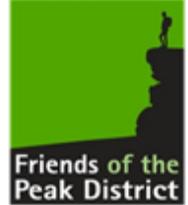




The countryside charity  
South Yorkshire



Adam Maxwell  
Planning Officer  
PDNPA

37 Stafford Road  
Sheffield S2 2SF

Tel: (0114) 312 2002  
mail@friendsofthepeak.org.uk  
mail@cpresouthyorks.org.uk

By email [adam.maxwell@peakdistrict.gov.uk](mailto:adam.maxwell@peakdistrict.gov.uk)

28 July 2020

Dear Adam

**NP/S/0620/0511 Restoration and extension of Thornseat Lodge and ancillary buildings to form holiday accommodation and ancillary guest facilities, restoration of historic stable block to form wedding venue, restoration of existing access and creation of new car park area and associated landscaping and management**

1. Friends of the Peak District represent CPRE, the countryside charity in the Peak District and are also part of the Campaign for National Parks. We are a registered charity with over 1500 members and supporters. We object to this application in its current form. Whilst the aspiration to restore this crumbling Victorian Gothic manor is welcome, few details are provided. The impacts of the accompanying development for a wedding/event/ function facility for 150 guests on the edge of Bradfield moors would be unacceptable.

#### **Restoration of Thornseat Lodge**

2. We support and welcome the proposed restoration and conversion of Thornseat Lodge to five holiday lets as an important non-designated heritage asset of regional architectural, historical and cultural interest. This was a fine and imposing building which has been long neglected and left to fall into serious disrepair. It is now in urgent need of repair if the historic structure is to survive. However, much detail is missing from this application, and in its current form we cannot support the restoration of the Lodge.

3. The imposing south east frontage as seen from Mortimer Road and the north-east wall would be restored. The stone, slate tiles and window stone surrounds would

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

**for the countryside, for communities, for the future**

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

Registered Charity No.1094975 Registered Company No. 4496754

be matched to the existing ones on the restored part of the Lodge (Design and Access Statement) but there is no indication of what would happen to the surviving internal features which have been detailed in the Heritage Statement. The rear of the Lodge would have a substantial 2-storey extension covered with modern slate tiles on both roof and walls with aluminium glazed windows. Some form of extension is required due to the ruinous state of the Lodge at the rear, and these proposals would complement the historic frontage.

4. We believe that the conversion of the Lodge could potentially meet the requirements of Policy RT2 and DMC10 Conversion of a heritage asset. The building could accommodate the new use without changes that adversely affect its character and could be converted without compromising the significance and character of the building. The new use for 5 holiday lets is unlikely to be visually intrusive or have an adverse impact on tranquillity, dark skies or other valued characteristics. However, in order to comply with National Planning Policy Framework 2018 (NPPF) paras 184, 192 and 197 and PDNPA policies RT2, DMC10 and DMC5 detailed information needs to be presented for both the external and internal works, and floor plans need to be provided (in order to see how the internal structure would change from its historic layout) in order to ensure that the proposals are sympathetic and sensitive. A landscape impact assessment is required to show how the proposals would conserve or enhance the setting of the Lodge and the valued landscape character. The approach towards renewable energy also requires revision. The majority of forms are rejected - *'air source heat pumps, are likely to be more realistic and the feasibility of these will be explored at the detailed design stage'* (Planning Statement 7.4.0). This is unsatisfactory as there is enough surrounding land within which to bury a ground source heat pump which would have less impact on tranquillity. If further information is supplied and meets the policies quoted above we believe that we would be able to support the restoration of this important building.

#### **Proposed wedding/event/function facility**

5. We object in principle to the proposed wedding/ event/ function venue on the footprint of the former stables and its courtyard, conversion of the ruins of an old cottage to a 4-bedroomed bunkhouse for up to 13 wedding guests and 80 car parking spaces in adjacent woodland. The viability assessment shows that converting the Lodge alone to market housing or holiday lets is not financially viable. Only when coupled with significant development relating to the other

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

***for the countryside, for communities, for the future***

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

Registered Charity No.1094975 Registered Company No. 4496754

buildings on site is it viable to restore the Lodge. Nevertheless, the proposed intensification of use adjacent to significant and sensitive natural assets is unacceptable.

6. The cluster of ruins that would become the venue are problematic. They would create a massive area of development out of a currently dispersed and fragmented cluster. There appears to be no attempt to incorporate the limited fragments of 'historic' former walling/ builds and, as for the Lodge, there is no detail given for fenestration and openings. Much more architectural detail is needed.
7. The number of guests would be limited to 150 (Transport Statement) with up to 10 staff. The impact of the generated traffic is assumed to be negligible but the frequency of use of the venue is not given. The assessment is only concerned with impacts at peak hours (we are given no baseline traffic flows), accident rates, and access arrangements for which there would be a sweeping one-way new drive. In addition to the 80 car parking spaces there would be an overflow car park to accommodate staff parking at peak times. The claim for traffic impacts to be seasonal in the Planning Statement appears unlikely.
8. Core Strategy policies GSP1-3 seek fulfilment of NP purposes and require significant overall benefit to the natural beauty, wildlife and cultural heritage of the area. The application undermines the achievement of these overarching policies and a number of Core Strategy and Demand Management policies.
9. This is a proposal for business development in the countryside outside the Natural Zone and the named settlements in policy DS1. It is therefore contrary to Policy E2 as it is isolated development in the open countryside in an unsustainable location, it is not small scale and no evidence has been supplied to show it would support an existing agricultural or other primary business responsible for estate or land management through which income will be returned to appropriate management of the landscape. The Design and Access Statement claims that creation of a mixed-use development here would contribute to the economic, social and cultural life of Bradfield but no evidence for this is supplied.

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

***for the countryside, for communities, for the future***

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

Registered Charity No.1094975 Registered Company No. 4496754

10. There is no assessment of landscape impact, although the heritage assessment does survey the immediate local landscape, nor any mention of tranquillity<sup>1</sup> or light pollution. The site lies within one of the most tranquil areas of the Dark Peak. In the National Park great weight should be given to conserving and enhancing landscape and scenic beauty; it has the highest status of protection in relation to these issues (NPPF para 172). Without a formal landscape assessment the proposals are contrary to NPPF para 172 and to PDNPA Policy L1A which requires development to conserve and enhance valued landscape character and other valued characteristics.
11. The amended Planning Statement (para 7.4.0) contains reference to carbon reduction and climate change. However, the approach towards the energy strategy does not address transport to/from the site - the round trip from Sheffield is 23miles. With all guests assumed to arrive by car the application has made no attempt to reduce the need to travel, to encourage sustainable transport, or discourage car use. The distance of the venue from any public transport would mean guests and staff would have to drive to and from the venue, which makes the proposal unsustainable. As a non-residential development greater than 1000sq.m floorspace (it expands from 600sq.m existing floor space to a total of 1659sq.m, or an increase of 1059sq.m), the proposal must achieve a Buildings Emissions Rate at least 10% less than the Target Emissions Rate but no rate has been supplied. The approach towards the energy hierarchy, the generation of traffic and the target emissions rate make the development contrary to policies CC1, T1, T2, T7 and DMT6.
12. Events at the venue would generate unacceptable increases in traffic on minor rural roads. The approach from urban areas on all points of the compass would require vehicles negotiating country lanes such as Windy Bank and Dale Road, all of which are steep and narrow with blind bends, and passing through villages such as High and Low Bradfield. An approach via the A57 Snake Road would use Mortimer Road itself, also with hair pin bends, steep inclines and poor sightlines. This network of quiet lanes covering Bradfield Dale and extending to the Sheffield boundary is hugely popular and important to cyclists and walkers, especially Sheffield residents for whom it provides easy and quick access to tranquil and

---

<sup>1</sup> Tranquillity Map England [https://www.cpre.org.uk/wp-content/uploads/2019/11/tranquillity\\_map\\_england\\_regional\\_boundaries\\_1.pdf](https://www.cpre.org.uk/wp-content/uploads/2019/11/tranquillity_map_england_regional_boundaries_1.pdf)

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

***for the countryside, for communities, for the future***

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

Registered Charity No.1094975 Registered Company No. 4496754

beautiful countryside. The lanes around Damflask Reservoir are also part of a PDNPA Miles without Stiles route for the less mobile. With the Covid-19 crisis the use of these lanes for recreation has intensified greatly. On most stretches there is room for only one vehicle and impatient motorists often take risks overtaking other users. These lanes should be protected from intimidating traffic both for their valuable role in improving people's quality of life and to enhance their character and tranquillity. They are about appreciating the beauty of the countryside rather than travelling from A to B. Consequently there is no room for any increase in traffic along any of these routes. Rather they should be considered for designation as Quiet Lanes.

13. The Bradfield Moors are an area of immense tranquillity, and an extremely important habitat for wild birds and other species. The boundary of the designated habitats SSSI/SPA/SAC and of open access land are within 250metres of the development site which lies within the Dark Peak SSSI Impact Zone. A venue which could, depending on the occasion, be extremely noisy, potentially with outdoor PA systems, loud music and fireworks, is inappropriate on the edge of the SPA/SAC/SSSI. Restricting licensing hours or conditions of use would not limit the impacts of noise arising from traffic and people movements, use of the open courtyard, loud music and general partying. This would prejudice the quiet informal enjoyment of the National Park. Policy L2B does not permit development, other than in exceptional circumstances, where it is likely to have an adverse impact on any sites that are of international or national importance for their biodiversity. No exceptional circumstances have been provided to meet this policy.
14. At present the buildings support bat roosts and birds. The ecology report on protected species advises restricting access to all land west of the proposed car parking and access road and that a buffer zone would be required to decrease the risk of disturbance to moorland birds. However, the PDNPA will need to assess whether there will be a 'likely significant effect' on the designated sites and their species.
15. A comprehensive tree survey accompanies the application but no plan is presented as to how the impacts on habitats and trees would be addressed. The Planning Statement (7.3.2) refers to a Mitigation Plan but this does not appear in the list of

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

***for the countryside, for communities, for the future***

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

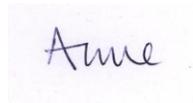
Registered Charity No.1094975 Registered Company No. 4496754

documents and the Indicative Landscape Plan provides no detail. The application is therefore contrary to DMC13 (Protecting trees, woodland or other landscape features put at risk by development). Policy DMC11 requires the development to achieve net gain for biodiversity but no evidence of this has been supplied.

16. NPPF para 202 requires planning authorities to assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. In our view the disbenefits of the development in total outweigh any benefits of such departure. Three of the special qualities for which the PDNP was designated - internationally important and locally distinctive wildlife and habitats; undeveloped places of tranquillity and dark night skies within reach of millions; an inspiring space for escape, adventure, discovery and quiet reflection, would be harmed by this proposal (PDNP Management Plan 2018).

### Conclusion

17. We object to the restoration of the Victorian Gothic Lodge as proposed but would welcome seeing more architectural details to ensure the proposal is sympathetic and sensitive. We object in principle to the proposals for the wedding/event/function development.



Anne Robinson  
Campaigner

President: Dame Fiona Reynolds

CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire

***for the countryside, for communities, for the future***

[www.friendsofthepeak.org.uk](http://www.friendsofthepeak.org.uk)

Registered Charity No.1094975 Registered Company No. 4496754