

Mr R Griffiths
The Barracks
15 Culmington
Ludlow
Shropshire
SY8 2DB

Date: 30 June 2021

Our Ref: PREAPP/21/00239
Your Ref:

<sent via Email>

Dear Mr Griffiths

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING REFERENCE: PREAPP/21/00239

DEVELOPMENT PROPOSED: Proposed change of use of buildings to a residential dwelling and erection of a single storey extension.

LOCATION: The Old School Culmington Ludlow Shropshire SY8 2DF.

Thank you for your recent request for advice on the above proposals and please accept my apologies for the slight delay in responding. Having now considered the details and received comment from the relevant consultees, I can provide my comments and guidance as below.

Site description

The proposed development site is known as 'The Old School' and 'The Pottery'; an existing residential dwelling and gallery, is situated to the west of the B4365 road, less than a quarter of a mile to the north of Culmington Village. The building is a former school with a half hipped roof, understood to have been built in 1865 and enlarged in 1900.

The site is situated between the adjacent road and Seifton Brook and part of the site falls within Flood Zones 2 and 3 of the Environment Agency's map.

The gallery rooms form part of the main building, to its northern side, whilst a single storey 'clay shed'; a brick built, former canteen, associated with the school building is adjoined to the main building by a single storey covered walkway. The 'clay shed' sits directly to the north west, almost at right angles to the main building. A smaller outbuilding abuts the 'clay shed' and a number of other dilapidated outbuildings group nearby. Meanwhile, a pottery studio links to the west / rear of the main building.

A residential dwelling, (Seifton Brook Cottage) lies to the north western corner of the proposed development site.

Proposal

The proposal is to convert a part of the gallery, formerly a school room; the 'clay shed', formerly a canteen and covered walkway link. A single storey extension would attach, further connecting these buildings as a whole and would provide a three-bedroomed, semi-detached residential dwelling, with living room, kitchen / dining room and bathroom.

The proposed extension would accommodate the kitchen / dining room and main entrance to the property. It would be clad with vertically mounted timber boarding and render and have a flat, zinc roof.

Principle of development

Current policy concentrates new residential development to locations which promote economic, social and environmental sustainability. Specifically, the Council's Core Strategy Policies CS1, CS3, CS4, CS5 and CS11 seek to steer new open-market housing to sites within and adjoining market towns, other 'key centres' and certain named villages, ('Community Hubs and Clusters') as identified in the Site Allocations and Management of Development (SAMDev) Plan. Isolated or sporadic development in the countryside, (i.e. on sites outside these designated areas), is generally regarded as unacceptable unless there are exceptional circumstances, or unless other material considerations are held to outweigh the statutory priority to be given to the local development plan.

Although Core Strategy Policy CS3 recognises the market town of Ludlow as one of Shropshire's larger, 'sustainable' settlements, S10 of the SAMDev plan confirms there are no Community Hub or Community Cluster settlements in the outlying Ludlow area, (other than the designated sites of Burford, Clee Hill and Onibury). Therefore, open market housing would not usually be permitted in the specified location or within the village of Culmington.

However, one of the exceptional circumstances, as referred to in the National Planning Policy Framework, (NPPF), Core Strategy Policy CS5 and SAMDev Policy MD7a would include the residential conversion of structures which constitute 'heritage assets', on account of their historic interest.

The NPPF seeks to provide a sufficient supply of homes, though equally to avoid isolated homes in the countryside. Development that would re-use redundant or disused buildings and enhance the setting, (Para 79) would be acceptable. The NPPF also seeks to make effective use of land, particularly where previous development has taken place.

I consider that the building/s to be developed would be deemed as a 'heritage asset', referred to in the Type and Affordability of Housing Supplementary Planning Document (SPD) as a building which pre-dates 1950; comprises of traditional materials and building methods; is of a permanent and substantial construction; of local significance and adds value to the landscape. Also, the property has already been developed for open market housing and used previously for commercial

purposes. As such, I consider the building/s would qualify as a heritage asset due to age, vernacular form and construction and the principle of development is likely to be supported by officers.

Appropriateness of design and visual impact

The main part of the building/s would appear to be capable of conversion without substantial alteration and I would not consider a structural survey would need to be submitted with any forthcoming planning application although, if an internal upper floor requires expansion, you may need to consider if that part of the building is capable of supporting the additional load, without significant reconstruction.

I consider the new fenestration proposed to be minimal, thereby respecting the existing structures and you do not propose to significantly alter or increase the scale of the 'clay shed' building or covered walkway link, which would ensure their subservience to the main building is maintained.

The extension would also be subordinate in terms of its scale and whilst this would introduce a new structural element to the site, I consider the appearance of the building to be contrasting, yet subtle. It would be positioned out of sight of the road and away from any other public viewpoints and would not be a dominant addition to the property or in the landscape.

Conservation Officer comments

The pre-application follows a previously withdrawn scheme for the substantial extension and alteration of the existing clay room, (reference 21/00082/FUL). The proposal now put forward proposes the conversion of the clay room with a much more modest extension and the subdivision of part of The Old School to form the proposed new dwelling.

Additional information regarding the history of the building has also been submitted. It is considered that the proposed scheme now put forward would generally be acceptable as a conversion of a non-designated heritage asset in this instance, due to the minimised intervention and extension and retention of historic fabric.

Residential amenity

There are no concerns in this regard, given the plot's physical separation from the adjacent house and its distance from other dwellings in the locality. The main focus of development would take place in a central position within the site and so I consider there would be no residential amenity impacts in terms of privacy, outlook or light. Please note, however that the Council is obliged to consult the local community on any planning application submitted and to take into account any comments and representations received.

Other matters

Your pre-application enquiry has also attracted comments from the following Council consultees:

Archaeology

We have no comments to make on this pre-application with respect to archaeological matters.

Ecology

The brief overview of the surveys and recommendations carried out at the site appear to be satisfactory. The council would expect to see such information submitted as part of an Ecological Impact Assessment and where no further survey or mitigation is recommended, justification for such. The Ecological Impact Assessment should be submitted to the Local Planning Authority with the full application.

An Ecological Impact Assessment should consist of:

- An Extended Phase 1 habitat survey, habitat map and target notes on any significant biodiversity or geological features.
- A desk study of historical species records and local, regional or national wildlife designated sites.
- Supplementary detailed surveys (phase 2 habitat surveys, protected or priority species or geological features as appropriate to the site).
- Evaluation of the importance of biodiversity or geological features present at a local, regional, national, international level.
- Analysis of the direct and indirect impacts of the development (during construction, working area, additional infrastructure and post construction).
- Proposed avoidance, mitigation or compensation measures, including method statements where appropriate.
- Legal implications such as the need for European Protected Species Mitigation Licences or other licences (e.g. badgers).
- Proposed biodiversity or geodiversity enhancement measures.

Bats

All buildings that are proposed to be affected by the works should be subject to a bat survey and a search for nesting birds should also be undertaken. The number of proposed bat surveys recommended are in accordance within the 2016 Bat Conservation Trust; Good Practice Guidelines, however it should be noted that if bats are identified roosting within the building at the site, additional survey visits are likely to be required.

Phase 2 Bat Roosting Surveys will allow the surveyor to consider the need for mitigation, enhancements and compensation, to assess the likelihood of an offence being committed and to make a decision as to the need for a European Protected Species Mitigation Licence from Natural England.

*Note – multiple surveys should be spread across the bat breeding season (May-August inclusive) and should be carried out at least 14 days apart in accordance with the current best practice guidelines (BCT, 2016)

Any deviation from the methods, level or timing of surveys set out in the Good Practice Guidelines should be accompanied by a reasoned evidence statement from the licensed ecologist carrying out the survey clarifying how the sub-optimal survey is ecologically valid.

Environmental Networks

The Shropshire Core Strategy contains in Policy CS17: Environmental Network provision for mapping and subsequently protecting, maintaining, enhancing and restoring Environmental Networks in the county in line with the recommendations of both The Lawton Review and the National Planning Policy Framework.

This proposed development site lies within the Environmental Network. As such, the proposed scheme must clearly demonstrate how the development will 'promote the conservation, restoration and enhancement of priority habitats and ecological networks' as required by paragraph 174 of the National Planning Policy Framework and provide a net gain in biodiversity. This could be achieved by submitting a plan indicating the makes, models and locations of wildlife enhancement features, such as bat and bird boxes, alternatively this could be subject to condition.

Finding an ecological consultant

A list of ecological consultants who work in Shropshire is available on request. This list is by no means exhaustive and contains information on other ways of finding a consultant.

Shropshire Council cannot recommend any consultant or guarantee their work.

You should always check that the ecologist you select has the relevant protected species survey licences issued by Natural England. Without a valid survey licence, the report provided by an ecologist may not be considered adequate by the Local Planning Authority.

It is always wise to seek several quotes since prices can vary.

For additional help or advice in regard to ecology, you can contact Shannon Davies or one of the other Ecology team members at: shannon.davies@shropshire.gov.uk, Tel: 01743 250633.

Drainage

1. The site is in Flood Zones 2 and 3. As this is a change of use of buildings to a residential dwelling and erection of a single storey extension, a simple Flood Risk Assessment Statement should be submitted for approval with any forthcoming planning application. This should include:

i. What is the flood level, if known.

ii. The existing ground levels and the finished floor levels.

iii. Extents of flooding on the site, details of any flood defences protecting the site and to what level, contingency and evacuation procedures are provided in the event of a flood.

iv. Flood compensation storage volume should be detailed.

v. Consider using Flood Resistance measures:

Installation of specialist door mounted flood barriers or flood resistant external doors. Use of non-return valves on all ground floor discharge points from toilets, sinks and white goods. Sealing of all inlets, below the anticipated flood water level.

vi. Consider using Flood Resilience measures:

Installation of solid flooring.

Installation of internal doors and windows manufactured from synthetic material.

Installation of internal doors with specialist hinges that allow for the easy removal of doors.

Installation of skirting boards and utility units/cupboards made of flood resilient material.

Raising of electrical points above flood levels.

Installation of water-resistant plaster board.

2. The use of soakaways should be investigated in the first instance for surface water disposal.

Percolation tests and the sizing of the soakaways should be designed in accordance with BRE Digest 365. Full details, calculations, dimensions and location plan of the percolation tests and the proposed soakaways should be submitted for approval. Surface water should pass through a silt trap or catchpit prior to entering the soakaway to reduce sediment build up within the soakaway.

The site is identified as being at risk of groundwater flooding. The level of water table should be determined if the use of infiltration techniques are being proposed.

Should soakaways not be feasible, drainage calculations should limit the discharge rate from the site equivalent to 5.0 litres per second runoff rate and should be submitted for approval.

The attenuation drainage system should be designed so that storm events of up to 1 in 100 year + 35% for climate change will not cause flooding of any property either within the proposed development or to any others in the vicinity.

3. If non permeable surfacing is used on the new access, driveway and parking area or the new access slopes toward the highway, the applicant should submit for approval a drainage system to ensure that no surface water runoff from the new access runs onto the highway.

4. The proposed method of foul water sewage disposal should be identified and submitted for approval, along with details of any agreements with the local water authority and the foul water drainage system should comply with the Building Regulations H2.

If a main foul sewer is not available for connection, full details, plan and sizing of the proposed septic tank/ package sewage treatment plant, including percolation tests for the drainage field should be submitted for approval including the Foul Drainage Assessment Form (FDA1 Form).

British Water Flows and Loads: 4 should be used to determine the loading for the septic tank/package sewage treatment plant and the sizing of the septic tank/ package sewage treatment plant and drainage fields should be designed to cater for the correct number of persons and in accordance with the Building Regulations H2.

These documents should also be used if other forms of treatment on site are proposed.

Highways

The proposed development site will share the existing access off the B4365, which is governed by a 40mph speed limit in the vicinity. Visibility at the access is acceptable. It is considered that the principle of development would likely be acceptable from a highways perspective, subject to the demonstration of adequate parking facilities for the existing pottery, (including any visitor spaces required) and for the proposed dwelling.

Any future planning application should provide any and all details necessary to assist with the appropriate determination from a Highways and Transport perspective.

Trees

The proposed change of use application appears to introduce no significant arboricultural implications and whilst the Tree Team would seek for the provision of a tree protection plan with any full application, we do not consider trees to be a significant constraint on the development, as indicated on the provided plan RG-PP-01.

Affordable Housing Contributions

Affordable housing obligation requirements will apply if the land exceeds 0.5 hectares in area. It is unclear, from the information supplied, the size of the site area. There is no objection in this respect, subject to site area being below 0.5 hectares. For further information in this regard, you can contact the Housing Enabling and Development Officer at: maria.howell@shropshire.gov.uk .

Community Infrastructure Levy

In accordance with Core Strategy Policy CS9, most new residential development (including conversion schemes) are potentially liable for a payment under the Community Infrastructure Levy (CIL) introduced by the Council in 2012. The purpose is to ensure that development contributes proportionately to the cost of infrastructure upon which it would be dependent.

The amount payable depends on the gross internal floor space of the development. However, my understanding is that the floor space of any existing building currently in use and which is to be converted as part of the scheme may be deducted from the calculation, so lowering or even negating the contribution. This should be clarified with the Council's CIL team, (email: cil@shropshire.gov.uk) or by consulting <https://www.shropshire.gov.uk/planning-policy/community-infrastructure-levy-cil/> , and the CIL liability form ('Form 0', available to download from the website) should be completed and included with any planning application submitted.

Notwithstanding the above, should you wish to pursue a planning application the following should be noted:

National List Validation Requirements

I can confirm a planning application would need to comply with National submission requirements in order to be validated and for this I recommend that you submit the following with any future planning application:

✓ **Completed Application Form**

Where possible please submit using the online Planning Portal, although you can also submit a paper application. Please ensure that the Ownership Certificate and the Agricultural Land Declaration sections are completed in all instances.

✓ **Location Plan**

Based on an up-to-date map at an identifiable metric scale (1:1250 or 1:2500). The plan should identify sufficient roads, buildings, adjoining land etc. to ensure that the location of the site is clear. The site should be edged clearly in a red line and include all that is within the proposal; including any access from a highway, landscaping, parking, open areas around buildings etc. A blue line should be drawn around any other land owned or controlled by you if close to or adjoining the site.

✓ **Drawings (existing and proposed)**

Applications should normally include existing and proposed plans at a standard metric scale (1:100 or 1:200 for householder applications and 1:500 otherwise). All site plans should be numbered and versioned if the drawing is subsequently amended. All site plans should accurately show:-

- Direction of North and an indication of scale
- The footprint of all existing buildings on site with written dimensions and distances to the site boundaries or a scale bar appropriate to the building scale. If using more than one scale on a drawing please clearly indicate so.
- The paper size that the drawing should be printed at
- Building, roads and footpaths on adjoining land to the site including access
- Any public Rights of Way
- The position of any existing trees or planting on and adjacent to the site and those to be retained
- The extent and type of hard surfacing proposed
- Boundary treatment, including type and height of walls or fencing

Types of existing and proposed site plans include:-

- Block plan of site (e.g. at 1:100 or 1:200) showing site boundaries
- Existing and proposed elevations (e.g. at 1:50 or 1:100)
- Existing and proposed floor plans (e.g. at 1:50 or 1:100)
- Existing and proposed site sections and finished floor and site levels (e.g. at 1:50 or 1:100)
- Roof plans (e.g. at 1:50 or 1:100)

As all applications are stored electronically and made available via the Shropshire Council website, applicants are asked to ensure that documents and drawings are of a sufficient quality and that their clarity is such that the documents can be viewed accurately after being scanned.

'Local list' validation requirements

In addition to the national requirements listed above, you will need to provide the following in this instance, which will accompany a planning application and / or a listed building consent application.

- ✓ Ecological Impact Assessment / bat survey
- ✓ Completed FDA1 form and drainage details, including a drainage plan
- ✓ Flood Risk Assessment Statement and details of flood resilience measures
- ✓ Landscaping / site layout plan to include parking arrangements
- ✓ Tree Protection Plan
- ✓ CIL Form '0'

✓ **The correct planning fee**

The on-line Planning Portal includes a fee calculator for applicants, however you can also contact Shropshire Council's Planning Validation Team for clarification on the correct fee to submit:-

Email: planning.validation@shropshire.gov.uk

Phone: 0345 678 9004

Please note this is an informal opinion based on the information you have provided at this stage.

Any planning application submitted will be determined taking into account the details contained in the application; the policy of the Development Plan; Government planning policy; the outcome of any consultation with statutory or other consultees; any representations received and any other material consideration. Any expenditure incurred in preparing plans or making the application must be entirely at your own risk.

For further information regarding validation requirements for Planning applications, please visit the Shropshire Council website:

<https://www.shropshire.gov.uk/media/2237/validation-checklist.pdf> .

If submitting a follow-on application, please ensure that you clearly state the Pre-Application 'Planning Reference' number provided at the top of this letter.

Yours sincerely

Helen Tipton

Helen Tipton (Mrs)
Area Planning & Enforcement Officer