



ARETÉ RURAL PLANNING

*ARETÉ (noun) The ancient Greek concept of striving for excellence*

# PLANNING STATEMENT

CARAVAN STORAGE

HARGATE HILL EQUESTRIAN CENTRE

APRIL 2026

E: [ben@areteruralplanning.co.uk](mailto:ben@areteruralplanning.co.uk)

T: 07828114546

## CONTENTS

|                                                                        |    |
|------------------------------------------------------------------------|----|
| 1. INTRODUCTION                                                        | 1  |
| 2. PRECEDENT APPEAL                                                    | 3  |
| 3. WHETHER THE PROPOSAL IS INAPPROPRIATE DEVELOPMENT IN THE GREEN BELT | 4  |
| 4. THE LOCAL PLAN POLICIES AND NPPF                                    | 19 |
| 5. OTHER MATERIAL CONSIDERATIONS                                       | 20 |
| 6. THE TILTED BALANCE: BENEFITS OF THE PROPOSAL                        | 21 |
| 7. CONCLUSION                                                          | 23 |
| 8. APPENDICES                                                          | 26 |

## 1. INTRODUCTION

### BACKGROUND – PLANNING HISTORY

1.1. The application site was recently subject to an application for *‘the change of use of the land to B8 storage use, with associated operational development comprising the engineering operations and laying of hardstanding to form the yard area’*. During the application the Council altered the description of development so that they could issue a positive certificate in respect of part of the proposal, while setting aside the aspect they could not support through that process. As a result, the application site has a lawful development certificate<sup>1</sup> for:

*Operational development comprising of hard standing and modifications to northern boundary*

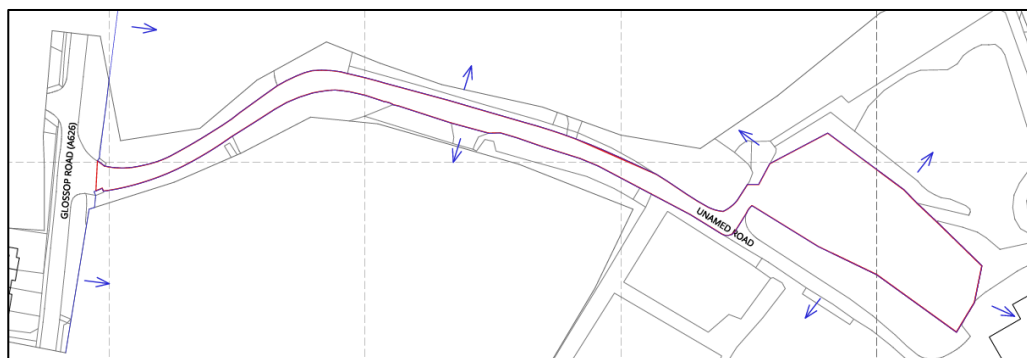


Figure 1: Location plan of HPK/2025/0337

1.2. The applicant recognises the Council’s pragmatism in determining the certificate as such. It remains their case that the land subject of this application has been used as set out within the supporting documents to that application for storage use for a period greater than 10 years.

1.3. However, it is also considered the case that the use of the land for storage use (B8) meets the relevant planning policy requirements and as such a retrospective application is made to regularise matters.

### BACKGROUND – WIDER SITE

1.4. A certificate<sup>2</sup> was issued on land immediately to the south of the site for:

<sup>1</sup> HPK/2025/0337

<sup>2</sup> HPK/2025/0339

*Change of use of land for storage of caravans, motorhomes and horse trailers, and associated operational development comprising the engineering operations and laying of hardstanding to form the yard area.*

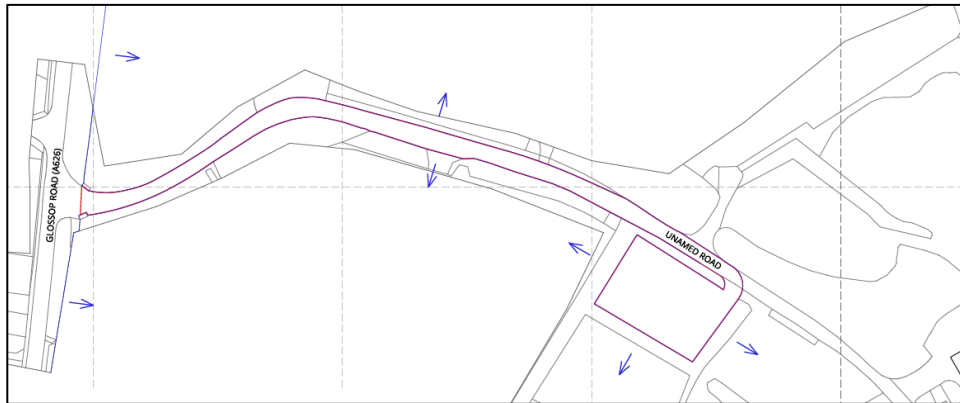


Figure 2: Location of HPK/2025/0339

1.5. This demonstrates the ongoing lawful business of the applicants extends to caravan storage.

## THE BUSINESS IN NUMBERS

1.6. On the site to the south, granted a lawful permission there are 27 caravans/campervans stored with rolling monthly agreements.

1.7. On the application site, there are 29 caravans/campervans<sup>3</sup> stored with rolling monthly agreements.

## PROPOSAL

1.8. The proposal is therefore made for:

*Retrospective change of use of land at Hargate Hill Equestrian Centre, Glossop, for caravan and motorhome/campervan storage*

## SUMMARY OF THE PLANNING CASE AND THIS STATEMENT

1.9. The proposal is considered to be policy compliant, with regard to paragraph 155, 154g) and 154h) v. of the Framework.

1.10. This statement addresses the Green Belt, countryside and economic considerations. There is also a highly comparable appeal decision that, notwithstanding

<sup>3</sup> In this statement reference to caravans includes campervans and motorhomes

each case being dealt with on its own merits, provides a clear road map for the interpretation of paragraph 155 - grey belt.

## **2. PRECEDENT APPEAL**

2.1. This section identifies an appeal where almost the exact circumstances were considered by an Inspector within the Green Belt.

2.2. Presenting this appeal doesn't seek to claim that because it was approved in one location, it should be here. However, there are very helpful guidelines in how the critical matters within the National Planning Policy Framework were considered and addressed.

### **APPEALS 3342201 AND 3341893 AT DODINGTON LANE, SOUTH GLOUCESTERSHIRE<sup>4</sup>**

#### **GREY BELT AND COMMERCIAL USE**

2.3. This appeal decision confirms that grey belt land is capable of accommodating commercial uses, including B8 storage and distribution. This establishes a clear precedent that grey belt status is not limited to residential or housing-led development; commercial and storage use can equally benefit from the policy as it clearly set out in para. 155.

#### **SUSTAINABILITY, PARAGRAPHS 110 AND 115, AND THE ROLE OF USE CLASS**

2.4. The Inspector considered the rural location and the absence of public transport links, but concluded that the development nonetheless met the sustainability test in paragraphs 110 and 115 of the Framework. Critical to this finding was the nature of the use itself. The Inspector noted that a B8 caravan storage use does not generate a large number of traffic movements and, fundamentally, does not give rise to a need for public transport accessibility, by its very nature, users arrive by private vehicle to deposit or collect a caravan. The Council did not resist the scheme on accessibility or highway safety grounds.

2.5. This is a significant finding for uses in this class. It demonstrates that the sustainability assessment under paragraphs 110 and 115 must be applied in a manner proportionate and appropriate to the specific use proposed, rather than as a blanket test. A use that is inherently car-dependent and low-trip-generating can satisfy the sustainability criterion even in a location with no public transport provision.

---

<sup>4</sup> See appendix 1 for the decision letter

2.6. This decision is a useful precedent for grey belt B8 applications and for any commercial use where the trip-generation profile and operational characteristics mean that conventional public transport accessibility is not a relevant measure of sustainability.

### 3. WHETHER THE PROPOSAL IS INAPPROPRIATE DEVELOPMENT IN THE GREEN BELT

3.1. The application site is located within the Green Belt. However, it is considered to fall within the category of grey belt land as defined in the National Planning Policy Framework (NPPF, July 2024, paragraph 155 and Annex 2) and clarified in the Planning Practice Guidance (PPG: Green Belt, 2024 update). This statement sets out the case that the development is not inappropriate in the Green Belt as it meets the tests in NPPF paragraph 155. Furthermore, the proposal is also considered to meet the paragraph 154.g) through the redevelopment of previously developed land, not causing substantial harm to the openness of the Green Belt and further 154.h) the material change of use of land, that preserves openness and does not conflict with the purposes of including land within it.

3.2. Three exceptions are therefore presented.

#### THE PARAGRAPH 155 EXCEPTION

3.3. NPPF Paragraph 155, introduced in the 2024 revisions, confirms that development on grey belt land may not be regarded as inappropriate where certain criteria are met.

3.4. Paragraph 155 states:

*155. The development of homes, **commercial and other development** in the Green Belt should also not be regarded as inappropriate where all the following apply:*

*a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*

*b. There is a demonstrable unmet need for the type of development proposed;*

*c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*

*d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

3.5. The PPG explains how local authorities should assess paragraph 155, including consideration of whether land is previously developed, whether it contributes to the relevant Green Belt purposes, and whether other designations apply.

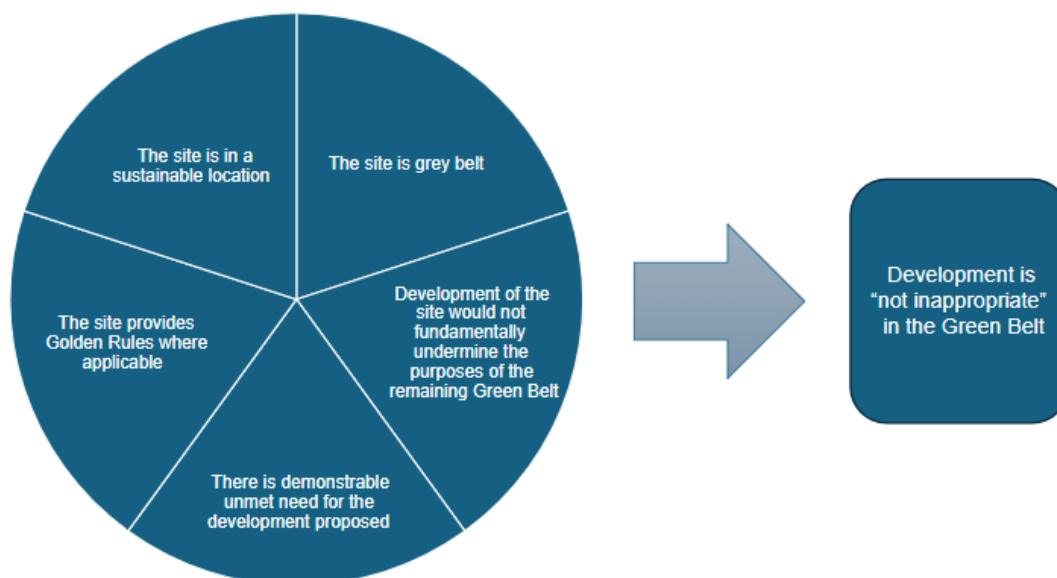


Figure 3: PPG summary of NPPF paragraph 155

3.6. Each of the criteria under paragraph 155 are examined in turn below.

#### **PARA 155A. GREY BELT**

3.7. Annex 2 of the Framework defines grey belt as:

*For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*

## PREVIOUSLY DEVELOPED LAND

3.8. The Framework glossary defines previously developed land as:

*Previously developed land: Land which has been lawfully developed and is or was occupied by a **permanent structure and any fixed surface infrastructure associated with it**, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising **large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed**. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.*

3.9. The NPPF definition of previously developed land requires that the land has been "lawfully developed" and is or was occupied by a permanent structure or fixed surface infrastructure associated with it. It also expressly includes "land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed."

3.10. The application site benefits from Lawful Development Certificate HPK/2025/0337, which was issued by High Peak Borough Council confirming the lawfulness of the operational development comprising the hardstanding and modifications to the northern boundary. This certificate confirms, as a matter of legal fact, that the hardstanding on the application site was lawfully carried out. The land therefore satisfies the NPPF definition of previously developed land on two grounds:

3.11. First, it is occupied by fixed surface infrastructure, namely the hardstanding, that has been lawfully developed, as confirmed by the certificate. This falls squarely within the express inclusion in the PDL definition.

3.12. Second, the certificate resolves any question as to the lawfulness of the development of the site. The Council's own decision to issue the certificate is determinative on this point. Whatever the Council's position on the nature of the subsequent storage use, the physical development of the hardstanding is confirmed as lawful, and it is on this basis that the PDL assessment is made.

3.13. It is noted that the NPPF excludes from PDL land that was "last occupied by agricultural or forestry buildings." As set out elsewhere in this statement, the land is not

and was not last in agricultural use. The equestrian activity on the wider site is not agricultural use for planning purposes, and the storage of wrapped hay associated with equestrian rather than agricultural activity does not bring the land within the agricultural exclusion. The PDL conclusion is robust.

#### PURPOSES (A), (B), OR (D) IN PARAGRAPH 143

3.14. The PPG<sup>5</sup> provides guidance on how these criteria are to be applied.

3.15. Purpose A is *‘to check the unrestricted sprawl of large built-up areas’*. The PPG guidance is clear that villages should not be considered large built-up areas. The site sits within the open countryside and is not adjacent to a large built up area. Therefore, by definition, by not being adjacent to a large built-up area complies on its face with purpose A.

3.16. Purpose B is *‘to prevent neighbouring towns merging into one another’*. The PPG is clear that this does not include impacts on villages. The site is not between two towns. The site and proposal do not make a strong contribution to this purpose.

3.17. Purpose D is *‘to preserve the setting and special character of historic towns’*. The site does not form part of the setting of a historic town. The site and proposal do not make a strong contribution to this purpose.

3.18. Based on the assessment above, the proposal satisfies the contribution to purposes A, B and D.

#### FOOTNOTE 7 ASSETS

3.19. The site does not trigger any of the footnote 7 assets.

#### 155A. THE REMAINING PURPOSES OF THE GREEN BELT

3.20. Paragraph 155A also requires assessment of whether the development would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan. Purposes A, B and D have been examined above.

3.21. Purpose C seeks to *‘assist in safeguarding the countryside from encroachment’*. The land occupies a very small percentage of the overall Green Belt. It is previously developed land and constrained on three sides by other existing development. Taking the Green Belt areas of the plans as a whole, the proposal is not considered to undermine this purpose.

---

<sup>5</sup> <https://www.gov.uk/guidance/green-belt#proposals-on-grey-belt-land>

3.22. Purpose E serves to *‘assist in urban regeneration, by encouraging the recycling of derelict and other urban land’*. The development of the site is not on greenfield land, so it does not detract from the principles of brownfield first. Opportunities for recycling other derelict and other urban land would remain for the Green Belt across the plan, as a result of this proposal. The proposal is not considered to undermine this purpose.

3.23. Based on the assessments above, the site is grey belt and would not undermine the purposes of the remaining Green Belt across the area of the plan.

### **PARA 155B. DEMONSTRABLE UNMET NEED**

3.24. Understandably, the owners of caravans seek to have them stored within proximity of their homes so that they are accessible for maintenance and for taking them to holiday destinations. The caravan storage at Hargate Hill Equestrian serves the Glossop and immediate villages.

3.25. The exact requirement for caravan storage is unknown; and there is no prescribed methodology for measuring supply of storage space.

### **EMPLOYMENT LAND REVIEW**

3.26. Reference is made to the High Peak Borough Council Authority Monitoring Report 2024-2025 (AMR)<sup>6</sup>, published December 2025. This is the Council's most recent annual monitoring report covering the period 1st April 2024 to 31st March 2025, and represents the most up-to-date authoritative record of land supply within the Borough.

3.27. The AMR monitors employment land supply and completions across all B use classes, including B8 storage and distribution. It is therefore the appropriate starting point for assessing whether any existing or allocated employment land within the Glossopdale sub-area could realistically accommodate caravan storage.

3.28. During the monitoring year 2024-25, the AMR records total gross gains of B8 land of 1.6362 hectares and 1,449 m<sup>2</sup> of floorspace, with no B8 losses recorded. However, across all B use classes combined, the AMR records a net loss of 3.1507 hectares and 29,463.9 m<sup>2</sup> of floorspace during the same period (Table 26). This overall net loss position demonstrates that employment land supply across the Borough is under significant pressure and there is no surplus capacity from which specialist storage needs could be met without displacing other employment generating uses.

---

<sup>6</sup> [https://www.highpeak.gov.uk/media/10694/Authority-Monitoring-Report-2024-2025/pdf/04HPBC\\_Authority\\_Monitoring\\_Report\\_2024-2025\\_V2.pdf?m=1770026400360](https://www.highpeak.gov.uk/media/10694/Authority-Monitoring-Report-2024-2025/pdf/04HPBC_Authority_Monitoring_Report_2024-2025_V2.pdf?m=1770026400360)

3.29. Within the Glossopdale sub-area, the AMR identifies one remaining undeveloped allocated employment land site. Land off Wren Nest Road, Glossop, with an allocated area of 2.5 hectares, all of which remained undeveloped as at 31 March 2025 (Table 27). As a Development Plan allocation, this site is reserved for conventional employment generating uses. Its use for caravan storage, which by its nature generates minimal employment, would represent an inefficient use of a scarce and strategically important employment allocation and would be contrary to the purpose for which it has been identified.

3.30. The AMR identifies two existing employment sites within the Glossopdale sub-area retaining undeveloped capacity (Table 28):

- Rossington Park / Graphite Way, Hadfield with 4.77 hectares remaining as at 31 March 2025.
- Waterside, Hadfield with 0.80 hectares remaining as at 31 March 2025.

3.31. Both of these sites are established, active industrial estates. The undeveloped capacity identified within the AMR is retained to accommodate conventional employment generating development. Neither site is available, allocated or identified for leisure storage uses such as caravan storage. Rossington Park in particular, at 4.77 hectares, represents a significant strategic employment asset for the Glossopdale sub-area and its retention for employment generating purposes is consistent with the objectives of Local Plan.

3.32. Critically, the AMR makes no reference to any allocated, consented or available site within the Glossopdale sub-area that could accommodate caravan or leisure vehicle storage. No planning permissions for caravan storage were granted within Glossopdale during the monitoring period, further confirming the absence of any pipeline of provision for this use.

3.33. The AMR confirms that Policy S4 (Maintaining and Enhancing an Economic Base) of the High Peak Local Plan was declared out of date by the Council in June 2022, and that adoption of a replacement Local Plan is not anticipated until Autumn 2026 (Table 1). There is therefore no up-to-date development plan policy identifying or allocating land to meet specialist B8 storage needs, including caravan storage, within the Glossopdale area.

3.34. It is further material to note that caravan storage, whilst falling within the B8 use class, is by its nature a passive economic use generating no meaningful employment. There are no staff permanently stationed on site, no logistics operations and no supply chain activity associated with the use. Its accommodation on allocated or available

employment land within established industrial estates, where the policy objective is to retain and create jobs, would displace genuinely employment-generating uses without any commensurate employment benefit.

3.35. This point is reinforced by the Inspector's findings at Dodington Lane (3342201 & 3341893), who noted that caravan storage does not generate a large number of traffic movements and is not a use that generates a need for accessibility by public transport, given its inherently passive operational nature. It is therefore entirely logical and appropriate that caravan storage is accommodated on land where such use is already established. The co-location of the proposed use with an existing operation is the most rational means of meeting the identified need without placing pressure on the finite supply of employment land within the Glossopdale sub-area.

3.36. The AMR evidence therefore confirms that there are no available or suitable sites within the Glossopdale employment land supply capable of accommodating caravan storage.

#### **ASSESSMENT OF CARAVAN STORAGE PROVISION WITHIN THE CATCHMENT AREA**

3.37. In order to assess the demonstrable unmet need for caravan storage within the Glossop area, a review of existing provision has been undertaken. Given the nature of the use, caravan owners requiring accessible storage within reasonable proximity to their homes, a catchment area of approximately 5 kilometres from Glossop has been used as the primary assessment area. This is consistent with the approach adopted by the appellant in the Dodington Lane appeal (APP/P0119/C/24/3342201), which was accepted by the Inspector as an appropriate basis for assessing local need.

3.38. The results of the review are set out below.

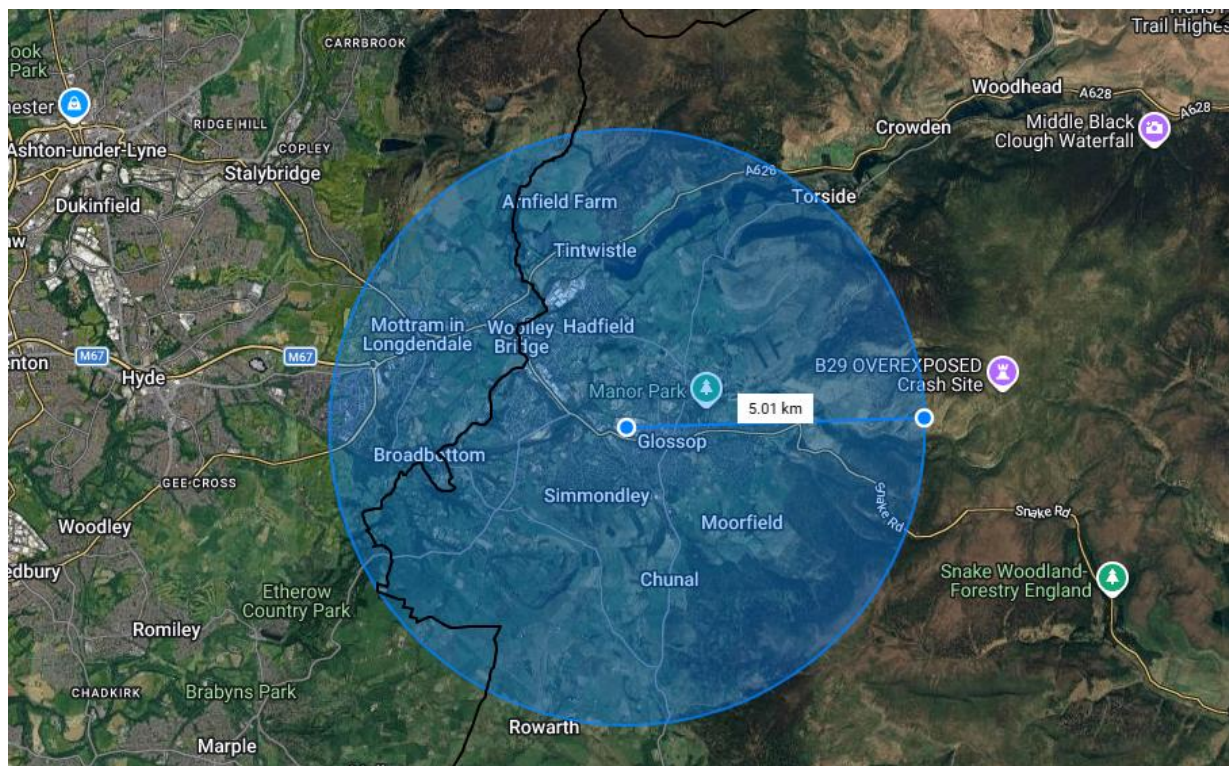


Figure 4: 5km radius of Glossop

#### **BROOKFIELD INDUSTRIAL ESTATE, PEAKDALE ROAD, GLOSSOP**

3.39. There is one identified caravan storage facility within the catchment area, located on land adjacent to High Peak Steels Ltd on Peakdale Road, Glossop. A review of current Google Earth imagery confirms that this yard is operating at capacity with no ability to expand. The site is constrained on all sides by existing development and there is no evidence of any land available for additional storage spaces. This site is therefore unable to absorb any additional demand.

#### **OTHER COMMERCIAL OR INDUSTRIAL PROVISION**

3.40. A review of commercial property listings and known industrial estates within the 5 kilometre catchment area has been undertaken. No other commercial caravan storage facilities have been identified within this radius. The review included the principal employment sites within the Glossop sub-area as identified in the High Peak Borough Council AMR 2024-2025 which are active industrial estates retaining undeveloped capacity for employment generating uses and are not available or suitable for caravan storage as set out within the employment land review above.

### **POSITION BEYOND THE CATCHMENT AREA**

3.41. Beyond the 5-kilometre catchment area, the options for caravan storage become increasingly impractical for Glossop-based caravan owners. The topography of the High Peak and the designation of significant areas of land as Green Belt, National Park and open countryside severely constrains the availability of suitable land. There are no known commercial caravan storage facilities in the immediately surrounding area beyond the 5 kilometre radius that would represent a realistic and sustainable alternative for caravan owners residing in and around Glossop.

### **SUMMARY OF PROVISION**

3.42. The position is therefore as follows. Within the relevant catchment area there is one existing caravan storage facility, which is operating at capacity with no ability to expand. There are no other known commercial caravan storage sites within the catchment. The employment land supply within Glossopdale does not provide any realistic alternative, as confirmed by the AMR evidence. The application site and the adjacent lawfully certificated land together represent the only meaningful caravan storage provision in the area, currently accommodating 56 caravans under rolling monthly agreements. This assessment is consistent with, and reinforces, the finding of the Inspector at Dodington Lane that there was a local need for caravan storage that the development was fulfilling.

3.43. The demonstrable unmet need for caravan storage within the Glossopdale area is therefore clearly established.

### **HARGATE HILL EQUESTRIAN**

3.44. The application site at Hargate Hill Equestrian Centre, together with the adjacent lawfully certified storage land, represents the only meaningful provision of caravan storage serving the Glossop area. The demonstrable unmet need required by paragraph 155(b) of the Framework is accordingly established.

### **PARA 155C. SUSTAINABLE LOCATION**

3.45. The application site is considered to represent a sustainable location for caravan storage having regard to paragraphs 110 and 115 of the Framework. It is acknowledged that the site is located in a rural setting without direct access to public transport.

3.46. However, as the Inspector at Dodington Lane (3342201 and 3341893) found in directly comparable circumstances, the sustainability assessment must be applied in a manner that is proportionate and appropriate to the specific use proposed. The Inspector

confirmed that caravan storage does not generate a large number of traffic movements and, fundamentally, does not give rise to a need for public transport accessibility. By its very nature, users arrive by private vehicle to deposit or collect their caravan, typically on an infrequent basis. The same logic applies here. The trip generation profile of caravan storage is inherently low, and the absence of public transport provision is not a relevant measure of sustainability for a use of this character. When assessed in the round, and with reference to the nature and operational requirements of the use, the application site represents a sustainable location for the proposed development. The proposal is considered to satisfy the requirements of 155c regarding sustainability.

#### **PARA 155D. GOLDEN RULES**

3.47. The application is not major development. The golden rules do not apply.

#### **CONCLUSION ON PARAGRAPH 155**

3.48. The proposal meets the four criteria set out in NPPF paragraph 155. The site is previously developed grey belt land, it does not make a strong contribution to Green Belt purposes, and it would not undermine the wider function of the Green Belt. There is a clear and demonstrable unmet need within High Peak, and the site represents a sustainable location for this form of development. The ‘golden rules’ do not apply. Accordingly, the proposal should not be regarded as inappropriate development in the Green Belt.

#### **PARAGRAPH 154.G) EXCEPTION**

3.49. Assessment of 154.g) first requires establishing:

- Is it previously developed land?
- Is it partial or complete redevelopment?
- Does it cause substantial harm to the openness of the Green Belt?

#### **PREVIOUSLY DEVELOPED LAND**

3.50. As established earlier in this statement, the land is considered to be previously developed.

3.51. Furthermore, a large proportion of the wider site is previously developed land and this has a fundamental bearing on the context. The image below shows, as a minimum, the land and buildings that would fall within the definition of previously developed land.



Figure 5: Previously developed land

## REDEVELOPMENT

3.52. The meaning of redevelopment taken from dictionary definitions is below:

### Dictionary

Definitions from [Oxford Languages](#) · [Learn more](#)



### redevelopment

/ˌrɪːdɪˈveləpm(ə)nt/

noun

noun: **redevelopment**; plural noun: **redevelopments**; noun: **re-development**; plural noun: **re-developments**

the action or process of developing something again or differently.

Figure 6: Redevelopment definition

3.53. The proposal seeks the change of use of the land from mixed general storage to caravan storage. It is acknowledged that the term "redevelopment" most commonly connotes physical rebuilding or construction works. However, the question of whether a change of use can constitute redevelopment for the purposes of paragraph 154(g) requires a purposive reading of the Framework rather than a purely linguistic one.

3.54. The PPG on Green Belt confirms that paragraph 154(g) applies to the "*partial or complete redevelopment of previously developed land.*" It does not restrict that concept to physical reconstruction. The purpose of paragraph 154(g) is to recognise that previously developed land within the Green Belt may be put to a new or different

productive use without that being treated as inappropriate development, provided that such use does not cause substantial harm to openness.

3.55. In this case the change of use is from one form of storage, a mixed storage use involving wrapped hay, horse trailers, commercial vehicles, caravans and general equipment, to a defined, regulated B8 caravan storage use. This represents a purposeful and formalised transition of the land from an uncontrolled mixed storage use to a specific, lawful and managed employment use. The change is not merely theoretical; it involves an active restructuring of how the land is used and managed, with rolling monthly agreements in place, defined areas for individual caravans, and an operational model that differs materially from the previous mixed activity.

3.56. It is further material that the Lawful Development Certificate issued under HPK/2025/0337 confirms that the engineering operations and hardstanding were lawfully carried out. The land has therefore been lawfully developed and is occupied by fixed surface infrastructure. The proposed change of use to caravan storage represents the redevelopment of that lawfully developed land for a new and defined purpose.

3.57. Even if a decision-maker were to take a narrower view of the term "*redevelopment*" and conclude that a change of use does not satisfy paragraph 154(g) in isolation, this limb is presented as one of three independent exceptions. The cases under paragraphs 155 and 154(h) each independently establish that the development is not inappropriate. The paragraph 154(g) case provides additional and supplementary support, and any concern about the scope of "*redevelopment*" does not undermine the primary case under paragraph 155.

#### **DOES IT CAUSE SUBSTANTIAL HARM TO THE OPENNESS OF THE GREEN BELT?**

3.58. Importantly, the use of the word substantial is one of several changes within the NPPF since December 2024, where previously it was '*not have a greater impact on the openness of the Green Belt than the existing development*'. This shift of wording accepts that for something to change means that there is some inevitable harm.

3.59. Substantial takes the dictionary meaning of:

## Dictionary

Definitions from [Oxford Languages](#) · [Learn more](#)



adjective

adjective: **substantial**

1. of considerable importance, size, or worth.

*Figure 7: Substantial definition*

3.60. As the definition states, it is something considerable. In terms of level of impacts, and for context, this wording can also be compared to ‘*preserve*’ used within other paragraph 154 exceptions.

3.61. The site is enclosed by other existing development. It is on an area of existing hardstanding that has been used for the storage of a variety of items across an extended period. It is also within the context of existing, and ongoing storage uses at the site that have been ongoing for significantly more than 10 years. Furthermore, it is in the setting of a significant equestrian facility with several large buildings, and often full car parks.

3.62. The PPG advises the following on openness:

### **Considering the potential impact of development on the openness of the Green Belt**

#### **What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?**

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness
- the degree of activity likely to be generated, such as traffic generation

Paragraph: 013 Reference ID: 64-013-20250225

*Figure 8: PPG openness*

3.63. Spatially, and prior to the complete introduction of caravans the land was laid as hardstanding and used for the ongoing storage of various items. It therefore occupies the same area of land without new land take.

3.64. If this land was not used for the storage of caravans, then it would be used for the same storage use that it has been put to over time. The submission of application HPK/2025/0337 included the evidence of aerial imagery and sworn statements on the land use. This includes the land used for wrapped hay for equestrian customers, horse trailers/boxes and commercial vehicles.

3.65. The Council have previously challenged the use of the land. However, even if that approach was adopted and taking their point regarding the use of the land for storing wrapped hay for equestrian customers, the wrapped hay would have a greater impact on the openness of the Green Belt than the caravans. The wrapped hay is stacked to a taller overall height than the caravans, could occupy the entire footprint of the hardstanding and placed there all year round.

3.66. The site is not readily visible from public vantage points and benefits from substantial screening by established planting. The closest footpath is approximately 130m away to the north, views are filtered by planting alongside the right of way. Furthermore, on the immediate north of the site are established trees. The public right of way is on lower ground, therefore views upwards towards the site will be obscured by the existing tree planting. An image of the right of way and distance is shown below.

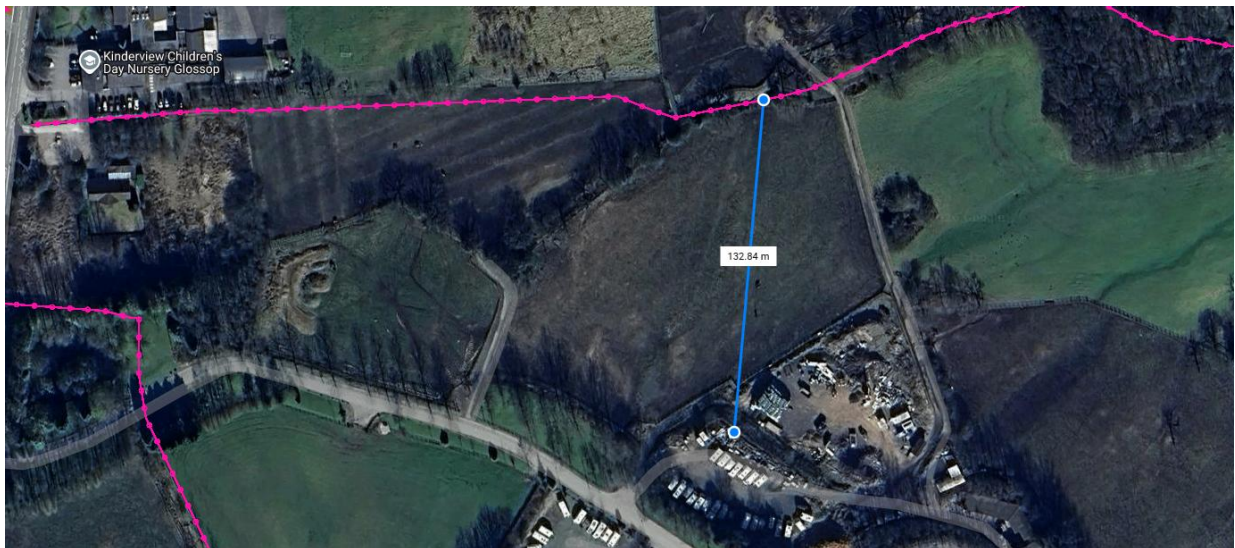


Figure 9: Public right of way

3.67. Given the size, scale and parameters of the application site within the context of the wider area, it is proposed that the development does not cause substantial harm to the openness of the Green Belt.

#### **CONCLUSION ON 154.G)**

3.68. The proposal is on previously developed land and constitutes redevelopment. The harm to the openness of the Green Belt is not substantial and therefore the development falls squarely within the exception set out within paragraph 154.g). It is not inappropriate development in the Green Belt.

#### **PARAGRAPH 154.H) EXCEPTION**

3.69. Assessment of 154.h) v. first requires two tests:

- Does it preserve openness?
- Does it conflict with the purposes of including land within the Green Belt?

3.70. Taking the purposes of the Green Belt first, the outcome from the para. 155 assessment above concludes that there would not be conflict with the purposes of including land within the Green Belt. This limb of the test is satisfied.

3.71. Impact on openness has also been discussed previously within this statement, under the umbrella of whether it would have a *substantial* impact. Given the assessment under that previous section and comparisons drawn to the ongoing land use, or even including the storage of wrapped hay for equestrian customers it is the case that the proposal would preserve openness.

#### **CONCLUSION ON 154.H)**

3.72. The proposal is for the change of use of the land, and within the 154.h) v. provision has been proven to preserve openness and would not conflict with the purposes of including land within it. The development falls squarely within the exception set out within paragraph 154.h). It is not inappropriate development in the Green Belt.

#### **GREEN BELT CONCLUSION**

3.73. Three separate exceptions to the general presumption against inappropriate development in the Green Belt have been demonstrated within this statement.

3.74. First, under paragraph 155, the site is grey belt land that does not strongly contribute to Green Belt purposes A, B or D, and would not fundamentally undermine the remaining purposes of the Green Belt across the plan area. There is a clear and

demonstrable unmet need for caravan storage within the Glossopdale area, confirmed both by the absence of any alternative provision and by the active occupation of the site itself. The development represents a sustainable location for this form of low-trip-generating, passively operated use. The golden rules do not apply.

3.75. Second, under paragraph 154(g), the site is previously developed land and the proposal constitutes redevelopment. The change of use to caravan storage does not cause substantial harm to the openness of the Green Belt, particularly when considered in the context of the existing and ongoing storage uses on the hardstanding and the wider equestrian facility.

3.76. Third, under paragraph 154(h), the material change of use preserves the openness of the Green Belt and does not conflict with the purposes of including the land within it.

3.77. On any one of these three grounds, the proposal is not inappropriate development in the Green Belt.

## **4. THE LOCAL PLAN POLICIES AND NPPF**

### **GREEN BELT**

4.1. The local plan policy on Green Belt, EQ 4, defers to the Framework. There is no conflict and the preceding assessments remains.

### **ECONOMIC GROWTH**

4.2. The Council cannot demonstrate an adequate supply of employment land, and there is a demonstrable shortfall in land to accommodate caravan storage in the Glossop area. The Council's monitoring document indicates that policy S4 – '*maintaining and enhancing an economic base*' is out of date for development management purposes. Paragraph 11 of the Framework dictates that the presumption in favour of allowing development is engaged, unless for footnote 7 conflicts, or adverse impacts significantly and demonstrably outweigh the benefits.

4.3. There are no policies within the Local Plan context of providing employment land, impacts to footnote 7 assets, or adverse impacts that would significantly and demonstrably outweigh the benefits of allowing the development.

4.4. Despite being out of date, the principles of policy S4 seek to align economic growth in a similar way to the Framework. S4 supports the *appropriate improvement, enhancement and expansion of existing businesses* while paragraph 88 of the Framework advises that supporting a prosperous rural economy includes:

*a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*

4.5. This is exactly the case at Hargate Equestrian Centre. There is an existing caravan storage business that has expanded to cater for demand.

4.6. The Framework goes on in paragraph 89 to acknowledge that local business and community needs may be found beyond existing settlements – as is the case here.

*Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements*

4.7. This approach is reflected within policy EQ3 – ‘rural development’. It supports:

*‘redevelopment of a previously developed site’ ...‘providing it does not have an adverse impact on the character and appearance of the rural area’.*

*‘rural employment in the form of ...commercial enterprises...where a rural location can be justified’.*

4.8. The approach in EQ3 is only reinforced by Policy E1 ‘new employment development’ supports:

*‘business development within the countryside that accords with Local Plan Policy EQ3 – Rural Development’*

4.9. The direction through planning policy at the national and local level is clear; support needs to be given to economic development including rural areas. Sometimes the development won’t take place within settlements, but policy recognises this and provides a direction for it. There is clear policy support and crucially in terms of the tilted balance, no adverse impacts from an economic standpoint. The tilted balance is revisited in section 6.

## 5. OTHER MATERIAL CONSIDERATIONS

### LANDSCAPE

5.1. The development benefits from existing, mature landscaping surrounding the application site, and within the wider area. Limited views will be possible from the right of way to the north as expressed above, but they will be filtered from the right of way itself, and existing planting near the parked caravans. The siting of caravans is not considered to have an undue impact on the immediate and wider landscape.

## **ECOLOGY**

5.2. The application site comprises existing hardstanding within an established equestrian complex. The land has been in active use for storage and equestrian-related activity over an extended period and does not contain features that would be considered to have significant ecological value.

5.3. The proposed use does not introduce any new built form, lighting, drainage infrastructure or ground disturbance. As a change of use of an existing surfaced area, the ecological impact of the development is negligible.

## **HIGHWAYS**

5.4. The site is accessed via a driveway to the public highway that serves a busy commercial equestrian and fishing facility. The proposal for the siting of caravans will not cause a material impact on highway safety or capacity.

## **DRAINAGE**

5.5. The caravans are sited on existing permeable hardstanding. The land holding owned around the site of the caravans is extensive. The proposal would not create any additional run off water – the land is already hardstanding with no further intervention.

## **6. THE TILTED BALANCE: BENEFITS OF THE PROPOSAL**

6.1. As set out above, Policy S4 of the High Peak Local Plan has been formally declared out of date by the Council since June 2022. In these circumstances, paragraph 11(d) of the Framework is engaged, and the presumption in favour of sustainable development applies. The question is whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

6.2. The benefits of the proposed development are set out below.

### **MEETING DEMONSTRABLE UNMET NEED**

6.3. The proposal meets a clear, evidenced and unmet need for caravan storage within the Glossopdale area. As demonstrated within this statement, the only other known provision within the catchment is at capacity with no ability to expand, and no alternative sites are available. The 56 caravan owners currently stored across the application site and the adjacent certificated land have no realistic alternative. This is a tangible benefit to local residents that weighs positively in the balance.

## **SUPPORT FOR AN ESTABLISHED RURAL BUSINESS**

6.4. The proposal supports the ongoing operation and expansion of Hargate Hill Equestrian Centre, an established rural business. The caravan storage operation generates income for the landowner that contributes to the viability and sustainability of the wider equestrian facility. This is consistent with the Framework's support for rural economic growth at paragraph 88, and with Local Plan Policies EQ3 and E1, both of which support rural commercial enterprises where a rural location can be justified.

## **USE OF PREVIOUSLY DEVELOPED LAND**

6.5. The proposal makes use of an existing area of hardstanding that has been lawfully developed and is confirmed as previously developed land. No new land is taken into use, no new structures are erected and no greenfield land is affected. The use of previously developed land is a positive planning consideration and is consistent with the brownfield-first principles embedded in the Framework.

## **REGULARISATION OF AN EXISTING USE**

6.6. The proposal is retrospective and seeks to regularise a use that is already in existence. Granting permission would bring the use within the planning system, subject to appropriate conditions including controls on the number of caravans, the nature of the use and any landscaping requirements. This is a benefit in itself, providing certainty and enabling the use to be managed and monitored going forward.

## **LOW ENVIRONMENTAL IMPACT**

6.7. The development generates no significant adverse impacts in respect of landscape character, visual amenity, ecology, highway safety or drainage. The use is passive and low-intensity, generating infrequent and low-volume traffic movements. It does not introduce any built form, noise, odour or other adverse environmental effects.

## **THE BALANCE**

6.8. Against these benefits, no significant harms have been identified. The development has been found not to be inappropriate in the Green Belt on three independent grounds. It is consistent with the relevant policies of the development plan and the Framework. The harms, to the extent that any exist, are limited and do not significantly and demonstrably outweigh the benefits. The presumption in favour of sustainable development therefore clearly points toward the grant of planning permission.

## 7. CONCLUSION

7.1. This statement has been prepared in support of a retrospective application for the change of use of land at Hargate Hill Equestrian Centre, Glossop, for caravan storage (B8 use). The proposal seeks to regularise an existing use that has developed organically in response to a clear and demonstrable need for caravan storage provision within the Glossop area, a need that cannot be met by any other known site within the catchment.

### THE GREEN BELT CASE

7.2. The case that the development is not inappropriate in the Green Belt has been established on three separate and independent grounds, each of which is sufficient in itself.

7.3. Under paragraph 155 of the Framework, the site is grey belt land. It does not strongly contribute to Green Belt purposes A, B or D, and the development would not fundamentally undermine the remaining purposes of the Green Belt across the plan area. A demonstrable unmet need for caravan storage within the Glossopdale area has been robustly established through a catchment-based assessment of existing provision. That assessment confirms that the only known alternative site within 5 kilometres is operating at capacity with no ability to expand, that no commercial caravan storage provision exists elsewhere within the catchment, and that the employment land supply within Glossopdale offers no realistic alternative. The 56 caravan spaces currently provided across the application site and the adjacent lawfully certificated land represent the only meaningful provision serving the Glossop area. The site is a sustainable location for this form of development. The Inspector at Dodington Lane (APP/P0119/C/24/3342201 and APP/P0119/W/24/3341893) found in materially identical circumstances that caravan storage does not generate a large number of traffic movements and does not give rise to a need for public transport accessibility by its very nature. The same finding applies here. The golden rules do not apply to this application.

7.4. Under paragraph 154(g), the application site is previously developed land, confirmed as such by Lawful Development Certificate HPK/2025/0337, which establishes the lawfulness of the hardstanding as fixed surface infrastructure. The proposed change of use from mixed general storage to defined and regulated B8 caravan storage constitutes redevelopment of that previously developed land within the purposive meaning of paragraph 154(g). The development does not cause substantial harm to the openness of the Green Belt. The site is enclosed by existing development on three sides, is not readily visible from public vantage points, benefits from established screening, and

the closest public right of way is approximately 130 metres distant. The caravans occupy no greater footprint than the previous mixed storage activity and sit at a lesser height than the wrapped hay (for equestrian purposes) previously stored on the site.

7.5. Under paragraph 154(h), the material change of use of land preserves the openness of the Green Belt and does not conflict with the purposes of including the land within it. The purposes assessment conducted under paragraph 155 equally satisfies this limb. The development is entirely consistent with both tests.

7.6. On any one of these three grounds the proposal is not inappropriate development in the Green Belt. On all three grounds taken together, the case is compelling.

## **THE DEVELOPMENT PLAN AND POLICY FRAMEWORK**

7.7. The proposal is consistent with the development plan taken as a whole. Local Plan Policy EQ4 defers to the Framework on Green Belt matters and is therefore satisfied by the Green Belt case set out above. Policy EQ3 supports the redevelopment of previously developed sites in rural areas and the provision of rural commercial enterprises where a rural location can be justified. Policy E1 supports business development within the countryside that accords with Policy EQ3. Both are satisfied here. The proposal is equally consistent with paragraphs 88 and 89 of the Framework, which support the sustainable growth and expansion of rural businesses and recognise that sites to meet local business and community needs may need to be found adjacent to or beyond existing settlements.

7.8. Policy S4 of the Local Plan, which governs the economic base, has been formally declared out of date by the Council since June 2022. In these circumstances paragraph 11(d) of the Framework is engaged and the presumption in favour of sustainable development applies. The question is whether any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

## **THE TILTED BALANCE**

7.9. The benefits of the proposed development are clearly identifiable and substantial. The proposal meets a demonstrable and unmet local need for caravan storage that no other site can satisfy. It supports the ongoing viability of an established rural business consistent with national and local economic policy. It makes use of previously developed land without introducing any new land take, built form or physical infrastructure. It regularises an existing use, bringing it within the planning system and enabling it to be managed under appropriate conditions. It generates no significant adverse impacts in respect of landscape, visual amenity, ecology, highway safety or drainage.

7.10. Against these benefits, no significant harms have been identified. The development is not inappropriate in the Green Belt. It does not conflict with any relevant development plan policies. It raises no objection from any statutory consultee on environmental, ecological or highway grounds. The impacts on openness and the Green Belt purposes are minimal and have been robustly assessed.

7.11. The adverse impacts of granting permission do not significantly and demonstrably outweigh the benefits. The presumption in favour of sustainable development is engaged and is not displaced. The tilted balance falls clearly and decisively in favour of granting planning permission.

## **OVERALL**

7.12. This is a proposal that meets a real and evidenced local need, on land that is previously developed, in circumstances where the policies at both national and local levels supports the grant of permission. The Green Belt case is established on three independent grounds. The tilted balance favours approval. There are no material considerations that would justify refusal.

7.13. Planning permission should be granted.

## **8. APPENDICES**

### **APPENDIX 1: APPEALS 3342201 AND 3341893 AT DODINGTON LANE**