

Planning Statement

Including Statement of Heritage Significance

Proposed conversion, and extension, of barn for ancillary use in association with main dwelling, and change of use of agricultural land to garden (retrospective) at Moorpit Farm, Yarcombe, EX14 9BG

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4.0 Statement of Heritage Significance

- 4.1 The application site is to the south of a Grade II listed building.
- 4.2 “Barn approximately 30m north of Moorpit Farmhouse” was listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) for its special architectural or historic interest in 1988 (list entry no. 1098187).
- 4.3 The list entry description describes the property as follows:
- “Dated 1846 and built by Sir Francis Drake. Roughly-shaped blocks of flint laid to courses and with Hamstone ashlar detail; slate roof. Threshing barn facing south-south-east, say south. It contains opposing central doorways onto the threshing floor. The front doorway is not full height. It contains probably original double doors. Above the front door there is a Hamstone plaque inscribed TTFE Drake, Bart, 1846. The roof is gable-ended with shaped kneelers, coping and ball finials on the gables. There is a hayloft loading hatch in the right (east) end. Interior: not inspected. Sir Francis Drake was evidently an improving landlord. Several of the farmhouses and most of the farmbuildings on his Yarcombe estate were rebuilt to a high standard in the mid C19. There are several other similar barns on the estate but this is perhaps the best example.”*
- 4.4 The list entry highlights that the barn derives much of its significance from its association with Sir T.T.F.E. Drake and its traditional layout and appearance, and that of its traditional material of construction.

5.0 Proposal

- 5.1 The proposal seeks planning permission to convert and extend an existing stone-built barn for use as ancillary accommodation to the main house. Retrospective permission is also sought for the change of use of a parcel of agricultural land to the west of the main dwelling to garden.
- 5.2 The barn is located approximately 9.5 metres to the north-west of the main dwelling, Moorpit Farm.
- 5.3 The ancillary accommodation/annexe is required to accommodate the applicants’ family when they visit and to provide overflow accommodation to the main house.
- 5.4 The existing building is relatively modest and, therefore, a small extension is proposed to provide a bedroom. An open plan living/dining/kitchen area, with a small separate bathroom, is to be provided within the footprint of the existing building. A new opening within the south-east wall of the existing barn is proposed to provide access into the proposed bedroom extension.
- 5.5 The proposed ancillary accommodation/annexe would retain a shared access with the host dwelling as well as a shared parking area comprising an area of hardstanding in front of the main dwelling building. The building subject to conversion is located adjacent to the curtilage of the adjacent dwelling to ensure it would remain ancillary to the use of the main dwelling.

- 5.6 The proposed conversion of the building would retain the main historic sections of the structure, including the stone walls and roof structure/tiles. Tiles to match the existing would be sourced from local reclamation yards to match those that are on the barn's existing roof.
- 5.7 The proposed conversion would utilise existing openings, wherever possible, to provide the new window and door apertures. Changes to the building and its extension have been sensitively designed as part of the development to ensure that new openings have been kept to a minimum and that the proposed annexe would retain a traditional 'barn-like' character appearance that respects its traditional vernacular, and would maintain its subservience to the adjacent dwelling.
- 5.8 The design of the conversion also includes timber shutter detailing adjacent the sliding doors on the north-east and south-west elevations to take design cues from the building's existing timber shutters.
- 5.9 All new internal walls would be stud partitions.
- 5.10 The proposal includes a small patio area to the south-west of the annexe to provide an amenity area.

6.0 Policy context

6.1 Local planning policy

- 6.1.1 Planning law requires applications to be determined in accordance with the development plan, unless material considerations indicate otherwise, which in this instance comprises the East Devon Local Plan 2013-2031 (the "Local Plan") and the Yarcombe Neighbourhood Plan (the "Neighbourhood Plan"). The application site is located outside of any Built-up Area Boundary and in a location classified as countryside.
- 6.1.2 Strategy 33 (Promotion of Tourism in East Devon) highlights that the Council will support and facilitate high quality tourism in East Devon to promote a year-round industry responsive to changing visitor demands. It explains that tourism growth should be sustainable and should not detrimental to the District's natural assets but aim to attract new tourism related businesses that can complement the high-quality environment of East Devon.
- 6.1.3 Strategy 7 (Development in the Countryside) highlights that development in the countryside will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:
- Landform and patterns of settlement.
 - Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.
 - The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.

- 6.1.4 Strategy 46 (Landscape Conservation and Enhancement and AONBs) explains that development will need to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty.
- 6.1.5 Policy D1 (Design and Local Distinctiveness) states that to ensure new development, including the refurbishment of existing buildings to include renewable energy, is of a high-quality design and locally distinctive. Proposals will only be permitted where they:
1. Respect the key characteristics and special qualities of the area in which the development is proposed.
 2. Ensure that the scale, massing, density, height, fenestration and materials of buildings relate well to their context.
- 6.1.6 Policy D8 (Re-use of Rural Buildings Outside of Settlements) permits proposals to re-use or convert buildings in the countryside subject to several considerations including where:
1. The new use is sympathetic to, and will enhance the rural setting and character of the building and surrounding area and is in a location which will not substantively add to the need to travel by car or lead to a dispersal of activity or uses on such a scale as to prejudice village vitality.
 2. The building is structurally sound and capable of conversion without the need for substantial extension, alteration or reconstruction and any alterations protect or enhance the character of the building and its setting;
 3. The form, bulk and general design of the building and its proposed conversion are in keeping with its surroundings, local building styles and materials;
 4. The proposed use would not harm the countryside by way of traffic, parking, storage, pollution or the erection of associated structures;
 5. The proposal will not undermine the viability of an existing agricultural enterprise or require replacement buildings to fulfil a similar function.
- 6.1.7 For residential proposals it must be established that:
- a) The building is no longer required for agricultural use or diversification purposes; and
 - b) That its conversion will enhance its setting - e.g. through removal of modern extensions and materials, outside storage, landscaping etc.
 - c) Development is located close to a range of accessible services and facilities to meet the everyday needs of residents
- 6.1.8 Policy EN8 (Significance of Heritage Assets and their Setting) requires the potential impact of development proposals to be considered against the significance of heritage assets and their settings. Policy EN9 (Development Affecting a Designated Heritage Asset) relates to development affecting a designated heritage asset and seeks to distinguish between that which would give rise to 'substantial harm to or total loss of significance' and that which would lead to 'less than substantial harm' where the public benefits of the proposal, including securing the building's optimum viable use, can be secured.

- 6.1.9 Policy TC7 (Adequacy of Road Network and Site Access) states that planning permission for new development will not be granted if the proposed access, or the traffic generated by the development, would be detrimental to the safe and satisfactory operation of the local, or wider, highway network.
- 6.1.10 Turning to the Neighbourhood Plan, Policy NE1 seeks to promote measures which protect and enhance the natural environment. It highlights that:
- i) Development proposals should demonstrate that they will not result in significant adverse impacts on the landscape, biodiversity and geodiversity and that they will enhance the natural environment where there is an opportunity to do so.
 - ii) Where mitigating measures are unavoidably required for development to be acceptable within its landscape setting, appropriate landscaping should be employed to mitigate the impact of the development and protect biodiversity. Such measures should include the use of native species of trees and hedges where planting is required.
 - iii) Proposals for development that would affect existing traditional Devon Hedges should demonstrate that all other options have been assessed and that it is the least damaging option to the hedge, its setting in the landscape, biodiversity and habitats.
- 6.1.11 Policy NE2 seeks to protect tranquillity and maintain dark skies to ensure that the tranquillity of the parish and our dark skies are maintained. It states that development should demonstrate that it:
- i) will have no significant adverse effect on the tranquillity, through increasing levels and frequency of noise, of the parish:
 - ii) will have no significant adverse effect, through light pollution (during any part of the year), on our valued dark skies observable from the parish.
- 6.1.12 Policy BHE1 seeks to ensure new development is sympathetic to the traditional built character of the parish, highlighting:
- i) proposals for residential development should be of a high-quality design and take account of the Blackdown Hills Area of Outstanding Natural Beauty Design Guide for Houses.
 - ii) proposals for any development should enhance the visual amenity of the setting and minimise any adverse visual impact on the essential character of Yarcombe, and on neighbouring properties to the proposed development site. Particular attention should be paid to:
 - a) ensuring that the size, scale and location of the development is appropriate to the form, scale and setting of the surrounding built environment;
 - b) ensuring that materials and design of the development are in-keeping with the character of the surrounding built environment;
 - c) ensuring that it is designed in such a way as to minimise its impact on the visual amenity of the surrounding landscape, on views of the proposed development and on the biodiversity and geodiversity.

6.1.13 It is noted that Policy EE1 (Conversion of Agricultural Buildings) permits the conversions of agricultural buildings subject to several considerations, however, the policy only relates to proposals for business or business-related purposes. Consequently, there are no policies guiding the conversion of rural buildings to non-business uses and consequently Policy D8 of the Council's Local Plan forms the primary Development Plan policy in this regard

6.2 National planning policy

6.2.1 The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. The 'golden thread' running through the NPPF is the presumption in favour of sustainable development the meaning of which is set out by the Government in Section 2, paragraphs 7 to 14 of the Framework. The NPPF explains that the planning system has three overarching objectives, economic, social and environmental, to achieve sustainable development.

6.2.2 Section 16 of the NPPF provides guidance in relation to the conservation and enhancement of the historic environment. Paragraph 189 of the NPPF highlights that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

6.2.3 In addition, paragraph 109 of the NPPF states:

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

6.2.4 Paragraph 190 of the NPPF states that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision (paragraph 191).

6.2.5 Paragraph 192 of the NPPF explains that in determining applications, LPAs should take account of:

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

- 6.2.6 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 6.2.7 Paragraph 195 of the NPPF highlights that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 6.2.8 Paragraph 196 of the NPPF highlights that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

7.0 Planning and design considerations

7.1 Principle of development

- 7.1.1 The site is located beyond any built-up area boundaries designated by the Local Plan and is consequently within an area classified as countryside. Strategy 7 (Development in the Countryside) of the Local Plan states that:

“The countryside is defined as all those parts of the plan area that are outside the Built-up Area Boundaries and outside of site-specific allocations shown on the Proposals Map. Development in the countryside will only be permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

- 1. Landform and patterns of settlement.*
- 2. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.*
- 3. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.*

- 7.1.2 Policy D8 of the Local Plan permits the conversion of buildings in the countryside subject to a number of considerations including where they are sympathetic to and will enhance the rural setting and character of the buildings and the surrounding areas, the buildings are structurally sound and capable of conversion without the need for substantial extension, alteration or reconstructions and that the buildings are no longer required for agricultural use.

- 7.1.3 For residential proposals, policy D8 requires the development to be located close to a range of accessible services and facilities to meet the everyday needs of residents, to enhance its setting and that the building is no longer required for agricultural use or diversification.
- 7.1.4 While ancillary accommodation would fall under a C3 (Dwellinghouses) use class it would be restricted in occupation for purposes ancillary to the main dwelling and would not be able to be used as a person's home. Consequently, the proposal would not comprise a 'residential proposal' (i.e. an independent dwelling) for which the additional requirements listed under policy D8 (see above) would apply.
- 7.1.5 It is noted that the barn is in relatively close proximity to the main dwelling which means it is considered unlikely to be used for agricultural purposes in the future, particularly for the housing of animals and livestock due to issues relating to noise, smells and disturbance. In addition, the wider site is no longer in agricultural use and the building is not required for agricultural or diversification purposes.
- 7.1.6 It is also considered that an ancillary use would also be more compatible with the residential context of the wider site and would provide a long-term future for the building and its ongoing maintenance.
- 7.1.7 While it is acknowledged that the site is not served by frequent public transport options, it is noted that paragraph 103 of the National planning Policy Framework (NPPF) highlights that "...opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making".
- 7.1.8 However, given the proposed use as ancillary accommodation tied to the main house would not result in an unrestricted dwelling, the need to provide for the day-to-day needs is not as great and given the context of the existing site this scenario is considered acceptable from a planning perspective.

7.2 Suitability for conversion of the barn and its future use

- 7.2.1 The barn is a traditional, stone-built barn which is capable of conversion without substantial reconstruction or alteration. While the submitted proposal seeks to convert an existing building and the requirements of policy D8 of the Local Plan are engaged, it is noted that a new-build annexe would, in principle, be acceptable from a planning perspective on the site. The proposal does include a modest extension to the footprint of the existing building, however, it is not considered that this extension would amount to 'substantial extension' for the purposes of policy D8. The proposed extension is considered sympathetic to the character and appearance of the existing barn and its context adjacent to the main dwelling.
- 7.2.2 The Structural Appraisal prepared by Prism Consulting Engineers Ltd, which is submitted in support of the application, highlights that the existing building is in relatively good order and structurally suitable for conversion with minimal alterations. While the existing roof would need waterproofing and insulating this would be a relatively straightforward task.

- 7.2.3 It adds further that the walls may require some localised repointing, as to be expected with a building of this type / age. The floor appeared in good order and could provide a good base to support any new flooring that may be required.
- 7.2.4 The Structural Appraisal summaries that with a sympathetic approach this building would be suitable for conversion as intended without significant rebuilding of the primary structure.
- 7.2.5 The submitted proposal seeks permission for a sensitive adaptive re-use of the building in a manner which respects its traditional vernacular as well as its historic significance while also minimising the loss of the building's existing fabric through the creation of limited new external openings.
- 7.2.6 It is considered that the proposed development would preserve and enhance the setting of the building and the character of the surrounding area.

7.3 Impact on setting of adjacent listed building

- 7.3.1 The site is located to the south-west of Drakes Barn, a Grade II listed building. However, the barn is separated from the adjacent listed building by a distance of approximately 25 metres as well as by a high hedge which largely screens the application site from view.
- 7.3.2 In addition, the relatively minor nature and scale of the proposed conversion and extension of the existing barn is unlikely to have any harmful impact on the adjacent listed building.
- 7.3.3 It is, therefore, considered that the distance of separation between the application site, combined with the existence of an existing hedge means that the proposed development would not harm the setting of the nearby listed building.

7.4 Change of use of agricultural land to garden

- 7.4.1 It is noted that permission 15/1480/FUL granted planning permission for the construction of a two-storey extension and terrace to Moorpit farm. To facilitate the extension and terrace the permission also approved the change of use of a small section of agricultural land for residential use.
- 7.4.2 Available Google Earth images show that a fence separating Moorpit Farm from the agricultural field to the south-west was removed at some point after planning permission was granted and construction of the extension and terrace commenced.
- 7.4.3 The site plan submitted in support of the 2015 application shows that the proposed garden fence was to be realigned to enclose the land for which change of use was granted and to separate it from the field to the west.
- 7.4.4 So far as the area is concerned where the fence has not been installed, the applicants have mown this area to keep it tidy. Having now been informed by us that it could be considered as agricultural land, the applicants would like to apply for change of use (retrospectively) to regularise the planning use of the land for residential purposes as garden.

- 7.4.5 It is noted that the Delegated Officer's Report for the 2015 application acknowledges that the land to the west of Moorpit Farm is not considered to be the 'best and most versatile agricultural land' and consequently the loss of part of this land to facilitate the extension, while irreversible, would not have been significant.
- 7.4.6 The Delegated Officer report also highlights that the 'small field' was likely a once a small orchard or 'home paddock' common to many historic farmsteads. Further, it also suggests that the 1889 and 1932 OS maps allude to there being an orchard within the field.
- 7.4.7 Further, the land for which a change of use is sought is relatively small, comprising less than half an acre. It also has no access to it other than that from the main dwelling. Even if it were to be used for agricultural purposes its likely agricultural usage would be limited, particularly considering the proximity of the main house (which is no longer part of a working farm). Consequently, it is considered that the use of the land for agricultural purposes is unlikely and its loss to residential use would not harm the supply or availability of agricultural land in the vicinity.
- 7.4.8 Given the likely 'quasi-residential' historic use of the small field to the west of the main house, combined with its limited likely agricultural value the change of use of the remainder of the area is not considered to be significant.
- 7.4.9 In addition, the land is contained by existing field boundaries (delineated by existing mature hedgerows) which have a limiting impact with regard to views of the land available within the surrounding landscape.
- 7.4.10 Any intensification in the use of the land for residential purposes, including any domestic paraphernalia, would be read in context with the residential use of the adjoining farmhouse.
- 7.4.11 While there could be a concern that the inclusion of the field as garden area could extend the main dwellings 'curtilage' (acknowledging that curtilage is not a use of land) it is worth noting the site is located within the AONB and the entirety of the land is beyond a side elevation of the dwelling. This would have a limiting impact with regard to the creation of any new structures as there would be no permitted development rights for structures/buildings incidental to the enjoyment of the dwelling house. Consequently, planning permission would be required for any such structures or buildings and the Local Planning Authority would retain control over any new structures created within the former field.
- 7.4.12 In summary, it is considered that the change of use of the agricultural field to garden would not have a harmful effect on the character and appearance of the surrounding countryside or undermine the landscape quality of the AONB.

7.5 Landscape impact

- 7.5.1 It is noted that site is located within a designated landscape and is visible from locations within the East Devon AONB. However, the sensitive design of the proposed barn conversion and modest extension means that it would retain its barn-like character and appearance and would continue to appear as a former barn in the surrounding landscape once converted.

7.5.2 In addition, the barn is located in close proximity to the cluster of buildings comprising Moorpit Farm. This means that the proposed development, including the change of use of agricultural land to garden, would be viewed from within the surrounding landscape against this context. Therefore, the proposed development would not undermine the character of the surrounding landscape or harm the East Devon AONB.

7.6 Residential amenity

7.6.1 The only near neighbour to the barn to be converted under this application, except the host dwelling, is Drakes Barn, approximately 25 metres to the north-east. Given the proposed domestic, ancillary use it is considered there is an adequate separation distance from that dwelling to ensure that the proposed development would not be overbearing or over-dominant, nor would it give rise to adverse residential amenity impacts such as noise or disturbance, overlooking and loss of privacy.

7.7 Tree and landscaping

7.7.1 There are no trees or hedges that would be impacted by the proposal. There is however some garden planting with large shrubs which would be relocated elsewhere within the garden.

7.8 Impact on protected species

7.8.1 A Bat and Protected Species Survey, Bat Emergence Survey and Automatic Bat Detector Survey prepared by Ecologic Consultant Ecologists, dated October 2020, is submitted in support of the proposed development to convert the building to ancillary accommodation.

7.8.2 The survey report highlights the barn is unlikely to be used by roosting bats as none were identified emerging during the bat emergence survey or recorded during the automated bat detector survey.

7.8.3 One former bird nesting site was identified within the barn. Therefore, care will need to be taken that any re-established or newly established birds nests are not disturbed by the works.

7.8.4 The survey report requires a number of mitigation and compensatory measures to be implemented as part of the development including:

- One bat roosting provision – integrated/positioned externally on the walls of the new dwelling at a minimum height of 3 m;
- One bird nesting provision – integrated/positioned externally on the walls of the new dwelling;
- One invertebrate provision – integrated/positioned externally on the walls of the new dwelling; and,
- Any external lighting associated with the development will be adapted to be based on a Passive Infrared Sensor (PIR) system (being motion-sensitive only to large objects) and on a short timer (no longer than 2 minutes). All lighting should be directional down-lighting, illuminating below the

horizontal plane. Such lighting will specifically not be positioned where it could illuminate surrounding vegetation (woodland, trees, hedgerows, hedgebanks etc), any bat roosts or any areas beyond the site.

7.8.5 Subject to the implementation of the recommended mitigation and compensatory measures, ecological enhancements, and biodiversity gains recommended in the survey report the proposed development would not have a harmful impact on protected species.

7.9 Access and parking arrangements

7.9.1 Access to the site exists in the form of a long driveway with direct access from the minor, lightly trafficked rural lane (Pound Lane) which runs to the north-east of the application site.

7.9.2 Given the nature of the rural lane the volumes of vehicles using the lane are likely to be low and travelling at low speeds. While acknowledging that use of the barn for ancillary uses associated with the main dwelling may slightly increase the daily use of the access this should be set against the existing volumes of traffic using the access.

7.9.3 In addition, the residual cumulative impact would not be so severe as to justify withholding planning permission on highway grounds, particularly noting paragraph 109 of the NPPF.

7.9.4 In terms of parking, the existing area of hardstanding adjacent the barn and main dwelling would provide sufficient space for the parking of several vehicles associated with the main dwelling and annexe. The proposed level of parking, and available manoeuvring and turning space, would comply with policy TC9 (Parking Provision in New Development) of the Local Plan.

7.9.5 It is, therefore, considered that the development would not give rise to a significant increase in additional traffic that would harm the safe and satisfactory operation of the surrounding highway.

8.0 Conclusion

8.1 The proposed development would provide for the repair and restoration of an attractive, traditional stone barn and the change of use of a modest section of agricultural land to form part of the garden to Moorpit Farm.

8.2 The proposed conversion seeks to maintain the appearance of the barn and would respect its simple vernacular and traditional appearance.

8.3 The proposed use of the existing barn for purposes ancillary to the main house would be in keeping with the residential context of the site. It would also be in keeping with the character and appearance of the existing barn, adjacent dwelling and the surrounding area.

8.4 The proposal would not harm the setting of the adjacent listed building, Drakes Barn, to the north-east of the application site.

- 8.5 Subject to the implementation of the recommended mitigation and compensatory measures, ecological enhancements, and biodiversity gains recommended in the survey report the proposed development would not have a harmful impact on protected species.
- 8.6 It is considered that the existing entrance to the site is adequate to provide a safe and convenient means of access and to accommodate the relatively low volumes of additional traffic generated by the development. In addition, it does not give rise to unacceptable highway safety impacts or severe residual cumulative impacts on the road network that would warrant refusal of the application on highway grounds.
- 8.7 The proposed development, including the change of use of agricultural land to garden, would be in keeping with the character and appearance of the surrounding area and would not result in any detrimental visual impact. In addition, the proposed development would not result in harm to the amenity of neighbouring residential properties.
- 8.8 There are no trees or hedges that would be impacted by the proposal.
- 8.9 The proposal would not undermine the character of the surrounding landscape or harm the AONB.