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Planning, Design and Access Statement

Conversion of existing agricultural barns to provide two dwellings at
Dale Gap Farm, Barrow Hill, Uttoxeter, ST14 5BX

On behalf of

THE TRUSTEES OF AHF DAWSON

Prepared by:

Sarah DeRenzy-Tomson BA (Hons) MRTPI

Fisher German LLP
St Helens Court
North Street
Ashby de la Zouch
Leicestershire LE65 1HS

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1.0 INTRODUCTION

- 1.1 This Planning, Design and Access Statement has been written in support of a planning application which proposes the conversion of existing agricultural barns to form two dwellings at Dale Gap Farm, Barrow Hill, Uttoxeter.
- 1.2 The site is located within the jurisdiction of East Staffordshire Borough Council. The proposal seeks to convert the existing redundant agricultural buildings at Dale Gap Farm to provide new dwellings.

Background

- 1.3 Dale Gap Farm used to be a small livestock farm of approximately 46 hectares (115 acres). Such units are of marginal viability and approximately 12 months ago there was a change of tenant with the land surrounding the buildings now being let to the other tenant of the owners (Quixhill Farm) to create a single ring fenced dairy holding of 102 hectares (252 acres). Whilst the traditional buildings and more modern buildings and yard had been used to some extent by the previous tenant, they are not suitable for modern farming and the new tenant of the surrounding land did not want them included in the tenancy of that land. They are accordingly standing empty and redundant in farming terms. The brick and tile traditional buildings are intrinsically attractive, but need significant investment to secure their fabric. There is no economic justification for that investment within an agricultural enterprise and so the current owners following pre-application advice are pursuing the conversion of these buildings in order to preserve and re-use them.

Planning History

- 1.4 Recent planning history at the farm comprises of an application for the erection of an agricultural stock building (PA/16621/002) which was approved in October 2000. It should also be noted that the access to the south of the site, which currently serves the Barrowhill Hall Nursing Home, has been the subject of a planning application to re-align the existing access drive to provide improved visibility (P/2015/00696). This application was approved on the 10th July 2015.

Pre-Application Advice

- 1.5 This planning application follows a pre-application enquiry which was submitted to East Staffordshire Borough Council in October 2014. The enquiry sought advice in respect of the

proposal to convert the building included in this application and also the possibility of converting a barn to the rear of this application and also providing a completely new dwelling.

- 1.6 The pre-application response confirmed that in principle the conversion of the brick and tile building which is the subject of this application to residential use was acceptable in accordance with the guidance in the National Planning Policy Framework (NPPF) and amendments to the General Permitted Development Order (GPDO).
- 1.7 Specific guidance was provided in the pre-application response for the proposed conversion which recommended that to retain the character of the structure, that existing openings should be utilised for the provision of windows and doors. In addition, the proposed scheme should consider the need to avoid unacceptable overlooking of adjacent properties.
- 1.8 In addition, the following surveys were identified as being required to support a full planning application:
- An Ecological Survey specifically relating to bats;
 - An Archaeological Assessment; and
 - Consultation with the Highway Authority – although it is stated that the scheme is not likely to cause unacceptable increases in traffic levels and there is sufficient space to accommodate off-street parking.

Contents

- 1.9 This statement supports the submission of the planning application and provides the following information:
- SITE AND SURROUNDING AREA – a description of the site and context of the surrounding area.
 - PROPOSED DEVELOPMENT – details of the proposed use, amount, layout, scale, landscaping and access to the development are included.
 - PLANNING POLICY REVIEW – details of policies relevant to the proposed development and site.
 - POLICY ASSESSMENT - The proposal is assessed against relevant planning policy and other material considerations.
 - CONCLUSION

2.0 SITE AND SURROUNDING AREA

- 2.1 Dale Gap Farm is located in countryside between Ashbourne and Uttoxeter. The farm is situated between the settlement of Ellastone to the north and the town of Rocester approximately 1.5km to the south. The site is in close proximity to Denstone Village, situated 1 km to the west. The B5030 follows the eastern boundary of the site. There is direct access from the farmyard onto this road. There are two small detached residential properties located immediately to the south of the former farmyard with what was the farmhouse situated 50m away to the west forming a small existing group of houses. To the south west of the site is Home Farm and a cluster of buildings forming Barrowhill Hall nursing home, with a group of (3) residential units/houses created out of the old Home Farm buildings.
- 2.2 The entire site is identified as being located within the Open Countryside. There are no heritage assets on site or in the immediate vicinity. The nearest listed building is the Grade II listed 'Hay Barn' located approximately 320m west south west of the proposed development site; with 4 No. additional listed structures in proximity to this, associated with Barrowhill. With regard other potential constraints, the site is not identified as being at risk of flooding by the Environment Agency; as it is located within flood zone 1. Furthermore, the site is not contained within, or lies in the immediate proximity of, any statutory ecological designations.
- 2.3 The site accommodates several redundant buildings, of which this application seeks to convert the traditional brick built barns located within the north east corner of the Dale Gap Farm.

Existing Use

- 2.4 The buildings, which form the subject of this application, are shown in Figures 2.1, 2.2, 2.3 and 2.4.
- 2.5 These traditional brick building provides an exciting opportunity for conversion. The brick work, round windows and barn door features are proposed for retention and are fully integrated into the design of the converted property. As the barns have been redundant for a substantial period, it is important to identify a viable long term future.



Figure 2.1 Proposed Building to be Converted (Unit 1)



Figure 2.2 Proposed Building to be Converted (Unit 1)



Figure 2.3 Proposed Building to be Converted (Unit 1)



Figure 2.4 Proposed Building to be Converted (Unit 2)



Figure 2.5 Proposed Building to be Converted (Unit 2)

3.0 PROPOSED DEVELOPMENT

- 3.1 It is proposed to convert the redundant agricultural barns to form two dwellings at Dale Gap Farm. The traditional agricultural buildings are structurally sound, make a positive contribution to their surroundings and are capable of conversion without substantial alteration or extension.
- 3.2 The steel portal framed building to the west, together with the concrete structures to the rear of the agricultural buildings along the eastern boundary are proposed for demolition. This will enhance the setting of the converted properties and enable the creation of garden curtilage and parking space.

Layout

- 3.3 With regard to the proposed layout of the dwellings. Unit 1 comprises single storey structures to the east of the site which are connected internally. The associated land will comprise of a parking area to the south which will accommodate approximately two vehicles, with a garden lying to the north west.
- 3.4 Unit 2, a two storey structure, is located adjacent to the west of unit 1 and will similarly have an associated garden to the north of the building and parking will be accommodated to the west of the structure.
- 3.5 The conversion creates two good family sized dwellings.

Scale and Appearance

- 3.6 The modifications to the existing buildings have been designed, in line with the advice gained through pre-application discussions, to retain the key traditional design features. As such, the plans submitted have sought to minimise the provision of additional openings, except where these have been essential to allow natural light and enable residential use of these currently redundant structures.
- 3.7 The differences between the built form of the existing structures and the proposed changes are depicted when comparing drawing no's: **D90.1-101B** with **D90.1-100**.

3.8 The main external changes that are proposed as part of the application is the relocation of an existing window and installation of 3 no. fenestrations on the south west elevation; the installation of a larger window on the south west elevation - courtyard elevation; the provision of 3 no. doors on the north west elevation and a singular window.

3.9 In line with the recommendations contained within the Bat Survey Report, the building has been designed to incorporate a bat loft. The following extract from the aforementioned document states:

"As an enhancement for brown long-eared bats and Natterer's for example, a bat loft could be included within the building as part of the proposals" (2015: s4.5).

It should be noted that the approach to this development has been proactive given that the report identifies that, "(... *this is not a requirement for licensing given the small numbers of non-breeding bats using the building*)". The proposed bat loft runs along the entire length of an upper partition within the first floor of the building, with the access point present on the north west elevation; depicted on plan **D90.1-101B**.

3.10 In terms of internal modifications for unit 1, the building will be altered to accommodate:

- Dining/sitting room
- Kitchen
- Study & 2 no. bedrooms/ 3 no. bedrooms
- Bathroom

3.11 In terms of internal modifications for unit 2, the building will be altered to accommodate:

- Sitting room
- Entry hall and adjoining W.C
- Dining room
- Kitchen
- Study & 2 no. bedrooms/ 3 no. bedrooms
- Bathroom

Landscaping

3.12 The conversion will see the removal of a steel portal framed building and concrete structures to the rear of the buildings in order to create garden space for private

maintenance within the curtilage boundary of each property. Gravelled aggregate areas will also be created as depicted on Drg. No. **D90.1-002B**.

Access

- 3.13 The proposed development would see the closure of the existing access point into the site from the B5030 which has poor visibility and is sited close to existing building proposed for conversion. The closure would create a safer environment for residents to live in.
- 3.14 Access would be provided from the route via Barrowhill Hall. The access to Barrowhill Hall benefits from significant visibility splays and is considered more than sufficient to support any increases in traffic movements that are created through the creation of 2 no. dwellings. This access has been the subject of a recent planning application to improve visibility at the site (P/2015/00696), as such its utilisation gains increased merit.
- 3.15 Bancroft Consulting have prepared a transport statement which is submitted with this planning application and confirms that the modified access would be safe and suitable for the development proposed.

4.0 PLANNING POLICY

4.1 This chapter identifies the most relevant policy and guidance at national and local level.

National policy and guidance

General Permitted Development Order (GPDO)

4.2 Permitted development rights have been introduced under Part 3 Class Q of the Town and Country Planning (General Permitted Development Order) to allow the change of use of existing agricultural buildings and land not exceeding 450 square metres of floor space to provide a maximum of 3 dwellings. There are a number of provisos that such proposals have to meet but in principle the changes to the permitted development rights supports the conversion of redundant agricultural buildings to residential use. In this instance it is not proposed to utilise the new permitted development rights and instead planning permission will be sought as demolition is required and a larger curtilage is required for parking and garden space than permitted by the GPDO. The changes first introduced in April 2014 clearly demonstrate a desire to ensure that redundant agricultural buildings are put into positive reuse and contribute towards sustaining the rural economy by enabling more people to live in rural areas. The reuse of existing structures also contributes to delivering much needed residential development and establishes the principle of conversion to residential use without the need to test for alternative commercial uses beforehand. It recognises the importance of providing appropriate residential accommodation for those wishing to reside in the countryside.

National Planning Policy Framework (NPPF)

4.3 The NPPF sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally. The NPPF sets out the Government's requirements for the planning system only to the extent that is relevant, proportionate and necessary to do so; and has replaced all national Planning Policy Statement's (PPS) and Planning Policy Guidance's (PPG).

4.4 Paragraph 14 of the NPPF outlines a presumption in favour of sustainable development. Proposed development which is in accordance with an up to date development plan should be approved, and proposed development which conflicts with it should be refused,

unless material considerations indicate otherwise. Development which is sustainable should be approved without delay.

- 4.5 One of the Core Planning Principles, identified within paragraph 17 of the NPPF, outlines that both plan making and decision taking should seek to support the transition to a low carbon future; specifically encouraging the reuse of existing resources through the conversion of existing buildings.
- 4.6 Paragraph 49 of the NPPF identifies that the policies which pertain to housing to housing delivery should not be considered up-to-date if the local planning authority cannot demonstrate a five year housing land supply.
- 4.7 Paragraph 55 of the NPPF states that isolated dwellings in the countryside should not be permitted by local planning authorities except in circumstances where the scheme would re-use redundant or disused buildings and would lead to an enhancement to the immediate setting.

Local Policy and Guidance

– East Staffordshire Local Plan 2012-2031 (Adopted October 2015)

- 4.8 This document outlines the spatial development strategy for the borough over the plan period of 2012 – 2031. This document replaces the policies contained within the 2006 Local plan and has become the guiding document when considering development proposals.
- 4.9 **Spatial Objective 9 – Heritage:**
To deliver high quality places that conserve and enhance the historic environment whilst promoting local distinctiveness, place making, significance and sustainable development to support heritage-led regeneration and the sustainable use of heritage assets, particularly in Burton upon Trent, the market town of Uttoxeter, rural villages and the wider countryside.
- 4.10 **Spatial Objective 11 – Prudent Use of Resources:**
This objective outlines a commitment by the Council to promote the prudent use of finite resources and the positive use of renewable resources, through the design, location and layout of development and by optimising the use of existing infrastructure.
- 4.11 **Spatial Objective 12 – Countryside:**

To protect, conserve and enhance the local countryside, character, distinctiveness and quality of the landscape and the diversity of wildlife and habitats.

4.12 **Strategic Policy 1** – East Staffordshire Approach to Sustainable Development:

This policy stipulates that development proposals will be expected to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development. When determining whether a proposal is sustainable, criteria are outlined within the policy. One of the criteria which may make a proposal sustainable is the re-use of existing buildings where this is practicable and desirable, in terms of the contribution the building makes to their setting. Furthermore the policy states that development must not infringe upon environmental, heritage, public amenity or any other site specific factors that would deviate from the intentions set out in the policy.

4.13 **Strategic Policy 2** – Settlement Hierarchy:

Development will only be permitted in exceptional circumstances as set out in NP1 and Strategic Policies 8, 14, 15, 18, 20 and 21.

4.14 **Strategic Policy 3** – Provision of Homes and Jobs 2012 - 2031:

This policy identifies that the Borough Council will provide 11,648 dwellings over the plan period. The indicative annual rate will be as follows:

- 466 dwelling per annum for 6 years (2012/2013 – 2017/2018)
- 682 dwellings per annum for 13 years (2018/2019 – 2030/2031)

4.15 **Strategic Policy 4** – Distribution of Housing Growth 2012 – 2031:

This policy states that 250 dwellings are required within the small villages, other settlements and the countryside during this period.

4.16 **Strategic Policy 8** – Development Outside Settlement Boundaries:

This policy outlines that development will not be permitted where it is located outside of settlement boundaries unless, amongst other factors, it comprises of the re-use of rural buildings and follows the guidance set out in the Rural Buildings SPD. Where proposals do align with these provisions they must also, not adversely affect the site specific amenities of existing residences; be compatible with the character of the surrounding area; carefully consider the choice of local architecture and roofscape design; and not adversely affect the transport and highway network.

- 4.17 **Strategic Policy 17 – Affordable Housing:**
This policy states that the affordable housing required from proposals 'on other land' will be 40% or the amount which is evidenced by an applicant to be viable.
- 4.18 **Strategic Policy 24 – High Quality Design:**
Development proposals must contribute positively to the area in which they are proposed and help to create a sense of place, building on the rural local character, respecting local patterns of development and the historic environment. In addition, development must present an appropriate layout for new development that integrates with the existing environment and context, including space around dwellings.
- 4.19 **Strategic Policy 25 – Historic Environment:**
Development proposals should protect, conserve and enhance heritage assets and their settings, taking account of their significance, as well as the distinctive character of the Borough's townscapes and landscapes.
- 4.20 **Strategic Policy 29 – Biodiversity and Geodiversity:**
The Council will seek to ensure that development retains, protects and enhances features of biological interest, ensuring that development produces a net gain in biodiversity. Development proposals that would have a direct or indirect adverse effect on Priority habitats and species will not be permitted unless prevention, mitigation and compensation measures of a comparable or enhance value are provided.
- 4.21 **Detailed Policy 1 – Design of New Development:**
This policy states that planning permission will normally be granted for development which responds positively to the context of the surrounding area and in itself exhibits a high quality of design and is compliant with the East Staffordshire Design Guide. Proposals will be assessed against the criteria contained within this policy.
- 4.22 **Detailed Policy 3 – Design of New Residential Development, Extensions and Curtilage Buildings:**
This policy outlines that planning permission for new residential development will be granted where it adheres to the East Staffordshire Design Guide and other policies contained in the development plan. The policy then outlines several other factors which must be considered when considering development proposals such as, overlooking, overbearing impacts, design and layout and siting.

4.23 **Detailed Policy 5** – Protecting the Historic Environment: All Heritage Assets, Listed Buildings, Conservation Area and Archaeology:

Archaeological sites should be subject to appropriate and relevant assessment and field assessment where appropriate especially to determine whether remains should remain insitu or are to be excavated.

Denstone Neighbourhood Plan

4.24 The site is recognised as falling within the Denstone Neighbourhood planning area. However, no substantive documents have been produced which relate to the proposed subject matter.

East Staffordshire Design Guide SPD (June 2008)

4.25 This document has been produced to inform the implementation of good design within the Borough and forms a material consideration when assessing proposed developments. Accordingly, the chapters of most relevance to this application are 2 and 4 which regard design quality in residential development and the character of East Staffordshire.

4.26 The main aspects of the guidance set out in chapter 2 that relate to the proposal are:

- To ensure that windows create a contextually appropriate and authentic design, and a more pleasing appearance;
- When designing landscaping and boundary treatments, the specification and detailing should reflect the context and create a high quality feel for the residential environment;
- With regard to the choice of building materials, wherever possible, traditional and natural materials should be utilised for walls and roofs in order that the development blends into its context.
- Although the Council has not identified any fixed space standards in relation to the separation distances that must be maintained between buildings, the overall aim when designing residential development should be to preserve reasonable levels of privacy and amenity.

4.27 Chapter 4 of this SPD characterises the different towns and areas in East Staffordshire in terms of architectural style, layout and landscape. The nearest village to the proposed development site, Rocester, is identified to contain more brick buildings than stone.

However, it is considered that the character and distribution of brick/stone built houses is not pertinent to the application itself as the proposed buildings which form the subject of this application, are of a unique agricultural style and are not influenced by the built pattern of development in this nearby locality.

Re-Use of Redundant Rural Buildings SPD (September 2010)

- 4.28 This Supplementary Planning Document (SPD) develops upon the requirements set out in adopted Policy BE15 of the East Staffordshire Local Plan 2006 and states within paragraph 2.4 that where there is no alternative use appropriate for an existing building, residential use will be considered. Such use is generally only appropriate for traditional agricultural buildings which are structurally sound, make a positive contribution to their surroundings, are capable of conversion without substantial alteration or extension, where there is an existing vehicular access to the building, and where any domestic curtilage can be accommodated without creating a visual intrusion into the surrounding countryside.
- 4.29 In terms of sustainability, paragraph 2.5.1 states that most of the buildings relevant to this guidance will occupy a location away from defined settlements, sustainability cannot be judged purely on proximity to existing infrastructure and facilities. It is stated that a more pragmatic approach to this consideration must therefore be adopted. Paragraph 2.5.2 confirms that the fact that there is a building standing unused in the countryside needs to be considered. In its unused state it may be regarded as a wasted resource. Bringing the building back into active use that is appropriate for in relation to its particular location, may be regarded as sustainable.
- 4.30 Paragraph 2.5.6 states that where there is no possibility of commercial reuse being acceptable, consideration will be given to residential conversion.
- 4.31 Paragraph 3.7 states that in the case of a traditional agricultural building, the existing form, condition, character and location of the building will be fundamental to the acceptability of any proposed conversion scheme. Outside of development boundaries, it will be necessary to demonstrate that a building is structurally sound and capable of conversion without substantial demolition and reconstruction. Paragraph 3.8 continues to state that traditional buildings which are suited to conversion are those associated with an existing farmhouse and form part of a group.

4.32 This SPD clarifies that the presence of a protected species will be regarded as a material consideration in the determination of any planning application.

4.33 The main message of the SPD are as follows:

- To retain the character and architectural integrity of traditional rural building, alterations to existing fabric must be kept to a minimum and necessary to facilitate the new use;
- Modest alterations will be acceptable only if they are used with restraint and are discreetly placed;
- Existing doors and windows should be utilised wherever possible;
- Re-pointing of all the elevations should not be carried out simply to give a unified appearance.

5.0 POLICY ASSESSMENT

- 5.1 This section considers the development proposal in the context of planning policy and other material considerations.

Principle of Development

- 5.2 The proposed development comprises of the conversion of redundant agricultural barns to provide two residential dwellings in open countryside. The principle of conversion is considered to be in accordance with the policies contained within the East Staffordshire Local Plan and National Planning Policy Framework. This is due to the development comprising of the reutilisation of existing redundant structures, retaining the character of these buildings through sensitive conversion.
- 5.3 The changes first introduced in April 2014 to the General Permitted Development Order clearly demonstrate a desire to ensure that redundant agricultural buildings are put into positive reuse and contribute towards sustaining the rural economy by enabling more people to live in rural areas. The reuse of existing structures also contributes to delivering much needed residential development and establishes the principle of conversion to residential use without the need to test for alternative commercial uses beforehand. It recognises the importance of providing appropriate residential accommodation for those wishing to reside in the countryside.
- 5.4 In addition, positive pre-application discussions have identified that the proposed extent of development is 'considered acceptable in this instance'. The development has been purposively designed to take into account the advice received on the 22 January 2015 and the views of the Council planning officer.

Sustainability

- 5.5 The National Planning Policy Framework outlines a presumption in favour of sustainable development. Specifically, the document outlines that one of the Core Planning Principles is to support the reuse of existing resources and specifically states that this can be achieved through the conversion of existing buildings. Furthermore, paragraph 55 of the NPPF states that in order to promote sustainable development within the rural areas, new isolated dwelling within the countryside should be avoided unless the proposal comprises

of the re-use of redundant or disused buildings which would lead to an enhancement of the immediate setting.

- 5.6 The proposed conversion will reutilise the existing built resources within the locality, improve the aesthetics of the surrounding environment, whilst, providing a viable use for these building.

Amenities

- 5.7 There a cluster of existing dwellings in the area and in proximity to the buildings proposed for conversion at Dale Gap Farm. The closest is within approximately 25m of the proposed development site. It is not anticipated that the proposal will infringe upon or adversely affect the visual or other site specific amenities of the occupants of these properties. Rather the repair to the structures and active use of the site will improve the appearance of the site and vitality of the area. The conversion plans have been drawn up to sensitively consider overlooking and it is therefore considered that the proposal will be in accordance with the NPPF and is not contrary to any of the policies contained within the East Staffordshire Local Plan.

Ecology

- 5.8 It was identified within the pre-application discussions (QU\2014\ENQ\1032) that there were records of bats within the area, as such it was stated that any subsequent planning application would have to be supported by a relevant ecological survey to, '*consider the impact of the proposal upon these species*'. Accordingly, a Bat Survey Report was produced in October 2015 to identify whether any of the species were present in the former agricultural buildings, which form the subject of this application, and whether mitigation measures were required to be implemented to maintain and enhance any identified bat habitat.
- 5.9 The survey comprised of external and internal building inspections, evening emergence surveys and DNA analysis of bat droppings; which identified that at least 4 no. species of bat utilise the buildings and that the building is utilised for roosting. The report identifies that, '*As well as direct impacts, such as loss of roosting locations and a reduction in the overall space available to bats, there would be indirect effects such as disturbance as a result of any development proposals*'. Both the applicant and the Fisher German planning team do not wish the proposed development to be delivered at the detriment to bat species which roost within the buildings. As such, the report states that the following mitigation measures

could be implemented to accommodate these valued species whilst enabling the conservation and subsequent habitation of the building:

- modified ridge tiles to allow for roosting;
- the use of traditional bitumen hessian (type 1F) under-felt rather than breathable roofing membrane or type 5U bitumen under-felt;
- treatment of roof timbers with chemicals approved by Natural England;
- the provision of bat boxes on external walls, either incorporated in the structure of the building or placed on the outside;
- the provision of a bat loft to support the presence of brown long-eared and Natterer's bats;
- external lighting needs to be limited at potential roost entry points and along flight lines used by bats;
- development works would need to be conducted within certain periods as to avoid any adverse effect on roosting species; and
- the design and installation of bat roosting and access provision would need to be supervised by an ecologist with the required Natural England Licence.

5.10 As shown within the submitted designs, the proposed conversion has taken into account the need to provide suitable habitats for roosting bat species. The conversion plans include provision for a bat loft within the roof space suitable for the species (Natterer's and brown long-eared) identified. This represents a positive approach to accommodate the species within the design and incorporate suitable space within the roof as it is known that these species favour open spaces in barns and roof voids. This measure has been incorporated into the design of the building and is shown on drawing number **D90.1-101B**.

Archaeology

5.11 Following the identification within the pre-application discussions that an archaeological assessment was required to support a planning application, the County archaeologist was contacted and his response is attached at Appendix B of this document.

5.12 It was considered that due to the limited scale of works proposed, mainly confined to the area within the footprints of the buildings themselves and the fact that trial investigatory trenches, dug in 2000, yielded Romano-British artefacts of limited archaeological interest; that the effect of converting the subject buildings would not cause an adverse impact on the heritage/archaeological environment. Furthermore, it was considered that the

conversion of these formerly agricultural buildings would preserve these buildings which are recognised to be a minimum of 136 years old; appearing in maps dating from the 1880's.

- 5.13 The response from the Principal Archaeologist at Staffordshire County Council notes the limited modifications proposed as part of the scheme but states that given that the site lies within an area of demonstrable archaeological potential that certain groundworks (floor reduction, services, underpinning, access tracks modification) have the potential to impact upon archaeological remains. Therefore it was advised that an archaeological watching brief is undertaken during groundwork operations.

Highways

- 5.14 It is not considered that the development would lead to a significant adverse impact on existing road infrastructure, as identified within the pre-application discussions, and therefore would not contravene the intentions of Strategic Policy 8). A Transport Statement was undertaken by Bancroft Consulting which revealed that the proposed entrance and exit to the site, located to the south, would be the most suitable to serve the proposed dwellings. The proposed access way aligns with the local highways authority design guide and best practice guidance outlined within Manual for Streets. It also confirms the contention that the existing, most direct access should be closed as part of the scheme, in the interests of highway safety; given visibility constraints. Vehicle movements arising from the scheme are considered to be minimal, resulting, in the worst case scenario of 2no. vehicle turning movement during network peak hours. This assessment is attached in support of this application.

Suitability for Conversion Survey

- 5.15 A Suitability for Conversion Survey was prepared in October 2015, by the Fisher German Building Consultancy team, to inform how the proposals contained within this application could physically be achieved. The report assesses the condition of each of the agricultural buildings and outlines the works necessary to bring them into use as dwellings. The document concludes that subject to the recommendations outlined within the report, that the buildings are capable of being converted into residential accommodation with minimal alteration.

6.0 CONCLUSION

- 6.1 Dale Gap Farm comprises a small cluster of agricultural buildings which are redundant, surrounded by existing hardstanding and located close to an existing road. The site does not encroach into the countryside, nor does it cause visual intrusion and is a relatively contained site. The site has existing good vehicular access to the main highway via Barrowhill Hall.
- 6.2 The traditional agricultural buildings are proposed for conversion to residential use and are considered structurally sound, make a positive contribution to their surroundings and are capable of conversion without substantial alteration or extension. The proposal will bring back into use a vacant redundant site and reuse existing buildings. The proposal will deliver small scale residential development and contribute to East Staffordshire's housing supply.
- 6.3 It is anticipated that the proposal would not adversely impact upon the setting of heritage, environmental and amenity assets and would provide an improvement in the visual appearance of the site.
- 6.4 The proposed development would see the closure of the existing access point into the site which has poor visibility and is sited close to existing building proposed for conversion. The closure would create a safer environment for residents to live in. The proposal would enhance the appearance of the site and redevelop it into a usable state.
- 6.5 It is contended that full planning permission should be granted for the conversion proposed.

Appendix A

Submission to Principal Archaeologist – Staffordshire County Council
(14/10/2015)

Our Ref: SDT/D90.1

Your Ref:

14th October 2015

Stephen Dean
Principal Archaeologist
Staffordshire County Council
Number 1 Staffordshire Place
Stafford
ST16 2DH

Dear Mr Dean,

**FORTHCOMING PLANNING APPLICATION SUBMISSION -
THE CONVERSION OF 2 NO. EXISTING AGRICULTURAL BARN TO PROVIDE 2 NO. DWELLINGS AT DALE GAP
FARM, BARROW HILL, UTOXETER STAFFORDSHIRE ST14 5BX**

Fisher German LLP has been commissioned to submit a planning application to East Staffordshire Borough Council for the conversion of 2 No. existing agricultural barns to provide 2 No. dwellings at Dale Gap Farm, near Rocester. As part of this commission, a pre-application advice request (QU/2014/ENQ/1032) was submitted to the Borough Council which sought to establish the acceptability of the conversion and also new residential development in this location. It is important to note that completely new dwellings were proposed in the original pre-application submission which are not now included in the forthcoming application. This application will solely relate to the conversion of the two existing buildings with no additional built footprint proposed.

It was identified within the pre-application response, received on the 22nd January 2015, that, 'Rochester is an historic settlement and there are records of archaeological features in the area'. Accordingly, it was stated that any subsequent application should be accompanied by an archaeological assessment. Furthermore, it was recognised that an archaeological watching brief may be required by condition, should permission be granted. Reference to section 12 of the NPPF was made in that proposals should not pose significant harm to any heritage assets and should aim to preserve or enhance the asset by way of sensitive and appropriate design. It is assumed that these potential requirements related to the proposed new residential development rather than the proposed conversion which will be within the existing built structure and with no additional new built footprint.

This letter identifies the known heritage assets that lie in proximity to the proposed development site and outlines how the proposed conversion of two existing agricultural buildings will not constitute impact on archaeology and as such, we request confirmation that an archaeological assessment is not required as part of the planning application submission. The buildings are not listed nor are they in a Conservation Area.

Heritage Site Context

The buildings which form the subject of this application are a minimum of 135 years old as they are clearly depicted on maps dating from the 1880s. As such, this building is representative of agricultural development in the 19th century.

The site lies approximately 320m away from the nearest designated asset; the grade II listed 'Barrow Hill'. Adjacent to this building are 4 No. other designated heritage assets, comprising of:

- The Grade II listed 'Coach House and Stables approximately 20 yards north of Barrowhill'
- The Grade II listed 'Farmyard group approximately 100 yards north west of Barrowhill'
- The Grade II listed 'Hay barn approximately 150 yards north west of Barrowhill'
- The grade II listed 'Icehouse approximately 150 yards north west of Barrowhill at NGR SK 1093 4061'

A search of Heritage Gateway has revealed that the NMR excavation Index contains a record of archaeological investigation conducted in the year 2000, undertaken by Birmingham University Field Archaeology Unit (ADS Depositor ID – 1380408; ADS Associated ID - AIP Record Number: C.41.6016). The work consisted of two trenches excavated on the site of a proposed new farmyard building (SK1120040800), north west of the proposed development location, which recorded Romano-British finds and an undated linear feature. It should be noted that on further analysis of this record, it is stated that, 'These revealed little of archaeological interest, other than a linear, negative feature, aligned northwest-southeast, which were present in both trenches'.

In addition, to the north of the proposed development site (SK 1115 4086), it appears that site accommodated a Roman Fort (HER No: 00586); this information was gathered from the Staffordshire Historic Environment Record (SHER).

It should be noted that East Staffordshire Council does not have a list of those buildings which are 'locally' listed buildings. These buildings are defined as, 'as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets', within paragraph 039 of the NPPG. This paragraph goes onto consider that, 'A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process'.

The buildings to be converted as part of the scheme are identified in **Figures 1.1 - 1.5**, shown below:



Figure 1.1 Proposed Building to be Converted (Unit 1)



Figure 1.2 Proposed Building to be Converted (Unit 1)



Figure 1.3 Proposed Building to be Converted (Unit 1)



Figure 1.4 Proposed Building to be Converted (Unit 2)



Figure 1.5 Proposed Building to be Converted (Unit 2)

The Proposal

The proposed extent of works, to convert the 2 no. existing buildings into residential use, will largely comprise of internal alterations to enable habitation. As such, the development will not lead to any impact on archaeology, given the minimal scope of works and the confinement of development to the existing structures. Therefore any development work should only be viewed in the context of the modifications to the existing formerly agricultural buildings.

The forthcoming planning application will be accompanied by detailed conversion plans and elevations and a comprehensive supporting statement along with building condition survey, ecological surveys and transport statement. The proposed conversion will seek to retain the fabric and intrinsic character of these buildings through a high level of design.

Relevant Planning Policy

- National Planning Policy Framework

The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. The relevant paragraphs are highlighted below.

Paragraph 128 of the NPPF identifies that local planning authorities, when determining planning applications, should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. It is important to note that the level of detail should

be proportionate to the assets' importance and should be no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 131 of the NPPF states that in the determination of planning applications, the local planning authority should take account of the:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

- **East Staffordshire Local Plan 2006 (saved policies)**

The saved policies of the adopted Local Plan have been extended beyond 2009 (although adopted prior to the publication of the NPPF). The key policies of relevance are listed below:

Policy NE1: *Development Outside Development Boundaries* indicates that planning permission will not be granted for development unless it cannot reasonably be located within them and is either:

- a) Essential to the efficient working of the rural economy; or
- b) Development otherwise appropriate in the countryside; or
- c) Development close to an existing settlement and providing facilities for the general public or local community which are reasonably accessible on foot, by bicycle or by public transport.

Proposals falling within one of these categories will be judged against the following criteria:

- a) The proposed development must not adversely affect the amenities enjoyed by existing land owners;
- b) The detailed siting of the proposed development and its associated environmental impact are compatible with the character of the surrounding area
- c) The design of the buildings, structures and materials relate satisfactorily to the proposed site and its setting
- d) Landscaping associated with the proposal takes into account both immediate impact and distant views of the development
- e) The access roads can accommodate traffic likely to be generated by the proposed development
- f) The proposed development provides for adequate access for pedestrians, cyclists and drivers, servicing and parking arrangements and provision within the site for plant, equipment and the storage of goods and materials.

Policy BE15: *Conversion of Rural Buildings*, proposals to convert an existing building or group of buildings to commercial, industrial, residential or recreational uses will be viewed favourably. In assessing such proposals the following factors will be taken into account:

- a) The visual impact and relevant history of existing buildings;
- b) The physical condition of existing buildings and their suitability for conversion without extensive alteration, extension and reconstruction. A structural survey will be required with the application in appropriate cases;
- c) The visual impact of the form, bulk and design of the conversion, its curtilage and any associated new development on the character and appearance of the surrounding area;
- d) The contribution of the development to improvement of the external appearance, retention of existing character and the preservation of any architectural, historic or traditional features of buildings or the surrounding area;

- e) The impact of proposed uses on, and their relationship to, surrounding land uses, nearby settlements, the highway network and public transport facilities;
- f) Proposal to convert rural buildings to dwellings will only be permitted where the criteria set out above are met and where:
 - i) Every reasonable attempt has been made to secure a suitable economic use for the building; or
 - ii) Residential conversion is a subordinate part of a scheme for a business use.

- **East Staffordshire Pre Submission Local Plan**

In April 2014, the pre-submission East Staffordshire Local Plan was submitted for consideration at Examination in Public. The document that has been utilised for this analysis is labelled 'F80 - Local Plan showing all Main Modifications and Additional Modifications', produced in July 2015. Key emerging policies of relevance to the proposal are outlined below:

Strategic Policy 1: *East Staffordshire Approach to Sustainable Development*, gives provision to take a positive approach to development that reflects the presumption in favour of sustainable development advocated through the NPPF. Furthermore, the development must not infringe upon environmental, heritage, public amenity or any other site specific factors that would deviate from the intentions set out in the policy. It states that in assessing whether a development proposal or allocation is as sustainable as possible a number of principles should be applied, one such principle is reuse of existing buildings where this is practicable and desirable in terms of the contribution the buildings make to their setting.

Strategic Policy 25: *Historic Environment*, states that development proposals should protect, conserve and enhance heritage assets and their settings, taking into account of their significance, as well as the distinctive character of the Borough's townscapes and landscapes. The policy goes on to state that heritage assets may consist of undesignated assets which contribute to the Borough's historic environment and local distinctiveness. Of particular relevance to the application, is the following extract, '*Development proposals that are likely to have negative impacts on the historic environment should demonstrate how harm can be effectively and justifiably mitigated*'.

- **Re-use of Rural Buildings Supplementary Planning Document, September 2010**

General Principles for Conversion Schemes

This SPD develops further the requirements of adopted Policy BE15 and states at paragraph 2.4 that where there is no alternative use appropriate for an existing building residential use will be considered. Such use is generally only appropriate for traditional agricultural buildings which are structurally sound, make a positive contribution to their surroundings, are capable of conversion without substantial alteration or extension, where there is an existing vehicular access to the building, and where any domestic curtilage can be accommodated without creating a visual intrusion into the surrounding countryside.

In terms of sustainability, paragraph 2.5.1 states that clearly as most of the buildings relevant to this guidance will occupy a location away from defined settlements, sustainability cannot be judged purely on proximity to existing infrastructure and facilities. It is stated that a more pragmatic approach to this consideration must therefore be adopted. Paragraph 2.5.2 confirms that the fact that there is a building standing unused in the countryside needs to be considered. In its unused state it may be regarded as a wasted resource. Bringing the building back into an active use that is appropriate for its particular location may be regarded as sustainable.

Paragraph 2.5.6 states that where there is no possibility of commercial reuse being acceptable consideration will be given to residential conversion, schemes should provide accommodation to facilitate working from home.

Visual impact and relevant history of buildings

Paragraph 3.7 states that in the case of a traditional agricultural building, the existing form, condition, character and location of the building will be fundamental to the acceptability of any proposed conversion scheme. Outside development boundaries it will be necessary to demonstrate that a building is structurally sound and capable of conversion without substantial demolition and reconstruction. Paragraph 3.8 continues to state that traditional buildings most suitable for conversion are those associated with an existing farmhouse and forming part of a group.

Alterations and Extensions

The main messages set out in the SPD are summarised as:

- To retain the character and architectural integrity of traditional rural buildings, alterations to existing fabric must be kept to a minimum and necessary to facilitate the new use;
- Modest alterations will be acceptable only if they are used with restraint and placed in discreet positions;
- Existing doors and windows should be utilised wherever possible.
- Re-pointing of all the elevations should not be carried out simply to give a unified appearance;
- Features of importance should be retained in situ and integrated into the proposed conversion.

Farmstead Assessment Framework (English Heritage, 2015)

This document is intended to help achieve sustainable development through the appropriate conversion of traditional farmsteads, as they are considered within the planning system. These buildings are no longer appropriate for modern agricultural use and to ensure retention require a new viable alternative use. The document identifies that most traditional agricultural buildings date from the 19th century. Accordingly, the building which forms the topic of this application is suspected to be representative of this statement.

The document states that when assessing heritage significance, it should be assessed as to whether the sites display any significance in a local or national context. The four criteria that should be identified to identify this significance at the national level include:

- *'Sites within or adjacent to archaeological remains of local and national importance, surviving historic parkland for country estates and common land*
- *18th century or earlier buildings, particularly if they are minor buildings other than barns. Well-preserved groups including building of this date are especially rare*
- *Buildings and group built to the designs of land agents, engineers or architects, which may display innovative design, planning and features such as early iron work*
- *Rare surviving materials and details, such as thatch and earth walling, historic fittings (doors, windows, stalls etc. and inscription (folk marks or graffiti)'*

When reviewing the buildings against these criteria, it appears that they do not meet the criteria.

Assessment

Dale Gap Farm comprises a small cluster of agricultural buildings which are redundant. We have identified that two agricultural buildings are suitable for sympathetic conversion to residential use. It is not considered necessary to prepare an archaeological assessment for the proposed conversion and no new development is proposed. Our opinion is based upon a review of the records which pertain to historic finds in the locality and the extent of works proposed. The records indicate some Romano-British artefacts were discovered when trial investigatory trenches were dug in 2000, approximately

50m from the proposed site, however these were acknowledged to be of little archaeological interest. When this factor is combined with the scale of works which are sought as part of the proposal, it becomes apparent that the effect of converting these buildings will not create an adverse impact on the heritage/archaeological environment and will ensure that by making the buildings suitable for habitation that a viable use is found; safeguarding their vitality.

In conclusion, it is respectfully requested that in your role as the County Council's Principal Archaeologist it is confirmed that, due the limited scale of development proposed it being an application for the conversion of two existing buildings with no new building footprint, an archaeological assessment is not required for this specific planning application.

If you require any further information or wish to discuss further please do not hesitate to call or email.

Yours sincerely,

Sarah DeRenzy-Tomson MRTPI

For and on behalf of Fisher German LLP

Email: sarah.derenzy-tomson@fishergerman.co.uk

Appendix 1: Pre-Application Submission

Appendix 2: Pre-Application Response

Appendix B
Response from Principal Archaeologist – Staffordshire County
Council (11/12/2015)

Subject: RE: Dale Gap Farm, Rocester Uttoxeter
Date: 11/12/2015 10:08
From: "Dean, Stephen (Place)" <stephen.dean@staffordshire.gov.uk>
To: "Mark Murphy" <Mark.Murphy@fishergerman.co.uk>

Dear Mr. Murphy,

Thank you for your email regarding the proposed scheme at Dale Gap Farm.

The Staffordshire Historic Environment Record does record that Dale Gap Farm sits partially within the line of a former Roman marching camp (PRN 00586) and that the building to be converted appears to sit directly over the projected defensive line of the camp. Roman small finds recovered from fields to the south of Dale Gap Farm attest to broader activity in the landscape around the camp.

The modification in the proposed scheme is noted. However, if the scheme still lies within an area of demonstrable archaeological potential. Indeed, the ESBC advice regarding potential Roman activity could be augmented to include the (albeit low) potential for the presence of later prehistoric activity. This may be suggested by the schemes proximity to a nearby watercourse; such activity as is found on watercourses elsewhere in Staffordshire.

As such, groundworks associated with the construction (i.e. floor reduction, services, underpinning, works to the access track) do have the potential to impact upon archaeological remains particularly of Roman date. I would advise therefore that an archaeological watching brief during groundwork operations would seem to be an appropriate response to mitigate potential impacts and understand the significance of such remains. This approach would be supported by NPPF para 141.

I trust that this provides you with sufficient information but please do drop me a line should you wish to discuss this further.

Kind regards,

Stephen

Stephen Dean BA MA ACIfA
Principal Archaeologist
Historic Environment Team
Staffordshire County Council

Office Location: No. 1 Staffordshire Place,
Stafford, ST16 2LP

Postal Address: Wedgwood Building, Block A,
Tipping Street, Stafford, ST16 2DH

Direct Dial: 01785 277290
Mobile Tel.: 07530 064235
Email: Stephen.dean@staffordshire.gov.uk
Website: www.staffordshire.gov.uk