



Appeal Reference: APP/B3438/W/24/3344014

Planning Proof of Evidence

Proposed Leisure Development (Phase 1)
Moneystone Park

On behalf of Laver Leisure (Oakamoor) Ltd
September 2024

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Version Final

Date: 2 September 2024

1 EXECUTIVE SUMMARY

- 1.1 This Proof of Evidence has been prepared by Jon Suckley MTCP FRTPI of Asteer Planning on behalf of the Appellant in respect of an appeal against SMDC's decision to refuse the Reserved Matters Application for Phase 1 of the leisure development at Moneystone Park.
- 1.2 The reason for the refusal of the Reserved Matters Application relates specifically to the appearance of the proposed lodges. All other aspects of the Appeal Scheme are deemed by the Local Planning Authority to be acceptable.
- 1.3 Chapter 3 provides the background to The Appellant and the vision for Moneystone Park. Laver Leisure has extensive experience in the leisure and tourism industry and its proposals for Moneystone Park would provide a diversification to their existing holiday home/beach orientated holiday offer via the delivery of what is intended to be a high-end high-quality leisure development at Moneystone Quarry (now known as Moneystone Park).
- 1.4 Laver Leisure's vision is to provide a premium offer targeted at the top end of the leisure market for lodge accommodation housed in a high quality landscaped environment with associated ancillary buildings providing opportunities for site occupants and visitors to enjoy on site a quality food and drink offer, along with indoor leisure activities, and outdoor activities such as walking, cycling, horse riding etc.
- 1.5 Chapter 4 provides the background to The Outline Planning Permission and The Reserved Matters Application which is the subject of this appeal. It also explains that the Reserved Matters Application was recommended by Officers for approval, before being refused by SMDC's Planning Committee.
- 1.6 Chapter 5 describes the Appeal Site and the surrounding area and Chapter 6 describes the Appeal Scheme, which proposes 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.
- 1.7 Chapter 7 provides a response to the note issued by the Inspector on 1 August 2024 identifying additional points to be included in the evidence to be submitted in advance of the Public Inquiry. This Chapter addresses the Caravans Act, the LIVA Viewpoints, Roofing Materials, Walling, Elevations, the Curtilages to the Lodges and also provides a detailed

description of the evidence that was submitted, determined, and conditioned at the Outline Planning Application stage.

- 1.8 The Appellant has commissioned the production of material samples and would intend to bring samples of this material to the inquiry itself to enable inspection, albeit that an approval of materials condition is anticipated.
- 1.9 The Appellant proposes that a generic palette of materials could be conditioned, with precise specimen samples submitted for approval by the LPA prior to the siting of the individual lodges on The Appeal Site. This would help to retain a consistency of appearance as The Appeal Scheme is delivered.
- 1.10 A Materials Palette (contained in **Appendix 12**) has been prepared by NBDA Architects which proposes the following materials:
- a) Wall Cladding/Treated T&G Timber: Accoya, Larch or Cedar
 - b) Roof Finish: Tile 'Lookalike' Pressed Metal Trays with a Textured Dark Grey Matt Finish
 - c) Eaves, Fascias & Rainwater Goods: Anthracite coloured Eaves/Fascias, Gutters, and Downpipes
 - d) Deck Balustrade: Glass in Stainless Steel Brackets between Timber Posts
 - e) Doors & Windows: Anthracite Door & Window Frames
 - f) Composite Timber Decking: Composite Prime or Millboard
- 1.11 An updated set of drawings are contained within **Appendix 8**. For clarification, the elevational drawings were submitted with The Reserved Matters Application but were in black and white. The updated elevation drawings are now provided in colour, exclude the title "indicative", and show the location of the Air Source Heat Pumps. The Council in their Statement of Case at Paragraph 7.3 state that "*...the design of the lodges appears unchanged...*".
- 1.12 Chapter 8 sets out the relevant planning policy framework at local and national levels as well as other material considerations.
- 1.13 Chapter 9 explains that the key areas to be considered by this Proof of Evidence are, firstly, the design and quality of the Appeal Scheme and the proposed lodges, and secondly, the compliance of the Appeal Scheme with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan, the Staffordshire Moorlands Design Guide SPD, the

CVM, Chapters 12 and 15 of the NPPF and the National Design Guide. This Chapter also challenges the three key design aspects that the Council says the reason for refusal is based around.

- 1.14 Chapter 10 summarises the design process and demonstrates that an appraisal of the character of the area, and the Appeal Site's opportunities and constraints, has been a significant design driver for the Appeal Scheme.
- 1.15 Chapter 11 addresses various matters concerned with the design and quality of the Appeal Scheme. Drawing on the evidence provided within Mr Pullan's Proof of Evidence, it demonstrates that the design of the proposed lodges is fully consistent with the relevant principles within the Design and Access Statement approved as part of the Outline Planning Application and that the Council is incorrect to suggest otherwise.
- 1.16 Chapter 12 provides an Assessment of the Appeal Scheme against the relevant planning policies (namely Policies SS1, SS11, DC1 and E4 of the Adopted Local Plan, the relevant paragraphs of the NPPF and the other relevant policies and guidance).
- 1.17 In summary, I consider that the Appeal Scheme complies with Policies SS1, SS11, DC1 and E4 of the Adopted Local Plan, as well as the relevant paragraphs of the NPPF and the other relevant policies and guidance assessed within this Chapter. The scheme accords with the Development Plan taken as a whole, together with a raft of policy at different levels.
- 1.18 At paragraph 5.3 of its Statement of Case, the Council indicates that the policy assessment presented within the Appellant's Statement of Case does not properly assess the Appeal Scheme against the relevant design policies of the Local Plan and seeks to demonstrate compliance with these policies simply on the grounds that the development would not impact on landscape, heritage or biodiversity. This is not the approach that was taken to the assessment. Furthermore, the updated assessment presented within this chapter draws directly on the Design evidence produced by Mr Pullan and Mr Bratherton in advance of the Public Inquiry.
- 1.19 At paragraph 5.4, the Council states that the assessment against the National Design Guidance (NDG) that formed part of the Appellant's Design Statement of Case is incomplete and fails to include a robust and comprehensive assessment against all the ten characteristics of that document – especially for a scheme of this size. As stated previously, Mr Pullan's Proof of Evidence provides a detailed assessment of the Appeal Scheme against the ten characteristics of the National Design Guide. The Council has not

however undertaken any such assessment of its own which has been presented at the time of writing.

1.20 Chapter 13 sets out the Appellant's response to the Reason for Refusal and addresses the Council's alleged three "shortcomings" where it asserts that the design of the proposed lodges fails to meet the policy requirements, and that therefore the lodges cannot be high quality.

1.21 I have concluded that:

1. The reason for refusal relates only to the design of the external appearance of the lodges and not any other aspects of the reserved matters application such as the density, layout, hub building, etc which has been confirmed in the email exchange between myself and Mrs Jane Curley, SMDC Planning Case Officer, at **Appendix 5**.
2. It was misguided of the Council's Planning Committee Members to judge that the proposed lodges are no more than 'caravans with cladding' and are not of a high standard of design. The lodges have been designed to comply with the statutory definition of 'caravans', however they are not static caravans nor touring caravans. The lodges have been designed to comply with the statutory definition for convenience of construction and irreversibility and through doing this, it does not impact on the high quality lodges that are proposed at Moneystone Park.
3. The lodge designs are proposed to be of high quality having regard to their appearance, detailing, form, design and materials. The lodges are low density and will have very low visual impact from anywhere beyond the site boundary.
4. The design of the lodges are in-keeping with the sensitivity of the site which includes Whiston Eaves SSSI. The reason for refusal is wholly wrong to refer to the SSSI because the SSSI is irrelevant in the context that it has been used. The SSSI designation does not relate to appearance or setting and solely relates to scientific interest. Raising this issue in the context of lodge design is entirely misguided to the point of being unreasonable.

1.22 Chapter 14 sets out the planning conditions proposed by The Appellant that should be attached to any reserved matters approval granted in the event that the Appeal is allowed. These conditions relate to lodge siting, elevational treatment, materials palette and energy strategy.

- 1.23 Chapter 15 (and the associated **Appendix 11**) provides the Appellant's response to the matters raised by the Rule 6 Parties and other Interested Parties regarding the Appeal Scheme.
- 1.24 Chapter 16 outlines the net benefit that the Appeal Scheme will deliver in respect of the economic, social and environmental objectives of sustainable development, which should be afforded significant weight in the determination of the Appeal.
- 1.25 In considering all of these matters as a whole, I have reached the conclusion that the Appeal should be allowed and the Reserved Matters Application should be approved, subject to conditions.

2 INTRODUCTION

2.1 This Proof of Evidence has been prepared by Jon Suckley MTCP FRTPI of Asteer Planning LLP (“Asteer Planning”) on behalf of Laver Leisure (Oakamoor) Ltd (“The Appellant”) in respect of an appeal against Staffordshire Moorlands District Council’s (“SMDC”) decision to refuse Reserved Matters Application ref: SMD/2019/0646 (“The Reserved Matters Application”) for Phase 1 of the leisure development (“The Appeal Scheme”) at the former Moneystone Quarry, now known as Moneystone Park, (“The Appeal Site”).

Professional Credentials

2.2 I am Jon Suckley MTCP FRTPI and I am the Managing Partner of Asteer Planning, a specialist independent planning practice which I founded in April 2021. Asteer Planning provides independent commercial planning advice to private and public sector clients predominately in the North of England across all sectors including housing, commercial, urban regeneration, mixed use, leisure, and care. Asteer Planning offers a range of services including planning appraisal and strategy advice, preparation and negotiation of planning applications, development plan promotion, planning appeals, public and stakeholder consultation and Environmental Impact Assessment advice and co-ordination.

2.3 I studied at the University of Manchester between 1999 and 2003 and qualified with an Undergraduate Masters in Town and Country Planning. I have practiced for over 20 years in the planning and development field and began my career in 2003 at the Former Macclesfield Borough Council (now Cheshire East Council). In 2005, I joined HOW Planning, an independent commercial planning practice and achieved my full membership of the Royal Town Planning Institute later that year.

2.4 In 2013, I became a Partner of HOW Planning and in 2017 I became an Equity Partner. In 2018, HOW Planning was acquired by GVA who in turn were acquired by Avison Young in 2019. I was a Senior Director at both GVA and Avison Young and until April 2021 I was the Head of Avison Young’s Manchester Planning Team and a Member of its Regional Executive. In September 2019, I was elected to Fellowship of the Royal Town Planning Institute (“FRTPI”). I advise a wide range of clients on complex residential projects, including national and regional house builders, developers, land promoters, private landowners, institutions and corporate bodies.

- 2.5 I have been providing planning advice to Laver Leisure on its proposed leisure development at Moneystone Park since 2009. I am extremely familiar with the area, the project and the relevant local planning policies.
- 2.6 The planning evidence which I am providing for this Appeal is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions, irrespective of by whom I am instructed.

The Scope of the Planning Appeal

- 2.7 The Appeal Scheme is for reserved matters consent of Phase 1 of The Leisure Development and comprises 190 lodges and a central hub building providing a significant range of ancillary leisure facilities. The planning application was a Reserved Matters Application seeking approval for the layout, scale, appearance and landscaping for Phase 1 of the Leisure Development.
- 2.8 The scope of the Planning Appeal is to assess the acceptability in planning terms of the reserved matters (i.e. the layout, scale, appearance and landscaping for Phase 1 of the Leisure Development). All other matters (for example the principle of leisure development at the Appeal Site and highways related matters etc,) were addressed at the Outline Planning Application stage.
- 2.9 The reason for the refusal of the Reserved Matters Application relates only to the proposed appearance of the proposed lodges. All other aspects of The Appeal Scheme are not encompassed by the reason for refusal resolved by the Local Planning Authority (“LPA”) and can therefore be assumed to be acceptable.
- 2.10 This was acknowledged by SMBC at paragraph 2.2 of its Statement of Case, which states that:
- “The Council’s reason(s) for refusal are specifically related to the 190 lodge buildings, with other elements of the scheme submitted for approval considered to be acceptable in all other regards. We note that the Council’s focus of this appeal on the design qualities of the lodges was confirmed by the original case officer in an email dated 23rd March 2024 and that is included with the appellant’s statement of case.”*
- 2.11 Furthermore, the Council’s Planning Committee was positively complementary about various other aspects of The Appeal Scheme. This is acknowledged at paragraph 2.3 of the Council’s Statement of Case, which states:

“It should be noted that the Committee were particularly complementary about the qualities of the ‘Hub Building’ and its design and architectural approach, as well as the wider landscape strategy, which highlights the poor-quality design solution for the proposed lodges. It should be noted that the Council consider that the ‘Hub’ building demonstrates a strong response to the site, its setting and the policy requirements.”

- 2.12 The Council also confirms at paragraphs 2.6 and 2.7 of its Statement of Case that it does not advance ecological impact as part of its reason for refusal and, at paragraph 4.2, it also confirms that it does not object to the landscape planting strategy, overall density or layout of The Appeal Scheme. The issue between the Appellant and the Council is therefore a narrow one.
- 2.13 However, third parties have expressed a wide range of concerns, many of which go to the principle of development, and as a result my proof of evidence has, of necessity addressed a much wider range of issues, as well as the somewhat complex history of these proposals.
- 2.14 To address the Reason for Refusal, the Appellant’s evidence comprises:
1. Planning Proof of Evidence prepared by Mr Jonathan Suckley MTCP FRTPI of Asteer Planning;
 2. Design Proof of Evidence prepared by Mr Colin Pullen BA (Hons) Dip UD of Pegasus. Mr Bunce, who prepared the Design Statement of Case, is unable to attend the Public Inquiry and therefore Mr Pullan was appointed by The Appellant in July 2024 to independently review The Appeal Scheme and the Design Statement of Case. Mr Pullan’s Proof of Evidence provides a design assessment which considers the design credentials of The Appeal Scheme from an urban design perspective;
 3. Design Quality Review Proof of Evidence prepared by John Bratherton BEng, CEng, M.I.C.E. of Bratherton Park Design Consultants. Mr Bratherton’s Proof of Evidence critiques the overall lodge park design and the proposed lodges, from an industry perspective in terms of how such facilities operate in practice; and
 4. Energy Proof of Evidence prepared by Paul Young BEng (Hons) CEng MCIBSE of Futureserv.
- 2.15 In assessing the acceptability of the Appeal Scheme I also draw upon the conclusions of the following Technical Statements which are appended to this Planning Proof of Evidence:

1. Landscape Statement (**Appendix 1**) Prepared by Rob Moore BA (Hons) Dip LA CMLI and John Willerton BA (Hons) Dip LA CMLI of Planit;
2. Ecology Statement (**Appendix 2**) Prepared by Jeremy James MSc BSc (Hons) CEcol CEnv MCIEEM of Bowland Ecology; and
3. Economic Benefits Statement (**Appendix 3**) prepared by Darren Wisner BA (Hons) MA(Econ) of Darren Wisner Consulting

3 BACKGROUND TO LAVER LEISURE AND ITS VISION FOR MONEYSTONE PARK

3.1 This Chapter provides the background to The Appellant and the vision for Moneystone Park.

Background and Experience

3.2 The Appellant, Laver Leisure is an experienced holiday park developer and operator and has been established since 1962. Laver Leisure owns 13 holiday parks across England which provide over 1,800 holiday homes. Within their portfolio of holiday parks, Laver Leisure provides a range of holiday accommodation which is predominantly seasonal seaside holiday accommodation in holiday homes.

3.3 Laver Leisure's proposals for Moneystone Park would provide a diversification to their existing holiday home/beach orientated holiday offer via the delivery of what is intended to be a high-end high-quality leisure development at Moneystone Quarry (now known as Moneystone Park), which will provide a premium offer targeted at the top end of the leisure market for lodge accommodation.

3.4 The existing Laver Leisure offer is traditional family holidays in holiday homes located in a seaside environment, which is very much a 'seasonal' product. All Laver Leisure Parks have direct access to the beach. Laver Leisure want to diversify their offer to include high quality inland lodge parks, which can operate all year round. It is intended that Moneystone Park will be the 'flag ship' inland lodge park offer. Moneystone Park is intended to be operational throughout the year and to service a different sector of the leisure market to the seaside parks. It is situated in a very central location within the UK, with more than 50% of the UK population located within 2 hours drive time, giving it ideal demographics to operate all year round.

3.5 The Leisure Development provides the opportunity for premium quality lodge accommodation housed in a high quality landscaped environment with associated ancillary buildings providing opportunities for site occupants and visitors to enjoy on site a quality food and drink offer, along with indoor leisure activities, and outdoor activities such as walking, cycling, horse riding etc. The occupants of Moneystone Park will also generate the opportunity for local businesses in close proximity to the site to create additional income and thus potential employment opportunities via visitor spend in the local economy. The facilities will be open to local residents to enjoy as well as guests to Moneystone Park.

Vision for Moneystone Park

- 3.6 Laver Leisure's vision for Moneystone Park as well as the delivery of a high-quality, sustainable leisure and tourism development, is to also provide a sensitive after use and restoration of the site following the quarry's closure. The aim is to create a leisure and tourism development which sits within Moneystone Park's landscaped setting and compliments the existing tourism accommodation, facilities and attractions in the local area.
- 3.7 It is intended that The Leisure Development will act as a catalyst for further investment in the local area, increasing economic prosperity and opportunities for employment, replacing the jobs and investment lost in the area following the closure of the quarry in 2011 in a sensitive and sustainable way.
- 3.8 Laver Leisure wishes to provide a mix of much needed quality lodge accommodation to increase the number of overnight stays in the area, which in turn will boost the local economy. Laver Leisure also proposes to deliver a range of high quality indoor and outdoor tourist facilities as well as extensive walking, cycling and bridleway provision to connect Moneystone Park with existing leisure and tourism facilities in the local area.
- 3.9 The leisure development also aims to deliver significant landscape and ecological enhancements as well as a sustainable development combining a leisure and tourism development with a renewable energy scheme in the form of a solar development, which has been implemented and is operational, generating a peak electrical output of approximately 5 MWp.

Summary

- 3.10 In summary, Laver Leisure has extensive experience in the leisure and tourism industry and is committed to delivering a high-quality leisure and tourism development at Moneystone Park which will secure significant economic, environmental and social benefits for the Churnet Valley area.

4 BACKGROUND TO THE APPEAL SCHEME

4.1 This Chapter provides the background to Moneystone Quarry, The Outline Planning Permission, and The Reserved Matters Application which is the subject of The Appeal.

Background to the former Moneystone Quarry

4.2 The former Moneystone Quarry has a complex planning history which is set out at **Appendix 4**. The quarry operation at the site was a significant local employment generator, however the refusal of a proposed extension to the quarry in 2007 resulted in its closure in March 2011. A planning permission granted in relation to Quarry 3 in 1998 required a restoration plan for the aftercare of the quarry.

4.3 The baseline position for the assessment of the outline planning application (to which The Reserved Matters Application relates) was the quarry in a form following restoration. The current restoration plan was approved on 6 March 2014. In the event that The Outline Planning Permission and The Reserved Matters Application are not implemented, there will remain an underlying obligation for The Appellant to deliver the restoration consent, hence restoration is an assumed future baseline against which The leisure Development has been judged throughout.

4.4 Laver Leisure acquired the former Moneystone Quarry in 2010 with the vision of delivering a high-end, high-quality leisure and tourism development, which would deliver significant economic, social and environmental benefits for the Churnet Valley area. Laver Leisure and its advisors worked closely with Officers at SMDC during the preparation of the Churnet Valley Masterplan SPD, which identifies Moneystone Quarry as an Opportunity Site for Leisure and Tourism development.

Background to The Outline Planning Permission

4.5 Outline Planning Permission (ref. SMD/2016/0378) was approved on 26 October 2016 for a high quality leisure and tourism development on The Appeal Site and remains extant. The Outline Planning Permission has the following description of 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)."

Main Issues Addressed at the Outline Stage

4.6 The main issues that were considered by The Council in the determination of The Outline Planning Application, and the conclusions reached (as outlined within the Officer Report), were as follows:

1. **Principle of the proposed development:** the Council confirmed that the proposed use of The Appeal Site for a leisure development subject to conditions imposed on the outline consent and section 106 agreement is acceptable in principle (N.B. it is agreed that The Appeal Scheme accords with the Parameters Plan that was approved at the outline application stage (Dwg Ref: PL1088.M.110 rev 6) (C/D Ref 1.2) which reflects the principle of development that was approved).
2. **Traffic and access:** following consideration of the submitted Transport Assessment and Travel Plan, the Council concluded subject to conditions that the development could be satisfactorily accommodated on the local highway network and that there would be no unacceptable highway safety or capacity impacts. (N.B. it is agreed that the Appeal Scheme accords with the access plans that were approved at the outline application stage, namely the Eaves Lane Access Plan (Dwg Ref: PB5196-0100 rev C) (C/D Ref: 1.4) and the Proposed Layout of A52 Whiston Eaves Lane Junction Plan (Dwg Ref: PB1608/SK001 rev C) (C/D Ref: 1.6)).
3. **Landscape and visual impact:** having regard to the submitted Landscape and Visual Impact Assessment, the Council concluded that the proposed scheme could, subject to reserved matters, be delivered without unacceptable landscape or visual impact in accordance with the maximum building heights set out within the approved Parameters Plan (C/D Ref 1.2).
4. **Ecology:** following consideration of the submitted Ecology Assessment, the Council concluded that, with appropriate conditions, the proposed development would be acceptable in terms of its impact on matters of biodiversity and would in fact achieve a significant biodiversity enhancement.
5. **Archaeology:** following consideration of the Archaeological Desk-Based Assessment, the County Archaeologist raised no objection to the proposed development, subject to conditions that were imposed on the outline consent.

6. **Built Heritage:** the Council concluded that the development could be implemented without causing more than “less than substantial” harm to the setting of the Grade II Listed Little Eaves Farm, which would be outweighed by the public benefits of the scheme.
7. **Flood Risk:** following consideration of the submitted Flood Risk Assessment, the Council concluded that, subject to appropriate conditions imposed on the outline consent, the development would be in compliance with both national and local planning policy with regard to flood risk.
8. **Ground conditions / contamination:** following a review of the submitted Contaminated Risk Assessment, the Council’s Pollution Officer concluded that it was unlikely that any identified contamination would be prohibitive to the Development, but that full and detailed intrusive ground investigations will be required to investigate (and remediate) the identified possible pollution linkages, which were secured by condition on the outline consent.
9. **Air quality:** the Council’s Pollution Officer accepted the conclusions of the submitted Air Quality Assessment, which demonstrated that any air quality impact caused by increases in vehicular traffic flows at sensitive receptors would be negligible.
10. **Minerals:** the County Minerals Officer considered the submitted material in respect of mineral sterilisation and raised no objection to the application.
11. **Waste management:** The County Waste Officer and Environmental Health Officer raised no objection to the application, subject to a condition ensuring sufficient provision is made for the management of wastes within the site which was imposed on the outline consent.
12. **Residential Amenity / Noise:** following a review of the submitted Noise and Vibration Assessment, the Council’s Environmental Health Officer raised no objection and concluded that, subject to conditions to mitigate and control noise levels both during construction and operation, the development was acceptable in terms of noise and amenity. Those conditions were imposed on the outline consent.
13. **Public Rights of Way:** the Council concluded that the development had the potential to enhance the local network and increase the connectivity and accessibility of the site for pedestrians, cyclists and horse riders, and that the detail and delivery of these routes could be secured by condition which was imposed on the outline consent. No objection was raised on this issue by the Highways Authority.

4.7 All of the above issues were addressed at the outline application stage, such that they are not relevant to the consideration of The Appeal, apart from where they were the subject of a planning condition attached to the outline consent which specifically required the submission of additional information for determination at the reserved matters stage (as listed below in the sub-section headed “Matters Requiring the Submission of Further Information at the Reserved Matters Stage”).

Matters Reserved for Future Approval by The Outline Planning Permission

4.8 Means of access (covering accessibility and capacity for all routes to and within the Appeal Site, as well as the way they link up to other roads and pathways outside the Site) was approved at the outline planning application stage and that the only detailed matters to be determined through the Reserved Matters Application, which are therefore relevant to the Appeal, are as follows:

1. Layout
2. Scale
3. Appearance
4. Landscaping

Plans, Drawings and Documents Approved by The Outline Planning Permission

4.9 The following plans and documents were approved as part of The Outline Planning Permission, as listed by planning condition no. 4:

1. Red Line Location Plan (Dwg Ref: DPL1088.M.106 rev 3) (C/D Ref: 1.1.): defining the outline application boundary.
2. Parameters Plan (Dwg Ref: PL1088.M.110 rev 6) (C/D Ref 1.2): defining the boundaries of the various activity zones to be created within the site as part of the Development (including areas of retained landscaping and woodland), maximum building heights within these zones, buildings to be retained and vehicular access points.
3. Character Areas Plan (Dwg Ref: PL1088.M.113 rev 3) (C/D Ref: 1.3): defining the boundaries of the various character areas within the site, namely the Hub Area, Quarry 1 – 3 lodge areas and the activity landscape area.
4. Eaves Lane Access Plan (Dwg Ref: PB5196-0100 rev C) (C/D Ref: 1.4): showing the approved arrangements for accessing the Site, including a “no right turn” junction that

has been designed to prevent visitors from exiting the scheme onto Carr Bank and ensuring traffic would be directed to and from the site via the A52 to the north.

5. Proposed Layout of A52/Whiston Eaves Lane Junction (Dwg Ref: PB1608/SK001 rev C)(C/D Ref: 1.5): showing the approved details of the off-site highway works required at the junction of Whiston Eaves Lane and the A52.
6. Existing and Restored Landscape Plan (Dwg Ref: PL1088.M116 Rev 1) (C/D Ref: 1.6): defining the areas of existing and restoration broadleaved woodland within and outside of the application site that will be managed in accordance with a Restoration Plan.
7. Environmental Statement (Moneystone Park) (June 2016) (C/D Ref: 1.29 to 1.78): assessing the likely significant environmental impacts of the Development and where necessary proposing mitigation measures to protect the environment or to reduce and significant adverse impacts. An Addendum to the Environmental Statement has been prepared by The Appellant and was submitted to PIN's on 27 August 2024.
8. Design and Access Statement (Moneystone Quarry) (June 2016) (C/D Ref: 1.22): all future reserved matters applications should be in accordance the design principles contained within the Design and Access Statement.

Illustrative Plans and Drawings submitted with The Outline Planning Application

- 4.10 A number of illustrative plans and drawings were submitted in support of the outline planning application including an overall illustrative masterplan, illustrative site sections, illustrative detail plans or the various proposed areas and illustrative proposed landscaping.
- 4.11 These illustrative plans and drawings were submitted on a "not for approval" basis to provide an indication of how the Development might be brought forward at the reserved matters stage, in accordance with the approved outline parameters.
- 4.12 No illustrative plans and drawings were approved at the outline application stage (with the exception of the illustrative Footpath Connection Plan PL 1088 M004 Rev 3 [C/D Ref: 1.20] which is referenced by planning condition 12) and they are therefore not to be taken as binding in the determination of the Reserved Matters Application.

Other Matters Approved by The Outline Planning Permission

- 4.13 The following other matters were approved by the Outline Planning Permission:

1. The total gross external floorspace of the uses permitted within the buildings and maximum areas of other uses to be located within the Multi Activity Hub Area (as defined by condition no. 6).
2. The total gross floorspace of the uses permitted within the buildings located within the area identified as Water Sport Hub Area (as defined by condition 7).
3. The maximum number of lodges (as defined by condition 8).
4. The minimum height of any floor level above ground level (as defined by condition 30)

4.14 The Reserved Matters Application is in accordance with these parameters.

Matters Requiring the Submission of Further Information at The Reserved Matters Stage

4.15 Several conditions were attached to the outline planning permission which required the submission of further information at the reserved matters stage for consideration as part of the reserved matters application. These conditions were as follows:

1. Condition 1: requiring the submission and approval of reserved matters relating to the layout, scale, appearance and landscaping of the Development.
2. Condition 9: requiring the submission of an Ecological and Arboricultural Assessment of any development proposed in any of the "Areas of Retained Landscape".
3. Condition 11: requiring submission of detailed site and ridge levels (existing and proposed), details of all engineering works and details of volumes of material to be disposed off-site.
4. Condition 14: requiring all reserved matters applications to be in accordance with the principles contained within the Design and Access Statement submitted in support of the outline planning application and incorporating the mitigation measures from table 8.9 of the LVIA presented within the Environmental Statement. Chapter 11 of my evidence contains a detailed assessment of the extent to which the Appeal Scheme complies with these principles.
5. Condition 27: requiring the first reserved matters application to include a statement of general principles for the disposal of foul and surface water.
6. Condition 41: requiring a full Arboricultural Impact Assessment to accompany the first reserved matters application.

7. Condition 44: requiring the first reserved matters application to be accompanied by a comprehensive Structural Landscape Strategy.
- 4.16 All relevant information required by the above conditions was submitted in support of The Reserved Matters Application.

Background to the Reserved Matters Application

Phase 1 Reserved Matters Application (Submitted October 2019)

- 4.17 Laver Leisure submitted the Reserved Matters Application at the Appeal Site on 21 October 2019. The application was given application reference SMD/2019/0646 and had the following description of development:

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

Pre-Application Consultation

- 4.18 Prior to the submission of the reserved matters planning application, the Appellant carried out extensive pre-application consultation with SMDC. Several pre-application meetings were held between November 2018 and July 2019 between Laver Leisure, SMDC and the project team.
- 4.19 Section 5 of the Supporting Planning Statement (October 2019) (C/D Ref: 2.92) prepared by Asteer Planning and submitted with the Reserved Matters Application summarises Laver Leisure's pre-application consultation approach, the feedback received and Laver Leisure's response.

Phasing Plan

- 4.20 To discharge Condition 5 of the Outline Planning Permission, the Reserved Matters Application was supported by a Phasing Plan (Drawing ref: 1733-MS-021 Rev 5)/ (C/D Ref: 2.68) which split the overall Moneystone Park site into two main phases – Phase 1 to the south of Eaves Lane and Phase 2 to the north of Eaves Lane.

- 4.21 The plan also separated the Phase 1 Site into sub-phases which included, Phase 1(a), Phase 1(b), Phase 1(c), Phase 1(d), Phase 2(a) and Phase 2(b) as follows:
1. Phase 1 (a): extending from the centre of the Phase 1 site southwards. This sub-phase will consist of a collection of 73 lodges in the northern extent of the sub-phase located around the larger existing lagoon. Phase 1(a) will also include a Quarry Park, Hub building, play areas. The existing administration building will be refurbished for maintenance and housekeeping and the existing storage building will also be retained.
 2. Phase 1 (b): Extends along the northern portion of quarry 3 and will consist of 38 lodges. The layout retains an undeveloped area to the northeastern corner of the lagoon which will enable a Watersports Centre to come forward as part of a future reserved matters application (now the subject of Phase 2).
 3. Phase 1 (c): Extends along the southern portion of Quarry 3 and will consist of 30 lodges.
 4. Phase 1(d): Lies within the northeastern corner of Phase 1. This area will consist of 49 lodges around the smaller existing lagoon.
 5. Phase 2 (a) and (b): consisting of 60 lodges.

4.22 The Reserved Matters Application covers the Phase 1 proposals.

Non-Statutory and Statutory Consultee Responses

- 4.23 The Officer's Report (C/D Ref: 6.2) recorded the consultation responses in the Reserved Matters Application from consultee organisations, and these are summarised below:
1. Conservation Officer – No objection subject to conditions
 2. Staffordshire Wildlife Trust – No objection subject to conditions
 3. Environmental Health Officer – No objection, subject to discharge of environmental protection conditions of outline consent
 4. Waste – no objection
 5. Local Highway Authority – no objection
 6. Local Lead Flood Authority ('LLFA') – no objection
 7. Environment Agency – no objection

8. Severn Trent Water – no objection
9. Trees and Woodland Officer – no objection, subject to conditions
10. Woodland Trust – no objection
11. Forestry Commission – no objection, subject to conditions
12. Natural England – no objection, subject to conditions
13. Historic England – no objection
14. Staffordshire Moorland Bridleways Group – no objection
15. Police Architectural Liaison Officer – no objection, subject to conditions
16. Staffordshire Fire and Rescue Services – no objection
17. Churnet Valley Conservation Society – objection
18. Oakamoor Parish Council – objection
19. Kingsley Parish Council – objection
20. Cotton Parish Council - objection

Determination of The Reserved Matters Application (October 2023)

- 4.24 The Committee Report (C/D Ref: 6.2) provided the following concluding assessment in respect of the Reserved Matters Application:

“The principle of a leisure development on this site was established by the grant of outline planning permission in October 2016 under SMD/2016/0378. Access was also approved at that time. This application comprises the reserved matters of layout, scale, appearance and landscaping for Phase 1 of the development.

For the reasons set out above and following various revisions to the plans the details are now considered to be acceptable and in accordance with relevant parts of Policies SS11, DC1, DC2, DC3, NE1 and NE2. There is compliance with the Development Plan. There are no material considerations which indicate that the decision should be made other than in accordance with the Development Plan.”

- 4.25 In accordance with the above, SMDC recommended the application for approval at SMDC’s Planning Application Committee on 26 October 2023.

4.26 The Reserved Matters Application was however, refused contrary to officer's advice at SMDC's Planning Committee on 26 October 2023. A total of 7 members voted against the application which outweighed 5 member votes for approval. The final Decision Notice was issued on 14 November 2023 (C/D Ref: 6.8).

4.27 The 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"

4.28 Breaking the reason for refusal down it alleges:

1. That the concern relates **only** to design of the lodges – not other aspects of the reserved matters application such as the hub building, nor layout.
2. That the lodge designs are said to be no more than 'caravans with cladding' and are not of a high standard of design.
3. That the lack of quality arises from:
 1. Choice of materials;
 2. Lack of green roofs;
 3. Lack of creativity and detailing.
4. The design is out of keeping with the sensitivity of the site – which includes Whiston Eaves SSSI.
5. Accordingly, there is conflict with SS1, SS11, DC1 and E4 of the adopted Local Plan, as well as the National Planning Policy Framework ("NPPF").

4.29 To seek clarification and agree what the reason for refusal relates to, I wrote an email to Mrs Jane Curley, Senior Planning Officer (Majors and Commercial) and Case Officer for the application on 27 March 2024. My email stated:

"...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?..."

4.30 Mrs Curley responded to the email on 28 March 2023, and stated:

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

4.31 A copy of the email trail is provided at **Appendix 5** of this Proof of Evidence.

Full Planning Applications for Surface Water Outfall (November 2019 & January 2022)

4.32 Alongside The Reserved Matters Application, a full planning application was submitted to SMDC on 29 November 2019 for the following development at the Appeal Site:

"Proposed construction of surface water outfall associated with Moneystone Park leisure development."

4.33 Following the submission of this application, there was extensive dialogue involving Natural England, the Environment Agency, Laver Leisure and their advisors JBA, Abbeydale BEC and Bowland Ecology to discuss the technical requirements, design, and location of the surface water outfall. This resulted in the location of the outfall being moved further east when compared to the principle for the outfall location proposed as part of the original application.

4.34 The original outfall application ref: SMD/2019/0725 was therefore withdrawn and another full planning application (C/D Ref: 4.1) was then submitted to SMDC on 11 January 2022 for the following development at the site:

"Proposed construction of a revised surface water outfall associated with Moneystone Park leisure development and engineering operations to infill the existing outfall structure."

4.35 Although the revised outfall proposals had the potential to affect the SSSI, it was ultimately accepted by the Council that the outfall proposals would in fact secure a betterment to the SSSI. The revised outfall application (Ref: SMD/2022/0014) was recommended for approval by SMDC Officers within the accompanying Officers Report

(C/D Ref: 6.2). This application was approved at SMDC's Planning Committee on 26 October 2023 and the final Decision Notice (C/D Ref: 6.9) was issued on 28 November 2023.

Full Planning Application – Change of Use of Existing Laboratory Building (November 2019)

4.36 A full planning application was submitted to SMDC on 27 November 2019 for the following development at the Appeal Site:

“Retention of former laboratory building and change of use to a sports hall with climbing wall, soft play area, two-lane mini bowl, cinema room; craft room and craft store, bike store and maintenance and bike hire office, cafe, viewing area, WCs, management office and plant rooms associated with Moneystone Park external alterations and reconfiguration of existing car park to provide 24no. car parking spaces.”

4.37 The purpose of this application was to provide additional facilities within the existing former laboratory building to form part of The Leisure Development. This was a variation on the original scheme and intended to reuse a perfectly serviceable building for a complimentary after use, in a manner which did not involve wasting the embodied carbon.

4.38 Paragraph 8.6. of the Committee Report (C/D Ref: 6.2) outlines SMDC's support of the high-quality design of the former lab building, specifically:

“The proposal largely works with the existing building. Some existing windows and doors are removed where internal uses necessitate, and three small extensions are proposed as described above. No objection is raised to these. One relates to the provision of a feature entrance and lobby created from an existing roller shutter door opening on the northwest elevation. This becomes the main entrance and focal point to the building, and it is considered to link well with the main hub building of the adjacent leisure scheme. Existing ducts and flues are removed and the whole building re clad in a mix of timber cladding and black profile sheeting with dark grey aluminium window frames and doors. The DAS explains that the design rationale is to change the appearance from ‘industrial’ to ‘agricultural’. Although an ‘agricultural’ appearance is not necessarily considered to be the outcome of the proposed changes, the proposed alterations and materials are considered to be acceptable and as the DAS says will visually tie in with the materials proposed for buildings in the reserved matters application for the adjacent leisure scheme. Subject therefore to a condition to secure an appropriate colour for the metal sheeting and samples of materials, the design is acceptable and there is compliance with Policy DC1 of the Local Plan and the NPPF.”

4.39 This application was recommended for approval by SMDC Officers within the accompanying Officers Report (C/D Ref: 6.2) and was approved by SMDC's Planning Committee on 26 October 2023. The final Decision Notice (C/D Ref: 6.10) was issued on 10 January 2024.

4.40 The planning permission is linked to the refused Appeal Scheme by condition 3, which states:

3. The development hereby permitted shall only be used and operated as a facility of the adjacent leisure scheme permitted under SMD/2016/0378 and shall not at any time be sold, let or used as an independent standalone facility.

Reason:- In the interests of highway safety and the and the integrity of the Approved Restoration Plan for the site.

Tourism Strategy for Staffordshire Moorlands 2022-2027 (February 2023)

4.41 The most up to date local Tourism Strategy (C/D Ref: 7.2) identifies the Council's vision, key priorities for growth and action plan for tourism delivery in the Staffordshire Moorlands over the next five years. The four key priorities identified for growth in the strategy are:

1. **Alton Towers** - unlocking investment to create a year-round driver of visits;
2. **Towns & Villages** - animated hubs with distinct food & drink to increase dwell times;
3. **Active Experiences** - developing cycling and walking routes, trails and events; and,
4. **Accommodation** - expand, improve and encourage investment.

4.42 A key aim of the strategy is to leverage further investment in attractions and accommodation which will help Staffordshire Moorlands to become a year-round destination attracting higher value visitors that create quality jobs.

4.43 It seeks 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. This will be achieved by unlocking private sector investment with a clear policy framework that encourages suitable accommodation development and improvement in Staffordshire Moorlands.

- 4.44 A draft version of the Tourism Strategy was recommended for approval at SMDC's Cabinet Meeting on 25 January 2023 (Report at C/D Ref: 7.1). The Strategy was formally adopted in February 2023.

Phase 2 Reserved Matters Application (October 2023)

- 4.45 A reserved matters application for Phase 2 of The Leisure Development at Moneystone Park for the remaining balance of 60 lodges to the north of Eaves Lane was submitted to SMDC on 20 October 2023 for the following development:

"Reserved matters application proposing details for the appearance, layout, scale and landscaping for Phase 2 of the leisure development comprising 60 lodges, archery centre and watersports centre, internal roads and car parking and hard and soft landscaping"

- 4.46 This application was validated by SMDC on 16 November 2023 and is currently pending determination.
- 4.47 The timescale for the submission of any further reserved matters approvals (as permitted by the outline consent) has now lapsed.

5 THE APPEAL SITE

5.1 This Chapter describes the Appeal Site and the surrounding area.

The Site

- 5.2 Eaves Lane bisects the former quarry forming a northern and southern area. The southern area comprises Quarry 1 'The Hub' and Quarry 3 'The Lake' and the northern area comprises Quarry 2 'The Upper Lakes'.
- 5.3 The Appeal Site encompasses Quarry 1 and Quarry 3 and is shown on the Site Location Plan (C/D Ref: 2.1). Quarry 2 is located to the north of Eaves Lane and is subject to a separate reserved matters application (Ref: SMD/2023/0532) for 60 lodges which represents Phase 2 of The Leisure Development. The Phase 2 reserved matters application was submitted in October 2023 and is pending determination. The resultant scheme would result in a total of 250 lodges and a range of ancillary and incidental elements - all of which would come together as a high quality leisure development with accommodation in a location which is considered to be appropriate for such a use.
- 5.4 Quarry 1 'The Hub' is located to the south of Eaves Lane. It comprises the former processing and production area of the quarry, two lagoons and woodland. The plant within the former 'production area' has now been dismantled and removed from the site. The remaining buildings on site include Sibelco UK's vacant former laboratories; vacant former offices and an electricity substation. Further south from this area, the existing road leads down as the ground drops away to the old Churnet Valley Railway line at the bottom of the valley. This area of the site contains areas of woodland and existing water pools. An Extract from the Site Masterplan - Hub Building Area (C/D Ref: 2.8) is shown below at **Figure 1**.



Figure 1: Hub Building

5.5 Directly to the south of Eaves Lane the ground drops away more steeply to the base of Quarry 1. There are some areas of woodland planting around the rear of the quarry and an existing lake to the south. The second basin in Quarry 1 is slightly higher in elevation with a small embankment leading up to another pool of water. There is woodland planting to the rear of the quarry, before the quarry walls steeply climb up to Eaves Lane. Extract's from both the Quarry 1 West Masterplan (C/D Ref: 2.10) and Quarry 1 East Masterplan (C/D Ref: 2.11) are shown below at **Figure 2** and **Figure 3**:



Figure 2: Quarry 1 (West)



Figure 3: Quarry 1 (East)

5.6 Quarry 3 'The Lake' is located to the south of Eaves Lane. It comprises a former mineral extraction area. It is characterised by a lake with surrounding areas of scrub and mature tree plantings. A track leads down into the historic quarry from the existing access road. The quarry walls drop at a steep gradient to the lake. The level of the lake will be maintained by the recently consented outfall. There is a small ridge cut into the quarry

wall halfway down its length. This runs around the quarry at approximately the same height all the way around. Vegetation around the quarry walls has now begun to establish. There is an existing landscape bund which runs the majority of the length of the top of the quarry adjacent to Eaves Lane. An Extract from the Quarry 3 Masterplan (C/D Ref: 2.9) is shown below at **Figure 4**.



Figure 4: Quarry 3

Surrounding Area

- 5.7 The locality of the Appeal Site is predominantly rural in nature with a scattered settlement pattern. The predominant land use around the quarry is pasture however quarrying has been a major feature within the immediate locality since at least 1948.
- 5.8 The Appeal Site is located in close proximity to a number of national and local tourist attractions, all of which are well connected by principal transport routes, such as the A52 or via bridleways, public footpaths and cycle routes. These include, but are not limited to the following:
 1. **Whiston Hall Hotel:** a Victorian Hall, built in 1850 with an 18 hole golf course is situated to the immediate north west of the site;

2. **Churnet Valley Railway:** located approximately 4km north west of the site. The railway is located at Cheddleton Station and links Leek Brook to Froghall. There are numerous linkages to the station via either the A52 or the A520 or via public footpaths such as the Staffordshire Way which runs through the Churnet Valley;
 3. **Alton Towers Theme Park and Resort:** located approximately 3km south east of the site. The latest figures show that over 2,300,000 people visited the attraction in 2022-23.
 4. **Foxfield Steam Railway:** located approximately 11km south west of the site. This is a heritage steam railway linking Blythe Bridge to Godleybook. Road linkages are from the A52 and the A521; and
 5. **Sudbury Hall:** located approximately 16km south east of the site towards Ashbourne. This is a National Trust site and houses a Museum of Childhood and numerous landscape gardens. Linkages via the A52.
- 5.9 In addition to these major attractions, there is also a range of Public Right of Ways and bridleways in the vicinity of the Appeal Site which are used for recreational use and a range of other smaller attractions and leisure activities. The Appeal Scheme proposes a series of connections to the existing PROW's in the surrounding area.

Access

- 5.10 The Appeal Site is accessed via Eaves Lane, which connects the villages of Whiston to the north and Oakamoor to the south east of the site. At Whiston, Eaves Lane joins the A52 which is a strategic route connecting Stoke-on-Trent to the west and Ashbourne to the east. Blakeley Lane is located adjacent to the north eastern boundary of the Appeal Site which joins Eaves Lane to the east of the existing Crowtrees Farm access. There are a number of cycle and footpath links running through the Appeal Site and in the immediate vicinity as shown on the Footpath, Cycleway and Bridleway Plan (C/D Ref: 2.56) at **Figure 5** below.

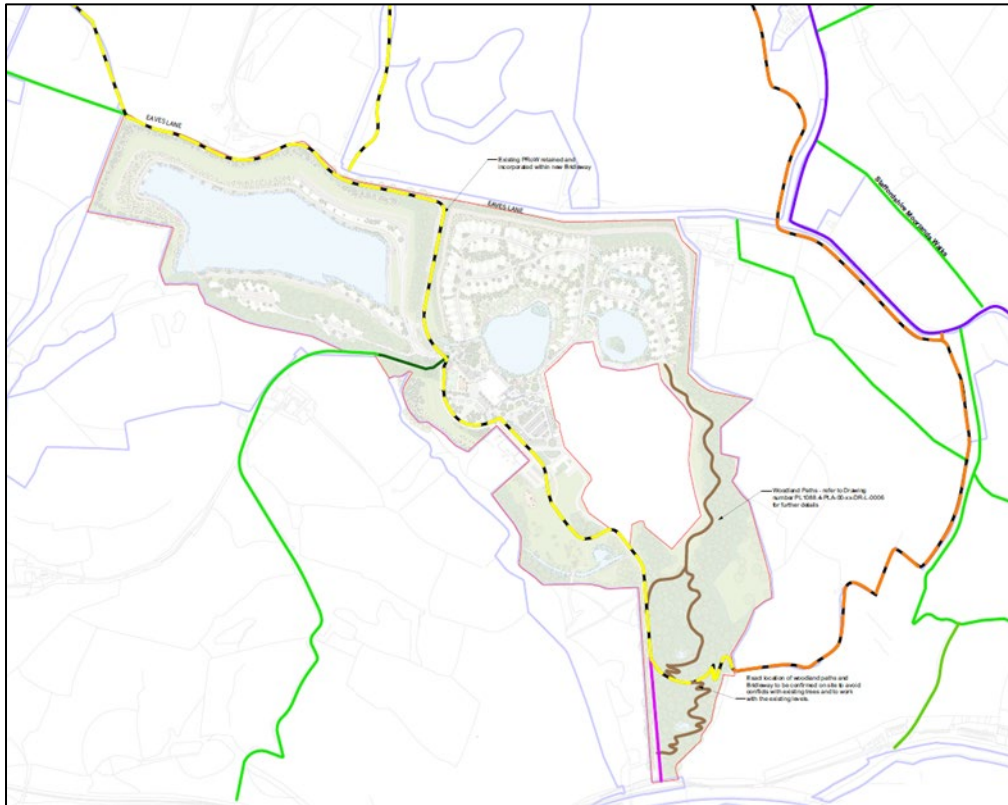


Figure 5: Footpath, Cycle Path & Bridleway Plan

- 5.11 Direct access into The Appeal Site was approved under the revised outline planning permission in October 2016. The Eaves Lane Access Plan (C/D Ref: 1.5) is listed as an approved plan under Condition 4 of the Decision Notice for the outline planning permission (C/D Ref: 6.5).
- 5.12 The permitted site access is taken from the existing access from Eaves Lane. A "no right turn" junction has been designed to prevent visitors from exiting the scheme onto Carr Bank. Traffic would be directed to and from the site via the A52 to the north.

6 THE PROPOSED DEVELOPMENT (THE APPEAL SCHEME)

6.1 The Appeal Scheme proposes 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 Appeal Scheme Masterplan is shown at C/D Ref: 2.7.

Quarry 1

6.2 Quarry 1 encompasses the eastern and western lagoon and seeks to provide a total of 122 lodges. New roads, car parking with each lodge, footpaths and cycleways will also be constructed.

6.3 This area will also provide a Quarry Park and 4 no. natural areas of play. High quality landscaping is proposed including extensive enhanced planting to the site's eastern boundary.

6.4 The Masterplan for Quarry 1 is shown at C/D Ref: 2.10 and C/D Ref 2.11.

Quarry 3

6.5 Quarry 3 will consist of 68 lodges embedded in high quality landscaping. New roads, car parking with each lodge, footpaths and cycleways will also be provided.

6.6 A bridge to the south-western corner of the lagoon is also proposed.

6.7 The Masterplan for Quarry 3 is shown at C/D Ref: 2.9.

Hub Area

6.8 The proposed hub area will consist of a central hub building including a swimming pool, restaurant/bar, gym, spa and treatment rooms, cafes, external terrace and seating areas, a farm shop, visitor centre and games area. The hub building will also accommodate a reception area with associated hub management area, toilets, plant rooms and service area. The hub area would also accommodate a 110-space car park and 24-space check in car park.

6.9 The hub area would also to seek to retain and make external alterations to the existing administration building and storage building on site. The administration building will include offices, staff meeting rooms, laundry and housekeeping rooms and storage facilities. The storage building to the south of the administration building would accommodate storage and maintenance facilities.

- 6.10 The hub area also seeks to provide a Multi-Use Games Area ('MUGA'), children's play area and adventure play area, roads, footpaths, and cycleways and high-quality landscaping features.
- 6.11 The Hub Area Masterplan is shown at C/D Ref: 2.8.
- 6.12 As set out in Chapter 2 of my evidence, there is no objection from SMBC to the layout and disposition of the lodges, nor any objection in respect of the hub building - rather their objection is focused solely upon the appearance of the individual lodges.

7 INFORMATION REQUESTED BY THE INSPECTOR

- 7.1 On 1 August 2024, the Inspector issued a note identifying additional points to be included in the evidence to be submitted in advance of the Public Inquiry. On 2 September 2024, a letter was sent on behalf of The Appellant to the Inspector providing a response to each of the points and is provided at **Appendix 6**.
- 7.2 This Chapter also provides a response to each of the points raised by the Inspector in the 1 August 2024 letter.

Compatibility with the Definition of ‘Caravans’

- 7.3 The Inspector has asked why it is necessary for the proposed lodges to be compatible with the definition of ‘caravans’. This was a matter which has been referenced from the outset of The Appeal Scheme and was set out in pages 21 to 22 of the Phase 1 Reserved Matters Design and Access Statement (C/D Ref 2.85).
- 7.4 In addition to the Inspector’s question, I consider that the Council has misinterpreted the Appellant’s Statement of Case. In particular it has alleged that it is the Appellant’s position that the need for the design of the lodges to fall within the requirements of the Caravan Act has been a “key design driver”. With respect that is not and has never been the Appellant’s position. To the contrary, the proposed lodges have been designed to respect the character of the surrounding area and the principles contained within the Outline Planning Permission Design and Access Statement as required by Condition 14 of The Outline Planning Permission. The strategy for the design and erection of the lodges at Moneystone is consistent with the approach successfully implemented in numerous high-quality lodge parks that have been delivered, and continue to be delivered, across the UK.
- 7.5 During the design process, it was decided that the proposed holiday lodges at Moneystone Park would be designed so as to be compatible with the statutory definition of ‘caravans’ as provided by Section 29 (1) of the Caravan Sites and Control of Development Act 1960, as supplemented by Section 13 (1) of the Caravan Sites Act 1968 (as amended). This compatibility has the following advantages:
1. **Procurement** – the method of procurement is more efficient to construct lodges which fall within the statutory definition of ‘caravans’ because the process reduces a) waste, b) on site construction time, c) noise, and d) the number of deliveries to site. It represents a low impact form of development and the proposed method of modular construction is faster and more efficient than traditional construction methods, thereby reducing the extent of embedded carbon associated with The Appeal Scheme.

2. **Environment** – it would allow all of the proposed lodges to be factory built and transported to site by road on a low loader. This is the typical approach taken to lodge parks of this nature. 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. Once positioned, the base of the lodges will then be concealed using what is termed a 'skirt', using the same material to the exterior of the lodge in question. This is so that the chassis cannot be viewed, and so it will create the clear impression that the lodge is constructed as a building in the conventional manner. There are significant sustainability benefits to prefabricating the construction of the lodges. Furthermore, as the lodges are placed onto a concrete pad (a principle set out on page 57 of The Outline Planning Permission Design and Access Statement), they are not permanently affixed to the ground. Lodges typically have a finite lifespan and this approach allows the lodges to be easily replaced, without the need for demolition and rebuilding. It also enables ready access to the base of the lodge for maintenance purposes.

7.6 Mr Bratherton goes on to address this point in his Design Quality Review Proof of Evidence and explains that 'caravans' within the Act's scope do not require Building Regulation Approval, instead are controlled by British Standard 3632 (BS 3632), which would enable a rapid delivery of the project, without impacting negatively on standards of build quality and sustainability.

7.7 Holiday lodges compliant with the relevant Caravan Acts are specifically designed and constructed to provide high quality accommodation in various bedroom formats to achieve a wide mix of sizes, arrangements and configurations. External cladding/roofing and detailing will be dictated to ensure a consistent design thread across the site whilst respecting the surrounding landscape character. The quality of the lodges is fixed by the imposition of conditions upon any reserved matters appeal which will operate in addition to the requirements of the Act.

7.8 The compliance of the proposed lodges with the statutory definition of 'caravans' does not mean that the lodges to be low value static caravans or touring caravans. This appears to have been the misapprehension of Councillors. Thus, the Council in its Statement of Case strongly asserts that the design quality should not be determined by whether the proposed design of the lodges is better than static caravans or exceeds the statutory minima of the Caravan Act but whether the proposed design is high quality by reference to planning policy and guidance. The Appellant firmly agrees with this, but the Council has misinterpreted the Appellant's Statement of Case by contending that this is the Appellant's position (what I am advised is referred to in legal parlance as creating a 'straw

man argument'). In fact, the proposed lodges will be high quality lodges which respect the surrounding landscape character but have been constructed so as to meet the requirements of the Caravan Act for the reasons set out above.

- 7.9 The reason that The Appellant draws the comparison between the proposed lodges and a traditional static caravan is because there is a strong misconception that a lodge constructed under The Caravans Act is merely a traditional static caravan. This is not the case and lodges designed under 'The Caravans Act' will be of suitably high quality, not least because of the requirements of any planning consent.
- 7.10 There are important and tangible differences between a traditional static caravan and a lodge of the type proposed here. Caravans externally are rectangular metal or plastic clad modules typically in pastel colours, with a simple shallow pitched roof. External walls are approximately 60mm thick and contain minimal insulation. Often the wheels and chassis are exposed, which makes them look temporary. In contrast, lodges (as proposed under the Appeal Scheme) are either single modules or twin modules jointed together leading to a variety of forms.
- 7.11 The proposed lodges will be clad in timber and terraces are included enclosing at least two faces of each lodge. These will consist of a raised deck constructed from composite timber decking boards and timber post and glass balustrades. As the lodge floors are elevated above ground level, due to the chassis and wheels, the gap between the floor and external ground level will be infilled with solid skirting so that they read architecturally as permanent buildings. In addition, lodge interiors are of a much higher quality than caravans with walls clad in timber or plasterboard and will have kitchens and bathrooms that will be completed to an excellent domestic standard.
- 7.12 This approach was supported by SMBC at paragraph 9.46 of the Officer's Report, which states:

"Notwithstanding however that the lodges may or may not fall within the definition of a caravan, this does not prevent the Council from seeking and securing good quality materials and designs for the proposed lodges in order to secure the 'high quality' development which the applicant applied for and in line with the requirements of Condition 14. Table 8.9 of the ES referred to in Condition 14 sets out the mitigation measures to be adopted to reduce and/or avoid landscape and visual harm. It confirms that in respect of the lodges, these will be built to a high standard in order to achieve a quality development overall. It also refers to the use of timber, timber cladding, glazing and green roofs on the lodges where appropriate.

The protection of the character and appearance of the Churnet Valley is in line with Local plan policies.”

- 7.13 In summary, whilst the proposed lodges have been designed to be compatible with the statutory definition of ‘caravans’ and are based upon a structure that can be manufactured off site and transported efficiently to plots, this does not mean that the design approach is restrictive or harmful to the surrounding landscape character.
- 7.14 SMBC alleges, at paragraph 4.3 of its Statement of Case, that one of the three shortcomings in the design of the proposed lodges is that it is focused on compliance with the relevant Caravan Acts, which has restricted the design approach.
- 7.15 This is not an accurate reflection of the design process that informed the proposals for the lodges. On the contrary, and in accordance with Local Plan Policy S11, the surrounding landscape character (rather than meeting the statutory definition of ‘caravans’) was the key design driver. Mr Pullen’s Design Proof of Evidence, and Chapter 9 of my Proof of Evidence, shows that an appraisal of the landscape character of the Appeal Site and its surroundings has been a significant driver of the proposed lodges. This approach “focused” on addressing the site’s opportunities and constraints, protecting and conserving locally distinctive qualities and maximising opportunities for restoring, strengthening and enhancing the landscape setting of the Development.

Viewpoints

- 7.16 The Inspector has asked the evidence to include information on viewpoints, specifically with regard to where the Appeal Site is experienced from, how it is experienced, what the significance of these viewpoints is, and what the effect of the lodges would be.
- 7.17 These matters are addressed in detail within the Landscape Design Statement of Case by Planit (Section 8), which is provided at **Appendix 1** of this Proof of Evidence and summarised below.
- 7.18 The Environmental Statement submitted in support of the Outline Planning Application contained a comprehensive Landscape and Visual Impact Assessment (LVIA), which assessed the impact that The Leisure Development would have on the surrounding landscape and views. 17 viewpoints were assessed in the LVIA. Up to date versions of these viewpoints (including viewpoint location maps) can be found in Appendix 8.1 to the Environmental Statement Addendum that has been submitted to the Inspector. They are also contained within **Appendix 7** of this Proof of Evidence.

7.19 A summary of the impact on the Appeal Scheme on each of these viewpoints is provided in the table below. This is taken from the Environmental Statement submitted in support of the Outline Planning Application and provides an assessment at commencement of the development thereby providing a robust assessment (i.e. it is important to note it does not take account of maturing of planting over time). The Environmental Statement Addendum being submitted to the Inspector confirms that the conclusions presented in this table have not changed.

Viewpoint	Viewpoint Location	Range	Sensitivity of visual receptor	Magnitude	Significance of effect
1	View from Staffordshire Moorlands Walk public footpath	Short distance	Medium	No change	Negligible
2	View from Crowtrees Footpath	Short distance	Medium	No change	Negligible
3	View from Site Entrance, Whiston Eaves	Short distance	Low	No change	Negligible
4	View from Eaves Lane, Crowtrees, South	Short distance	Low	Minor / No change	Minor adverse / Negligible
5	View from Eaves Lane, Crowtrees, North	Short distance	Low	No change	Negligible
6	View from Cottage Farm, Eaves Lane	Short distance	Low	Minor	Minor Adverse
7	View from A521, Kingsley Holt	Long distance	Low	No change	Negligible
8	View from Wood House Farm, Lockwood Road	Long distance	Low	No change	Negligible
9	View from Oakamoor Road	Long distance	Low	No change	Negligible
10	View from Blakeley Lane	Long distance	Low	No change	Negligible
11	View from Whiston Hall	Long distance	Medium	No change	Negligible

12	View from Whiston, off Eaves Lane	Long distance	Low	No change	Negligible
13	View from A52	Long distance	Low	No change	Negligible
14	View from Ross Lane	Long distance	Medium	No change	Negligible
15	View from Blackley Lane	Short distance	Medium	No change	Negligible
16	View from Hawksmoor Wood	Long distance	Medium	Low	Minor adverse
17	View from public footpath adjacent to Little Eaves Farm	Short distance	Medium	Low	Minor adverse

- 7.20 The LVIA demonstrates that the Appeal Site is experienced from a range of short – long range views, with the developed parts of the appeal site being placed in a well landscaped, and therefore well mitigated context. Short-range views of the Appeal Site are likely to be considered sensitive due to their proximity, however this also depends on the sensitivity of the visual receptor. A number of these views are from PRow, where viewers are enjoying the fields and woodland environment with glimpse views across the landscape. Medium and/or long-range views are also likely to be considered highly sensitive, located largely within designated landscapes or from long distance recreational routes from which users are likely to be focussed on the landscape. These views are however, at a considerable distance where the Appeal Site is viewed as a component of the wider landscape context.
- 7.21 The LVIA demonstrated that The Leisure Development would result in minor beneficial effects to the local landscape character. The scheme would work 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 additional restorative measures to the quarried areas that are included in the Appeal Scheme will enhance their landscape quality, visual appearance and potential habitat and ecological value, thus contributing more positively to defining and restoring landscape character. This will result 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.
- 7.22 The LVIA also concluded that public views of the developed parts of the Appeal 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. As a result, recorded effects were predominantly negligible in significance with only 4 of the 17 assessed views being minor adverse in nature where either long range, or partially screened views of development were available that could alter the view composition or character.
- 7.23 With regards to visual effects relating specifically to the proposed lodges, the LVIA demonstrated the degree of screening available from existing trees, vegetation and landform, and how lodges were unlikely to be visible from the majority of viewpoints.
- 7.24 In the following short range views, the lodges would be completely screened:

1. View 1 – view from Staffordshire Moorlands Walk public footpath;
 2. View 2 – view from Crowtrees Footpath;
 3. View 3 – view from Site Entrance, Whiston Eaves;
 4. View 4 – view from Eaves Lane, Crowtrees, South;
 5. View 5 – view from Eaves Lane, Crowtrees, North; and
 6. View 6 – view from Cottage Farm, Eaves Lane.
- 7.25 There would be limited glimpse views of the lodges in View 17 (view from public footpath adjacent to Little Eaves Farm) beyond the main hub building.
- 7.26 A single long range view illustrated potential visibility of lodges (View 16 – view from Hawksmoor Wood), but at a considerable distance where it was difficult to see individual units and more general massing of the development was visible. All other viewpoints had no visual connection to the proposed lodges or facility buildings.

Roofing Materials

- 7.27 The Inspector has asked if grass roofs would be feasible and, if so, what their likely composition and maintenance regime would be, what their effect would be, what if any would be the effect of weathering to the proposed roofing material, what the roofscape would be seen against and what the context/background is. This also arises from the reason for refusal.
- 7.28 No 'living' green roofs are proposed as part of The Appeal Scheme. Having carefully assessed the design of the lodges it is not considered that the use of green roofs is required to make The Appeal Scheme acceptable from a landscape and visual impact perspective.
- 7.29 As noted previously, the Environmental Statement submitted in support of the Outline Planning Application contained a comprehensive LVIA, which assessed the impact that The Leisure Development would have on the surrounding landscape and views. As previously stated, the LVIA also concluded that public views of the developed parts of The Appeal 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. No significant adverse effects were identified through the assessment. Given the robust

approach to landscape and design-led mitigation, the addition of green roofs is not required to mitigate significant adverse effects from a landscape and visual impact perspective.

- 7.30 Notwithstanding the above, the provision of green roofs (in some form) could be feasible if it was determined by the Inspector that they were needed in selected locations.
- 7.31 One option in this regard would be the use of grass roofs, comprising a low maintenance wildflower of a diverse species mix, which would offer biodiversity benefits. The seed mix could be tailored depending on aspect and shading. A layer of low fertility soil (circa 80-100mm) would likely be required with a water storage layer beneath. Maintenance would be minimal and could be reduced to an annual trim. However, there are real practical maintenance difficulties which would arise due to the small roof size, for example access would not be possible and a system of strimming the wildflower “off the roof” would be required, potentially using some form of platform. Over time the impression of a degraded roofscape might be difficult to avoid therefore, and maintenance costs of avoiding such an impression would likely be disproportionate.
- 7.32 As an alternative, sedum roofs could be used, requiring similar soil depths but requiring much less maintenance. Generally, however, the wildflower roof is considered more beneficial to local biodiversity such as insects, bees and birds.
- 7.33 In terms of visual effects, wildflowers would create a greening effect up to 800mm high in summer, reducing to 100mm in autumn to spring after the annual cut. Sedum roofs are evergreen, low growing, maintaining a constant 100mm height of greening.
- 7.34 In such circumstances, the roofing structure would be fully obscured by the green roof finishes (wildflower/sedum).
- 7.35 The roofscape is set against a backdrop of existing and proposed woodland trees, understorey planting and wildflowers. A mix of both finishes could potentially be used, as follows:
1. Sedum – used on roofs adjacent exposed quarry cliffs/ existing wooded areas – Quarries create a natural habitat for sedums.
 2. Wildflower – used on roofs that are further away from cliffs, in areas that are more open – mimicking natural woodland glades/ sunny areas.

- 7.36 Although The Appellant considers the use of green roofs would be feasible, its position is that they are not required from a landscape and visual impact perspective. Furthermore, the current extensive landscape and planting proposals across The Appeal Scheme would provide the greatest benefit to local fauna and flora by connecting areas “at ground level”. Connecting landscapes in this way ensures maximum flexibility for foraging animals compared to isolated, elevated pockets that would be the roof spaces.
- 7.37 Should the Inspector consider that some green roofs were appropriate across the Appeal Site, then this could be the subject of a suitable condition, identifying which lodges would need to be fitted with such a roof and a scheme to identify the type of such roofs. However, The Appellant’s position is that a blanket requirement for such roofs across the entire site is unwarranted and unnecessary. As yet no draft wording of a condition to secure green roofs had been provided by the LPA.

Walling

- 7.38 The Inspector has requested various items of information in relation to the walling of the proposed lodges, including confirmation whether natural or synthetic timber boarding is proposed, how would it be fitted, how it would be treated, how it would be maintained, whether generic samples could be submitted to the Inquiry and whether a generic palette should be conditioned.
- 7.39 A natural shiplap cladding T+GV BB4A is proposed for the lodges, which would have a long service life (40+ years).
- 7.40 The cladding would be fitted by way of a traditional shiplap (scaloped lap joint) profile with Tongue and Groove, horizontally and vertically aligned for variation.
- 7.41 The cladding would be treated using a Western Red or British Cedar British Cedar Shiplap and oiled to help maintain longevity at factory. The objective thereafter would be to maintain the initial colour of the cedar and minimise any greying.
- 7.42 The cladding would be maintained by applying an oil and a soft wash every year, followed by recoating exposed areas every 2-3 summers. This would remove the dust and other contaminants that discolour the Cedar and retain moisture.
- 7.43 The Appellant has commissioned the production of material samples. The Appellant would intend to bring samples of this material to the inquiry itself to enable inspection, albeit that an approval of materials condition is anticipated.

- 7.44 The Appellant proposes that a palette of materials could be conditioned, with precise specimen samples submitted for approval by the LPA prior to the siting of the individual lodges on The Appeal Site. This would help to retain a consistency of appearance as The Appeal Scheme is delivered.
- 7.45 A Materials Palette (contained in **Appendix 12**) has been prepared by NBDA Architects which proposes the following materials:
- a) Wall Cladding/Treated T&G Timber: Accoya, Larch or Cedar
 - b) Roof Finish: Tile 'Lookalike' Pressed Metal Trays with a Textured Dark Grey Matt Finish
 - c) Eaves, Fascias & Rainwater Goods: Anthracite coloured Eaves/Fascias, Gutters and Downpipes
 - d) Deck Balustrade: Glass in Stainless Steel Brackets between Timber Posts
 - e) Doors & Windows: Anthracite Door & Window Frames
 - f) Composite Timber Decking: Composite Prime or Millboard

Elevations

- 7.46 The Inspector has requested clarification regarding the status of the elevational drawings submitted with The Reserved Matters Application, which are titled "indicative" but were proposed by Officers to be conditioned for compliance in the Committee Report.
- 7.47 An updated set of drawings are contained within **Appendix 8**. For clarification, the elevational drawings were submitted with The Reserved Matters Application but were in black and white. The updated elevation drawings are now provided in colour (to reflect the proposed materials), they exclude the title "indicative", and now show the location of the Air Source Heat Pumps. The Council in their Statement of Case at Paragraph 7.3 state that "*...the design of the lodges appears unchanged...*". It is understood that the Council are agreeable that the inquiry considers these drawings.
- 7.48 There are 4 lodge types and, for clarification, The Appellant is proposing that these elevational drawings, listed below, are considered for approval:
- 1. Proposed Lodges – Twin Lodge End Deck GA Plans and Elevations (drawing ref. 1733-LV-020 Rev E);

2. Proposed Lodges – Twin Lodge Side Deck GA Plans and Elevations (drawing ref. 1733-LV-021 Rev E);
3. Proposed Lodges – Single Lodge End Deck GA Plans and Elevations (drawing ref. 1733-LV-022 Rev E); and
4. Proposed Lodges – Single Lodge Side Deck GA Plans and Elevations (drawing ref. 1733-LV-023 Rev E).

7.49 The following updated site layout plans have been submitted, which have been amended to show the location of the 4 lodge types across The Appeal Site:

1. Hub Building Area Masterplan (drawing ref. 1733-MS-010 Rev E);
2. Site Masterplan (drawing ref. 1733-MS-019 Rev F);
3. Quarry 3 Masterplan (drawing ref. 1733-MS-022 Rev F);
4. Quarry 1 West Masterplan (drawing ref. 1733-MS-023 Rev E); and
5. Quarry 1 East Masterplan (drawing ref. 1733-MS-024 Rev D).

7.50 In addition, amended photomontages have also been amended (these are contained within **Appendix 9**) to ensure that they illustrate more precisely the 4 types of lodges proposed and the energy strategy which has been updated to propose air source heat pumps for each lodge rather than a combination of air source heat pumps and solar panels.

7.51 The Inspector has also asked what is proposed for the “skirt” around the lodges, and whether the wheels and/or structural base would be visible.

7.52 Unlike traditional static caravans which are often sited in such a manner as to reveal the wheels and chassis, the lodges would be provided with timber cladding skirts with gap ventilation to hide the undersides of the lodges and decks. These skirts would be formed from exactly the same timber cladding as the lodge and would be regularly retreated in a similar fashion to the lodges. The fixing would be such that the impression would be of a traditionally constructed building.

The Surroundings/Curtilages to the Lodges

- 7.53 The Inspector has requested clarity on the status of the submitted plans which are also titled “indicative”. As stated at paragraph 7.47 above, the updated set of drawings exclude the title “indicative” and are proposed for approval.
- 7.54 The Inspector has asked for clarification on how much weight should be given to the submitted photomontages. As stated above, updated photomontages (**Appendix 9**) have now been reviewed and those which have been submitted to the inquiry more accurately represent the materials and design of the proposed lodges and the proposed landscape scheme and should therefore be afforded significant weight in the determination of the Appeal.
- 7.55 The Inspector has asked how the spaces between the lodges would be maintained.
- 7.56 As set out within the Landscape Statement prepared by Planit contained within **Appendix 1** of this Proof of Evidence, a site-wide Management Team will be employed to maintain The Leisure Development, including the spaces between the lodges, which is an important element to help integrate the built form into the landscape. The Appellant acknowledges that the maintenance of the Appeal Scheme, particularly these spaces, is important to ensure the establishment of the planting through to successful maturity to retain the high quality aesthetic of the site.
- 7.57 The Structural Landscape Management Plan would be used as a guide and reviewed every 5 years to ensure this corresponds with any changes to the site and environment.

Assessment of Outline Application

- 7.58 In addition to the items requested by the Inspector in the note dated 1 August 2024, the Case Management Conference Note, which was issued on behalf of the Inspector on 18 July 2024, stated at paragraph 22 that:

“The Statement of Common Ground should clearly specify and evidence what was submitted, determined, and conditioned at the outline stage: what matters (and the accompanying plans/documents) were considered and permitted. Any indicative submissions should also be set out with suggestions on the weight they should be given.”

- 7.59 A full overview of The Outline Planning Permission has been provided at Paragraphs 4.5 – 4.16.

8 PLANNING POLICY CONTEXT

8.1 This Chapter sets out the relevant planning policy framework at local and national levels as well as other material considerations.

The Development Plan

8.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with a statutory Development Plan unless material planning considerations indicate otherwise.

8.3 For the purpose of this Appeal, the adopted Development Plan comprises the following relevant documents:

1. Staffordshire Moorlands Local Plan (Adopted September 2020) (C/D Ref: 7.3);
2. Minerals Local Plan for Staffordshire 2015-2030 (Adopted February 2017) (C/D Ref: 7.4); and,
3. Staffordshire and Stoke-on-Trent Waste Local Plan 2010 to 2026 (adopted March 2013) (C/D Ref: 7.5).

8.4 The Minerals Local Plan for Staffordshire (2015 to 2030) states that there is no longer any production of silica sand for industrial manufacturing following the cessation of quarrying at Moneystone Quarry. Whilst these documents form part of the Development Plan, the policies of the Minerals and Waste Local Plans are not relevant to the determination of this Appeal and have therefore not been considered further.

Staffordshire Moorlands Local Plan

8.5 The Local Plan was adopted on 9 September 2020 and sets out SMDC's vision and strategy for the District until 2033.

8.6 It also looks at the proposed locations for development, and policies which will be used in determining planning applications. The Local Plan covers the Staffordshire Moorlands area except for the part that lies within the Peak District National Park Authority.

8.7 The Decision Notice (C/D Ref: 6.8) states that the proposed development fails to comply with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan. Whilst it is agreed that these policies are up to date and amongst the most relevant for the determination of the Appeal, The Appellant's position is that those policies are not breached by the Appeal Scheme. This matter is considered further in Chapter 11.

Other Material Considerations

8.8 There are a series of other planning policy guidance documents at local and national levels that are relevant to the determination of this Appeal. These are summarised below.

Local Planning Policy Guidance

Churnet Valley Masterplan SPD (2014)

- 8.9 Core Strategy Policy SS7 (which has now been superseded by the new Local Plan) identified the Churnet Valley as a sustainable tourism area and stated that a Masterplan will be prepared to guide the detailed planning and management of the area. The Churnet Valley Masterplan SPD (CVM) (C/D Ref: 7.6) was adopted by the Council in March 2014 and states that it will have a major influence on future planning decisions and on other initiatives and strategies affecting the area.
- 8.10 The CVM, which was subject to extensive and prolonged community consultation over a period of 3 years prior to its adoption, identifies Moneystone Quarry as a key opportunity site. It provides an overview of the site and identifies the constraints and opportunities associated with creating a high-quality leisure development and a development strategy. The CVM states that the site represents an opportunity to create a high-quality leisure venue to complement other recreational and leisure attractions and enhance the area.
- 8.11 The CVM sets out the Development Strategy for Moneystone Quarry which is as follows:
1. New leisure development based around restoration of the quarry.
 2. The potential for a complementary renewable energy scheme on the site.
 3. 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.
 - Hub within Zone 1.
 - Recreational lake to include non-motorised water-based activities in Zone 3.
- 8.12 The CVM sets out the following General Development Principles:

1. Ensure that any future development accords with the overall strategic approach to development within the Churnet Valley.
 2. Ensure appropriate restoration of the quarry.
 3. Take a comprehensive approach to development.
 4. Must deliver economic, social and environmental benefits for area.
 5. Restoration of the quarry unless a more beneficial alternative can be justified.
- 8.13 The CVM provides guidance for the Appeal Site in relation to economic considerations, sustainable development, community, landscape and visual impact, ecology and tourism and leisure activities.
- 8.14 The CVM includes key principles and guidance for the development and management of the whole of the Churnet Valley Masterplan area. This includes consideration of the natural environment, heritage, sustainable tourism, sustainable transport, economic development, green initiatives and design principles. The CVM at section 8.7 sets out criteria which will be used to assess the design quality of proposals.
- 8.15 Figure 7.4 shows a Concept Plan for the Moneystone Quarry development and Picture 7.5 provides an artist impression of what the holiday lodges in zone 2 of Moneystone Quarry could potentially look like.

Staffordshire Moorlands Design Guide SPD

- 8.16 The Staffordshire Moorlands Design Guide SPD (C/D Ref: 7.9) was adopted by the Council in February 2018 and identifies the overarching principles in securing good design in Staffordshire Moorland's high quality natural environment, historic towns and villages. This SPD supports the emphasis of high-quality development in Adopted Policy DC1 - Design Considerations.
- 8.17 Section 2 of the Design Guide SPD (The Staffordshire Moorlands Tradition) explains that the Staffordshire Moorlands' landscapes provide some of the defining characteristics of the area and have been instrumental in shaping local settlement patterns. In order to protect, and where possible enhance, the landscape character, development should assimilate into the landscape and avoid adverse impact on landscape quality.
- 8.18 In the context of new development, Section 3 of the Design Guide SPD (New Development – Designing in Context) states that the setting of any development should be carefully

considered in relation to its impact on views, into, over and out of the site. Specifically in relation to sites on the edge of settlements, development should sit comfortably in the landscape by emulating the horizontal, ground-hugging form of traditional buildings with strong eaves and ridge lines, and simple low silhouettes parallel with contours.

- 8.19 New development should ultimately be guided by the existing character and context. Site proposals should consider both contemporary and traditional architectural style capable of accommodating high quality and functional development. The scale of new development should be respectful of the surrounding built environment.
- 8.20 Section 7 of the Design Guide SPD (Details and Materials) states that new buildings should ideally be constructed from the same palette of materials used traditionally in the area. This means for the most part natural stone or brick for walling and Staffordshire blue clay tiles or slate for roofs. It notes that high quality modern materials may be acceptable in certain circumstances and encourages the use of sustainable materials.

National Planning Policy & Guidance

National Planning Policy Framework ("NPPF") (2023)

- 8.21 The revised NPPF was published in December 2023. (C/D Ref: 7.7) The NPPF sets out the Government's planning policies and guidance and how this is to be applied.
- 8.22 **Paragraph 11 ('The presumption in favour of sustainable development')** states that plans and decisions should apply a presumption in favour of sustainable development.
- 8.23 **Chapter 12 ('Achieving well-designed and beautiful places')** states that good design is a key aspect of sustainable development, creates better places to live and work and helps make development acceptable to communities. Paragraphs 131, 134, 135, 139 and 140 are considered to be relevant.
- 8.24 **Chapter 15 ('Conserving and enhancing the natural environment')** states 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. Paragraph 180a and 180b are considered to be relevant.

Planning Practice Guidance (2014)

- 8.25 The PPG is intended to assist practitioners and provide further guidance on the interpretation of national planning policy within the NPPF. It is therefore a significant material consideration in the determination of the application.

National Design Guide (2021)

- 8.26 The Government's National Design Guide (C/D Ref: 7.8) was published in October 2019 and last updated in January 2021. It illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. Pages 5 – 8 note that a well-designed place comes about through making the right choices at all levels, including the layout, form, scale, appearance, landscape, materials and detailing. It adds that the choices made in the design process contribute towards achieving the ten characteristics of good design: Context; Identity; Built Form; Movement; Nature; Public Spaces; Uses; Homes and Buildings and Lifespan.

9 THE STATUTORY TEST AND KEY CONSIDERATIONS

9.1 This Chapter sets out the statutory test and the key considerations for the Appeal.

Section 38(6) of the Planning and Compulsory Purchase Act 2004

9.2 Within the Local Plan Proposals Map (C/D Ref 7.10), the Appeal Site is allocated under Local Plan Policies SS9 (Smaller Villages Area Strategy), SS10 (Rural Area Strategy), H1 (New Housing Development), and DC3 (Landscape and Visual Impact). The Churnet Valley Masterplan SPD (C/D Ref 7.6) is a material consideration in the determination of the appeal and identifies Moneystone Quarry as an Opportunity Site to create a high-quality new tourism and leisure destination.

9.3 The principle of a high-quality leisure development at Moneystone Park is established through SMDC's decision to grant outline planning permission (Ref: SMD/2016/0378) on 26 October 2016.

Key Areas Considered by this Proof of Evidence

9.4 In light of this, this Proof of Evidence considers:

1. The design and quality of The Appeal Scheme, but with a focus upon the proposed lodges (reliant upon the professional views of colleagues).
2. The compliance of The Appeal Scheme, but with a focus upon the proposed lodges with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan, the Staffordshire Moorlands Design Guide SPD, the CVM, Chapters 12 and 15 of the NPPF and the National Design Guide.

The Reason for Refusal

9.5 The Council's Statement of Case explains, at paragraph 2.4, that the reason for refusal is based around the following three key design aspects:

- a. That the design of the lodges lacks architectural design quality and includes insufficient creativity and detailing to be considered high quality.
- b. That the design of the lodges fails to adequately respond to the character and qualities of the local area or vernacular.
- c. That as a result there is an unacceptable impact on the wider landscape and setting of this sensitive and highly valued landscape – a matter highlighted by the proximity to the Whiston Eaves SSSI.

- 9.6 The Appellant's position regarding each of these three key design aspects is summarised below.

Lack of architectural design quality and insufficient creativity and detailing

- 9.7 As demonstrated in Mr Pullan's Proof of Evidence, the Appeal Scheme is a well designed proposal.
- 9.8 The design creativity and detailing of the proposed lodges is considered entirely appropriate to the function they would fulfil within The Leisure Development. Where a function is required to be of greater significance, such as is the case with the Hub building, where the building is appropriately designed to be more expressive.
- 9.9 The cohesive design of the lodges with careful, limited variation in facade treatment is considered to deliver an appropriate, overall high quality contribution to the leisure development.

Response to the character and qualities of the local area / vernacular

- 9.10 A simple, rural building aesthetic is considered to be appropriate response to the character and qualities of the local area / vernacular. Architecture does not have to be flamboyant in order to be high quality.
- 9.11 The proposed lodges are appropriately low 'polite' structures in a rural landscape.
- 9.12 It would be wholly inappropriate to look to urban townscape features and draw these into the rural environment.
- 9.13 The Council does not disagree with the choice of a natural wood finish as it is reflective of the wider wooded landscape setting (see paragraph 4.3 iii of the Council's Statement of Case).

Impact on the wider landscape and setting

- 9.14 Landscape and visual impact was assessed at the Outline Planning Application stage and the LPA concluded that the Leisure Development would not lead to any unacceptable landscape or visual impact.
- 9.15 The Appeal Site was assessed to have a very low impact on the landscape and the proposed buildings and lodges will be set in high quality and attractive landscaping.
- 9.16 It is not clear why the Council considers the Appeal Site's proximity to the Whiston Eaves SSSI to be a relevant consideration in this regard, or why ecological issues add to design

sensitivity of the exterior appearance of the lodges. Nonetheless, the Council acknowledges at paragraph 2.6 of its Statement of Case that the ecological and scientific qualities of the SSSI would not be negatively impacted by the design quality of the lodges. The SSSI is irrelevant in the context that it has been used. The SSSI designation does not relate to appearance or setting and solely relates to scientific interest. Raising this issue in the context of lodge design is entirely misguided to the point of being unreasonable.

The Council's Five Key Criteria

9.17 Paragraph 3.13 of the Council's Statement of Case states that the following five criteria have been developed from the relevant planning policies and asserts that these should form the cornerstone of the planning arguments and assessment within the case:

1. *"Clearly responding to the site's context with the buildings' design, taking account of the surrounding landscape / townscape, and reflecting the local built vernacular.*
2. *Delivering a building that has an appropriate scale, mass and form, that reflects local forms and does not undermine the landscape / townscape qualities.*
3. *Providing creativity in the architecture of the building, including appropriate materials, roofscape and detailing, delivered as part of an effective composition.*
4. *Creating buildings that are fit for purpose, durable and long lasting, and that maximise opportunities for sustainable design and construction.*
5. *Delivering buildings that preserve and enhance their setting, and do not impact on the wider landscape, heritage or biodiversity."*

9.18 Within his Proof of Evidence, Mr Pullen provides his own assessment of the Appeal Scheme against each of these five key criteria. This assessment demonstrates that the Appeal Scheme performs positively against each.

9.19 The Appellant nevertheless questions whether these five criteria, which have been selected by the Council, accurately reflect the requirements and guidance of the relevant planning policies against which the Appeal should be assessed. The Council's Statement of Case offers no explanation of how these criteria are linked (or have been developed from) to the relevant policies.

9.20 The National Planning Practice Guidance ("NPPG") establishes that "good design" can be described with reference to the ten characteristics of the National Design Guide ("NDG") and, in accordance with the NDG, the criteria can inform judgements of design quality and

beauty. The NDG therefore forms the primary structure for Mr Pullen's Design Proof of Evidence with reference to relevant design policies and guidance. The Appellant considers that this approach provides a far more balanced assessment of the design and quality of the Appeal Scheme than the Council's five criteria.

9.21 Judged through either prism however, The Appeal Scheme performs well.

10 THE DESIGN PROCESS

- 10.1 This Chapter sets out the Design Process for the Appeal Scheme and should be read in conjunction with the Design Proof of Evidence prepared by Mr Pullan.
- 10.2 It is considered that good design should demonstrate an understanding of its context and demonstrate how it has learnt from it (the design is rooted in place). It should respond favourably to a good environment and enhance a poor one. It should promote or reinforce local distinctiveness.
- 10.3 Consistent with the National Design Guide, The Appeal Scheme was informed by the material prepared in support of The Outline Planning Permission which included a comprehensive understanding of the landscape context. Please refer to Section 4 of Mr Pullan's Proof of Evidence where mitigation measures identified by the LVIA of the Environmental Statement (C/D Ref: 1.37) are set out and provide key design drivers for the scheme.
- 10.4 The Design and Access Statement consented by The Outline Planning Permission also provides general lodge design principles and assessment of key character areas (as set out within Section 4 of Mr Pullan's Proof of Evidence) which provide an informed assessment of The Appeal Site's opportunities and constraints, identifying the key parameters for development. The Outline Planning Permission is also supported by a Parameters Plan and an Illustrative Masterplan.
- 10.5 The Appeal Scheme and Outline Planning Permission were discussed and developed with the Council professional Officers and the community consistent with paragraph 137 of the NPPF. This demonstrates the extent to which The Appellant sought to collectively resolve an appropriate design for The Appeal Site. The context supports a low density, landscape led, scheme. The optimisation of this former quarry site resolves an appropriate standard of accommodation.
- 10.6 The proposed pattern of development reinforces the existing landscape framework of The Appeal Site. The design approach is deliberate in designing buildings and structures that are subservient in scale and appearance to the landscape. The 'hub' is an exception, and is a distinctive, contemporary building.
- 10.7 The Appeal Scheme is visually contained such that it can draw upon its own character - a natural, rural setting - an approach consistent with the imagery of the Design and Access Statement approved with the Outline Planning Permission.

- 10.8 Individual character areas afford for variation in plotting of the lodges in response to the landscape, such as the arrangement of linear plots about the lake in Quarry 3 and plots to either side of the wandering access routes in Quarry 1. The greatest density of lodges are within the visually contained Quarry 1 area, closest to the hub and the proposed activity building. The lowest density of development is around Quarry 3. The retained woodland and landscape corridors between the lodge character areas further breaks up the perceived density of development.
- 10.9 The aesthetic simplicity and restraint in the design of the lodges is appropriate to the landscape. This is not a context where the individual lodge design should detract from the wider landscape setting. Matching natural timber applied to the 'skirt'/deck base and main building provides a strong visual coherence to the lodge and lands it to the ground. The glazed balustrades, more commonly seen on 'high end' apartments, add a visual quality and lightness to the deck.
- 10.10 Whilst the design of the lodge is based upon a structure that can be manufactured off-site and can be transported efficiently to plots, it does not suggest that the design is 'restricted' or harmful. Off-site modular construction is now a well-recognised and sustainable mode of construction and was identified by the Outline Planning Permission Design and Access Statement (C/D Ref: 1.22) and Landscape and Visual Chapter of the Environmental Statement (C/D Ref: 1.37).

11 THE DESIGN AND QUALITY OF THE APPEAL SCHEME

11.1 This chapter seeks to address various matters concerned with the design and quality of the Appeal Scheme. The Council in its Statement of Case has raised concerns with: form, scale, elevation appearance, response to local character and lack of accord of the Appeal Scheme with the principles of the Outline Planning Permission Design and Access Statement.

Architectural Design Quality

Form and Scale

11.2 The Council argues in its Statement of Case that the form and scale of the proposed lodges is formulaic and standardised, noting that they appear temporary and transient, with little in the way of variation or articulation of the elevations.

11.3 This is not accepted but is a matter which is addressed comprehensively in Mr Pullan's Design Proof of Evidence.

11.4 He explains that, typically, built schemes in numbers adopt standardised elements and a common design language (otherwise coherence would be replaced by discord). Where discord is sought, it is often to define a particular character, set piece, keynote building, landmark or landmark feature.

11.5 The rural landscape approach of The Appeal Scheme does not necessitate discord and variety in form, elevation and scale, apart from in relation to the hub. As proposed, there is rightly a narrow palette of design elements such as the articulation of elevations and where variation is notable, such as the wide fronted lodges proposed to be sited around the lake, this minor variation reinforces the proposed character which remains landscape (lake and escarpment) dominated.

11.6 The scale of the development is in accordance with the parameters approved by The Outline Planning Permission. The proposed lodges adopt a degree of variation, as expressed by the CGI's which illustrate how the elevations can be articulated by variation in material, whilst also retaining an overall degree of homogeneity to the 190 lodges. The Appellant therefore rejects the Council's stance that the lodges adopt a poor design and that this is exacerbated by the number of lodges proposed.

Elevational Appearance

- 11.7 The Council alleges in its Statement of Case that the design of the lodges lacks architectural design quality and includes insufficient creativity and detailing to be considered high quality.
- 11.8 Mr Pullan explains in his Design Proof of Evidence that, collectively across The Appeal Scheme, there is a legible and logical approach to the aesthetic. The centrepiece hub is a creatively designed building, a focal point for The Appeal Scheme, wherein most guests and residents will likely meet. The 190 lodges on the other hand are appropriately less 'creative', but nonetheless creatively and appropriately designed. The lodges have a coherent, simple design language.
- 11.9 Whilst there is some variation in the 'creative' lodge design, less is considered to be 'more' in this respect. A cacophony of 190 creatively individual lodge designs would introduce harmful discordance to the measured natural landscape. To introduce lodge designs that take different footprints, roof forms, material, aesthetic, would visually place the lodge above the significance of the wider landscape setting and the hub.
- 11.10 Importantly high quality design is not merely about external appearance but about a range of factors including the role and functionality of the proposals. In this case the design will produce appropriately designed lodges, which rely upon sustainable construction methods, which sit well in the landscape and which will function well for their intended use. Overall, what is proposed comprises high quality design.
- 11.11 My colleague Mr Pullan addresses the specific issues raised by the Council's Statement of Case, noting that many of the detailed design issues were not raised prior to the matter being presented to Planning Committee and appear to comprise points that could have been readily addressed by minor tweaks had they had any substance.
- 11.12 It is considered that built schemes in numbers, where appropriate, adopt standardised elements and a common design language. Where discord is sought, it is often to define a particular character, set piece, keynote building, landmark or landmark feature. Therefore, for a design language to be coherently and to maintain a landscape dominant environment with subservient lodges, a strong degree of uniformity and a simple aesthetic is a positive. Therefore, there is rightly a narrow palette of design elements for the lodges and any noticeable variation reinforces the proposed character.
- 11.13 The lodges are aesthetically simple and blend into the landscape setting as seen from afar. As shown by the photomontages in **Appendix 9**, the siting and height of the lodges

afford a view of trees and planting between, above and below the buildings and the timber cladding relates well to the woodland backdrop. Up close the design affords subtle variation and interest. The photomontages demonstrate a variation of the principal elevation to include additional fenestration above the main windows and doorways. The variations in the facade does not detract from the overall cohesiveness / homogeneity of the lodge aesthetic.

- 11.14 In accordance with Paragraph 3.2 of the Staffordshire Moorlands Design Guide (SMDG) the lodges have strong eaves and ridge lines. Outwardly, as demonstrated by the photomontages (**Appendix 9**) the lodges would be ground hugging buildings, of a low silhouette, parallel with contours where appropriate.
- 11.15 As demonstrated by the proposed elevations, in appearance the skirt would comprise a continuation of the cladding and give the appearance of conventionally constructed building. The effect would be that the lodges would not have the appearance of mobile structures, let alone conventional static caravans. Rather they would appear permanent buildings.
- 11.16 The overall style is contemporary, large areas of glazing, glazed balustrades and simple elevations. In terms of detailing, the tongue and groove facades creates shadow and interest, notwithstanding the natural grain of the wood. Variation in horizontal and vertical application adds further richness to the individual and collective appearance of lodges.

Response to Local Character

- 11.17 The Council alleges within its Statement of Case that the design of the lodges fails to adequately respond to the character and qualities of the local area or vernacular.
- 11.18 This matter is addressed in Mr Pullan's Design Proof of Evidence but a summary is provided below.
- 11.19 The Appeal Site's landscape context affords the opportunity for a development of its own character. Taken as a whole, this rural landscape context has informed a landscape-led development with a number of character areas which provide a setting for the built form.
- 11.20 The natural shape of the quarries and level areas has informed the disposition of individual lodges across character areas. The hub lies at the heart of the scheme and is a centrepiece of design. The subservient lodges draw upon the aesthetic of the hub, and are a simple, low form of structure in timber cladding. And overall, the hub and lodges are appropriately subservient to the wider landscape as demonstrated by the photomontages.

Individual and small groups of lodges are located within a landscape context, at a low density, such that where collectively seen, there remains a strong landscape framework.

- 11.21 The hub centrepiece is of local stone and timber cladding and sedum shaped and flat roofs. It does not reflect local vernacular but draws upon local materials and those appropriate to a rural setting. This simple aesthetic is considered an appropriate response to the rural landscape, where buildings are predominantly low and subservient in form and scale.
- 11.22 The hub centrepiece is a distinctively designed building, a focal point for The Appeal Scheme, wherein most guests and residents will likely meet. The 190 lodges on the other hand are appropriately less 'distinctive', but nonetheless creatively designed with a polite, coherent and simple design language.
- 11.23 There is some variation in the 'creative' lodge design but 'less, is 'more'. An exuberant cacophony of 190 individual lodge designs of different height, scale, footprint, roof form, material and aesthetic, would visually place the lodge above the significance of the wider landscape setting and the hub; and would introduce harmful discordance to the surrounding landscape.
- 11.24 As demonstrated within the proposed Materials Palette (**Appendix 12**), windows and openings, roofs (imprinted with a 3D slate effect) and guttering are grey/antracite. It is considered that the visually textured roof material will reflect natural slate and is appropriate.
- 11.25 The cladding is natural timber arranged tongue and groove both vertically and horizontally. The timber will be retreated on a regular basis to retain its colour rather than allowing it to grey naturally in order to maintain colour and avoid an aged appearance. The deck railings are proposed to be timber post and glass.
- 11.26 The deck floor area would not be seen unless stood above or on the deck, and for practical reasons is not natural wood. Although outwardly, it would appear similar.

Compliance with the Outline Planning Permission

- 11.27 The Council alleges, at paragraph 2.5 of its Statement of Case, that the Appeal Scheme, specifically in relation to the proposed lodges, does not deliver what had been envisaged and proposed as part of the wider principles, vision and strategy associated with the outline permission. This is plainly not the case.

- 11.28 The Appellant's objectives for Moneystone Park, as summarised in Chapter 3, have not changed since the approval of The Outline Planning Permission. The vision remains to deliver a high-quality, sustainable leisure and tourism development, which secures the restoration of the site and creates a sensitive development, sitting comfortably in its landscape setting.
- 11.29 The proposed lodges reflect and accord fully with this vision. As described in Mr Bratherton's Proof of Evidence, they offer a high standard of design and detailing typical of other acclaimed high quality lodge parks across the UK. Their design respects the local environment and would assist in restoring, strengthening, and enhancing the existing site and its distinctive landscape features, which is contrary to the suggestion made otherwise within the reason for refusal set out in the Decision Notice.
- 11.30 Condition 14 of the Outline Planning Permission requires all reserved matters applications to be in accordance with the principles contained within the Design and Access Statement that was submitted with the Outline Planning Application.
- 11.31 The Council asserts, at paragraph 2.5 of its Statement of Case, that it was clear from the discussions at the Planning Committee, and by the third party representations made, that there was a strong belief that The Appeal Scheme presented as part of this Reserved Matters Application (specifically where the lodges were concerned) was not what had been envisaged and proposed as part of the wider principles, vision and strategy associated with The Outline Planning Permission.
- 11.32 The Council goes on to allege, at paragraph 4.8, that there are a number of design principles contained within the Design and Access Statement that "*have not followed through*" to the Reserved Matters Application.
- 11.33 The Appellant disagrees and to the contrary considers that the Appeal Scheme aligns fully with the overall vision and strategy for The Leisure Development that was set out in the Outline Planning Permission and accords with the principles contained within the Design and Access Statement submitted in support of that application (thus complying with the requirements of condition 14).
- 11.34 The table below provides an assessment of The Appeal Scheme (and specifically the lodges) against the most relevant principles within the Design and Access Statement, including those specifically highlighted by The Council within its Statement of Case. This matter is considered in detail in Mr Pullan's Proof of Evidence and the table below draws upon his assessment.

Design and Access Statement Principle	Page	Appellant's Assessment
<i>7.0 The Vision</i>		
<p>This section of the Design and Assess Statement presents a high-level vision for the overall Development. The Council alleges (at paragraph 4.8 of its Statement of Case) that this section <i>"provides some clear images of the accommodation offer, all of which are a very different design approach to the lodges that are proposed as part of the Appeal Scheme"</i>.</p>	42-43	<p>As set out in Mr Pullan's Proof of Evidence, the Design and Access Statement does not prescribe the form of lodge, but in illustrating typical forms, affords a narrow degree of latitude, which the design of the proposed lodges is consistent with.</p>
<i>8.0 Masterplan</i>		
<p>At paragraph 4.8 of its Statement of Case, the Council draws attention to the three sketches illustrated on page 49 of the Design and Access Statement.</p>	49	<p>As set out in Mr Pullen's Proof of Evidence, these sketches show the following features:</p> <ul style="list-style-type: none"> • Strong landscape setting (with lodges subservient) • Elevated base to lodges • Simple form to lodge (rectilinear) • Horizontal emphasis to a low silhouette building • Plain roof form with shallow pitch and understated eaves • Coherent aesthetic of lodges <p>The typical single storey lodges that are proposed as part of The Appeal Scheme are shown as simple horizontal forms raised above ground, which are consistent with the above principles.</p>

<i>9.0 Character Areas</i>		
Dependant on Lodge design and size, it is anticipated that units will either be delivered as a complete structure by lorry or assembled on site utilising smaller prefabricated sections.	57	All the proposed lodges will be factory built and transported to site by road. The Appeal Scheme therefore accords with this principle.
Typical site preparation for a lodge would be construction of a level concrete slab with integrated service connections, however in sensitive site locations consideration might also be given to smaller pad/beam foundations or lodges positioned on driven pile/ stilts.	57	The proposed lodges will be positioned on concrete slabs and bolted together at a time to suit completion of groundworks and services. The exact size of the slab will be dependent on the particular size of lodge. The Appeal Scheme therefore accords with this principle.
Surrounding pathways and access to the lodges would utilise permeable surfacing and soft verges that promotes natural drainage and minimises excavation requirements.	57	As outlined within the Landscape Statement (Appendix 1), 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.
Soft landscape would be encouraged up to the base of the lodges in the form of grassland meadow and low native shrub planting with a mown maintenance strip to the immediate external facade.	57	As outlined within the Landscape Statement (attached at Appendix 1), the landscape surrounding the lodges has been designed to also include areas of open grass land, meadow and shrub planting.
Given the sensitivity of the location, the lodges within the park should utilise a limited material palette that reflects the local architectural character.	57	The Appeal Scheme is of its own contemporary rural style and the materials palette (principally timber and muted tones) draws upon the context. It therefore accords with this principle.
Use of timber, stone, slate, or metal cladding and roofing in a muted colour range could be a suitable mix, that would allow the units to blend with the surrounding context.	57	The proposed lodges would be finished in timber cladding with matt tiles effect dark roof and muted tones for windows and doors, in accordance with this principle.
Selected use of grass/ sedum roofing systems could also help in areas of particular visual sensitivity, as well as promote	57	The selective use of grass / sedum roofing systems is not identified as an essential requirement. As explained in Chapter 7, the use of green roofs would be feasible but is not considered necessary to

<p>biodiversity and habitat links within the lodge areas themselves.</p>		<p>make The Appeal Scheme acceptable from a design quality, landscape and visual impact, biodiversity or sustainability perspective. The proposed lodges are therefore not in conflict with this principle. Selective use of such roofs could be conditioned should the Inspector consider it to be necessary</p>
<p>Where located on sloping sites, it will be required to set the new lodges on either a piled stilt, or piled retaining wall structure. Materials will be chosen to match with the locality, but typically could include, timber, steel or stone facing either as a drystone wall, or within a gabion cage.</p>	<p>57</p>	<p>The Site Sections submitted with The Reserved Matters Application show the use of stilted supports, retaining walls and gabions. The Appeal Scheme is of its own contemporary rural style and the materials palette (principally timber and muted tones) draws upon the context. It therefore accords with this principle.</p>
<p>The Council states, at paragraph 4.8 of its Statement of Case, states that, aside from one image on page 57, the sketches and diagrams throughout Section 9 of the Design and Access Statement <i>“do not show an image that reflects the proposed lodge design.”</i></p>	<p>56-74</p>	<p>As set out in Mr Pullan’s Proof of Evidence, the sketches and figures accompanying the character areas are single storey, simple forms consistent with The Appeal Scheme.</p> <p>There are a number of images provided throughout the Design and Access Statement that are drawn from a wide range of leisure parks. It is wholly appropriate that the design team have undertaken such an exercise to help inform decisions made. The inspirations drawn from these images inform more than aesthetics. Throughout the Design and Access Statement, the lodges are illustrated to be simple in form and subservient to the landscape design. The Appeal Scheme accords fully with this principle.</p>

11.35 The additional table below responds specifically to the design principles that The Council argues have not been followed through to the Reserved Matters Application, as set out at paragraph 4.8 of its Statement of Case. The assessment provided in the table below is also informed by the assessment undertaken by Mr Pullan in his Proof of Evidence.

Design and Access Statement Principle Conflict Alleged by SMBC	Appellant’s Assessment
<p>i. <i>The vision (pg. 43)</i> shows some clear images of the accommodation offer all of which are a very different design approach to the lodges that are proposed as part of the appeal scheme.</p>	<p>The Appellant does not consider that the images in question exhibit a “very different design approach” to the lodges proposed as part of the appeal. As set out in Mr Pullan’s Proof of Evidence, the Design and Access Statement does not prescribe the form of lodge, but in illustrating typical forms, affords a narrow degree of latitude, which the design of the proposed lodges is consistent with.</p>
<p>ii. <i>The Illustrative masterplan (pg. 49)</i> shows three sketches of the proposed development. The lodges (bottom two images) show proposals on stilts, with more articulation within the elevations and shadow lines at the eaves. The inclusion of stilts lets landscape flow up to and around the development.</p>	<p>The sketch illustrations in question show the following features, which the proposed lodges are consistent with:</p> <ul style="list-style-type: none"> • Strong landscape setting within which lodges are subservient • Elevated base to lodges • Simple form to lodge (rectilinear) • Horizontal emphasis to a low silhouette building • Plain roof form with shallow pitch and understated eaves • Coherent aesthetic of lodges <p>It is also relevant to note that these sketches show a distinctive hub design, but which is flat roofed and curved (i.e. not consistent with the current hub design proposal, which the Local Planning Authority has no issue with)</p>
<p>iii. <i>Section 9 (pg. 57)</i> shows a number of precedent images with only one that has a passing resemblance to the proposed development. In fact, beyond this images, sketches and diagrams throughout section 9 do not show an image that reflects the proposed lodge design of this appeal.</p>	<p>The Design and Access Statement contains a number of images that are drawn from a wide range of leisure parks. It is wholly appropriate that the design team have undertaken such an exercise to help inform decisions made. It is important to note that the inspirations inform more than aesthetics. The lodges proposed adopt a simple form, subservient to the landscape design, in accordance with many of the precedent images included.</p>

<p>iv. The principles also show a series of one and two storey units with a variety of roof forms, whereas the appeal proposals only have single storey units with very simple and basic roof forms.</p>	<p>The lodges are secondary elements of the design which need to blend into the quiet landscape setting. Two storey lodges would have a greater landscape and visual impact than single storey lodges. Quarry 3 is the most sensitive part of The Appeal Site and it was never envisaged that any two-storey lodges would be introduced here. There would potentially be an opportunity to introduce some two storey lodges within the Quarry 2 area, which is the subject of a separate Reserved Matters Application to the Appeal Scheme.</p> <p>The Appellant considers that the roof form proposed for the lodges is entirely appropriate in design terms. To introduce lodge designs that take different roof forms would visually place the lodge above the significance of the wider landscape setting and the hub.</p>
<p>v. Page 57 goes on to discuss a palette of materials including stone, slate, natural wood cladding, gabion walling, drystone walling. Only one material from this palette has been used – the wood cladding.</p>	<p>As set out in Mr Pullan’s Proof of Evidence, the proposed palette of materials is considered appropriate to the landscape context of The Appeal Site and the role that buildings perform within it – the subservient lodges and the keynote hub. The Council is incorrect to state that the wood cladding is the only material that has been used – gabion is also used and the hub uses local stone. At all events – it is not understood that wood is an inappropriate material.</p>
<p>vi. The lodge design principles text (pg. 57 – paragraph 3) also refers to <i>“selected use of grass/ sedum roofing systems could also help in areas of particular visual sensitivity, as well as promote biodiversity and habitat links within the lodge areas themselves.”</i> Grass / sedum roofs do not form part of the proposal.</p>	<p>As set out in Chapter 7 of my Proof of Evidence, whilst the use of green roofs would be feasible, The Appellant does not consider that this is necessary to make the Development acceptable from a design quality, landscape and visual impact, biodiversity or sustainability perspective.</p>
<p>viii. Finally, the principles refer to lodges on sloping sites sited on retaining walls or stilts whilst the lodges as proposed now sit ‘atop’ the landscape. Concrete pads are mentioned for siting, but there is no mention creating the plateaus for lodges, parking and roads to facilitate delivery of wheeled units.</p>	<p>The Appellant does not consider that the creation of plateaus for lodges, parking and roads is inconsistent with any of the principles contained within the Design & Access Statement. The Site Sections submitted with The Reserved Matters Application show the use of stilted supports, retaining walls and gabions.</p>

The Use of Flat 'Pads'

11.36 In paragraphs 4.4 and 4.5 of its Statement of Case, the Council raises concern about the proposal to place the lodges on concrete bases upon a series of flat 'pads', on the grounds that this is a "highly engineered" approach which "lacks naturalistic landforms", which would be in conflict with guidance presented in the Staffordshire Moorlands Design Guide. The table at paragraph 11.34 above demonstrates however that this approach would be in accordance with the approach proposed at the Outline Planning Application stage (i.e. the statement on page 57 of the Design & Access Statement that typical site preparation for a lodge would be construction of a level concrete slab).

The Bridge

11.37 The Reserved Matters Application proposes the inclusion of a bridge across the corner of the lake within Quarry 3. This was necessitated by ground profiles within The Appeal Site and the requirement to incorporate a route around the perimeter of Quarry 3 to simplify guest access, provide emergency access and create a circular pedestrian route.

11.38 Although this bridge is not expressly referenced within the Design and Access Statement accompanying the Outline Planning Permission (as it is a product of detailed design development), the Appellant considers that there is no conflict with the relevant principles, and in any event it is not considered to be objectionable as part of the reason for refusal.

Bluestone Luxury Resort

11.39 At paragraphs 6.3 and 6.4 of its Statement of Case, the Council references a comment made by Oakamoor Parish Council that, whilst it was stated at the Outline Planning Application stage that the vision for Moneystone Park would be based on the Bluestone Resort in Pembrokeshire National Park, this was not carried through to the Reserved Matters Application.

11.40 The Council's Statement of Case does not provide any indication of which elements of The Appeal Scheme this comment relates to, but the Appellant maintains its position that the Moneystone Park development will be of an equivalent high quality to the Bluestone Resort. That emphatically does not mean that there is an intention to mimic the design ethos and palette of that scheme. To the contrary The Appeal Scheme has been designed for its particular context.

Quarry 3 Sections

- 11.41 The Design and Access Statement submitted with the Outline Planning Application includes a detailed section for the proposed Quarry 3 northern lodges, which show a lodge at a height of +171.50.
- 11.42 The GA site sections submitted with The Reserved Matters Application which relate to the northern part of Quarry 3 (Q3-DD, Q3-EE and Q3-GG) show the lodges at a notably lower height (+157.00) with a second, upper lodge in section Q3-DD at +168.15.
- 11.43 The siting of the lodges at a lower height than was illustrated at The Outline Planning Application stage reduces the landscape and visual impact of the lodges within Quarry 3 (which is the most sensitive part of the site in this regard) on the surrounding area. Layout is in any event not an issue as between The Council and The Appellant.

Summary

- 11.44 In summary, I have assessed, drawing upon the conclusions of Mr Pullan's Design Proof of Evidence, that the design of the proposed lodges is fully consistent with the relevant principles within the Design and Access Statement approved as part of The Outline Planning Permission and The Council is incorrect to suggest otherwise.

12 ASSESSMENT AGAINST RELEVANT PLANNING POLICY

12.1 This chapter provides an Assessment of the Appeal Scheme against the relevant planning policies, which are as follows:

1. Local Plan Policy SS1 (Development Principles);
2. Local Plan Policy SS11 (Churnet Valley Strategy);
3. Local Plan Policy DC1 (Design Considerations);
4. Local Plan Policy E4 (Tourism and Cultural Development);
5. Churnet Valley Masterplan SPD;
6. Staffordshire Moorlands Design Guide SPD;
7. National Planning Policy Framework (including Chapters 12 and 15); and
8. National Design Guide.

Local Plan Policy SS1 (Development Principles)

12.2 My assessment of the Appeal Scheme against Policy SS1 is set out in the following table. To aid the Inspector and based upon my understanding, the final column in the table sets out whether the policy criteria is disputed between The Appellant and The Council.

Policy SS1 (Development Principles)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
The Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands in terms of delivering, in partnership with other agencies and services:	Yes	Overall, 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 16 of this Proof of Evidence. The principle of the Leisure Development at the Appeal Site has been agreed by The Outline Planning Permission and is not relevant in the determination of this Appeal.	No Dispute
A mix of types and tenures of quality, affordable homes, to meet the needs and aspirations of the existing and future communities.	N/A	The Appeal Scheme is for a leisure development providing holiday accommodation therefore the provision of affordable housing is not applicable.	No Dispute
Quality local services, including provision for education, healthcare, leisure, community, cultural and tourist facilities in response to anticipated population change and visitor numbers.	Yes	The Appeal Scheme will deliver high-quality, sustainable leisure, community, cultural and tourist facilities, as detailed in Chapter 6 of this Proof of Evidence. The principle of the Leisure Development at the Appeal Site has been agreed by The Outline Planning Permission and is not relevant in the determination of this Appeal.	No Dispute
Easy access to jobs, shops and transport services by all sections of the community.	Yes	The Appeal Scheme includes a range of facilities which will be accessible to the local community. As part of the Outline Planning Permission, the principle of the Leisure	No Dispute

Policy SS1 (Development Principles)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
		Development at the Appeal Site has been agreed and measures were already secured through the Section 106 associated with the Outline Planning Permission to promote accessibility. This is not relevant in the determination of this Appeal.	
Increased economic prosperity and opportunities for employment and greater local capacity with an educated, skilled and flexible workforce.	Yes	<p>The Appeal Scheme will deliver substantial economic benefits which are set out in the Economic Benefit Statement (Appendix 3) prepared by Mr Wisher and Chapter 16 of this Proof of Evidence.</p> <p>The principle of the Leisure Development at the Appeal Site has been agreed by The Outline Planning Permission and is not relevant in the determination of this Appeal.</p>	No Dispute
A healthy, safe, attractive, active, well-designed and well-maintained environment.	Yes	As detailed throughout this Proof of Evidence, supported by the conclusions of Mr Pullan in his Design Proof of Evidence, the Appeal Scheme will deliver a high-quality development including a range of indoor and outdoor tourism and leisure facilities which will create a healthy, safe, attractive, active and well-designed environment which will be well-maintained throughout the lifetime of the development.	Yes, Dispute
Development which maintains the locally distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings.	Yes	Mr Pullan's Design Proof of Evidence, Mr Bratherton's Design Quality Proof of Evidence and the Landscape Design Statement (Appendix 1) conclude that the Appeal Scheme is a well designed development that provides a high standard	Yes, Dispute

Policy SS1 (Development Principles)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
		of design that integrates the overall form and layout into its surroundings, thus maintaining the locally distinctive character of the surrounding area.	
Development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas, including the Peak District National Park, both now and for future generations.	Yes	<p>The Landscape Design Statement (Appendix 1) and the Ecology Statement (Appendix 2) demonstrate that the Appeal Scheme will deliver a high-quality development in ecology and landscape terms which will enhance the natural environment of the Appeal Site and provide for the creation and long-term management of a range of habitats.</p> <p>In terms of heritage impact, this was assessed in detail as part of the Outline Planning Permission and was considered acceptable.</p> <p>The Reserved Matters Application was supported by a Heritage Technical Note (C/D Ref: 5.12) and a Landscape and Visual Impact Assessment Technical Note (C/D Ref: 5.13) which reassessed the effect of the development on the setting of Little Eaves Farmhouse.</p> <p>The conclusion of this work was that there are no changes to the landscape, or visual effects predicted in the 2016 ES as a result of the Reserved Matters proposals. The photomontages (Appendix 7) demonstrate that the visual impact of the Hub Building from Little Eaves Farm would be minimised by the provision of a sedum roof on the Hub Building to visually integrate it into the landscape. The Hub</p>	Yes, Dispute

Policy SS1 (Development Principles)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
		<p>Building has also been designed over two levels with the lower level set into the sloping ground and curved roof forms utilised to further reduce its visual impact. Condition 11 of the Officer's recommendation for approval also proposed for additional planting to filter these views.</p> <p>As set out in Mr Pullan's Proof of Evidence, this will be a distinctive and characterful place that positively contributes to the wider character and improves the quality of the area.</p>	
Support development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions.	Yes	The Energy Proof of Evidence demonstrates that the Appeal Scheme is high quality in energy terms. Air Source Heat Pumps are proposed for each lodge to encourage energy efficiency and exceed the design standards for leisure developments. In Chapter 14, The Appellant proposes that an additional planning condition could be imposed should the Inspector be minded to allow this appeal, requiring the submission of a detailed energy statement for the development (covering the lodges), in order to ensure the Appeal Scheme is sustainable, in line with policy objectives.	Unsure of Dispute
All proposals for development will be considered in the context of the District-wide Spatial Strategy and with regard to both its direct and indirect cumulative impact over the longer term. New development will make effective use of	Yes	The Appeal Site is a former quarry requiring restoration. It does not constitute previously developed land however the landform is artificial and The Appeal Site is not to be taken as pristine condition. Furthermore, the Appeal Scheme aligns with the CVM which has long identified the Appeal Site as an opportunity site for tourism-related development.	No Dispute

Policy SS1 (Development Principles)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellent and The Council
land and the best use of previously developed land and buildings.		The principle of the Leisure Development at the Appeal Site has been agreed by The Outline Planning Permission and is not relevant in the determination of this Appeal.	

12.3 In summary, it is my assessment that The Appeal Scheme fully complies with the requirements of Policy SS1.

Local Plan Policy SS11 (Churnet Valley Strategy)

12.4 My assessment of the Appeal Scheme against Policy SS11 is set out in the following table. To aid the Inspector and based upon my understanding, the final column in the table sets out whether the policy criteria is disputed between The Appellant and The Council.

Policy SS11 (Churnet Valley Strategy)			
Policy Requirement	Appellants Assessment of Compliance	Appellant’s Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
The Churnet Valley is identified as an area for sustainable tourism and rural regeneration. The Churnet Valley Masterplan provides a comprehensive framework for development in the Churnet Valley and development should be in accordance with the Masterplan. Within this area particular support will be given to the following forms of development and measures:	Yes	The Appeal Scheme will ensure the delivery of a high quality, sustainable Leisure Development in line with the Council’s vision for the Churnet Valley and Moneystone Park. At Appendix 10 of my Proof of Evidence, I assess the Appeal Proposals against the guidance contained in the CVM).	Yes, Dispute
Short stay and long stay visitor accommodation.	Yes	The Appeal Scheme will deliver 190 high-quality lodges to cater to both short and longer stay visitors. A planning obligation was imposed on the Outline Planning Permission to prevent long-term occupancy of the lodges ad permanent residences.	No Dispute
The expansion of existing tourist attractions and facilities and the provision of compatible new tourist attractions and facilities.	Yes	The Appeal Scheme will develop the visitor offer aimed primarily at the countryside market and also increase overnight stays. The Appeal 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.	No Dispute

Policy SS11 (Churnet Valley Strategy)			
Policy Requirement	Appellants Assessment of Compliance	Appellant’s Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
Measures to enhance, protect and interpret the landscape character and heritage assets of the Churnet Valley.	Yes	<p>The Appeal Scheme has been sensitively designed to ensure that the development is compatible with the surrounding area, is appropriate in quality, scale and landscape character.</p> <p>Mr Pullan’s Design Proof of Evidence, Mr Bratherton’s Design Quality Proof of Evidence, the Landscape Design Statement (Appendix 1) and the Ecology Statement (Appendix 2) all demonstrate that the Appeal Scheme will deliver a high-quality development in design, landscape and ecology terms which will enhance the natural environment of the Appeal Site and provide for the creation and long-term management of a range of habitats.</p>	Yes, Dispute
Measures to remediate and restore derelict land, buildings and features including the appropriate redevelopment of sites.	Yes	<p>The Appeal Site is a former quarry requiring restoration. It does not constitute previously developed land however the landform is artificial and The Appeal Site is not to be taken as pristine condition. Furthermore, the Appeal Scheme aligns with the CVM which has long identified the Appeal Site as an opportunity site for tourism-related development.</p>	No Dispute
Actions to protect and enhance the biodiversity of the valley, including the maintenance, buffering and connection of designated sites and actions to mitigate climate change.	Yes	<p>The Ecology Statement (Appendix 2) demonstrate that the Appeal Scheme will deliver biodiversity enhancement which was secured by The Outline Planning Permission.</p>	Unsure of Dispute

Policy SS11 (Churnet Valley Strategy)			
Policy Requirement	Appellants Assessment of Compliance	Appellant’s Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
		The Energy Proof of Evidence demonstrates that the Appeal Scheme is high quality in energy terms. Air Source Heat Pumps are proposed for each lodge to encourage energy efficiency and exceed the design standards for leisure developments. In Chapter 14, The Appellant proposes that an additional planning condition could be imposed should the Inspector be minded to allow this appeal, requiring the submission of a detailed energy statement for the development (covering the lodges), in order to ensure the Appeal Scheme is sustainable, in line with policy objectives.	
Measures that support and integrate the heritage transport infrastructure of the valley, sympathetically with enhancing and developing links to strategic footpaths, cycle and horse riding routes.	Yes	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.	No Dispute
Measures to improve connectivity and accessibility to and within the Churnet Valley by sustainable transport means having regard to the Green Infrastructure Strategy.	Yes	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.	No Dispute
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	Yes	Mr Pullan’s Design Proof of Evidence, Mr Bratherton’s Design Quality Proof of Evidence, the Landscape Design Statement (Appendix 1) and the Ecology Statement (Appendix 2) demonstrate that the Appeal	Yes

Policy SS11 (Churnet Valley Strategy)			
Policy Requirement	Appellants Assessment of Compliance	Appellant’s Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
<p>of the area. Strong sustainable development and environmental management principles should also be demonstrated. The consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximise opportunities for restoring, strengthening and enhancing distinctive landscape features.</p>		<p>Scheme will deliver a high-quality development in design, landscape and ecology terms. The Appeal Scheme has been designed to respect the landscape character of the area, will enhance the natural environment of the site and provide for the creation and long-term management of a range of habitats.</p> <p>Mr Pullan’s Design Proof of Evidence demonstrates in detail that the landscape character has demonstrably informed the design of the Appeal Scheme. In summary, the Appeal Scheme will create a distinctive and characterful place that positively contributes to the wider character and improves the quality of the area.</p>	

12.5 In summary, the Appeal Scheme fully complies with the requirements of Policy SS11.

Local Plan Policy DC1 (Design Considerations)

12.6 My assessment of the Appeal Scheme against Policy DC1 is set out in the following table. To aid the Inspector and based upon my understanding, the final column in the table sets out whether the policy criteria is disputed between The Appellant and The Council.

Policy DC1 (Design Considerations)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
<p>New development should:</p> <p>Be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area.</p>	Yes	Mr Pullan's Design Proof of Evidence and Mr Bratherton's Design Quality Proof of Evidence demonstrate in detail how the development, including the detailing and materiality of both the lodges and facilities buildings are appropriate to the character of the area.	Yes
<p>Be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, height, density, layout, siting, landscaping, character and appearance.</p>	Yes	Mr Pullan's Design Proof of Evidence, Mr Bratherton's Design Quality Proof of Evidence and the Landscape Statement (Appendix 1) demonstrate in detail how the Appeal Scheme has been designed to respect the site's context and is appropriate in terms of its scale, height, density, layout, siting, landscaping, character and appearance.	Yes
<p>Create, where appropriate, attractive, active, functional, accessible and safe public and private environments which incorporate public spaces, green infrastructure including making provision for networks of multi-functional new and existing green space (both public and private), landscaping, public art, 'designing out crime' initiatives and the principles of Active Design.</p>	Yes	As set out in the Landscape Statement (Appendix 1), the Appeal Scheme includes an extensive network of attractive and functional green spaces and linkages including play areas, extensive areas of managed woodland, a Quarry Park and extensive walking, cycling and bridleway paths.	No Dispute

Policy DC1 (Design Considerations)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
Incorporate sustainable construction techniques and design concepts for buildings and their layouts to reduce the impact of the development.	Yes	<p>Mr Pullan's Design Proof of Evidence and Mr Bratherton's Design Quality Proof of Evidence describe how the lodges will be constructed to meet the requirements of British Standard BS3632:2015 and The Caravans Sites Act, which will secure sustainable construction techniques and design concepts for the lodges which will reduce the impact of the development.</p> <p>Furthermore, the Landscape Statement (Appendix 1) demonstrates in detail how the layout of the lodges and the other buildings on site have been designed to reduce their visual impact.</p> <p>Mr Young's Energy Proof of Evidence also sets out the measures that will be implemented to reduce the impact of the development in terms of energy usage and carbon emissions.</p>	Yes, Dispute
Protect the amenity of the area, including creation of healthy active environments and residential amenity, in terms of satisfactory daylight, visual impact, sunlight, outlook, privacy, soft landscaping as well as noise, odour and light pollution.	Yes	All technical considerations were addressed as part by The Outline Planning Permission. The Appeal Scheme has been designed in accordance with the parameters of the Outline Planning Permission and the amenity of the area will be protected in relation to daylight, visual impact, sunlight, outlook, privacy, soft landscape, noise, odour and light pollution.	No Dispute

Policy DC1 (Design Considerations)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
Promote the maintenance, enhancement, restoration and re-creation of biodiversity and geological heritage, where appropriate.	Yes	The Ecology Statement (Appendix 2) demonstrates that the Appeal Scheme will deliver a high-quality development in ecology terms. The Outline Planning Permission secured biodiversity enhancement and provides for the creation and long-term management of a range of habitats.	No Dispute
Provide for safe and satisfactory access and make a contribution to meeting the parking requirement arising from necessary car use.	Yes	The main vehicular access to the Appeal Site from Eaves Lane was approved through the Outline Planning Permission (C/D Ref: 6.5). The parking provision for the Appeal Scheme is shown on the Site Masterplan (C/D Ref: 2.7) and set out in detail on the Parking note (C/D Ref: 2.89).	No Dispute
Require new developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links.	Yes	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. 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 Churnet Valley.	No Dispute
Ensure that existing drainage, waste water and sewerage infrastructure capacity is available, and where	Yes	As detailed in the drainage strategy which formed part of the Reserved Matters Application (C/D Ref: 2.87), a comprehensive and sustainable	No Dispute

Policy DC1 (Design Considerations)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
necessary enhanced, to enable the development to proceed.		management of surface and foul water is proposed and there is sufficient capacity within the existing drainage and sewerage systems to accommodate the Appeal Scheme.	
Ensure, where appropriate, equality of access and use for all sections of the community.	Yes	The Appeal Scheme will primarily serve residents from the Leisure Development but would also be open to the local community.	No Dispute
Be served by high-speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.	Yes	The Appeal Scheme will be served by high-speed broadband once Moneystone Park is operational.	No Dispute

12.7 In summary, the Appeal Scheme fully complies with the requirements of Policy DC1. It is considered that The Council disputes the compliance of The Appeal Scheme with the parts of Policy DC1 highlighted in red in the table above.

Local Plan Policy E4 (Tourism and Cultural Development)

12.8 My assessment of the Appeal Scheme against Policy E4 is set out in the following table. To aid the Inspector and based upon my understanding, the final column in the table sets out whether the policy criteria is disputed between The Appellant and The Council.

Policy E4 (Tourism and Cultural Development)			
Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment	Appellants Understanding on Policy Criteria Dispute between The Appellant and The Council
New tourism and cultural development which complements the distinctive character and quality of the District will be supported having regard to the Area Strategies in Policies SS 5 to SS 10 and Churnet Valley Strategy Policy SS 11.	Yes	<p>The Appeal Scheme will ensure the delivery of a high-quality new tourism and cultural development. Policies SS 5 to SS 9 are not relevant to the Appeal Scheme however Policy SS10 supports sustainable tourism development in the Churnet Valley in accordance with Policy SS 11 and the Churnet Valley Masterplan SPD.</p> <p>The Appeal Scheme respects the distinctive character of the Churnet Valley in line with Policy SS11 (please see the table above for assessment against Policy SS11).</p>	Yes
<p>1. New tourist, visitor and cultural accommodation, attractions and facilities should be developed in locations that offer, or are capable of offering either:</p> <p>A) good connectivity with other tourist destinations and amenities, particularly by public transport, walking and cycling; or</p> <p>B) in locations in or close to settlements where local services, facilities and public transport are available; or</p>	Yes	<p>The Appeal Site is specifically identified as an opportunity site for tourism development in the CVM and therefore accords with Criterion C.</p> <p>The Appeal Scheme also accords with Criterion A as the Appeal Scheme includes a range of new footpaths and bridleways which will provide connectivity with other tourist destinations.</p> <p>The principle of leisure development on the site has been established through the Outline Planning Permission.</p>	No Dispute

<p>C) in areas specifically identified for tourism development in the Churnet Valley Masterplan or other relevant documents.</p>			
<p>2. Developments in other locations may be supported where a rural location can be justified.</p> <p>New accommodation, attractions and facilities should:</p> <p>A) support the provision and expansion of tourist, visitor and cultural facilities in the rural areas where needs are not met by existing facilities; and</p> <p>B) all development shall be of an appropriate quality, scale and character compatible with the local area, protect the residential amenity of the area, enhance the heritage, landscape and biodiversity of the area and shall not harm interests of acknowledged importance.</p>	<p>Yes</p>	<p>This element of Policy E4 is not applicable as the Appeal Site is in a location specifically identified for tourism development.</p>	<p>No Dispute</p>

- 12.9 In summary, the Appeal Scheme fully complies with the requirements of Policy E4. It is considered that The Council disputes the compliance of The Appeal Scheme with the parts of Policy E4 highlighted in red in the table above.

Churnet Valley Masterplan SPD

- 12.10 Whilst the Reason for Refusal does not refer to conflict of the Appeal Scheme with the CVM, this represents a material consideration in the determination of the Appeal.
- 12.11 So, for completeness, an assessment of the Appeal Scheme against the CVM is contained at **Appendix 10**. This demonstrates that the Appeal Scheme is strongly supported by the policies within the CVM.

Staffordshire Moorlands Design Guide SPD

- 12.12 Whilst the Reason for Refusal does not refer to the Staffordshire Moorlands Design Guide SPD (SMDG), the Council states at paragraph 3.7 of its Statement of Case that this is of relevance to the Appeal Scheme.
- 12.13 Mr Pullan's Design Proof of Evidence demonstrates that the guidance provided within this SPD has guided the design of the Appeal Scheme.

Section 2 – The Staffordshire Moorlands Tradition

- 12.14 Section 2 of the Design Guide SPD (The Staffordshire Moorlands Tradition) explains that the Staffordshire Moorlands' landscapes provide some of the defining characteristics of the area and have been instrumental in shaping local settlement patterns. In order to protect, and where possible enhance, the landscape character, development should assimilate into the landscape and avoid adverse impact on landscape quality.
- 12.15 As set out in Mr Pullan's Design Proof of Evidence, the Appeal Scheme pattern of development reinforces the existing landscape framework of the Appeal Site. The design approach is deliberate in designing buildings and structures that are subservient in scale and appearance to the landscape. The Hub is an exception which is a distinctive and innovative building (in appearance).

Section 3 – New Development – Designing in Context

- 12.16 In the context of new development, Section 3 of the Design Guide SPD (New Development – Designing in Context) states that the setting of any development should be carefully considered in relation to its impact on views, into, over and out of the site. Specifically in

relation to sites on the edge of settlements, development should sit comfortably in the landscape by emulating the horizontal, ground-hugging form of traditional buildings with strong eaves and ridge lines, and simple low silhouettes parallel with contours.

- 12.17 New development should ultimately be guided by the existing character and context. Site proposals should consider both contemporary and traditional architectural style capable of accommodating high quality and functional development. The scale of new development should be respectful of the surrounding built environment.
- 12.18 As set out in Mr Pullan's Proof of Evidence and Chapter 10 of my evidence, the existing character and context of the Appeal Site has been a key driver of the Scheme design that is proposed, in accordance with the thrust of this policy.

Section 7 – Details and Materials

- 12.19 Section 7 of the Design Guide SPD (Details and Materials) states that new buildings should ideally be constructed from the same palette of materials used traditionally in the area. This means for the most part natural stone or brick for walling and Staffordshire blue clay tiles or slate for roofs. It notes that high quality modern materials may be acceptable in certain circumstances and encourages the use of sustainable materials.
- 12.20 As set out in Mr Pullan's Design Proof of Evidence, the Appeal Scheme is of its own contemporary rural style and the materials palette (principally timber and muted tones) draws upon the context, in accordance with this guidance. It would not be appropriate for holiday lodges (howsoever constructed) to be built of stone with slate roofing for example.

National Planning Policy Framework (including Chapters 12 and 15)

- 12.21 The reason for refusal does not state which paragraphs of the NPPF the Appeal Scheme is contrary too. I have therefore assessed the Appeal Scheme against Chapter 12 'Achieving well-designed and beautiful places' and Chapter 15 'Conserving and enhancing the natural environment' of the NPPF, both of which are referenced in the reason for refusal, which is set out below.

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<i>Chapter 12 'Achieving well-designed and beautiful places'</i>		
<p>131. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</p>	Yes	<p>The Appeal Scheme will create a high quality, beautiful and sustainable place. I conclude that the Appeal Scheme will be high quality because:</p> <ol style="list-style-type: none"> 1. A comprehensive Landscape Led Masterplan process has been followed to ensure the Appeal Scheme has a sensitive relationship with the Appeal Site and its constraints. 2. The quantum and scale of the Appeal Scheme is appropriate and the density, massing and height is in accordance with the Outline Planning Permission. 3. The design of the proposed lodges, hub building and activity building is high quality in terms of the materials, fitness for purpose of the proposed architecture and local distinctiveness. 4. The landscape visual impact of the Appeal Scheme is also appropriate having regard to the relationship of the Appeal Scheme to its wider setting and its very low impact on close views and wider vistas. 5. The landscape design and the positive contribution the Appeal Scheme will make to public realm, landscape and planting. The Appeal Scheme will deliver extensive areas of open space and walking, cycling and bridleway connections. 6. The significant ecological enhancements the Appeal Scheme will deliver. 7. The energy benefits that the Appeal Scheme will secure. <p>In addition, over a significant period of time, the Appellant has had very effective engagement with the SMDC Officers who recommended the application for approval.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>132. Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.</p>		<p>SMDC has not produced a Borough Wide Design Code and there is not a Neighbourhood Plan covering the Appeal Site nor a Neighbourhood Plan Group.</p> <p>However, the CVM SPD has been prepared and approved by SMDC for the area which covers the Appeal Site. The CVM sets out, at section 8.7, criteria that the design quality of proposals will be assessed against. A full assessment of the Appeal Scheme against the CVM is provided at Appendix 10.</p> <p>The CVM identifies the Appeal Site as an Opportunity Site for a high quality leisure development and in doing so sets out a clear design vision. Through extensive engagement with SMDC, Laver Leisure helped shape the design vision for the Appeal Site in the CVM and I have concluded that the Appeal Scheme accords with the CVM.</p>
<p>133. To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places</p>		<p>SMDC has not prepared a Borough Wide Design Code however, as stated above, the Appeal Scheme has been assessed against the CVM design quality criteria.</p> <p>Furthermore, the Design Proof of Evidence assesses the Appeal Scheme against the National Design Guide. The Appeal Scheme accords with both the CVM and the National Design Code and will create a beautiful and distinctive place with a consistent and high quality standard of design.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.</p>		
<p>134. Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.</p>		<p>As stated above, SMDC has not prepared a Borough Wide Design Code. However, the Council has prepared and adopted the CVM which is an SPD and does contain Design Principles at Section 8.7. The CVM was subject to community consultation and Laver Leisure inputted into every stage of preparation of the CVM and helped shape the design vision for the Appeal Site. The Appeal Scheme has been assessed against the CVM and accords with it.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>135. Planning policies and decisions should ensure that developments:</p> <p>a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;</p> <p>b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</p> <p>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</p> <p>d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;</p> <p>e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other</p>		<p>I have assessed the quality of the Appeal Scheme and concluded that it is high quality. The Appeal Scheme:</p> <p>a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. The Appeal Site has been assessed to have a very low impact on the landscape and the proposed buildings and lodges will be set in high quality and attractive landscaping. Furthermore, extensive areas of ecological enhancement area proposed which will have long term management.</p> <p>b) Is visually attractive as a result of good architecture, layout and appropriate and effective landscaping.</p> <p>c) Is sympathetic to local character and history, including the surrounding built environment and landscape setting.</p> <p>d) Will establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create an attractive, welcoming and distinctive place to live, work and visit.</p> <p>e) Will optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks. An extensive range of facilities are proposed which will be accessible to the local community. Furthermore, extensive footpath, cycleway and bridleway links are proposed. The Appeal Scheme will deliver significant economic, social and environmental benefits.</p> <p>f) Will create a place that is safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>public space) and support local facilities and transport networks; and</p> <p>f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p>		
<p>136. Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways</p>		<p>Laver Leisure has had extensive dialogue with SMDC Officers including the Trees and Woodland Officer who raised no objections to the Appeal Scheme. Furthermore, no objections were raised to the application by the Woodland Trust and the Forestry Commission.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
standards and the needs of different users.		
<p>137. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.</p>		<p>The Appellant has had very effective engagement with SMDC Officers over a significant period of time and the scheme was revised to address comments that were received from SMDC Officers and statutory and non-statutory consultee organisations during the determination of the application. This process led to the Reserved Matters Application being recommended for approval subject to conditions.</p> <p>Laver Leisure has also undertaken extensive community consultation prior to the submission of both the outline and reserved matters applications and where possible has amended the proposals at every stage. There is opposition to the development from local action groups because they do not agree with the principle of the development which was approved by The Outline Planning Permission and is not relevant to the determination of this Appeal.</p>
<p>138. Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. The primary means of doing so should be through the preparation and use of local design codes, in line with the National Model Design Code. For assessing proposals there is a range of tools including</p>		<p>As stated above, SMDC has not prepared a Borough Wide Design Code. However, the Council has prepared and adopted the CVM which is an SPD and does contain Design Principles at Section 8.7. The CVM was subject to community consultation and Laver Leisure inputted into every stage of preparation of the CVM and helped shape the design vision for the Appeal Site. The Appeal Scheme has been assessed against the CVM and accords with it.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life. These are of most benefit if used as early as possible in the evolution of schemes and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.</p>		
<p>139. Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:</p> <p>a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and</p>		<p>The Appeal Scheme is well designed and is high quality. Furthermore, I have concluded in this Chapter that the Appeal Scheme accords with Local Plan policies SS1, SS11, DC1 and E4, the CVM and government guidance on design. Therefore, significant positive weight should be given to this in the determination of the appeal.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>supplementary planning documents such as design guides and codes; and/or</p> <p>b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.</p>		
<p>140. Local planning authorities should ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development and are clear about the approved use of materials where appropriate. This will provide greater certainty for those implementing the planning permission on how to comply with the permission and a clearer basis for local planning authorities to identify breaches of planning control. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted</p>		<p>Chapter 14 of this Proof of Evidence sets out suggested planning conditions which refer to clear and accurate plans as well as a Materials Palette. These plans provide visual clarity about the design of the Appeal Scheme and are clear about the use of materials.</p>

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
scheme (for example through changes to approved details such as the materials used).		
141. The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.		The Reserved Matters Application is not seeking advertisement consent for the Appeal Scheme which will be addressed through a separate application for Advertisement Consent at a later date.
<i>Chapter 15 'Conserving and enhancing the natural environment'</i>		
180a. States that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.		Mr Pullan's Design Proof of Evidence, Mr Bratherton's Design Quality Proof of Evidence, the Landscape Design Statement (Appendix 1) and the Ecology Statement (Appendix 2) all demonstrate that the Appeal Scheme will deliver a high-quality development in design, landscape and ecology terms which will enhance the natural environment of the Appeal Site.
180b. States that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.		Mr Pullan's Design Proof of Evidence, Mr Bratherton's Design Quality Proof of Evidence, the Landscape Design Statement (Appendix 1) and the Ecology Statement (Appendix 2) all demonstrate that the Appeal Scheme will deliver a high-quality development in design, landscape and ecology terms which will enhance the natural environment of the Appeal Site.

Policy Requirement	Appellants Assessment of Compliance	Appellant's Assessment
<p>189. States that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.</p>		<p>Matters relating to contamination were considered at the outline stage. Both the Councils Environmental Health Officer and the Environment Agency raised no objection, subject to appropriate conditions being attached to the outline permission.</p>
<p>190. States that where a site is affected by contamination or land stability issues, responsibility for securing a safe environment rests with the developer and/or landowner.</p>		<p>Matters relating to contamination were considered at the outline stage. Both the Councils Environmental Health Officer and the Environment Agency raised no objection, subject to appropriate conditions being attached to the outline permission.</p>

12.22 In summary, the Appeal Scheme fully complies with the requirements of Chapters 12 and 15 of the NPPF.

National Design Guide

12.23 Mr Pullan's Proof of Evidence provides a detailed assessment of the Appeal Scheme against the ten characteristics of the National Design Guide. The assessment concludes that:

1. The Appeal proposal is a well-designed and attractive scheme that successfully integrates the lodges into a strong landscape framework; and
2. The lodges are of a suitability high quality design (functionally and aesthetically), such that the Appeal Scheme would be appropriately beautiful in its landscape context.

Summary

12.24 In summary, I consider that the Appeal Scheme complies with Policies SS1, SS11, DC1 and E4 of the Adopted Local Plan, as well as the relevant paragraphs of the NPPF and the other relevant policies and guidance assessed within this Chapter. The scheme accords with the Development Plan taken as a whole, together with a raft of policy at different levels.

12.25 At paragraph 5.3 of its Statement of Case, the Council indicates that the policy assessment presented within the Appellant's Statement of Case does not properly assess the Appeal Scheme against the relevant design policies of the Local Plan and seeks to demonstrate compliance with these policies simply on the grounds that the development would not impact on landscape, heritage or biodiversity. This is not the approach that was taken to the assessment. Furthermore, the updated assessment presented within this chapter draws directly on the Design evidence produced by Mr Pullan and Mr Bratherton in advance of the Public Inquiry.

12.26 At paragraph 5.4, the Council states that the assessment against the National Design Guidance (NDG) that formed part of the Appellant's Design Statement of Case is incomplete and fails to include a robust and comprehensive assessment against all the ten characteristics of that document – especially for a scheme of this size. As stated previously, Mr Pullan's Proof of Evidence provides a detailed assessment of the Appeal Scheme against the ten characteristics of the National Design Guide. The Council has not

however undertaken any such assessment of its own which has been presented at the time of writing.

13 APPELLANT'S RESPONSE TO THE REASON FOR REFUSAL

13.1 In the previous chapters of my Proof of Evidence, I have concluded that:

1. The reason for refusal relates only to the design of the external appearance of the lodges and not any other aspects of the reserved matters application such as the density, layout, hub building, etc which has been confirmed in the email exchange between myself and Mrs Jane Curley, SMDC Planning Case Officer, at **Appendix 5**.
2. It was misguided of the Councils Planning Committee Members to judge that the proposed lodges are no more than 'caravans with cladding' and are not of a high standard of design. The lodges have been designed to comply with the statutory definition of 'caravans', however they are not static caravans nor touring caravans. The lodges have been designed to comply with the statutory definition for convenience of construction and irreversibility and through doing this, it does not impact on the high quality lodges that are proposed at Moneystone Park.
3. The lodge designs are proposed to be of high quality having regard to their appearance, detailing, form, design and materials. The lodges are low density and will have very low visual impact from anywhere beyond the site boundary.
4. The design of the lodges are in-keeping with the sensitivity of the site which includes Whiston Eaves SSSI. The reason for refusal is wholly wrong to refer to the SSSI because the SSSI is irrelevant in the context that it has been used. The SSSI designation does not relate to appearance or setting and solely relates to scientific interest. Raising this issue in the context of lodge design is entirely misguided to the point of being unreasonable.

13.2 The reason for refusal alleges conflict with SS1, SS11, DC1 and E4 of the Adopted Local Plan, as well as the NPPF. I assessed the Appeal Scheme against these and the other most relevant policies in the previous chapter.

The Three Alleged "Shortcomings"

13.3 At paragraph 4.3 of its Statement of Case, the Council states that there are three shortcomings where the design of the proposed lodges fails to meet the policy requirements, and that therefore the lodges cannot be high quality. These "shortcomings" are as follows:

1. A focus on compliance with the Caravans Act has immediately restricted the design approach.

2. Poor form, scale and elevation appearance.

3. Poor response to the character and vernacular.

13.4 These are assessed in detail within Mr Pullan's Proof of Evidence (and summarised above), who rejects these alleged shortcomings and concludes that this is a well designed scheme which meets the requirements of the relevant design policies and guidance.

14 PLANNING CONDITIONS

14.1 The Statement of Common Ground which at the time of writing is being discussed between The Appellant and The Council will include, in the event that the Inspector is minded to allow the appeal:

1. A list of conditions; and
2. An updated list of Application Plans and Drawings.

14.2 The conditions being discussed are largely taken from the Officers Report to Committee. The Appellant is proposing condition amendments and additions to the list of conditions to address the following matters:

Lodge Siting

14.3 As set out at Paragraph 7.49, the Layout Plans submitted with The Reserved Matters Application have been amended to show the location of the 4 lodge types across The Appeal Site. The Layout Plans are provided at **Appendix 8**. To reflect this amendment, The Appellant proposes for the following condition:

“Any lodge including its decked area (and all subsequent replacement lodges and their associated replacement decked area) shall only be sited in accordance with the siting as specified and in drawing numbers 1733-MS-010 Rev E; 1733-MS-022 Rev F; 1733-MS-023 Rev E and 1733-MS-024 Rev D hereby approved. 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 of the Local Planning Authority”.

Elevational Treatment

14.4 At Paragraph 7.47, I describe the minor updates which have been made to the elevation drawings were also provided at **Appendix 8**. To reflect this amendment, The Appellant proposes the following condition:

“Any lodge including its decked area (and all subsequent replacement lodges and their associated replacement decked area) shall only be constructed in accordance with the design and elevational treatment and using the external facing and roofing material as specified and described in drawing numbers 1733 LV-020 Rev E, 1733 LV-021 Rev E, 1733 LV-022 Rev E and 1733 LV-023 Rev E hereby approved. There shall be no variation to any of these details without the prior consent of the Local Planning Authority. For the avoidance of doubt any glazing proposed to decked areas should be non-reflective/anti glare”.

Materials Palette

14.5 The Council indicates at paragraph 7.9 of its Statement of Case that it would be willing to accept a condition to be attached to any reserved matters approval granted relating to the final materials, finishes and installation of the external materials, including agreeing specification of the glazed balustrade.

14.6 As set out at Paragraph 7.45, a Materials Palette (contained in **Appendix 12**) has been prepared by NBDA Architects. The Appellant proposes a new condition to condition the Materials Palette as follows:

“No lodges shall be constructed until samples of the materials to be used in the external surfaces of the lodges hereby permitted have been submitted to and approved in writing by the Local Planning Authority. The sample materials shall be in accordance with the Materials Palette (dated August 2024) and shall include finishes, installation methods and the specification of the glazed balustrade. The development shall be carried out in accordance with the approved details.”

Energy Strategy

14.7 At paragraph 7.5 of its Statement of Case, The Council states that there is a lack of clarity regarding the energy strategy that was submitted with the Reserved Matters Application. Further clarity is provided on this matter by Mr Young within his Energy Proof of Evidence. A proposed Energy Statement is appended to Mr Young’s Proof of Evidence which proposes that Air Source Heat Pumps will be provided at each lodge which is a significant benefit of The Appeal Scheme.

14.8 The Appellant has recommended an additional condition, requiring the submission of a detailed energy statement for the development (covering the lodges and the hub building). The Council indicates at paragraph 7.9 of its Statement of Case that it would be supportive of such a condition.

14.9 The Appellant proposes that this condition should be worded as follows:

“No development shall commence until a detailed Energy Statement has been submitted to and approved in writing by the Local Planning Authority. The detailed Energy Statement shall be in accordance with the Energy Statement prepared by Futureserv (Document Ref: P7700-FS-XX-XX-RP-M-003-P02) received by Staffordshire Moorlands Council on 2nd September 2024. The development shall be constructed and operated in accordance with the approved detailed Energy Statement.”

15 THIRD PARTY COMMENTS

- 15.1 **Appendix 11** to this Proof of Evidence provides, in a tabular form, the Appellant's response to the matters raised by the Rule 6 Parties in their Statement of Case and the Interested Parties in their representations regarding the Appeal Scheme.

16 SCHEME BENEFITS

- 16.1 Paragraph 8 of the NPPF promotes the delivery of sustainable development through three overarching objectives: economic, social and environmental. Paragraph 9 of the NPPF requires that planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 16.2 The Appeal proposals will deliver a net benefit in respect of the economic, social and environmental objectives of sustainable development and as such the proposals align themselves with one of the most important objectives of national policy. The Appeal Scheme will deliver the following benefits which should be afforded significant weight in the determination of the appeal.

Economic Benefits

- 16.3 The Economic Benefits Statement (**Appendix 3**) sets out that the following economic benefits will be secured by the Appeal Scheme:
1. 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.
 2. 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.
 3. 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.
 4. 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.

5. 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.

16.4 In addition to these quantified benefits, The Leisure 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.

16.5 In summary, The Appeal Scheme will deliver a series of economic benefits which should be afforded significant positive weight in accordance with Paragraph 85 of the NPPF.

Social benefits

16.6 The Appeal Scheme will deliver the following social benefits:

1. Accessibility to an extensive range of indoor and outdoor activities at 'the Hub' by the local community. The central hub area will offer a range of leisure facilities including a farm shop, restaurant, café, swimming pool, gym, spa, games room, bowling alley, visitor centre, Multi Use Games Area (MUGA) and play area.
2. Accessibility to the proposed services within the hub by the local community which will enhance the ongoing vitality and viability of local villages.
3. Delivery of educational opportunities at the visitor centre covering:
 - a) Quarrying History - The quarrying history of the site and background to the geology in the area;
 - b) Silica Sand - The use and importance of silica sand in modern technology;
 - c) Sustainable Technologies - Focussing on the adjacent solar farm demonstrating how the energy is produced and where it goes; and
 - d) Wildlife and Ecology - Remote recording/ 'spy cams' showing protected habitats and local fauna and flora.
4. Short and long stay visitor accommodation in the form of new lodges which will make a positive contribution towards the local economy.
5. Measures to improve connectivity and accessibility to and within the Churnet Valley by sustainable transport means such as a shuttle bus to Alton Towers.

6. The Appeal Scheme will open up the site for the public via several new footpaths and cycleway connections to provide greater access to the countryside for the local community and visitors.

16.7 In summary, there are a compelling suite of social benefits which should be afforded significant weight in the determination of this appeal.

Environmental benefits

16.8 The Appeal Scheme will deliver the following environmental benefits:

1. 190 single storey lodges set within an extensive landscape led framework including the retention and enhancement of existing woodland, extensive new planting and the provision of a Quarry Park.
2. In habitat sensitive areas 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.
3. The Quarry Park will add amenity value to The Leisure Development and have beneficial ecological impacts for local wildlife.
4. The Appeal Site will be porous in ecological terms as there is no major land take nor will significant barriers to the movement of wildlife be created.
5. The landscaping proposals will provide a range of new and enhanced planting including: new native hedgerows; tree planting and native scrub planting.
6. Overall, the development will deliver substantial benefits for wildlife by:
 - a) enhancing extensive areas of grassland within and beyond the proposed development site;
 - b) bringing extensive areas of neglected broadleaved woodland, including ancient, replanted woodland, into favourable management;
 - c) protecting and enhancing SSSI and SBI designations as a consequence of grassland and woodland management;
 - d) creating and enhancing other habitats within the former minerals extraction areas including wetland habitats;

- e) creating opportunities for a wide range of species associated with the site (e.g. bird and bat boxes, refuge habitat for amphibians/reptiles); and
 - f) delivery of a long term monitoring strategy secured by planning condition, compared to the previous 5 year after care period associated with quarry restoration.
7. Moneystone Park is a former quarry requiring restoration and The Appeal Scheme would represent an efficient use of the land.
8. There are no designated or non-designated heritage assets within the site. The Appeal Scheme will not result in any adverse impacts on existing heritage features or archaeological assets.
9. Mitigation is proposed to remove contamination risk and as such there would be no harm to visitors at the application site.
10. In accordance with the Energy Strategy Statement of Case, the proposed lodges will be powered by Air Source Heat Pumps.
- 16.9 In summary, there are a compelling suite of environmental benefits which should be afforded significant weight in the determination of this appeal.

Summary

- 16.10 In summary, the Appeal scheme will deliver a net benefit in terms of economic, social, and environmental objectives of sustainable development in accordance with the NPPF. As such, The Appeal Scheme will bring forward a suite of undeniable benefits that weigh very heavily in favour of granting planning permission and should be afforded significant weight in the determination of the appeal.

17 SUMMARY AND CONCLUSIONS

- 17.1 This Proof of Evidence has been prepared by Jon Suckley MTCP FRTPI of Asteer Planning on behalf of the Appellant in respect of an appeal against SMDC's decision to refuse the Reserved Matters Application for Phase 1 of the leisure development at Moneystone Park.
- 17.2 The reason for the refusal of the Reserved Matters Application relates specifically to the appearance of the proposed lodges. All other aspects of the Appeal Scheme are deemed by the Local Planning Authority to be acceptable.
- 17.3 Chapter 3 provides the background to The Appellant and the vision for Moneystone Park. Laver Leisure has extensive experience in the leisure and tourism industry and its proposals for Moneystone Park would provide a diversification to their existing holiday home/beach orientated holiday offer via the delivery of what is intended to be a high-end high-quality leisure development at Moneystone Quarry (now known as Moneystone Park).
- 17.4 Laver Leisure's vision is to provide a premium offer targeted at the top end of the leisure market for lodge accommodation housed in a high quality landscaped environment with associated ancillary buildings providing opportunities for site occupants and visitors to enjoy on site a quality food and drink offer, along with indoor leisure activities, and outdoor activities such as walking, cycling, horse riding etc.
- 17.5 Chapter 4 provides the background to The Outline Planning Permission and The Reserved Matters Application which is the subject of this appeal. It also explains that the Reserved Matters Application was recommended by Officers for approval, before being refused by SMDC's Planning Committee.
- 17.6 Chapter 5 describes the Appeal Site and the surrounding area and Chapter 6 describes the Appeal Scheme, which proposes 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.
- 17.7 Chapter 7 provides a response to the note issued by the Inspector on 1 August 2024 identifying additional points to be included in the evidence to be submitted in advance of the Public Inquiry. This Chapter addresses the Caravans Act, the LIVA Viewpoints, Roofing Materials, Walling, Elevations, the Curtilages to the Lodges and also provides a detailed description of the evidence that was submitted, determined, and conditioned at the Outline Planning Application stage.

- 17.8 The Appellant has commissioned the production of material samples and would intend to bring samples of this material to the inquiry itself to enable inspection, albeit that an approval of materials condition is anticipated.
- 17.9 The Appellant proposes that a generic palette of materials could be conditioned, with precise specimen samples submitted for approval by the LPA prior to the siting of the individual lodges on The Appeal Site. This would help to retain a consistency of appearance as The Appeal Scheme is delivered.
- 17.10 A Materials Palette (contained in **Appendix 12**) has been prepared by NBDA Architects which proposes the following materials:
- a) Wall Cladding/Treated T&G Timber: Accoya, Larch or Cedar
 - b) Roof Finish: Tile 'Lookalike' Pressed Metal Trays with a Textured Dark Grey Matt Finish
 - c) Eaves, Fascias & Rainwater Goods: Anthracite coloured Eaves/Fascias, Gutters, and Downpipes
 - d) Deck Balustrade: Glass in Stainless Steel Brackets between Timber Posts
 - e) Doors & Windows: Anthracite Door & Window Frames
 - f) Composite Timber Decking: Composite Prime or Millboard
- 17.11 An updated set of drawings are contained within **Appendix 8**. For clarification, the elevational drawings were submitted with The Reserved Matters Application but were in black and white. The updated elevation drawings are now provided in colour, exclude the title "indicative", and show the location of the Air Source Heat Pumps. The Council in their Statement of Case at Paragraph 7.3 state that "*...the design of the lodges appears unchanged...*".
- 17.12 Chapter 8 sets out the relevant planning policy framework at local and national levels as well as other material considerations.
- 17.13 Chapter 9 explains that the key areas to be considered by this Proof of Evidence are, firstly, the design and quality of the Appeal Scheme and the proposed lodges, and secondly, the compliance of the Appeal Scheme with Policies SS1, SS11, DC1 and E4 of the Staffordshire Moorlands Local Plan, the Staffordshire Moorlands Design Guide SPD, the CVM, Chapters 12 and 15 of the NPPF and the National Design Guide. This Chapter also

challenges the three key design aspects that the Council says the reason for refusal is based around.

- 17.14 Chapter 10 summarises the design process and demonstrates that an appraisal of the character of the area, and the Appeal Site's opportunities and constraints, has been a significant design driver for the Appeal Scheme.
- 17.15 Chapter 11 addresses various matters concerned with the design and quality of the Appeal Scheme. Drawing on the evidence provided within Mr Pullan's Proof of Evidence, it demonstrates that the design of the proposed lodges is fully consistent with the relevant principles within the Design and Access Statement approved as part of the Outline Planning Application and that the Council is incorrect to suggest otherwise.
- 17.16 Chapter 12 provides an Assessment of the Appeal Scheme against the relevant planning policies (namely Policies SS1, SS11, DC1 and E4 of the Adopted Local Plan, the relevant paragraphs of the NPPF and the other relevant policies and guidance).
- 17.17 In summary, I consider that the Appeal Scheme complies with Policies SS1, SS11, DC1 and E4 of the Adopted Local Plan, as well as the relevant paragraphs of the NPPF and the other relevant policies and guidance assessed within this Chapter. The scheme accords with the Development Plan taken as a whole, together with a raft of policy at different levels.
- 17.18 At paragraph 5.3 of its Statement of Case, the Council indicates that the policy assessment presented within the Appellant's Statement of Case does not properly assess the Appeal Scheme against the relevant design policies of the Local Plan and seeks to demonstrate compliance with these policies simply on the grounds that the development would not impact on landscape, heritage or biodiversity. This is not the approach that was taken to the assessment. Furthermore, the updated assessment presented within this chapter draws directly on the Design evidence produced by Mr Pullan and Mr Bratherton in advance of the Public Inquiry.
- 17.19 At paragraph 5.4, the Council states that the assessment against the National Design Guidance (NDG) that formed part of the Appellant's Design Statement of Case is incomplete and fails to include a robust and comprehensive assessment against all the ten characteristics of that document – especially for a scheme of this size. As stated previously, Mr Pullan's Proof of Evidence provides a detailed assessment of the Appeal Scheme against the ten characteristics of the National Design Guide. The Council has not

however undertaken any such assessment of its own which has been presented at the time of writing.

17.20 Chapter 13 sets out the Appellant's response to the Reason for Refusal and addresses the Council's alleged three "shortcomings" where it asserts that the design of the proposed lodges fails to meet the policy requirements, and that therefore the lodges cannot be high quality.

17.21 I have concluded that:

1. The reason for refusal relates only to the design of the external appearance of the lodges and not any other aspects of the reserved matters application such as the density, layout, hub building, etc which has been confirmed in the email exchange between myself and Mrs Jane Curley, SMDC Planning Case Officer, at **Appendix 5**.
2. It was misguided of the Council's Planning Committee Members to judge that the proposed lodges are no more than 'caravans with cladding' and are not of a high standard of design. The lodges have been designed to comply with the statutory definition of 'caravans', however they are not static caravans nor touring caravans. The lodges have been designed to comply with the statutory definition for convenience of construction and irreversibility and through doing this, it does not impact on the high quality lodges that are proposed at Moneystone Park.
3. The lodge designs are proposed to be of high quality having regard to their appearance, detailing, form, design and materials. The lodges are low density and will have very low visual impact from anywhere beyond the site boundary.
4. The design of the lodges are in-keeping with the sensitivity of the site which includes Whiston Eaves SSSI. The reason for refusal is wholly wrong to refer to the SSSI because the SSSI is irrelevant in the context that it has been used. The SSSI designation does not relate to appearance or setting and solely relates to scientific interest. Raising this issue in the context of lodge design is entirely misguided to the point of being unreasonable.

17.22 Chapter 14 sets out the planning conditions proposed by The Appellant that should be attached to any reserved matters approval granted in the event that the Appeal is allowed. These conditions relate to lodge siting, elevational treatment, materials palette and energy strategy.

- 17.23 Chapter 15 (and the associated **Appendix 11**) provides the Appellant's response to the matters raised by the Rule 6 Parties and other Interested Parties regarding the Appeal Scheme.
- 17.24 Chapter 16 outlines the net benefit that the Appeal Scheme will deliver in respect of the economic, social and environmental objectives of sustainable development, which should be afforded significant weight in the determination of the Appeal.
- 17.25 In considering all of these matters as a whole, I have reached the conclusion that the Appeal should be allowed and the Reserved Matters Application should be approved, subject to conditions.

APPENDIX 1 – Landscape Design Statement

APPENDIX 2 – Ecology Statement

APPENDIX 3 – Economic Benefits Statement

APPENDIX 4 – Moneystone Quarry Planning History

APPENDIX 5 – Email Exchange Between Applicant and Mrs Jane Curley

APPENDIX 6 – 2nd September 2024 Letter from The Appellant to the Inspector

APPENDIX 7 – Key Viewpoints

APPENDIX 8 – Updated Set of Reserved Matters Application Drawings & Lodge Elevation Plans

APPENDIX 9 – Updated Photomontages

APPENDIX 10 – Assessment Against the Churnet Valley Masterplan SPD

APPENDIX 11 – Appellant’s Response to Third Party Matters

APPENDIX 12 – Materials Palette