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Planning Statement

Arches at Tudor Lodge, Lodge Drive, Belper

Conversion to ancillary sleeping accommodation

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1 Introduction

1.1 Planning & Design Practice is a multidisciplinary practice consisting of chartered town planners, architects and heritage specialists. The practice operates across England and Wales and has an exemplary track record of submitting successful planning applications and in facilitating sustainable development.

1.2 This statement identifies the context and need for the proposed development and includes an assessment of how the proposed development accords with relevant national and local planning policies, as well as assessing any other material considerations.

1.3 Also submitted to accompany the application are the following:

- A Full set of Drawing comprising:
  - Site Location Plan
  - Existing Site Plan
  - Existing Elevations
  - Existing Arches
  - Proposed Site Plan
  - Proposed Plans
  - Proposed Elevations
  - Proposed Section
  - Proposed Ground Floor in Context
- Heritage Impact Assessment

2 Site Description and Planning History

Site Location

2.1 The application site is Tudor Lodge on Lodge Drive, Belper. The site extends approximately 0.35ha and comprises a 2no. bed bungalow referred to as Tudor Lodge, a set of stone arches in incidental residential use and landscaped gardens wrapping around the site, as shown in Figure 1.



Figure 1 *Aerial view of the site*

2.2 The site is located within an established residential area within the boundary of Belper and is primarily surrounded by detached dwellings of varying sizes. The River Derwent is located to the south east of the site, with the centre of Belper just beyond.

2.3 Vehicular and pedestrian access to the site is taken via Lodge Drive.

2.4 There are no listed buildings located on site. The closest listed building is the Grade II listed 'Arched Stone Structures and Ice House to the rear of No 34A Lodge Drive' approximately 60m north east of the site. The site is located outside of the Belper Conservation Area, but within its setting, as shown in Figure 2.

The site is also located outside of the Derwent Valley Mills World Heritage Site but is located within its Buffer Zone.

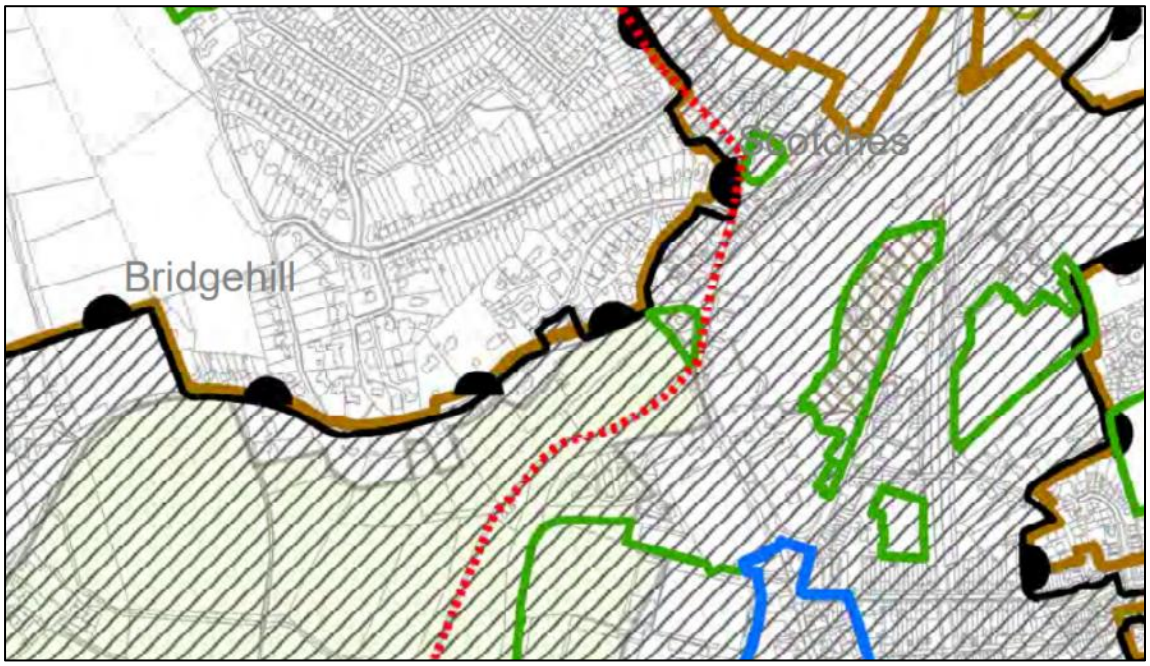

Figure 2 Snippet from Amber Valley Policy Maps

2.5 The site is located in Flood Zone 1 and is at low risk of flooding.

Relevant Planning History

2.6 The site is subject to the following planning history:

- AVA/2026/0061 | Lawful Development Certificate for an existing use of outbuilding as incidental residential use. Granted 17 June 2026.
    - The Certificate confirms that the Council was satisfied that the land and buildings had been in incidental residential use in association with Tudor Lodge for a continuous period in excess of ten years.

3 The Proposed Development

3.1 Tudor Lodge in its entirety is in C3 Use. The owners of the property are letting the site out as holiday accommodation. This is acceptable under use class C3 so long as it is let to single family groups of less than 6 people. As the property is currently a 2 bed, there is an opportunity to provide another bedroom to serve the main house under this operation.

3.2 The proposed development therefore seeks the conversion of arches currently in incidental residential use to an ancillary sleeping accommodation.

3.3 The conversion will utilise and retain the existing form of the stone arches, with the majority of works required internally to create a 1 bed studio with an en-suite. This requires insertion of partition walls, bathroom and a kitchenette.

3.4 Externally, the front elevation of the arch is proposed to be finished with bespoke full length glazing to provide natural light for the future occupier.

3.5 The proposal will utilise the existing points of access. In recognition of the increase in total bedroom numbers on the planning unit, the proposals include plans to formalise parking spaces to provide 2no parking spaces in total, in line with minimum parking standards set out by Derbyshire County Council guidelines.

3.6 For further details, please refer to the appended drawing pack.

4 Planning Policy Context

4.1 The purpose of this section is to set out the relevant planning policy background which is pertinent to the site and proposed development.

4.2 Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

4.3 In this case, the Development Plan consists of the Amber Valley Borough Council Local Plan (2026) and the Belper Neighbourhood Plan (2021). Other material considerations include the National Planning Policy Framework (2026), the associated Planning Practice Guidance and Supplementary Planning Documents (SPDs).

Amber Valley Local Plan

4.4 Policy H1 Housing Development Within and Adjacent to Urban Areas & Key Villages states that: *'housing development will be permitted on land within the built framework of urban areas'* and includes where the '*conversion of existing dwellings to provide additional dwellings or of existing buildings to housing from other uses' and 'proportionate extensions to or replacement of existing dwellings'.*

4.5 Policy EN1 Climate Change states that *'all development proposals will need to demonstrate how climate change issues have been considered through the submission of a climate change assessment in conjunction with a planning application.'*

4.6 Policy EN5 Derwent Valley Mills World Heritage Site states that: '*Development proposals within the Derwent Valley Mills World Heritage Site, its Buffer Zone or its wider setting must be of an appropriate scale, massing, siting, design and alignment that will conserve the Outstanding Universal Value of the Site. The Borough Council will expect development to consider any adopted policy and design principles set out for the Site.'*

4.7 Policy EN15 Quality and Design of Development sets out the principles that all development should follow regarding, but not limited to, the creation of high quality and sustainable spaces, contribution to the creation of a sense of place, accounting for neighbouring amenity, provision of safe access and

recognising the importance of conserving heritage assets. It also dictates that all new housing development should be in accordance with Nationally Described Space Standards.

4.8 Policy IN1 Transport establishes that development will be permitted where use of sustainable transport modes is promoted, the highway network is suitable to cope with generated traffic and the proposals comply with relevant parking standards.

Belper Neighbourhood Plan

4.9 The site is included in the adopted neighbourhood plan for Belper. Which was made by Amber Valley Borough Council in June 2021 and forms as part of the statutory Development Plan.

4.10 Policy NPP1 supports sustainable development within the built framework of Belper where proposals respect the character of the area and contribute positively to the existing built environment.

4.11 Policy NPP11 places significant emphasis on the conservation and enhancement of heritage assets, reflecting the importance of the Derwent Valley World Heritage Site and the historic character of Belper. Development should respect the scale, building plots, height and roof line and complement existing materials and architectural detailing and reflect the pattern and design.

4.12 Policy NPP12 sets out that development must be of a high design quality that will contribute to the character of Belper Parish. Well designed buildings should be appropriate to their location and context and may include contemporary design solutions provided that they positively enhance character and local distinctiveness.

National Planning Policy Framework

4.13 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications and confirms that planning decisions should be taken in accordance with the Development Plan unless material considerations indicate otherwise.

4.14 The Framework seeks to achieve sustainable development through economic, social and environmental objectives which should be pursued in mutually supportive ways. These objectives include supporting

strong and healthy communities, making effective use of land and protecting and enhancing the built environment. The following policies are relevant to this application:

4.15 Policy S3 confirms that development proposals which accord with the development plan and the decision-making policies of the framework should be approved without delay.

4.16 Policy S4 confirms that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

4.17 Policy DP3 requires development proposals to respond positively to their context and integrate with and enhance their surroundings through appropriate design, form, materials and architectural detailing. The proposed conversion has been designed to work within the existing structure and retain its established relationship with Tudor Lodge. As such, the proposal represents a sensitive and proportionate form of development that would preserve the character and appearance of the site.

4.18 Policy L2 states that substantial weight should be given to development proposals which make better use of vacant or underutilised buildings and create additional residential floorspace within existing plots. The policy specifically supports the beneficial re-use of existing buildings and the efficient use of land within established residential curtilages.

4.19 Policy HE8 regard proposals impacting world heritage sites and sets out that in such instances; proposals should be designed in a way which pays particular regards to the significance and Outstanding Universal Value of the World Heritage Site (including any contribution made by its setting including any buffer zone)

4.20 Policy HE9 states that development proposals should '*retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible'* and '*consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.'*

4.21 Policy TR4 states that developments should provide a suitable number of parking spaces for a range of transport modes, reflecting the location and nature of development.

4.22 Policy TR6 states that '*development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.'*

5 Key Planning Issues

Principle of Development

5.1 The application seeks the conversion of stone arches currently in incidental residential use to Tudor Lodge, to ancillary sleeping accommodation. Policy SS3 of the Local Plan identifies Belper as an Urban Area, meaning that Policy H1 of the Local Plan is applicable to this application. This sets out that:

'Housing development will be permitted on land within the built framework of the Urban Areas and Key Villages, as defined in Policy SS3 Settlement Hierarchy. This includes the following types of development:

- *the conversion of existing dwellings to provide additional dwellings or of existing buildings to housing from other uses*
- *proportionate extensions to or replacement of existing dwellings […]"*

5.2 As the stone arches form part of the wider planning unit of Tudor Lodge, which is within Use Class C3, the proposals represent householder conversion works to increase the residential occupancy of the site. The development is therefore akin to a house extension, by virtue of it providing additional sleeping accommodation to Tudor Lodge. This will be achieved by carrying out internal and external alterations to create habitable space in the arches, where it has previously only been used for garaging and storage.

5.3 The proposals will convert buildings already proven to be in incidental residential use, as proven by application ref: AVA/2026/0061 and will not introduce a new planning unit.

5.4 For the reasons set out above, the proposed development is acceptable in principle.

Design and Amenity

5.5 The proposal involves the conversion of an existing structure and has been designed to protect and enhance the established character and appearance of the arches and their relationship with Tudor Lodge. The alterations will therefore retain the scale, form and appearance of the existing structure whilst introducing only those alterations necessary to facilitate its ancillary residential use.

5.6 Externally, the proposals include the replacement of the garage door and infill brickwork in the central arch with full height glazing. This will improve overall appearance and better compliment the acknowledged historic character of the arches as the original opening of the central arch will be re-established.

5.7 The glazing will provide the internal area with sufficient natural daylight. Whilst the proximity of the arches to the neighbouring property is appreciated, the central archway is not directly adjacent to a habitable room as shown on the 'Proposed Ground Floor in Context' drawing and will therefore not impact negatively on neighbour/occupier amenity.

5.8 Internally, an open plan studio style living space is proposed with a kitchenette and bathroom included to provide essential residential amenities for any future occupier of the arches.

5.9 The proposal would therefore preserve the established character of the site and remain visually subordinate to Tudor Lodge. The proposals therefore align with Policy EN15 of the Local Plan and Policy of the NPPF.

Heritage

5.10 Due to both the non-designated heritage status of the arches and the site's location within the Derwent Valley Mills World Heritage Site (DVMWHS) Buffer Zone and Belper and Milford Conservation Area setting, a Heritage Impact Assessment has been prepared and is appended to this application for review.

5.11 The report concludes that the due to the limited nature of the proposed works, there would be no impact on the character and appearance of the Conservation Area. The proposal also would not negatively impact the Outstanding Universal Value of the World Heritage Site. The replacement of the garage and infill brickwork with full height glazing is assessed to improve the overall appearance of the arches, as it will restore the original opening of the central arch.

5.12 The development would secure the continued use of an existing building whilst preserving the character of the site and its contribution to the wider historic environment of the Derwent Valley World Heritage Site. As such, the proposal is considered to accord with the heritage objectives of the Neighbourhood Plan.

5.13 The proposals therefore align with Policies of the Local Plan and Policies HE8 and HE9 of the NPPF.

Access and Parking

5.14 Access via Lodge Drive is to be retained and unchanged. The conversion of the arches to a granny annexe will have a very minor increase in the total occupier capacity of the site, with the total number of bedrooms across the site increasing from two to three. However, in recognition of this and the parking standards set out in Derbyshire County Council's Parking Guidance for New Developments, the proposed site plan demonstrates how a minimum of 2no parking spaces can be located on site whilst allowing for sufficient turning and passing space.

5.15 It is viewed overall that due to the size of the wider site, there is sufficient space to accommodate the proposed additional residential accommodation without detriment to pedestrian or vehicular safety.

5.16 The proposed development therefore aligns with Policy IN1 of the Local Plan and Policy TR4 and TR6 of the NPPF.

Climate Change Assessment

5.17 This Climate Change Statement demonstrates how the proposal responds to the requirements of Amber Valley Borough Local Plan Policy EN1: Climate Change by reducing carbon emissions and supporting climate change mitigation and adaptation. The assessment draws upon the submitted plans, heritage information and ecological appraisal.

Reducing embodied carbon through the reuse of existing buildings and materials

5.18 The reuse of existing arches represents an inherently sustainable form of development, significantly reducing embodied carbon compared with demolition and replacement or the construction of new ancillary accommodation.

5.19 Furthermore, the proposals will bring the arches into habitable use to secure their long term maintenance. Building materials will be retained where possible.

Improve Energy Efficiency

5.20 The conversion provides an opportunity to improve the usability and operational performance of the outbuildings whilst retaining their character.

5.21 The conversion will also improve thermal performance through the use of appropriate insulation measures largely related to the glazing, though the details of this are requested to be secured by condition.

Use of Sustainably Sourced Materials

5.22 Where new materials are required to facilitate the conversion, including new windows, internal alterations and associated repair works, these will be selected to complement the existing buildings and sourced sustainably where practicable. The use of durable, high-quality materials will support the longevity of the development and reduce future maintenance and replacement requirements.

Retention of Trees and Other Habitats

5.23 The proposal does not require the removal of significant trees, hedgerows or other landscape features. Existing vegetation surrounding the site will be retained, continuing to provide biodiversity, landscape and climate resilience benefits. The proposal does not result in the loss of woodland, priority habitats or other significant carbon storage habitats.

Conclusion

5.24 The proposed conversion of the arches responds positively to the objectives of Policy EN1: Climate Change. By reusing and conserving existing arche, retaining materials, improving energy efficiency and avoiding biodiversity impact, the scheme represents a sustainable form of development.

5.25 The proposal is therefore considered to accord with the objectives of Policy EN1.

6 Conclusions

6.1 The proposed development seeks the conversion of arches currently in incidental residential use to Tudor Lodge to ancillary sleeping accommodation.

6.2 The proposed development comprises a series of internal and external alterations to bring the arches into suitable habitable use, including the introduction of full length glazing the arches.

6.3 The arches are already within incidental residential use, with the proposed scheme representing a low impact strategy to better utilise the space and ensure its upkeep and maintenance into the future. The proposed re-use is a sustainable form of development and as it presents householder works within an established C3 planning unit, the proposals are acceptable in principle.

6.4 The application has considered the historic context of the site, as it is a non-designated heritage asset located within both the DVMWHS Buffer Zone and Belper and Milford Conservation Area setting. The arches have a degree of historic significance due to their association with Bridge Hill House, a Strutt property previously located at this site, though it is reminded that Historic England determined previously that the structures are not suited to being listed. In view of this, it has been determined with that the limited nature of the works, there will be no negative impact to the OUV of the World Heritage Site or the Conservation Area. The replacement of the garage and infill brickwork with full height glazing is assessed to improve the overall appearance of the arches, as it will restore the original opening of the central arch.

6.5 The proposal would not give rise to any unacceptable impacts on neighbouring amenity, highway safety, parking provision or the wider environment.

6.6 The development therefore complies with relevant local and national planning policies, and it is politely requested that the application is approved.



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