

Rocester Parish Council  
Hilltop Cottage  
Wood Lane  
Uttoxeter  
ST14 8JR

Mr Alan Harvey  
ESBC Principal Planning Officer  
30<sup>th</sup> March 2020

Dear Alan

Please find below comments on planning applications – P/2017/00668 – Churnet House Farm

**P/2017/00668 : Erection of 18 no dwellings with new vehicular access and associated garaging/parking facilities following the demolition of the existing farm buildings along with restoration works to the existing dwelling at Churnet Farm (Amended Scheme)**

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**1.0 Executive Summary**

Housing need and its location in Rocester

- 1.1 Being part of ESBC's Strategic allocation of 90 new dwellings for Rocester, the provision of 18 new dwellings and the restoration of the existing dwelling at Churnet Farm is not objected to.

Access to the Development Site

- 1.2 From consideration of paragraphs 8, 91, 95,102 and 108 -111 of the National Planning Policy Framework (NPPF), until it is known whether or not agricultural access is required through the development site and the highway widths adjusted accordingly, the proposed access as submitted must be objected to.

Existing on-street car parking in Churnet Row / High Street

- 1.3 Unless it can be guaranteed that the existing number of on-street parking spaces in Churnet Row and High Street can be maintained or spaces lost by providing an adequate access to the development site are relocated within said site close to the existing highway, the proposals as submitted are objected to.

Flood Risk

- 1.4 Unless there is a planning condition or obligation in accordance with NPPF paragraph 54 to ensure that any flooding arising from a 1 on 100 year plus 40% climate change flood event is to be limited to within the development boundary and must not be allowed to migrate to adjacent properties, the development proposal is objected to.

Surface Water Drainage

- 1.5 Unless;
- it is clearly established who is to be responsible for the maintenance, repair, safety and security of the SuDS system and included as a planning condition; and
  - the SuDS system is fully operational;
- the proposals are objected to.

Impact on Rocester Conservation Area

- 1.6 It is encouraging that Churnet House is now to be retained. If full planning permission is to be granted, its long-term retention must become a planning condition, otherwise the proposals are objected to.
- 1.7 Concerning the brick barns on the street frontage, after weighing the present building's lamentable condition against the careful design of the proposed replacement dwellings and the general maintenance of the existing streetscape thereby, their demolition is accepted.

#### Design proposals

- 1.8 Subject to the site access, existing on-street parking and SuDS management issues being resolved satisfactorily, the general design proposals shown in the Amended Scheme are accepted.

#### **Overall Conclusion + Formal Response**

- 1.9 To achieve 'well-designed places', NPPF Paragraph 128 states that '*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*'. Despite Rocester Parish Council's formal raising of its concerns to ESBC as local planning authority, this has not happened.
- 1.10 For the reasons stated above and in accordance with NPPF paragraph 130 para, Rocester Parish Council objects to the Amended Scheme as presently submitted, maintaining that '*permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*'.

## **BACKGROUND**

### **1.0 Housing need and its location in Rocester**

- 1.1 Following significant modification, the East Staffordshire Local Plan 2012 – 2031 was formally adopted on Thursday 15 October 2015. Its Strategic Policy 4 : *Distribution of Housing Growth 2012 – 2031* declares that Rocester's housing needs will be met by the building of 115 new houses within the Plan period, comprising a 90-dwelling Strategic Allocation and a 25-dwelling Development Allowance.
- 1.2 Whilst it was always accepted that 115 new dwellings could well be needed in Rocester, the Parish Council has long-standing reservations as to whether the Churnet Farm site declared as the sole Strategic site was suitable for as many as 90 dwellings.
- 1.3 Since this particular application P/2017/0668 is for just 18 units and need for an additional 115 has already been accepted, the proposal is not objected to in this regard.

### **2.0 Access to the Development Site**

N.B. This section is generally a repeat of the relevant response to Application P/2017/00667.

#### Relevant National Planning Policy Framework (NPPF) requirements

- 2.1 Achieving sustainable development : paragraph 8
- Achieving sustainable development means that the planning system has 3 overarching objectives....*
- *an economic objective – .....*
  - *a social objective – to support strong, vibrant and healthy communities ...by fostering a well-designed and safe built environment, and*
  - *an environmental objective – .....*
- 2.2 Promoting healthy and safe communities : paragraph 91
- Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*
- (b) are safe and accessible ....; and*

*(c) enable and support healthy lifestyles...*

- 2.3 Promoting healthy and safe communities : paragraph 95

*Planning policies and decisions should promote public safety*

- 2.4 Promoting sustainable transport : Paragraph 102

*Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- (a) the potential impacts of development on transport networks can be addressed;*
- (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

- 2.5 Considering development proposals : paragraph 108

*In assessing... specific applications for development, it should be ensured that:*

- (b) safe and suitable access to the site can be achieved for all users...*

- 2.6 Considering development proposals : paragraph 109

*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

- 2.7 Considering development proposals : paragraph 110

*Within this context, applications for development should:*

- (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;*
- (c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles...;*
- (d) allow for the efficient delivery of goods, and access by service and emergency vehicles;*

- 2.8 Considering development proposals : paragraph 111

*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.*

#### National Design Guide

- 2.9 Paragraphs 101 in Section P1 'Create well-located, high quality and attractive public spaces' state that 'Well-designed public spaces, particularly streets, are designed to support an active life for everyone, and are maintained for continual use. It is important to design them to include all of the users who may wish to use them for activities such as socialising, informal doorstep play, resting and movement. Their success depends on them being fit for purpose, attractive places that people enjoy using'. Paragraph 102 mentions that 'In well-designed places, streets are public spaces that are open to all'.

#### Existing Traffic

- 2.10 Churnet Row and the High Street already suffer traffic problems which will be exacerbated by the two proposed developments totalling 90 new dwellings.
- 2.11 The Applicant states that the Transport Assessment and Travel Plan carried out in 2017 are still relevant. This view is not supported by the Parish Council since there have been new traffic-generating developments within the village since that time as well planning permissions granted for significant residential development (71 units) outside the settlement boundary for Rocester and expansion of the JCB Academy.
- 2.12 ESBC and the Highways Authority may have a view on whether these need to be updated.

### Proposed location

- 2.13 After further discussions between the relevant parties, the Applicant believes that a satisfactory access into the site can now be provided as shown on ADC Infrastructure Dwg. No. ADC 1465/002 rev D of 15 October 2016 submitted as part of the amended application.

### Access to residual agricultural land

- 2.14 On behalf of its community and in its previous responses and representations on earlier planning applications, the Pre-submission Local Plan and at the Inspector's Hearings prior to the adoption of the Local Plan, Rocester Parish Council has always expressed its concerns about the continued access for modern agricultural vehicles to land within the Applicant's ownership that will not be used for development.
- 2.15 Both the Design and Access Statement and the Heritage Impact Statement contain aerial and ground-level photographs respectively of the track, the former of which clearly shows access through the farmstead on Churnet Row / High Street.
- 2.16 This amended planning submission and that for the 71 dwellings on the same Strategic Site still give no details as to how said track is to join to the highway network. The Applicant may have already made binding arrangements with adjoining landowners for access to such land. If so, this is neither mentioned nor indicated in the application documents so the matter must be regarded as not having been given due consideration or ignored. Consequently, it can only be assumed that access will remain through the site of the farmstead. No alternative access is possible from the western side since the area is 'river-locked' by the Churnet, whilst the fields on the southern and eastern boundaries are not shown as owned by the Applicant and so access therefrom may not have been granted.
- 2.17 Modern agricultural practices require the regular use of long vehicle combinations equivalent to those of large articulated vehicles, so the proposed road widths and turning radii based on a maximum vehicle length of 10 metres may prove very inadequate. Furthermore, the number of such traffic movements could be considerable at times such as harvest and haymaking.
- 2.18 It seems that such access will have to be along roads within the residential development, depending on ownerships and permissions and require the displacement of the existing on-street parking.
- 2.19 No mention is made of this critical issue in the Memorandum of Understanding so the matter may have not been given any considered or even ignored.
- 2.20 If such access is still required, the proposed highway widths, curve radii and the likely effect on the existing on-street parking in Churnet Row and High Street must be reconsidered.
- 2.21 There is precedent within the village of a planning requirement for a separate tarmac-surface agricultural access being provided for safety reasons to avoid farm traffic having to pass through the new residential estate built on land released for development.
- 2.22 From the above, ESBC as the local planning authority may wish to
- advise the Applicant to update the DAS or provide an addendum (or explanatory note if covered elsewhere in the supporting information) to deal with the very real concerns raised; and/or
  - submit this scheme and that for P/2017/00667 to a Design Review if it considers that this and other local issues are not adequately covered in the DAS and the masterplan for the whole of the Strategic site; and/or
  - consult the various statutory and non-consultees as to whether have been made aware of and subsequently considered agricultural vehicle movements within a significant new residential are when formulating their earlier advice; or
  - refuse the application.

### Vehicles, deliveries and servicing

- 2.23 The large vehicles requiring access to the development site will be for deliveries, servicing and emergencies. The Applicant's Transport Assessment prepared by ADC Infrastructure Ltd and submitted in May 2017 considers that, once the development is occupied, such vehicles will be no more than 10 metres in length, being refuse trucks, fire appliances and large removal vans. However, vehicles longer than this are very likely to require access during the construction phase.
- 2.24 The Applicant asserts that the Highway Authority is satisfied that the standards contained in the Memorandum of Understanding meet such requirements. However, given the unresolved issue of agricultural access, it may not necessarily be the case that the required standards have been met.

#### Conclusion

- 2.25 From consideration of paragraphs 8, 91, 95, 102 and 108 -111 of the National Planning Policy Framework (NPPF), until it is known whether or not agricultural access is required through the development site and the highway widths adjusted accordingly, the proposed access as submitted must be objected to.

### **3.0 Existing on-street car parking in Churnet Row / High Street**

N.B. This section is generally a repeat of the relevant response to Application P/2017/00667.

- 3.1 There are presently 13 existing on-street car parking spaces in Churnet Row and the High Street used by the residents of the adjacent properties and, despite the recent increase provision on the JCB World Headquarters site, its employees.
- 3.2 It is essential that these spaces remain available. The issue was drawn to the attention of ESBC back in April 2012, a time when the Applicant asserted that it was '*able to offer residents assurance that there would be no loss of parking along High Street as a result of the proposed development*'. These latest Application documents also assert that no reduction in numbers will be necessary.
- 3.3 Whilst ADC Infrastructure Dwg. No. ADC 1465/002 rev D of 15 October 2016 shows the turning sweeps for a 10-metre long vehicle entering and exiting the site in both eastward and westward directions, it does not indicate whether the existing and necessary on-street parking spaces will have to be reduced.
- 3.4 If it is found later that numbers will have to be reduced to permit the required sweeps for the largest vehicles (including those for agricultural purposes) expected to use the access, then parking spaces at least equivalent in number to the spaces lost must be provided within the development site as close as possible to said access and early in the construction programme.
- 3.5 Whilst the latest Transport Assessment still claims that there will be no loss of the 13 existing on-street car parking spaces as a result of the development, there are still concerns that the revised location of the sole access for construction, maintenance and any agricultural traffic may require the temporary or, at worst, permanent relocation of all or some of the on-street parking for residents' vehicles.
- 3.6 The revised layout plans continue to make no provision of any necessary compensating off-street parking within the development site so ESBC may wish to reconsider whether the proposed access and total parking arrangements are appropriate.

#### Conclusion

- 3.7 Unless it can be guaranteed that the existing on-street parking provision in Churnet Row and High Street is maintained or spaces lost by the development site's access requirements are relocated within said site close to the existing highway, the proposals as submitted are objected to.

### **4.0 Flood risk**

N.B. This section is generally a repeat of the relevant response to Application P/2017/00667.

Relevant National Planning Policy Framework (NPPF) requirements : Planning and flood risk

4.1 Paragraph 155

*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*

4.2 Paragraph 156

*Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.*

4.3 Paragraph 157

*All plans should apply a sequential, risk-based approach to the location of development... so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:.....*

*(b) safeguarding land from development that is required, or likely to be required, for current or future flood management;*

*(c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and*

*(d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.*

4.4 Paragraph 160

*The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:*

*(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*

*(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*

4.5 Paragraph 161

*Both elements of the exception test should be satisfied for development to be allocated or permitted.*

4.6 Paragraph 163

*When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.... Development should only be allowed in areas at risk of flooding where, in the light of this assessment... it can be demonstrated that:*

*(a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

*(d) any residual risk can be safely managed; and*

*(e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

ESBC Strategic Policy 27 : Climate Change, Water Body Management and Flooding

4.7 *Proposals in flood risk areas, or proposals which would affect such areas, will only be permitted where they would not cause unacceptable harm to the following interests:*

*(i) The protection and storage capacity of the flood plain, washlands and other areas at risk from flooding;*

- (ii) Access to watercourses for maintenance;
- (iii) The characteristics of surface water run-off;
- (iv) The integrity of fluvial defences;
- (v) The drainage function of the natural watercourse system; or
- (vi) The necessity for additional public finances for flood defence works.

Flood risk within the development

- 4.8 See Appendix 1 for a photograph, taken in February 2020, of recent flooding to the Churnet Farm site now being considered for development. Such flooding is already becoming a more regular occurrence.
- 4.9 It is noted that the raising of ground floor levels of the new dwellings should meet what is said in the above paragraph 7.2(1) and keep their safe from flooding. But this will also lead to consequent raising of external ground levels to provide the necessary level threshold accesses and cover to drainage and services as required by the Building Regulations. It must be recognised that such requirements could well displace flood water presently accommodated within the site into existing adjacent properties.

Flood risk to adjacent properties

- 4.10 The Parish Council has significant and ongoing concerns that existing properties surrounding the site in Churnet Row, High Street and Riversfield Drive might, depending on their location and ground floor levels, suffer flooding from water emanating from the development, especially in view of previous flooding and the known problems for residents when seeking flood risk insurance.
- 4.11 The Applicant's Flood Risk Assessment was originally accepted by the Environment Agency in the expectation that *'the 1 on 100 year plus 30% climate change flood ....be limited to the development boundary and must not be allowed to migrate to adjacent properties.'*
- 4.12 However, the amended submission now includes EWE Technical Note ref 2019/2458 of 17 February 2020 now says that a higher standard of 1 in 100-year plus 40% climate change event should be adopted for the proposed drainage strategy, one that should also apply to the flood strategy. The same note also acknowledges that the development must not cause flood water migration to adjacent properties.
- 4.13 Matthew Montague Architects' Design and Access Statement (DAS) and Dwg. No. ROC-MMA-A1-ZZ-DR-A-01006 revision P2 dated 21 November 2019 have been studied carefully. DAS Appendix J states that both sites are *'generally level topographically and no difficulty is envisaged in achieving the compliance with Part M access requirements to the individual dwelling units.'* Indeed, the area of the farmstead has been free of significant flooding during the recent storms and indicates why it was probably built in this location in the first place. Consequently, there should be no need for any significant raising of existing ground levels during development.
- 4.14 Risk from flood water within the site should now be very much minimised because the proposed standard 86.36m finished ground floor level for the 19 new dwellings is not much higher than the existing ground levels in Churnet Row and the High Street.
- 4.15 Even so, a potential flood risk still remains so ESBC must ensure that the configuration of the development is such that no additional protection measures to such properties will be necessary or that appropriate measures are provided to cause no flooding to adjacent properties.
- 4.16 From the amended application documents, where shown, the intended finished floor and ground levels for this 18-dwelling development suggest that it should not exacerbate the potential for flooding in Churnet Row and the High Street. If any changes to the levels shown on Matthew Montague Architects Dwg. No. ROC-MMA-A1-ZZ-DR-A-01006 revision P2 dated 21 November 2019 are found to be necessary, ESBC must be informed by the Applicant / Developer accordingly and obtain its formal approval.

Conclusion

- 4.17 Unless there is a planning condition or obligation in accordance with NPPF paragraph 54 to ensure that any flooding arising from a 1 on 100-year plus 40% climate change flood event is to be limited to within the development boundary and must not be allowed to migrate to adjacent properties, the development proposal is objected to.

## **5.0 Surface Water Drainage**

### Sustainable drainage system (SuDS)

- 5.1 It is noted that much of the SuDS system falls outside the application site. Being outside the red line shown on Matthew Montague Architects Dwg. No. 1815-ROC-MMA-A1-ZZ-DR-A-01001-S0-P1 Site 1 Location Plan, it does not form part of this application. It is also not clear if the system shown is adequate for these 19 and the other 71 dwellings for which parallel Application No. P/2017/00667 has been submitted. Even so, the following comments are being made, being largely the same as those being made for Application No. P/2017/00667.
- 5.2 The proposed SuDS system is for the sites of both planning applications, draining surface water to a balancing pond and then the River Churnet rather than into existing drains and sewers. Such facilities are essential for this particular application and must be operational at least by the time that the dwellings are occupation.
- 5.3 One notable discrepancy is that the size and location of the balancing pond are significantly different between EWE Associates Ltd. Dwg. No. EWE/2458/01 rev B Appendix B Drainage Strategy and Matthew Montague Architects Dwg.No. 1815-ROC-MMA-A2-ZZ-DR-A-01007-S0-P1 Site 2 Layout Plan forming part of parallel Application P/2017/00667. Whichever size and location are finally chosen, it is important that it will offer no particular danger to the public.
- 5.4 As stated in previous responses by the Parish Council, one concern is the proposed management arrangements for SuDS. It is essential to establish exactly who is to be responsible for its ongoing maintenance and eventual replacement so that the intended flood attenuation measures remain effective, safe, secure and maintained after the development is complete and occupied.
- 5.5 In accordance with its own advice note on Flood Risk, ESBC must clearly establish who is to be responsible for the maintenance, repair and safety of the SuDS system (especially the open collecting pond) and make it a planning condition. Until this is confirmed, the proposals are objected to.

### Conclusion

- 5.6 Unless it is clearly established who is to be responsible for the maintenance, repair, safety and security of the SuDS system and included as a planning condition, the proposals are objected to.

## **6.0 Impact on Rocester Conservation Area**

### Heritage Impact Assessment (HIR)

- 6.1 The amended planning submission now includes a comprehensive Heritage Impact Assessment prepared by Locus Consulting in November 2019 which, having drawn on many authoritative sources, demonstrates that the farmhouse and threshing barn indeed make significant contributions to the Conservation Area and that the existing Rocester Conservation Area contains some significant if non-designated heritage assets.
- 6.2 As the Heritage Impact Statement says, it is accepted that this particular part of the proposed development will have an overall neutral impact upon the Rocester Conservation Area and the setting of its heritage assets.

### Churnet House



- 6.3 It now appears that the opinion of Historic England has prevailed and accepted by the Applicant so Churnet House is to be retained and renovated, even though its setting may be somewhat compromised by the proximity of the proposed main access into the development.
- 6.4 It should be noted, however, that the HIR states in paragraph 4.2.42 that many original features and layouts have been lost. Given the present condition of the house's fabric and the needs for meeting current Building Regulation requirements, environmental standards and occupants' expectations, it hoped that those features that remain and make the building worthy of retention will not be lost.
- 6.5 If full planning permission is granted for this phase of the intended development and a case is subsequently made that the house is 'beyond economic repair', the building's long-term retention must become a planning condition.

#### Existing farm buildings

- 6.6 The original and amended planning application documents make great mention of the farm buildings' becoming derelict and so justifying their demolition, even though the submissions state that the Applicant has owned the farm for several years(!). In the case of the threshing barn, the removal of the roofing tiles will not have helped to preserve the structure. Hopefully, there has been no deliberate neglect during the lengthy period from when the premises were acquired until the submission of the first full planning application.
- 6.7 Despite this, the proposal to demolish the barns was accepted in the previous response and is confirmed.

#### Conclusion

- 6.8 It is encouraging that Churnet House is now to be retained. If full planning permission is to be granted, its long-term retention must become a planning condition, otherwise the proposals are objected to.
- 6.9 Concerning the brick barns on the street frontage, after weighing the present building's lamentable condition against the careful design of the proposed replacement dwellings and the general maintenance of the existing streetscape thereby, their demolition is also accepted.

## **7.0 Design proposals**

### Amended design proposals

- 7.1 The latest drawings submitted are assumed to replace those in the earlier submission and, in showing some welcome improvements, are accepted as making a positive and much-needed contribution to the Rocester Conservation Area.

### Government planning advice on Design and Access Statements (DAS)

- 7.2 The following website have been used as sources for information

<https://www.gov.uk/guidance/design>

<https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement>

- 7.3 *What is a Design and Access Statement?*

*(Paragraph: 029 Reference ID: 14-029-20140306 : Revision date: 06 03 2014)*

*A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users. Design and Access Statements can aid decision-making by enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal.*

- 7.4 *What is the role of Design and Access Statements in achieving well-designed places?*

(Paragraph: 012 Reference ID: 26-012-20191001 : Revision date: 01 10 2019)

*Design and Access Statements (DAS) set out the narrative for the design approach and design rationale for the scheme. They demonstrate how the local character of an area has been taken into account and how design principles will be applied to achieve high quality design. They set out concisely how the proposal is a suitable response to the site and its setting, taking account of baseline information.*

- 7.5 What should be included in a Design and Access Statement accompanying an application for planning permission?

(Paragraph: 031 Reference ID: 14-031-20140306 : Revision date: 06 03 2014)

A Design and Access Statement must:

(a) explain the design principles and concepts that have been applied to the proposed development; and

(b) demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.

A development's context refers to the particular characteristics of the application site and its wider setting. These will be specific to the circumstances of an individual application and a Design and Access Statement should be tailored accordingly.

Design and Access Statements must also explain the applicant's approach to access and how relevant Local Plan policies have been taken into account. They must detail any consultation undertaken in relation to access issues, and how the outcome of this consultation has informed the proposed development. Applicants must also explain how any specific issues which might affect access to the proposed development have been addressed.

Design and Access Statement (DAS) : Revision P1 of 3 October 2019

- 7.6 Unfortunately, the latest DAS forming part of this amended submission and that for P/2017/00668 does not address the continuation of agricultural access to land not required for development but remaining in the Applicant's ownership. In this, it falls short of being a full DAS that has considered all of the accesses required to and over the site and bringing their need to the attention of the relevant planning and highway authorities.
- 7.7 The matter is addressed in full in Sections 2.0 Access to the Development Site and '3.0 Existing on-street car parking in Churnet Row / High Street' of this response.

Demolition of the existing farm buildings

- 7.8 Curiously, it is noted that the necessary demolition of the existing farm buildings does not form part of this application for full planning approval but rather but rather form part of Application P/2017/00667 for which outline approval for the access into the site is being sought. This suggests that, if full planning permission is granted to this application, it cannot go ahead until approval is given to Application P/2017/0668.

Site layout

- 7.9 As mentioned in previous responses, the streetscape seems to be appropriate by largely maintaining the enclosed character of Churnet Row and High Street, matter also endorsed by the Heritage Impact Statement.

Floor Plans and Elevations

- 7.10 It is appreciated that particular care has been taken with the elevational treatment to reflect the appearances of existing traditional buildings within the village.

Materials

- 7.11 The specifications given in the amended application appear to be satisfactory.

Conclusion

7.12 Subject to the site access, existing on-street parking and SuDS management issues being resolved, the general design proposals shown in the Amended Scheme are accepted.



**River Churnet in Flood : February 2020 : looking due east from the B5030**