be included in design to reduce carbon emissions and generate renewable energy to meet the onsite demand.

6.6 The following technologies are considered to be incorporated within the development.

- Photovoltaic Roof Panels
- Air Source Heat Pumps

6.7 In addition, the park as a whole has been carefully designed to create a high-quality sustainable development, including the enhancement of walking, cycling and bridleway routes, a Travel Plan to promote sustainable modes of travel and high-quality materials for both buildings and landscaping from sustainable sources

SAP Calculations:

		Moneystone Quarry Lodges All electric solution + PV	Moneystone Quarry Lodges ASHP solution + No PV
Average TER		14.01	14.01
Average DER		3.70	6.85
% improvement over Part L		**73.59**	**51.11**
Average TFEE		58.4	58.4
Average DFEE		53.77	51.35
% improvement over Part L		**7.93**	**12.07**
Average TPER		75.05	75.05
Average DPER		73.45	71.84
% improvement over Part L		**2.13**	**4.28**
		Initial Proposals	Initial Proposals
Building			
Air Tightness	Air tightness	3	3
U Values			
	Rapid Vent Panels	n/a	n/a
	External Walls	0.14	0.14
	Roof	0.1	0.1
	Ground floor	0.1	0.1
	Windows - average u-value applied	1.2	1.1
	Roof Lights	N/A	N/A
	Doors	N/A	N/A
	G Values	0.60 to all elevations	0.60 to all elevations
	Party Walls	N/A	N/A
	Thermal Mass Parameter	Medium	Medium
	Heated Corridors	N/A	N/A
	Thermal Bridging Y-Values	0.05	0.05
Ventilation	Whole House Vent?	No	No
	Vent details	extract fans only	extract fans only
Chimneys	Open Fire in lounge?	N	N
Open Flues	No. Of?	N	N
Lighting	No. of Internal (No. of lights and LEL)	100% LEL fittings 5W - 100lm/W	100% LEL fittings 5W - 100lm/W
Elec Tariff	Economy 7/ standard/ other?	Standard	Standard
Heating System	Emitter Type	Electric Panel Heaters	ASHP to radiators and HW
	Boiler Type	n/a	n/a

	Boiler eff	100%	Winter - 236.18 Summer - 170.68
	Flue Gas Heat Recovery	n/a	n/a
	Control	Time & Temp Control	Time & Temp Control
	Flue? Balanced? Fan Assisted	n/a	n/a
	Percentage of Heat	n/a	n/a
DHW System	Boiler Type	Gledhills stainless lite Plus direct	Generic cylinder
	Storage Insulation (type & thickness)	-	-
	Control (cyl stat? time control?)	Time & Temp Control	Time & Temp Control
	Less than 125l/p/day	Y	Y
	Pipes Insulated	Y	Y
	Cylinder standing losses 1 & 2 bed 200L	180ltr = 1.32kwh/day	180ltr = 1.32kwh/day
Renewable Technology Detail	PV	between 5.5 - 7.5 kWp	N
	Wind	N	N
	ASHP	N	N
	Solar Thermal	N	N

APPENDIX 6

WISHER CONSULTING

Moneystone Park Development – Economic & Tourism Benefits Assessment

Client : Laver Leisure (Oakamoor) Limited

Date : May 2024

Report Status : Final Report

Contents

1. Introduction

1.1 Laver Leisure (Oakamoor) Limited have appointed Wisher Consulting to assess the economic and tourism impacts of their proposed development at Moneystone Quarry in the district of Staffordshire Moorlands.

1.2 The new strategic leisure development proposed at Moneystone Quarry secured Outline Planning consent in 2016 and Laver Leisure (Oakamoor) Limited are seeking Reserved Matters approval for:

- 190 holiday lodges for staying visitors.
- Erection of a new central hub building - providing farm shop, gym, swimming pool, spa, restaurant, cafe, games, room, visitor centre, and hub management facilities.
- Other ancillary works.

1.3 The Reserved Matters application constitutes the vast majority of the scheme that was granted Outline Planning consent. The only substantial item absent from the Reserved Matters application is the delivery of the final phase of 60 lodges, which would take the final scheme total to 250 lodges. The application for that part of the scheme remains as yet undetermined.

1.4 The Reserved Matters application was submitted in 2019 and refused some considerable time later in October 2023, despite officer recommendation for approval. Laver Leisure (Oakamoor) Limited are now appealing the 2023 decision and have asked for this report to be prepared as part of their appeal documentation in order to inform the decision maker.

1.5 This report is structured as follows:

- Section 2 provides a summary of headlines and conclusions.
- Section 3 provides an assessment of the tourism and economic need in Staffordshire Moorlands, as evidenced through various Council policy documents and socio-economic data.
- Section 4 outlines the scheme's economic and tourism benefits.

1.6 This current assessment represents an update to the socio-economic impact assessment that was prepared for the scheme in 2015[1]. That said, the fundamentals have not shifted and the scheme benefits are similar to those set out some nine years ago.

1.7 Wisher Consulting is the new venture of Darren Wisher, and I have prepared this report. I am an experienced economist and was previously Managing Director of both Regeneris Consulting and the UK economics consulting arm of Hatch. I hold a BA (Hons) Degree in Economics and Public Policy from Leeds Metropolitan University and a MA(Econ) in Applied Economic and Social Research from the University of Manchester. The opinions expressed in this report are my true and professional opinions.

[1] See 2015 Environmental Statement, Socio-Economics Chapter, prepared by Regeneris Consulting.

2. Summary of Main Points

Significant Need for Economic and Tourism Investment

2.1 The Council's new 2023 Tourism Strategy states that "over the next five years Staffordshire Moorlands will become a stronger destination, unlocking its potential with an improved offer and a better reputation that results in more value from visitors".

2.2 The Tourism Strategy list the challenges the district faces in meeting this objective, including:

- "Lack of destination awareness and weak destination identity".
- "Lack of accommodation investment".
- "Day visitors dominate" with staying visitors accounting for just 10% of all visits.
- "(Slow) pace of change – getting left behind".

2.3 The same objective of growing the tourism sector is set out in the Local Plan which was adopted in September 2020. The Local Plan states that "…economic development needs to recognise the contribution which the rural areas can make to the District's economy with a major role for tourism in terms of providing opportunities for jobs, attracting investment and bringing in wealth".

2.4 Local Plan Policy E4 explicitly supports the important role that a growing tourism and culture sector plays in the economy of the Staffordshire Moorlands. In addition, Local Plan Policy SO5 seeks to "ensure the long-term vitality and viability of the three market towns of Leek, Biddulph and Cheadle". Delivery of these town centre aspirations will be greatly accelerated through the provision of additional expenditure and new visitors to Staffordshire Moorlands.

2.5 The growth of the tourism sector is also set out as an objective of the Council's 2018 Growth Strategy. The Growth Strategy identifies Leisure & Tourism as a key employment sector accounting for 17% of the workforce. One of the proposed key actions in the Growth Strategy is to "attract more staying visitors by improving the quality and range of accommodation stock across the district". The Strategy specifically lists the proposed Moneystone scheme as a prime example of the type of development that is required.

2.6 Economic data for Staffordshire Moorlands shows why the growth of the tourism sector is so important:

- The total number of jobs has not grown in the last five years, at a time when BRES data shows the number of jobs nationally has grown by nearly 5%.
- The job density ratio stands at 0.76, significantly below the national ratio of 0.87.
- Data from the Census shows a 10,204 inflow of workers into Staffordshire Moorlands each day, but also a 22,994 outflow. The 12,790 net outflow is reflective of the shortage of jobs locally.
- There are pockets of significant economic deprivation in all of the three principal towns of Leek, Cheadle and Biddulph.

2.7 It is clear from the above that the growth of the tourism sector, and especially any efforts to grow overnight stays, is of critical importance to Staffordshire Moorlands. Any investment in boosting overnight stays, and the benefits that flow from this, should be afforded very significant weight in any planning decisions.

Substantial Benefits to be Delivered

2.8 This assessment has identified the following economic and tourism benefits from the proposed Moneystone Park development:

- The generation of circa 210 on and off-site construction jobs over an assumed two-year construction programme. This total comprises a mixture of on-site works and off-site pre-fabrication works. The

construction industry offers very accessible employment opportunities, with extensive use of apprenticeships and trainees.

- Attraction of 42,000 new staying visitors to Staffordshire Moorlands per annum, based on a 190-lodge development, rising to 55,400 per annum when all 250 lodges are operational. It is estimated a further 32,500 day-visitors could potentially be attracted annually.
- The creation of 190 FTE on-site jobs for the 190-lodge scheme across a range of different occupations, rising to 250 FTE on-site jobs with a 250-lodge development. The jobs will have localised travel to work patterns, low barriers to entry and a range of flexible working opportunities. Based on evidence from Center Parcs it is anticipated that around 85% of all staff will reside within circa 12 miles of Moneystone.
- The creation of 50 FTE jobs off-site elsewhere in the Staffordshire Moorlands economy. These arise through (i) local corporate supply chain expenditure, (ii) the additional expenditure of workers locally and (iii) jobs resulting from off-site visitor expenditure.
- The generation of additional Business Rate revenues of circa £1.6 million per annum. An element of these revenues will flow to Staffordshire Moorlands District Council.

2.9 In addition to these quantified benefits, the Moneystone Park development has the potential to trigger wider catalytic effects for Staffordshire Moorlands. Major leisure investments, like that proposed at Moneystone, often serve as a catalyst for further rounds of tourism related investment. This is because leisure operators have clear criteria for investment in new locations based, in large part, on the presence of complementary operators.

2.10 Given the demonstrable need for economic and tourism growth in Staffordshire Moorlands, the benefits listed above should be afforded significant weight in any planning decision.

The No-Approval Scenario

2.11 If the scheme does not secure approval at appeal then the single biggest opportunity in a generation to expand the overnight tourism accommodation market in Staffordshire Moorlands will be lost. This will mean that Staffordshire Moorlands will, for the foreseeable future, remain a tourism market overly dependent on day visitors and unable to capture the more lucrative market of overnight stays – completely at odds with the aims and objectives of the Council's recently launched Tourism Strategy. This missed opportunity will mean that:

- Significant job creation benefits will not be captured.
- Additional Business Rates will not be captured.
- There will be no major catalyst for change in the Staffordshire Moorlands tourism accommodation market.

3. Economic and Tourism Need

3.1 Although the main focus of this report is assessing the impacts of the proposed new development an understanding of the economic and tourism context in Staffordshire Moorlands is essential and helps to determine the weight that can be attached to scheme benefits.

Relevant Policy Context

Tourism Strategy

3.2 Staffordshire Moorlands Council launched their Tourism Strategy in early 2023, and in doing so recognised the importance of tourism as one of the prime employment sectors in the district.

3.3 The Strategy's SWOT analysis (p7) lists the numerous strengths of Staffordshire Moorlands as a tourism location but also lists a series of weaknesses and threats. These include:

- "Lack of destination awareness and weak destination identity".
- "Lack of accommodation investment".
- "Day visitors dominate".
- "(Slow) pace of change – getting left behind".

3.4 The Vision for the document (p9) states:

"Over the next five years Staffordshire Moorlands will become a stronger destination, unlocking its potential with an improved offer and a better reputation that results in more value from visitors".

3.5 Four Action Areas are identified in the Strategy, the fourth of which is 'Accommodation'. The aim of this Action Area is to "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" (p20).

3.6 The Strategy states that there is a requirement to "unlock private sector investment with a clear policy environment that encourages suitable accommodation development and improvement in Staffordshire Moorlands" (p20).

3.7 All of the above is of obvious and direct relevance to the appeal proposals.

Local Plan

3.8 The Staffordshire Moorlands Local Plan was adopted in September 2020 and covers the period 2014 to 2033.

3.9 Page 24 of the Local Plan list the main challenges and opportunities faced in Staffordshire Moorlands. The list includes:

- "Tourism is identified as one of the key areas where the District can have a major role to help bring more people in and diversify its economy".
- "Service sector is seen as the main driver for economic growth with an opportunity to capitalise on the growth of the 'experience economy' – tourism, leisure and retail- in particular developing the District's tourism role".
- "Economic development needs to recognise the contribution which the rural areas can make to the District's economy with a major role for tourism in terms of providing opportunities for jobs, attracting investment and bringing in wealth".

3.10 The Local Plan Vision (p30) includes further reference to the tourism sector:

"Tourism will be a key element in the diversification of the District's economy and will also contribute significantly to raising the environmental quality and the regeneration of the District….particularly around the Churnet Valley which together with Alton Towers will be a significant tourist attraction".

3.11 Policy E4 positively supports the important role that tourism and culture plays in the economy of the Staffordshire Moorlands. In support of Policy E4, the Local Plan states…"At present a very low proportion of visitors to the Moorlands stay overnight in serviced accommodation and supply is particularly low in the three towns. Within the Churnet Valley the provision of further short and long stay visitor accommodation is particularly supported" (p90/91).

3.12 The scheme is located in the heart of the Churnet Valley and the Local Plan expands on the role of this area in Policy SS11. Policy SS11 is the Churnet Valley Strategy and states that the Churnet Valley is identified as an area for sustainable tourism and rural regeneration. The Policy states that 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 remediate and restore derelict land, buildings and features including the appropriate redevelopment of sites" (p68/69).

3.13 The Moneystone scheme is also located near to the towns of both Leek and Cheadle, both of which are likely to be major recipients of any off-site expenditure, especially on food and provisions, emanating from the scheme, as well as the location of much of the workforce. The Local Plan Policy SO5 seeks to "ensure the long-term vitality and viability of the three market towns of Leek, Biddulph and Cheadle" (p103).

3.14 Policy SO5 contains a whole range of measures to maintain the vitality and viability of the town centres. The Policy states that retailing and other key town centre uses like offices, leisure uses such as hotels and cinemas and cultural facilities like those connected with performance and the arts should ideally be focused in town centres.

3.15 In addition to Policy SO5:

- Policy SS5 is the Leek Area Strategy and seeks to consolidate the role of Leek as the principal service centre and a market town and support its regeneration. The Policy states a desire promote Leek's special character and heritage and strengthen its role as a visitor destination.
- Policy SS7 is the Cheadle Area Strategy and seeks to expand the role of Cheadle as a significant service centre and a market town. The Policy outlines a desire to promote the role and historic character of the town, including the protection of heritage assets and its links with the Churnet Valley as a visitor destination.

3.16 Delivery of the town centre policies listed above would be greatly accelerated through the provision of additional expenditure and new visitors to the Staffordshire Moorlands area. The planning balance is addressed by others – but again the economic underpinnings of the Local Plan are of direct relevance to the proposed development in terms of both the location and type of proposal under consideration.

Growth Strategy

3.17 Staffordshire Moorlands Council published their 'Growth Strategy for Staffordshire Moorlands' in December 2018. The Strategy sets out how Staffordshire Moorlands can promote and develop both housing and economic growth.

3.18 The Growth Strategy lists the main economic challenges that need to be overcome which include:

- "Low growth area and low level of economic dynamism".

- "Low level of development and inward investment" (p9).

3.19 The Growth Strategy identifies Leisure & Tourism as a key employment sector, accounting for 17% of the workforce (p6). In commenting on the tourism sector, the Strategy reiterates that the ratio of staying/day visitors is low…"in part due to lack of visitor accommodation compared to Derbyshire" (p15).

3.20 One of the proposed key actions in the Growth Strategy is to "attract more staying visitors by improving the quality and range of accommodation stock across the district by working with key operators and small businesses" (p16). The Strategy specifically lists the proposed Moneystone scheme as a prime example of the type of development that is required (p16). This too provides clear support for the type and location of the development proposed.

Economic and Tourism Market Data

Tourism Data

3.21 Data in the Staffordshire Moorlands Tourism Strategy shows that day visitors dominate the local tourism market, accounting for about 90% of the estimated 5.6m visits in 2019. This is obviously driven in part by the area playing host to one of the UK's most successful theme park. Staying visitors account for just 10% of visits, however they account for 42% of the total estimated tourism spend. The data highlights the importance of boosting overnight visits and extending the duration of visits and underscores that the potential for maximising the wider economic benefits of such visits is being missed.

3.22 The Tourism Strategy states that families and adult couples are the most prevalent visitor groups in Staffordshire Moorlands, accounting for 51% and 31% of all visits respectively. Data suggests that visitors to Staffordshire Moorlands are more affluent than the rest of Staffordshire with 43% from the 'AB' socio-demographic groups compared to 36% for Staffordshire.

Jobs/Inactivity

3.23 According to the latest (2022) data from the Government's Business Register and Employment Survey (BRES), there are some 29,150 employee jobs in Staffordshire Moorlands[2]. The total number of jobs has not grown in the last five years, at a time when BRES data shows the number of jobs nationally has grown by nearly 5%. Staffordshire Moorlands demonstrably needs to find additional sources of economic growth.

3.24 Other measures also show the need for additional jobs:

- The job density ratio measures the ratio of total jobs (including self-employment) to the population aged 16-64. In Staffordshire Moorlands the ratio stands at 0.76, significantly below the national ratio of 0.87[3].
- Data from the 2011 Census[4] shows a 10,204 inflow of workers into Staffordshire Moorlands each day, but also a 22,994 outflow. The 12,790 net outflow is reflective of the shortage of jobs locally.

3.25 The current rate of economic inactivity in Staffordshire Moorlands - at 15.5% - is below the GB average of 21.2%. That said, there remain numerous local people who need a job and are looking for one. The current unemployment claimant count in Staffordshire Moorlands stands at 1,175. There are also future labour market needs arising from extended later life working and an expanding population base.

[2] This number excludes the self-employed.

[3] ONS Jobs Density data for 2022.

[4] Commuting data from the 2021 Census is unfortunately heavily skewed by the COVID travel restrictions that were in place at the time and is not reliable.

Other Socio-Economic Data

3.26 The overall scale of deprivation is Staffordshire Moorlands is modest compared to more urban areas. The district is the 204th most deprived local authority in England out of a total of 317, so it sits at the 65th percentile. There are however distinct pockets of deprivation and economic disadvantage. There are 59 Lower-Level Super Output Areas (LSOAs) in Staffordshire. Of these:

- Two are in the top 20% most deprived LSOAs in England and a further six are in the top 30%.
- Of these eight LSOAs:
  - 4 are in Leek.
  - 2 are in Cheadle.
  - 2 are in Biddulph.

3.27 There are clearly pockets of deprivation within close proximity to the Moneystone development site.

3.28 Town centre vacancy rates are highlighted in the Council's 2018 Growth Strategy. The data (see p15) shows vacancy rates as follows:

- UK (towns) average - 9.9%.
- West Midlands - 10.2%.
- Leek - 11.6%.
- Biddulph - 17.0%.
- Cheadle - 17.8%.

3.29 The vacancy rates are worryingly high in all of three town centres in Staffordshire Moorlands and given structural changes in the UK retail sector are unlikely to have strengthened considerably in the period since the data was last collected. Additional expenditure and new visitors to the Staffordshire Moorlands area would help, in part, to underpin improved occupancy rates in the town centres.

4. Economic and Tourism Benefits

4.1 This assessment of benefits covers the following categories:

- Construction investment and associated construction jobs.
- Additional overnight tourism trips to Staffordshire Moorlands.
- On-site jobs created.
- Off-site jobs created – both via traditional 'multiplier' effects and also via off-site visitor spend.
- Business Rates.
- Catalytic impacts.

4.2 The assessment focuses on the Reserved Matters 190-lodge scheme, which includes all the main hub facilities associated with the development. For some categories of benefit, the assessment also makes reference to the additional benefits of a further 60-lodges as per the Outline Planning consent.

Construction Investment and Jobs

4.3 The latest assessment of construction costs is set out in a 2021 Cost Assessment prepared by Poole Dick. This assessment, together with inflation since 2021 plus the inclusion of certain items excluded from the Poole Dick report, suggests a total current construction cost inclusive of fees and all lodge costs of circa £28 million for the Reserved Matters scheme.

4.4 Spend is likely to be defrayed over a circa two-year period, so on average £14m of construction spend per annum.

4.5 Government metrics on the ratio of construction spend to job creation have been sourced from the government agency previously known as OffPAT[5]. For a development such as this employment development, the guidance suggests a figure of 15 jobs per £1 million of construction turnover. On this basis, the proposed development will support in the region of 210 on and off-site construction jobs per annum.

4.6 This total estimate of construction jobs comprises a mixture of on-site works and off-site pre-fabrication and supply chain activities including lodge manufacture.

4.7 Construction jobs are to be highly valued. The construction industry offers very accessible employment opportunities, with extensive use of apprenticeships and trainees within the sector. The construction sector also offers more social mobility than any other sector of the UK economy. 53% of those in management or professional roles in construction were from families where the main earning parent was from a skilled trade or a lower occupational group[6].

4.8 A further phase of more modest construction benefits would be delivered as and when the final phase of 60-lodges is introduced.

New Tourism Trips and Overnight Stays

4.9 At the time of the Outline Consent, Laver Leisure (Oakamoor) commissioned a Feasibility Study for the proposed development by Christie & Co, specialist advisors in the visitor and leisure market. The study was comprehensive and provided insights and analysis on the UK holiday centre market, competitor analysis, projections of demand (including average occupancy) and pricing, and projections of income and expenditure.

[5] OffPAT Construction Job Appraisal Guidance.

[6] Source: The Real Face of Construction 2020. Chartered Institute of Building.

4.10 The Feasibility Study projected stabilised annual occupancy of circa 67%, given the above latent demand this is considered to be a conservative estimate, notwithstanding that Alton Towers (which is a major local attraction) does not operate over the four winter months. Given the initial phase of the development will deliver 190 lodges and will be open all year, this equates to 46,000 occupied lodge nights per annum. While lodges will vary in size from 1-bed to 6-bed, using Christie & Co's average occupancy of four visitors per lodge, this equates to a total of 184,000 visitor lodge nights per annum.

4.11 To convert total annual visitor lodge nights to total staying visitors, information provided on a stabilised operational year for three, four and seven-night lodge bookings has been used. Given some lodges can be occupied twice in one week as a result of short stays and using an average occupancy of 4 visitors per lodge, it is estimated that the resort would attract 42,000 staying visitors per annum. Around three-quarters of visitors are assumed to be staying at the resort as part of three or four-night breaks, and a quarter for a whole week booking.

4.12 When all 250 lodges are operational the estimated annual staying visitors will increase from 42,000 per annum to 55,400 per annum.

4.13 There will also be additional day visitors attracted to the development to make use of the facilities. Using data from the 2015 socio-economic impact assessment, it is estimated a further 32,500 day-visitors could potentially be attracted annually.

On-site Jobs

4.14 Wisher Consulting has previously collected good quality employment evidence from a number of Center Parcs operations and from the Bluestone National Park Resort in Wales, which are all likely to be comparable to the proposals at Moneystone, albeit of a different scale. These facilities all represent similar formats to that proposed at Moneystone (i.e. a central facilities hub and self-serviced lodge accommodation) and are all located in similar geographical areas (i.e rural areas within relatively close proximity to the main market areas). They represent a good proxy for likely employment levels at Moneystone.

4.15 The data collected included the ratio of FTE (full time equivalent) jobs at each facility and their size expressed in terms of number of lodges. The average overall ratio was 1.2 FTE jobs per lodge. As with the 2015 socio-economic assessment, it is judged prudent to utilise a staff to lodge ratio of 1.0 for the purposes of this report.

4.16 Based on the 190-lodge development, the staffing requirement would equate to 190 FTE on-site jobs across a range of different occupations. Given the nature of the roles available at the resort and the working hours required (i.e. flexible shift patterns) it is anticipated that the number of actual on-site jobs could be in the region of 285 actual jobs, comprising 95 full-time and 190 part-time posts, requiring a range of different skills from unskilled posts through to management. There is potential for the scheme to link to local learning institutes and their courses in hospitality.

4.17 With a 250-lodge development, as per the Outline Consent, the staffing requirement would increase to 250 FTE on-site jobs.

4.18 One of the key benefits of the scheme will be that the jobs created will be accessible to local people. This is borne out in the experience of Center Parcs where research from Sheffield Hallam University[7] showed that around 85% of all staff resided within 12 miles of each Center Parcs facility. The proposed development will create jobs which have localised travel to work patterns and which have low barriers to entry and a range of flexible working opportunities. This is particularly important in addressing local unemployment and deprivation as well as assisting in the upskilling of the local labour force.

[7] Sheffield Hallam University (2005); The Local Economic Impact of Center Parcs Holiday Villages.

Off-site Jobs

4.19 In total it is estimated there will be at least 50 additional FTE jobs created off-site elsewhere in Staffordshire Moorlands district as a result of the proposed development. This total is comprised:

- Standard off-site 'multiplier' effects. These are created via (i) corporate supply chain expenditure – so called *indirect* jobs supported via purchases of goods and services by the operator and (ii) the additional expenditure of direct and indirect workers locally on convenience, comparison and leisure goods – which supports *induced* jobs. Official guidance from UK government on the multiplier effects of development projects suggests that a combined induced plus indirect multiplier of 0.20 would be reasonable for an area such as Staffordshire Moorlands – meaning that for every 100 FTE jobs created on-site a minimum of a further 20 will be created off site. This would support an additional 38 FTE posts off-site for the 190-lodge scheme.
- Jobs resulting from off-site visitor expenditure. It is estimated the development will yield total off-site annual expenditure by visitors of circa £0.75 million[8]. Based on a turnover per FTE estimate of £65,000 for the tourism sector, a further 12 FTE off-site tourism sector jobs will be supported.

Table 4.1 – Summary of Job Creation (190-lodge Appeal Scheme)

Category		Number
Temporary Construction (On and Off-site)		210
Permanent (FTE)	On-site	190
	Off-site	(at least) 50
	Standard Off-site 'Multiplier' Effects	*38*
	Off-site Visitor Expenditure Jobs	*12*
	Total On and Off-Site Permanent Jobs	240

Business Rates

4.20 Publicly available data from HMRC shows that the Center Parcs facilities at Whinfell and Longleat each paid circa £8 million annually in Business Rates in recent years. These payments are for circa 900 lodge developments with a commensurate scale of on-site facilities.

4.21 On the basis that the proposed Moneystone development (at 190 lodges) constitutes about 20% of the size of the one of the large Center Parcs schemes, it can be expected that that scheme will generate additional Business Rate revenues of circa £1.6 million per annum. An element of these revenues will flow to Staffordshire Moorlands District Council.

Catalytic Impacts

4.22 The development of Moneystone as a major visitor attraction in the district has the potential to deliver wider and catalytic effects for the local area. Major investments, like that proposed at Moneystone, often serve as a catalyst for further rounds of investment in a local area. Leisure operators have clear criteria for investment in new locations or formats, taking account of the presence and strategy of complementary operators. The proposed Moneystone development can serve as a demonstrator to others about the opportunities for developing/growing the visitor market in this area. In particular, in growing the staying visitor market and increasing visitor expenditure.

4.23 Specific catalytic developments which could occur include:

[8] This figure of £0.75 million has been estimated using evidence from a 2005 report by Sheffield Hallam University, 'The Local Economic Impact of Center Parcs Holiday Villages'. The SHU report quoted PACEC 1991 Center Parcs research which found that each holiday unit/lodge booking spent approximately £30 off-site in the local area as part of their stay. In current prices this would be around £75 per unit per booking. The estimate of £0.75 million is based on 10,500 lodge bookings per annum.

- Investment in new/upgraded visitor accommodation in the vicinity of the site.
- Local food and retail investment to capture enhanced visitor spend.
- Other investments in attractions as the project demonstrates success in drawing large volumes of higher spending visitors to this part of Staffordshire.

4.24 The potential catalytic effects are borne out by the evidence of visitors to Center Parcs[9]. Survey evidence shows that:

- 18% of visitors temporarily left the Center Parcs during their stay for the purposes of either local shopping or to visitor other attractions.
- 67% of visitors said they were likely to visit the area again, and not necessarily staying at the Centre Parcs.

[9] See Center-Parcs-Local-Economic-Impact - Sheffield Hallam University.

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Appendix 7: The Appellants Case for a Public Inquiry

7.1 The Appellant has submitted the appeal with the expectation that it will be dealt with by way of Public Inquiry.

7.2 In accordance with the Planning Inspectorate's 'Procedural Guide: Planning appeals – England' (Updated 11th January 2024) and the 'Criteria for determining the procedure for planning, enforcement, advertisement and discontinuance notice appeals' (Published 21st April 2022), a Public Inquiry is the most appropriate procedure for determining the appeal because the case involves matters of considerable complexity which require to be heard in person, with the ability to present and cross examine evidence. The Reserved Matters Planning Application generated substantial interest from local residents and other local stakeholders, and it is likely that significant numbers of members of the community will wish to attend the Public Inquiry and observe the evidence of the Appellant's and Council's witnesses. The prospects of at least one rule 6 party being in attendance seems high. Further, a Public Inquiry will allow local residents and stakeholders interested in the Appeal Scheme to be heard fully.

7.3 Whilst the case superficially revolves around the design of the lodges. In fact, it is likely that a wide range of issues will be raised to address their appropriateness, these include: planning, econometrics, sustainability, embedded carbon, energy resources, landscape and ecology.

7.4 In terms of third party issues – they are extensive and will be presented by a long standing group of local residents who are opposed to the principle of development. These include, highways, ecology, econometrics, lodge ownership, health and safety, slope stability, heritage, sustainability etc.

7.5 It will therefore be necessary to present expert evidence across a range of issues, which will be essential to test by way of cross examination.

7.6 Furthermore, there have been a number of court cases which have arised as a result of development at the Appeal Site. It is therefore likely that there will be considerable legal scrutiny of the circumstances of this appeal, especially by third parties, and it is therefore intended that the Appellant will be represented throughout by Counsel.

7.7 Finally, the level of interest in the appeal is likely to be considerable. Bearing all of the above in mind it would be unwieldy and inappropriate for this appeal to be dealt with by way of anything other than a Public Inquiry.

From:	Jane Curley
To:	Jon Suckley; Haywood, Ben (SMDC)
Cc:	Alice Henderson
Subject:	RE: Phase 1 Moneystone Quarry (SMD/2019/0646) - Appeal Statement of Common Ground
Date:	28 March 2024 16:33:45
Attachments:	image001.jpg image003.jpg image005.png image006.png image007.png image008.png image009.png image010.png image011.png image012.png image013.png image014.png image015.jpg image016.jpg image017.png image018.png image002.jpg image004.jpg

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Thank you for your e-mail Jon. That is certainly my understanding, that the concern related to the lodges only.

Jane

Jane Curley Senior Planning Officer (Majors and Commercial)
Planning
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07794 768397**
www.highpeak.gov.uk | Follow HPBC on X (Formerly Twitter) | Facebook
www.staffsmoorlands.gov.uk | Follow SMDC on X (Formerly Twitter) | Facebook

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From: Jon Suckley <Jon.Suckley@asteerplanning.com>
Sent: Wednesday, March 27, 2024 3:37 PM
To: Haywood, Ben (SMDC) <Ben.Haywood@staffsmoorlands.gov.uk>; Jane Curley <jane.curley@staffsmoorlands.gov.uk>
Cc: Alice Henderson <Alice.Henderson@asteerplanning.com>
Subject: Phase 1 Moneystone Quarry (SMD/2019/0646) - Appeal Statement of Common Ground

Dear Ben and Jane,

I hope you are both well.

Further to the refusal of reserved matters application ref: SMD/2019/0646 for the Phase 1 leisure development at Moneystone Quarry at your Planning Committee meeting on 26th October 2023, we are currently in the process of preparing an appeal against the refusal on behalf of Laver Leisure.

Laver Leisure are seeking that the appeal will be dealt with by way of Public Inquiry and in accordance with the Planning Inspectorate's Procedural Guidance (recommendation 3 of the Rosewell Review), we will be issuing the Council with a formal notification of intention to submit an appeal not less than 10 working days prior to submission.

I have reattached the refusal notice but for ease of reference, the reason for refusal states:

> *This site lies within the Churnet Valley which is an area of significant landscape, wildlife and heritage value. Policy SS11 of the Staffordshire Moorlands Local Plan (adopted September 2020) sets out the strategy for the Churnet Valley. It says that all 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. The consideration of landscape character it says will be paramount in all 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.*
>
> *It is considered that the proposed lodges, which are little more than caravans with cladding, fail to deliver the required high standard of design. Owing to the proposed materials and lack of any green roofs, lack of creativity and detailing the lodges could not be said to be of an appropriate high quality nor do they add value to the local area. They have not been designed to respect this sensitive site or its surroundings, noting that it is in part adjacent to the Whiston Eaves SSSI.*
>
> *For these reasons the proposal fails to comply with Polices SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan and the National Planning Policy Framework including but not limited to Chapters 12 which says that good design is a key aspect of sustainable development and Chapter 15 which says that planning decisions should contribute to and enhance the natural and local environment by amongst other matters recognising the intrinsic character and beauty of the countryside and minimising impacts on biodiversity.*

As part of the appeal process, there is a requirement to agree a Statement of Common Ground (SOCG) between the Appellant and the Local Planning Authority (LPA) and a draft of the SoCG will be submitted with the appeal. The SoCG is important to narrow the issues for consideration by the Planning Inspector identifying the matters of agreement and the matters in dispute.

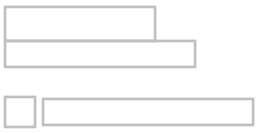
In order for Asteer to draft the SoCG, with a view to this then being shared and agreed with the LPA, I would be very grateful if you could confirm that the reason for refusal solely relates to the design quality of the lodges?

Please can I request that you provide confirmation to myself and Alice Henderson by close of business on 5 April.

In the meantime, should you have any queries or wish to discuss then please do let Alice or I know.

With kind regards

Jon



Appendix 9: CVM Assessment

Churnet Valley Masterplan SPD (2014) 7.6.5 Moneystone Quarry Opportunity Site		
Requirement	**Compliance**	**Appellant's Assessment**
Development Strategy		
New leisure development based around restoration of the quarry	**Yes**	The Appeal Scheme is for a new leisure development centred around a disused quarry which ceased operation back in 2011. The Appeal Scheme seeks to restore the quarry through a sensitively designed development.
May be the potential for a complementary renewable energy scheme on the site	**Yes**	As set out at Chapter 3 of this Statement, a Solar Farm which produces 5MWp of solar-generated electricity on land directly has been delivered and is in operation on land directly adjacent to the Appeal Site.
Appropriate uses: Holiday accommodation – low impact holiday lodges in Zones 1 and 2. Limited development in Zones 4 and 5. Maximum of 250 holiday lodges in total. Outdoor recreation facilities – including walking, cycling, horse riding and climbing	**Yes**	The Appeal Scheme comprises 190 low impact lodges which have been sited in accordance with the zones within the CVM. Low impact lodges are proposed in Zones 1 and 2 and limited development is proposed in Zone 4. Lodges within Zone 4 have been sensitively located to minimise their impact and there are no lodges within Zone 5.

Hub within Zone 1. Recreational lake to include non-motorised water based activities in Zone 3		Extensive outdoor recreational facilities are proposed which are set out in full detail at Chapter 10 of this Statement. The proposed Hub Building is located within Zone 1. Whilst it does not form part of the Appeal Scheme, a watersports centre is proposed within Zone 3 as part of the Phase 2 reserved matters application which is current pending determination.
The Concept Plan identifies a number of Zones for potential development. These are indicative and are as follows: Zone 1 - Quarry 1 Low impact holiday lodge development, incorporating landscaping and biodiversity areas. Zone 2 - Quarry 2 Low impact holiday lodge development, incorporating landscaping and biodiversity areas. Zone 3 - part of Quarry 3 Recreational lake. Zone 4 - part of Quarry 3 Limited sensitive development of holiday lodges to be informed by a Landscape and Visual Impact Assessment. Consideration should be given to the impact on the SSSI of development. Any development should conserve and enhance the SSSI.	**Yes**	The Appeal Scheme fully accords with the principles for each of the Zones on the Concept Plan. Low impact lodges are proposed in Zones 1 and 2 and limited development is proposed in Zone 4. Lodges within Zone 4 have been sensitively located to minimise their impact and there are no lodges within Zone 5.

Zone 5 - part of Quarry 2 Limited sensitive development of holiday lodges to be informed by a Landscape and Visual Impact Assessment.		
General Development Principles		
Ensure that any future development accords with the overall strategic approach to development within the Churnet Valley.	**Yes**	The Appeal Scheme is for a leisure development which is in full in accordance with the overall strategic approach to development within the Churnet Valley.
Ensure appropriate restoration of the quarry.	**Yes**	The Appeal Scheme is for a new leisure development centred around a disused quarry which ceased operation back in 2011. The Appeal Scheme seeks to restore the quarry through a sensitively designed development.
Take a comprehensive approach to development.	**Yes**	A comprehensive approach has been taken by the Appellant in developing the Appeal Scheme. Laver Leisure have actively engaged with the Council, key stakeholders and the local community over a significant period of time in order to design the most comprehensive scheme possible at Moneystone Park.
Must deliver economic, social and environmental benefits for area.	**Yes**	The Appeal Scheme will deliver a net benefit in respect of the economic, social and environmental objectives of sustainable development. The comprehensive suite of benefits are detailed at Chapter 14 of this Statement.

Restoration of the quarry unless a more beneficial alternative can be justified.	**Yes**	The principle of redeveloping Moneystone Quarry for leisure used has been established by the Outline Planning Permission. There are extensive economic, social and environmental benefits the Appeal Scheme will deliver above and beyond that proposed by the approved restoration plan. The proposals would contribute to delivering the Council's vision for enhancing the role of Staffordshire Moorlands as a tourism and leisure destination and would deliver many economic benefits which will have a significant and positive impact on the local economy, as further detailed at Chapters 10 and 14 of this Statement.
Accessibility and Connectivity		
Utilise the opportunities the site affords for outdoor recreational activities such as cycling, walking and horse riding and water-based activities.	**Yes**	As detailed in Chapter 10 of this Statement, the Appeal Scheme includes a range of existing and new footpaths and bridleways which will connect into the existing footpath network enhancing the accessibility of the site and creating opportunities for walking, cycling and horse riding.
Ensure development does not generate unacceptable volumes of traffic on existing road network and that major highway works are avoided.	**Yes**	It was demonstrated through the Outline Planning Permission that the Appeal Proposals are acceptable in highways terms and would not have an unacceptable impact on the existing local highway network. As such there is no need for major highways works.

Incorporate measures to create off road links to be used by cyclists, walkers and horse riders to reach other attractions.	**Yes**	The Appeal Scheme seeks to connect to wider pedestrian/cycle routes and proposes several new walking, cycling and bridleway recreational routes as shown on the Footpath, Cycleway and Bridleway Plan (C/D Ref: XXX).
Appropriately address any significant demand for travel generated by development through complementary highway improvements of access routes.	**Yes**	It was demonstrated through the Outline Planning Permission that the Appeal Proposals are acceptable in highways terms and would not have an unacceptable impact on the existing local highway network. As such there is no need for major highways works.
Promote the use of sustainable modes of transport to reach the site and once at the site to explore the surrounding area.	**Yes**	As detailed in Chapter 10 of this Statement, a Travel Plan was approved by the Outline Planning Permission which secured a range of measures to promote sustainable transport modes and improve connectivity within the Churnet Valley.
Ensure that necessary road improvements associated with the expansion of the facility should be in-keeping with the character of the area and avoid creating intrusive features. Roads within the site should be of a scale and nature that are not intrusive to the landscape character and should minimise hedgerow and tree removal.	**Yes**	Minor highway junction improvements are required to support the proposed development in the form of improvements to the A52 / Eaves Lane junction and a “no right turn” junction at the site access with Eaves Lane which were secured through the Outline Planning Permission. All the internal roads proposed as part of the Appeal Scheme have been sensitively designed to minimise tree and hedgerow removal and to assimilate with the landscape character.

Incorporate measures to dissuade visitors from driving to other attractions.	**Yes**	The primary mechanism for the delivery of transport mitigation measures for the Moneystone Park proposals is the Travel Plan Framework secured through the Outline Planning Permission which will deliver 'at source' traffic impact mitigation through the implementation of sustainable transport measures.
Ensure highway/junction improvements to support development subject to minimising environmental impact.	**Yes**	Minor highway junction improvements are required to support the proposed development in the form of improvements to the A52 / Eaves Lane junction and a "no right turn" junction at the site access with Eaves Lane which were secured through the Outline Planning Permission. The Appeal Scheme will have an acceptable impact on the existing highway network and as a result no major highway junction improvements are required.
Economic Considerations		
Complement the role of other key facilities and attractions in the area.	**Yes**	The Appeal Scheme would support the local economy and promote the distinctive character and quality of the District, enhancing the role of Staffordshire Moorlands, and more specifically the Churnet Valley, as a tourism and leisure destination. The proposals would develop the visitor offer aimed primarily at the countryside market and also increase overnight stays. The site is ideally located to complement the role of existing facilities and attractions in the area for example Alton Towers and the Peak District National Park.

		The range of on-site facilities and lodge accommodation proposed will compliment and will not compete with other key facilities and attractions in the area.
Lodge development should complement and not impact negatively on existing accommodation stock in the area.	**Yes**	It was demonstrated by the Outline Planning Permission Feasibility Study (CD REF: XX) that the Appeal Scheme would be purpose built to meet the specific demands of the market and would complement the existing accommodation stock available in the area.
Encourage the creation of local jobs.	**Yes**	As demonstrated in detail in the Economic Benefits Statement (Appendix 6), prepared by Wisher Consulting, the Appeal Scheme will generate significant local employment during both the construction and operational phases.
Sustainable Development		
Creation of a high quality, sustainable environment which will promote environmental awareness – use of sustainable building techniques, low carbon, low impact development with on-site energy generation, green technology, eco-lodges.	**Yes**	The Energy Strategy Statement of Case **(Appendix 5)** demonstrates that the Appeal Scheme is high quality in energy terms. The use of Solar PV and Air Source Heat Pumps to power the proposed lodges have been identified as appropriate types of renewable energy.
Ensure new development is water efficient.	**Yes**	The Energy Strategy Statement of Case **(Appendix 5)** demonstrates that the Appeal Scheme is high quality in energy terms including water efficiency.

Ensure that where feasible renewable energy and energy efficiency technologies are included within projects for new development.	**Yes**	The Energy Strategy Statement of Case **(Appendix 5)** demonstrates that the Appeal Scheme is high quality in energy terms. The use of Solar PV and Air Source Heat Pumps to power the proposed lodges have been identified as appropriate types of renewable energy.
Community		
Provide new community facilities which will help sustain local villages and businesses through promotion of local services, goods and attractions, according to local need.	**Yes**	The Appeal Scheme will integrate with surrounding communities and will create high quality leisure development for tourists and the local community. Moneystone Park will offer a range of facilities which will be accessible to the local community tourism. There will also be enhanced footpath, cycleway and bridleway linkages. Furthermore, as demonstrated in detail in the Economic Benefits Statement **(Appendix 6)**, , the Appeal Scheme will result in significant expenditure in the local economy which will help sustain local businesses.
Landscape and Visual Impact		
Ensure that any development is in-keeping with the scale and nature of the landscape character of the three sub areas within which it is located.	**Yes**	As set out in Chapter 10 of this Statement and the Landscape Statement of Case **(Appendix 3)**, t, the Appeal Scheme has been designed to be in keeping with the scale and nature of the landscape character of the sub areas.

Ensure that any additional planting is of a nature that complements the informal wooded setting of the Dissected Sandstone Cloughs and Valleys and relates to the existing woodland planting associated with the quarry. Woodland planting should aim to take on the form and character of the ancient and semi natural woodland which is typical of the landscape character type. This should avoid the introduction of incongruous woodland blocks within the landscape.	**Yes**	The Appeal Scheme will complement the informal wooded setting of the Dissected Sandstone Cloughs and Valleys and would also seek to retain existing tree cover of value, retain new planting implemented as part of the approved restoration plan wherever possible, and supplement it with additional tree planting to create extra habitat potential and create a strong landscape setting to the development, as shown on the Landscape Masterplan (CD REF XXX).
Ensure that any future development is located in a way that does not impinge on the small scale landscape or the open, visible landscape and where they can be screened by existing vegetation or can be screened by appropriately located new planting.	**Yes**	A comprehensive landscape scheme (CD REF: XXX) is proposed as part of the Appeal Scheme and the lodges and buildings have been sensitively positioned to reduce their visual impact.
Ensure that any future development proposals give consideration to the openness and high visibility of areas outside of the core quarry and any development within these locations, where it can be justified, will be required to be low key and should be of a nature, character and style that is intrinsic to the character of the area.	**Yes**	A comprehensive LVIA (CD REF: XXX) was undertaken as part of the Outline Planning Permission which demonstrated that views of the proposed development will be extremely limited. The Appeal Scheme will not adversely impact upon the openness of areas outside of the core quarry.
Development proposals to be subject to a Landscape and Visual Impact Assessment and potential impacts on landscape need to be mitigated through sensitive design and a landscape strategy.	**Yes**	A comprehensive LVIA (CD REF: XXX) was undertaken as part of the Outline Planning Permission which demonstrated that views of the Appeal Scheme will be extremely limited.

		A comprehensive landscape scheme (CD REF: XXX) is proposed as part of the Appeal Scheme and the lodges and buildings have been sensitively positioned to reduce their visual impact.
Ecology		
Active conservation of the site – re-establishing habitats, measures to protect SSSI, woodland planting.	**Yes**	As detailed in the Ecology Statement of Case **(Appendix 5)**, comprehensive compensation and mitigation measures are proposed which will re-establish a number of habitats including grassland and woodland. The management and enhancement of land immediately adjacent to the Whiston Eaves SSSI and Ashbourne Hey SBI will increase the extent and value of this resource.
Ensure development makes appropriate provision for the management of land for nature conservation and the enjoyment of areas of wildlife and geological interest while ensuring that any potential impacts of development on biodiversity and geodiversity are appropriately mitigated including, if necessary, off-site compensation and enhancements are delivered where possible.	**Yes**	Details of the extensive ecological mitigation and management measures proposed as part of the Appeal Scheme are detailed in the Ecology Statement of Case **(Appendix 5)**.
Maintain the agreed management regime for the Whiston Eaves SSSI.	**Yes**	No portion of the Whiston Eaves SSSI falls within the Appeal Site boundary. As noted above, the management and enhancement of land immediately adjacent to the Whiston Eaves SSSI and Ashbourne Hey SBI will increase the extent and value of this resource.

		This additional land will also act as a buffer to the designated sites.
Ensure enhancement to biodiversity.	**Yes**	As detailed in the Ecology Statement of Case **(Appendix 5)**, the Appeal Scheme includes extensive creation and management of habitats to enhance biodiversity.
Ensure development makes appropriate provision for the sustainable management and use of surface water.	**Yes**	As detailed in the drainage strategy which formed part of the reserved matters application (CD REF XXXX), a comprehensive and sustainable management of surface water is proposed.
Tourism and Leisure Activities		
Ensure a high quality, sustainable tourist offer	**Yes**	As set out in detail in Chapter 10 of this Statement, the Appeal Scheme will ensure the delivery of a high quality, sustainable offer in line with the Council's vision for the Churnet Valley and Moneystone Park.
Ensure provision of outdoor activity facilities – walking, cycling, horse riding, water sports, climbing etc.	**Yes**	As detailed in Chapter 10 of this Statement, the Appeal Scheme will deliver a high-quality development including a range of outdoor tourism and leisure facilities.
Expand off-road paths with existing networks for walkers, cyclists and horse riders.	**Yes**	The Appeal Scheme proposes several new walking, cycling and bridleway recreational routes as shown on the Footpath, Cycleway and Bridleway Plan (C/D Ref: XX).

Promote industrial heritage of site and educational opportunities.	**Yes**	Moneystone Park will provide an opportunity for visitors and the local community to learn about the area. It is proposed that the visitor centre within the hub building would include educational information about the history of the quarry, sustainability and wildlife and ecology.

Appendix 10: Planning Conditions

10.1 To provide certainty that a high-quality leisure development is secured and implemented, the Appellant is agreeable the planning conditions provided at **Appendix 10** of this Statement, in addition to those proposed in the report to committee:

a) A condition requiring lodges to be sited in accordance with approved masterplan in terms of locations of the bases of the single and double lodges. The proposed condition states:

"The lodges hereby permitted shall only be erected in the positions shown on the approved Site Wide Masterplan (Ref: 1733/MS-019 Rev X)"

b) A condition listing the elevations of each of the lodge types as approved plans. This includes a fixed materials palette to ensure that the lodges are timber clad with double glazed windows. The second part of the condition would then secure details of the external facing and roofing materials to be submitted to and approved in writing by the LPA. The proposed condition states:

"Any lodge including its decked area (and all subsequent replacement lodges and their associated replacement decked area) shall only be erected in accordance with the design and elevational treatment and using the external facing and roofing material as specified and described in drawing numbers [INSERT ELEVATION PLAN REF NUMBERS] submitted with the application, with samples of such facing and roofing materials having first been approved in writing by the Local Planning Authority. The development shall be carried out strictly in accordance with the agreed details. There shall be no variation to any of these details without the prior consent in writing of the Local Planning Authority. For the avoidance of doubt any glazing proposed to decked areas should be non reflective/anti glare."

c) A condition requiring the Appeal Scheme to be brought forwards in accordance with the Energy Strategy Statement of Case. The proposed condition states:

"The proposed development shall be implemented in accordance with the Energy Strategy Statement of Case (dated INSERT) prepared by FutureServe".

10.2 Indicative floorplans have been submitted with the appeal which note that the exact internal layout of the lodges will be dictated by manufacturers.

10.3 The approach to planning conditions set out above has been informed by the Appellant's design team's experience in designing and securing planning permission for similar high-quality lodge park developments across the UK. In particular, the Appellant's approach has been informed by the approach taken at Rivendale Lodge Retreat which is located in the Peak District National Park and is a quarry setting but of a far smaller total area than the Appeal Site. A copy of the full Decision Notice for the Rivendale planning permission (Ref: NP/DDD/0219/0137) is contained at C/D Ref: 10.1 however in summary, the following conditions were imposed:

11. "Before any units are brought onto site, the materials and colour finish or the units shall be submitted to and approved in writing by the Local Planning Authority. The units shall be fully in accordance with the approved details and retained as such thereafter.

18. The lodges, cabins and camping pods shall only be sited in accordance with the submitted plans and no units shall be sited elsewhere within the application site. Other than the camping pods as shown on the submitted plans, the remainder of the camping field shall be used for touring camping only."

Appendix 11: Assessment Against Third Party Comments

Public Responses

11.1 The table below summarises public reasons for objection to the Planning Application and the Appellant's response:

Comment	Appellants' Response
Summarised Letters of Objection	
Inconsistencies with application agreed at outline stage in terms of density and impact on wildlife	The layout has been designed to fully accord with the land use and maximum building heights Parameter Plan (Drawing ref: PL1088.M.110 rev 6) approved by the outline planning permission. The density of lodges around Quarry 1 is low when compared to minimum spacing requirements. The density within Quarry 1 is no more than 8no. lodges per acre, almost half the density of a standard commercial leisure layout. Additionally, the development has been sensitively designed so that no built development is within the Natural England specified 15m buffer of Ancient Woodland. The development has also been assessed to have an acceptable impact on the Whiston Eaves SSSI and the Ashbourne Hey SBI.
Existing road network not suitable and cannot cope and potential traffic impacts have been underestimated.	It was demonstrated through the Outline Planning Permission that the Appeal Proposals are acceptable in highways terms and would not have an unacceptable impact on the existing local highway network. As such there is no need for major highways works. Additionally, no objections to the development were raised by the Local Highway Authority.
No public transport in the area to service the development and the site does not represent 'sustainable' tourism development. The development relies on visitors arriving by car which with insufficient car parking will result in overspill parking on Whiston Eaves Lane.	The site's sustainability and accessibility was considered at the outline stage. A Travel Plan Framework was agreed which promoted green travel initiatives including a staff car share scheme, public transport incentives, cycle storage, extension of the existing shuttle bus service to Alton Towers and walking and cycling links.

Comment	Appellants' Response
Development will harm existing ecology/biodiversity which threatens the proposed AONB status for the Churnet Valley. Concerns of impact to surrounding wildlife during construction without a credible management plan presented. Call for the restoration plan to be honoured and land restored.	The Churnet Valley is not designated as an AONB. An extensive suite of ecological surveys have been undertaken on site. Conditions on the outline permission secure a Construction Ecological Management Plan and a Habitat Management Plan. The development aims to protect and enhance the local wildlife and ecology on the site with over 60 hectares of habitats being brought into positive long-term management. This will include measures to enhance and restore grassland, plant and manage new woodland and hedgerows, protection of and provision of habitat for protected species and careful management of access and recreational activity.
Scale of potential job creation is overexaggerated and a lack of unemployment exists within Staffordshire Moorlands to justify development. No benefit to the local economy in a self-constrained resort which will take business away from local high streets. States Alton Towers provides similar facilities, and the area does not need another large tourist attraction.	The development of Moneystone Park will secure significant economic benefits including the creation of circa 190 direct jobs in Phase 1, as well as additional indirect employment, construction jobs, additional spending in the local area and a Local Labour Agreement to ensure employment for local residents. It will make a significant and important contribution to the visitor economy by improving the availability and variety of visitor accommodation in line with the Council's Tourism Strategy and the Churnet Valley Masterplan.
Proposed lodges are in fact 'caravans' and do not comply with the original permission nor relevant design policies	A comprehensive response to this comment is provided in Chapter 10 of this Statement.
Proposed lodge ownership is now rising to 60%. Experience elsewhere shows it will be used for long term residential use rather than the permitted holiday lodges.	There will be a mix of for sale and rental lodges, all of which will be subject to occupancy restrictions secured by the outline planning permission.
Concern over safety of lodges within proximity to waterbodies with regards to increased flood risk from development. Similar concerns to lodges proposed close to climbing rock faces amidst issues of land instability from the former quarries	The Appeal Scheme has been designed having regard to health and safety and in addition to slope stability, the lodges which counter lever Quarry 3 will be safe and appropriate barriers and railings will be installed to ensure the safety of all visitors and users of Moneystone Park.
Impacts on local heritage assets and disregard of components of former listed buildings on site	The impact on heritage was assessed at the outline stage. As part of this reserved matters application, photomontages have been provided to illustrate the detailed design of the hub building when viewed from the direction of the

Comment	Appellants' Response
	Listed Buildings at Little Eaves Farm. The hub building has been designed to work with the natural topography of the site by using the existing sloping ground profile and arranging the building over two levels, reducing its visual scale. The photomontages demonstrate that the impact of the hub building on the adjacent listed building is acceptable.

Oakamoor Parish Council

9.2 The table below summarises Oakamoor Parish Council's reasons for objection to the Planning Application and the Appellant's response:

Reason	Explanation	Appellants Response
Traffic	Development will cause a negative impact on air quality, noise levels and litter levels due to increase traffic movement in the area. Applicant has failed to include any plans to mitigate the negative environmental impact caused by traffic.	The site's sustainability and accessibility was considered at the outline stage. A Travel Plan Framework was agreed which promoted green travel initiatives including a staff car share scheme, public transport incentives, cycle storage, extension of the existing shuttle bus service to Alton Towers and walking and cycling links.
Environmental Impacts	Location of development adjacent to Whiston Eaves SSSI create potential for degradation of protected area. Proposed development on edge of Oakamoor Conservation Area will erode it's status.	The development has been sensitively designed so that no built development is within the Natural England specified 15m buffer of Ancient Woodland. The development has also been assessed to have an acceptable impact on the Whiston Eaves SSSI and the Ashbourne Hey SBI. No objections to the development are raised from the Environmental Health, the Trees and Woodland Officer, the Environment Agency, Natural England, the Woodland Trust and Staffordshire Wildlife Trust.
Social Impact	The proposal is not 'local enterprise' as intended by the Churnet Valley Masterplan. As the unemployment rate for Staffordshire Moorlands was 1.1% in 2018, the real	Chapter 14 of this Planning Statement of Case outline's a compelling suite of economic, social and environmental benefits which should be afforded significant positive weight in the determination of this appeal.

Reason	Explanation	Appellants Response
	employment benefits for 'local' people are negligible. The development does not address the current and future needs of the local population and will strain existing healthcare resources. The development will create a new 'village' which will swamp both Oakamoor and Whiston, changing the social character of the Churnet Valley.	
Economic Impact	The development will not benefit the local economy as the various on-site facilities will retain any visitor spending.	The development of Moneystone Park will secure significant economic benefits including the creation of circa 190 direct jobs in Phase 1, as well as additional indirect employment, construction jobs, additional spending in the local area and a Local Labour Agreement to ensure employment for local residents. It will make a significant and important contribution to the visitor economy by improving the availability and variety of visitor accommodation in line with the Council's Tourism Strategy and the Churnet Valley Masterplan.
Health & Safety	Quarry 3 is a deep area of water which presents a serious risk to the occupants of proposed lodges.	The development has been designed having regard to health and safety and in addition to slope stability, the lodges which counter lever Quarry 3 will be safe and appropriate barriers and railings will be installed to ensure the safety of all visitors and users of Moneystone Park.
Local Changes since Outline Approval	The southern end of the Churnet Valley has been further exacerbated by tourism accommodation at Alton Towers and popularity of other existing campsites in Cotton and Cheadle.	The principle of a high-quality leisure development for up to 250 lodges at the site was established by the outline permission granted in 2016. The Appeal Scheme proposes the reserved matters for Phase 1 which relate to the layout, scale, appearance and landscaping of the development. A Travel Plan Framework was agreed which promoted the extension of the existing shuttle bus service to Alton Towers and walking and cycling links.

Reason	Explanation	Appellants Response
Divergence of RM Application	Several substantial differences between the outline and reserved matters application exist which represents a major character change of development.	The layout, density, scale, appearance and landscaping has been designed to fully accord with the land use and maximum building heights parameter plan approved by the outline permission. The density of the proposed development has been informed by the upper limits and land use parameters set by the outline permission, the character and topography of the site and Laver Leisure's operational requirements.
Resort Quality	On the evidence of the quality and style of the applicant's other parks, Oakland Parish Council have no confidence that the development is suitable or appropriate.	The layout is a high quality landscape led framework which retains and strengthens the existing structural woodland around the edge of quarries 1 and 3 and along the access road; proposes swathes of extensive and varied new shrub planting between lodges; and tree planting in the central hub area. High quality materials are proposed for the hard landscaping including compacted stone and natural aggregate paving. An attractive, low density leisure development is proposed set in a high quality and naturalistic landscape framework. The hub building and lodges will be constructed from high quality materials and the scale of the development accords with the approved parameter plan.

Kingsley Parish Council

9.3 The table below summarises Kingsley Parish Council's reasons for objection to the Planning Application and the Appellant's response:

Theme	Reason	Appellants Response
Sustainability	The size of the proposed development is larger than the two nearby villages of Whiston and Oakamoor and would overwhelm the communities. The likelihood of employment opportunities created locally have been exaggerated. The number of lodges being offered for sale has increased since the original application. No enforceable control will be in place to ensure lodges are for holiday use only.	The principle of a high-quality leisure development for up to 250 lodges at the site was established by the outline permission granted in 2016. The Appeal Scheme proposes the reserved matters for Phase 1 which relate to the layout, scale, appearance and landscaping of the development.
Transport / Road Safety	The majority of traffic accessing or leaving the site will do so via Whiston Eaves Lane. This road is relatively narrow and unclassified and unsuitable for potential volumes of traffic. Despite the suggested improvements to the junction layout, there are serious concerns for road safety, particularly at times of peak traffic flow. There will be no safe pedestrian or cycle route to/from the site. Emergency services will have difficulty accessing the site.	Access was considered at the outline stage and no objections were raised by the Local Highways Authority. It was agreed at the outline stage that the developments highways impact is acceptable providing the agreed mitigation measures secured by outline conditions and s106 Agreement are implemented. These mitigation measures include improvements to the existing site access to prohibit the right turn out of the site on to Eaves Lane, improvements to the Whiston Eaves Lane / A52 junction and a Travel Plan.
Recycled Materials	Concerns over the nature and quantity of the recycled building materials which will be brought to site. Specifically, concerns are that the site may become a waste disposal operation that is detrimental to the environment.	The lodges will be constructed off site and transported to site on a low loader. This method of construction has sustainability benefits when compared to on site construction.

Theme	Reason	Appellants Response
Environment / Climate Change	No public transport exist to the site and all access will be from large numbers of private vehicles.	The site's sustainability and accessibility was considered at the outline stage. A Travel Plan Framework was agreed which promoted green travel initiatives including a staff car share scheme, public transport incentives, cycle storage, extension of the existing shuttle bus service to Alton Towers and walking and cycling links.
AONB	The Churnet Valley has been shortlisted as one of three sites considered for AONB status. It is believed that Moneystone Quarry will have a negative impact on the application.	The Appeal Site has been identified as a key opportunity site for a high quality leisure development in the Councils CVM. Furthermore, the Churnet Valley is not a designated AONB.
Community Impact	The size/scale of development will have a negative impact on the identity of neighbouring villages of Whiston and Oakamoor. This would be exacerbated by at least 40% of the lodges sold on a permanent basis.	Please refer to Chapter 14 of this Planning Statement of Case which outline's a compelling suite of economic, social and environmental benefits which should be afforded significant positive weight in the determination of this appeal.
Health & Safety	The close proximity of lodges and a deep-water lake at is a serious health and safety risk to children and non-swimmers.	The development has been designed having regard to health and safety and in addition to slope stability, the lodges which counter lever Quarry 3 will be safe and appropriate barriers and railings will be installed to ensure the safety of all visitors and users of Moneystone Park.

Cotton Parish Council

9.4 The table below summarises Cotton Parish Council's reasons for objection to the Planning Application and the Appellant's response:

Theme	Reason	Appellant's Response
Sustainability	The site of the proposed development is significantly larger than Cotton Parish.	The principle of a high-quality leisure development for up to 250 lodges at the site was established by the outline permission granted in 2016. The Appeal Scheme proposes the reserved matters for Phase 1 which relate to the layout, scale, appearance and landscaping of the development.
Transport / Road Safety	The bulk of traffic will access and leave the site via narrow lanes. The number of permanent residents potentially living on the site will exacerbate this further.	Access was considered at the outline stage and no objections were raised by the Local Highways Authority. It was agreed at the outline state that the developments highways impact is acceptable providing the agreed mitigation measures secured by outline conditions and s106 Agreement are implemented. These mitigation measures include improvements to the existing site access to prohibit the right turn out of the site on to Eaves Lane, improvements to the Whiston Eaves Lane / A52 junction and a Travel Plan.
Recycled Materials	Concerns raised about the nature and quantity of recycled building materials which will be brought to site.	The lodges will be constructed off site and transported to site on a low loader. This method of construction has sustainability benefits when compared to on site construction.
Environment / Climate Change	No public transport to the site exists and all access will be by private vehicles.	The site's sustainability and accessibility was considered at the outline stage. A Travel Plan Framework was agreed which promoted green travel initiatives including a staff car share scheme, public transport incentives, cycle storage, extension of the existing shuttle bus service to Alton Towers and walking and cycling links.
AONB	The Churnet Valley has been shortlisted as one of three sites considered for AONB status. It is believed that Moneystone Quarry will have a negative impact on the application.	The Appeal Site has been identified as a key opportunity site for a high quality leisure development in the Councils CVM. Furthermore, the Churnet Valley is not a designated AONB.
Community Impact	The sheer size and scale of the development would have a negative impact on the local villages. Many of the proposed lodges may be sold to purchasers who live there on a	Please refer to Chapter 14 of this Planning Statement of Case which outline's a compelling suite of economic, social and environmental benefits which should be afforded significant positive weight in the determination of this appeal.

Theme	Reason	Appellant's Response
	permanent basis. This is in effect a planning application for a new community which at present does not exist.	