

# HAT Projects

## Watering Farm Planning Statement

22.12.2021

### 1.0 Introduction

- 1.1 This statement is written by HAT Projects Limited on behalf of Blakenham Farms, in support of a planning and listed building application for the change of use and conversion of an existing Grade II listed agricultural barn to a new dwelling.
- 1.2 This Statement should be read in conjunction with the following drawings and reports, which are submitted in support of the application:

#### Architectural Drawings and Reports

- 174\_WF1\_HAT\_PL\_001, 010, 020,
- 174\_WF1\_HAT\_PL\_030, 031, 032, 035
- 174\_WF1\_HAT\_PL\_050, 051, 052
- 174\_WF1\_HAT\_PL\_110, 111
- 174\_WF1\_HAT\_PL\_130, 131, 132, 133, 134
- BlakenhamFarms\_WF\_HAT\_HeritageDesignAccessStatement.pdf
- BlakenhamFarms\_WF\_HAT\_DesignExpectationsValidationRequirements.pdf

#### Structural Reports

- 60225-Structural report\_RevA.pdf

#### Environmental Reports

- JAH-20.125-Phase1.pdf
- Watering Farm Nettlestead – Elite Ecology Bat Survey Report\_July2020.pdf

#### Highways Consultant Reports

- 2045-03RevA.pdf

### 2.0 The Site and context

- 2.1 Watering Farm is located on the very edge of the settlement boundary of Somersham and is accessed off the Ipswich Road. The Tudor Grange, which is in separate ownership is located immediately to the south east of the site, and comprises a Grade 2\* listed house and a Grade 2 listed Dairy and Bakehouse building which directly abuts the road. Two pairs of 20<sup>th</sup> century semi-detached farm worker cottages are located to the south west of the site. The site is surrounded by farmland to the north, east and west.
- 2.2 The applicant and landowner put in a representation to the Emerging Babergh and Mid Suffolk Joint Local Plan process in 2019 to state that the site should be included within the boundary as the farm is within the 30mph zone and connected to the rest of the village via

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a safe footway along the Ipswich Road. No response or follow-up has been received to date.

2.3 The farm grouping within the applicant's ownership comprises of the following buildings:

- a Grade II listed barn with a modern roof and lean-to structure
- an unlisted, dilapidated timber framed barn
- an unlisted brick stock shed
- a small former cart shed in poor condition
- a large modern machinery shed
- modern grain dryer.
- Four semi-detached agricultural workers cottages

The Tudor Grange and its ancillary outbuildings are not part of the same ownership as the barn which is the subject of this proposal.

2.4 The Grade II listed barn first appears on the 1882 OS maps and is therefore at least 140 years old. It appears on the OS map as part of a farmstead arrangement of barns immediately to the north of the Tudor Grange.

2.5 The site is accessed from a private farm access track off Ipswich Road. This track currently serves all the agricultural and residential buildings on the site, as well as the Tudor Grange, and a farm further north, Rookery Farm.

2.6 The site is within Flood Zone 1

2.7 Planning consent was granted in January 2021 for the demolition of the unlisted cart shed and the erection of 3no new dwellings, on the 'Triangle Site' west of the listed barn which is the subject of this planning application.

2.8 Detailed pre-application discussions have taken place with Daniel Cameron, planning officer, and four different heritage officers who have reviewed the scheme at different times due to personnel changes at BMSDC - Tegan Chenery, Karolina Yperman, Paul Harrison and Thomas Pinner.

## 3.0 The Proposal

3.1 The proposed development involves the restoration and conversion of the Grade II listed barn into a four bedroom dwelling. This is achieved within the envelope of the timber framed barn without requiring any extension and with the replacement of the existing non-historic low-pitched roof with a more appropriate steep pitched roof, as supported by the Heritage Officer. The conversion includes substantial work to stabilise and restore the existing historic fabric which is currently in a poor state of repair, and has been informed by detailed structural and historic fabric surveys. The works include:

- Removal of cement render throughout
- Stabilisation and repointing of existing brick plinth
- Stabilisation of the timber frame
- Removal of the modern roof and replacement with an oak framed roof at an appropriate pitch that will restore the original profile of the building.
- The recladding of the building in black stained weatherboarding (the original cladding material mentioned in the listing text) and re-roofing with black S-profiled fibre cement roofing to retain the agricultural aesthetic.
- Conversion of an existing mezzanine / hay loft into a bedroom and bathroom suite

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- Creation of an additional mezzanine floor level to accommodate two further bedrooms, while keeping the majority of the barn open from ground floor to roof, as it would originally have been.
- Insulation between the existing timber frame and to the outside of the existing timber frame to improve the energy performance and mitigate the climate change impacts of the project, with historic wattle and daub panels and historic timber framed elements left exposed internally
- Water, drainage, electricity, gas and other services would be installed.

3.2 Access will be via the existing access track from Ipswich Road which will serve the listed barn and the three new dwellings which have already been consented to the west, as well as the existing cottages and the Tudor Grange adjacent to the site. The access track will be slightly realigned and relandscaped into an attractive rural lane and will include a turning head. The works associated with this have been consented as part of the planning consent for the three new dwellings. Also as part of the consented scheme, a new agricultural- use only access road will be created to the west of the site, which will remove all agricultural traffic and Rookery Farm traffic from the existing access track. This will improve safety and amenity for the existing homes which use the current access, as well as the new homes. It also allows the access lane to be realigned and relandscaped as it will only be required to take a small amount of residential traffic and not large agricultural vehicles.

3.3 Two external parking spaces are provided to serve the new dwelling in the converted barn.

3.4 This proposal also includes landscaping proposals for the immediate surroundings of the listed barn, which include:

- A terrace on the west side of the barn enclosed with a low level brick wall
- A walled garden to the rear including new fruit trees
- Resurfacing the access track to provide a better quality vehicle surface.

## 4.0 Planning Policy Considerations

### National Planning Policy Framework (2019 update)

4.1 **Paragraph 11** states that planning decisions should contribute to the achievement of sustainable development, and that this includes protecting and enhancing our natural, built and historic environment and making effective use of land. Plans and decisions should apply a presumption in favour of sustainable development. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed 6 ; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

4.2 **Paragraph 77** states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

4.3 **Paragraph 108** states that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

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- a. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b. safe and suitable access to the site can be achieved for all users; and
- c. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

4.4 **Paragraph 127** states that planning policies and decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users 46 ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.5 **Paragraph 128** states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

4.6 **Paragraph 189** states 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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

4.7 **Paragraph 192** states that in determining applications, local planning authorities 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.

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4.8 **Paragraph 196** states 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.

## **Mid Suffolk Core Strategy 2008, Focused Review 2012, and Saved Policies from the 1998 Local Plan**

It is noted that the Mid Suffolk Local Plan is out of date and therefore holds limited weight. The presumption in favour of sustainable development should apply.

Recent planning appeals have demonstrated that policies CS1 and CS2 of the Core Strategy and Policy H7 of the Local Plan are inconsistent with the National Planning Policy Framework. Those policies are most important for determining the application and are out-of-date. Paragraph 11(d) of the Framework provides for permission to be granted, unless adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole. We have therefore not included an assessment of the above policies.

## **4.9 CS05 – Mid Suffolk’s Environment (Core Strategy 2008)**

All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area.

To protect, manage and enhance Mid Suffolk's biodiversity and geodiversity based on a network of:

- designated sites (international, national, regional and local)
- biodiversity action plan species and habitats, geodiversity interests within the wider environment
- wildlife corridors and ecological networks

and where appropriate increase opportunities for access and appreciation of biodiversity and geodiversity conservation for all sections of the community. Emphasis will be given to the creation new habitats particularly along the Gipping, Upper Waveney and Deben river valley's in connection with flood management schemes and to contribute towards green tourism opportunities.

**Landscape:** The council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the district's most important components and encourage development that is consistent with conserving its overall character.

**Design:** Development will be of a high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. It should create visual interest within the street scene and where appropriate encourage active uses at ground floor level, creating uses of public space which encourage people to walk and cycle.

**Historic Environment:** The council will introduce policies in the other DPDs of the Local Development Framework to protect, conserve and where possible enhance the natural and built historic environment including the residual archaeological remains. These policies will seek to integrate conservation policies with other planning policies affecting the historic environment.

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## **4.10 H09 – Conversion of Rural Buildings to Dwellings (Saved Policy from Local Plan 1998)**

In the countryside, the conversion and change of use of agricultural and other rural buildings whose form, bulk and general design are in keeping with their surroundings, will be favourably considered, subject to the following criteria:-

- The proposed conversion must respect the structure, form and character of the original building and retain any important architectural features. Existing openings should be utilised wherever practicable and new openings kept to a minimum;
- Where proposed extensions are essential they should not dominate the original building in either scale, use of materials or situation. Proposed extensions should not detract from the appearance or character which warrants the original building being retained as a feature in the countryside. Domestic features, such as porches and chimney stacks, unrelated to the traditional appearance of the building will be considered inappropriate. The creation of a residential curtilage around a newly converted building should not impose adversely on the character of the surrounding countryside;
- The extent to which any residential conversion detracts from the original character of the building or its rural surroundings will be treated as a material consideration. In order to protect the character and appearance of the converted building or the amenity and appearance of the surrounding countryside the district planning authority may impose conditions removing permitted development rights under the general permitted development order 1995.

## **4.11HB 1 Protection of Historic Buildings (Saved Policy from Local Plan 1998)**

The district planning authority places a high priority on protecting the character and appearance of all buildings of architectural or historic interest. Particular attention will be given to protecting the settings of listed buildings.

## **4.12HB 3 Conversions and Alterations to Historic Buildings**

Proposals for the conversion of, or alteration to, listed buildings or other buildings of architectural or historic interest will only be permitted in exceptional circumstances and will be required to meet high standards of design, detailing, materials and construction.

Listed building consent will be granted if the district planning authority is satisfied that:-

- the proposal would not detract from the architectural or historic character of the existing building or its setting;
- and, in the case of a timber framed building, the structure of the frame including its infill material remains largely unaltered.

## **4.13HB 5 Preserving Historic Buildings Through Alternative Uses**

The district planning authority will support the use of buildings of architectural or historic interest in a manner compatible with their character and setting. The change of use of listed buildings or other buildings of historic or architectural interest will be approved if the proposed use preserves the building and its setting without undue alteration.

Changes of use of historic buildings should observe the following criteria:-

- the design of any proposed conversion must respect the structure, form, internal spaces, and materials of the original building, existing openings should be utilised and new openings kept to a minimum. Important historic and architectural features should be retained;
- where extensions are considered necessary to accommodate the proposed use they should not dominate the original building by virtue of their setting, scale or materials.

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## 5.0 Planning Analysis

### 5.1 Listed Building and heritage assessment

The listed barn at Watering Farm first appears on the 1882 OS Map and is part of the farmstead associated with the Tudor Grange. The Tudor Grange itself consists of two separate Grade II listings; the house itself and the dairy and bakehouse Range. The Tudor Grange is now in separate ownership to Watering Farm.

An assessment of the significance of the listed building has been undertaken and in accordance with the NPPF, this statement of significance is proportionate to the asset's importance. This assessment has been undertaken by HAT Projects, an award-winning architecture practice with long experience of working with listed and historic buildings, with the input of Ian Alderton, an MCIAT Accredited Conservationist.

### 5.2 Principle of conversion of a disused historic building

The NPPF, as well as Babergh Mid Suffolk's current and emerging Local Plan policies place a high priority on sustaining and enhancing the character and appearance of all buildings of historic interest, and ensuring their longevity through encouraging the optimum viable use to be found for buildings whose original purpose is no longer viable. Policies support the use of historic buildings in a manner compatible with their character and setting, and their change of use if the proposed use preserves the building and its setting without undue alteration. The principle of conversion of the listed barn at Watering Farm to residential use is supported by Babergh Mid Suffolk District Council.

The proposal for change of use of the listed barn at Watering Farm will preserve the building and secure its future in its optimum viable new use, as its use as an agricultural building is no longer feasible and has not been for many years. The proposal not only preserves and restores the building itself but will restore its setting to a much higher quality environment which allows the historic building to be appreciated and understood. It removes the unsympathetic modern roof, replacing it with a more sympathetically pitched roof, and removes other later alterations such as the modern lean to at the east, which currently detracts from the integrity of the historic building fabric. The proposal restores many historic and architectural features of the building, including the internal wattle and daub panels, and ensures that the historic significance of the barn is still visible to the occupants internally. While limited new openings will be created in the existing fabric, these represent a low level of less than substantial harm to the heritage asset and this is outweighed by the public benefit of restoring and preserving the barn, reinstating the original roof form, removing inappropriate non-historic alterations to the barn, and substantially improving its setting.

The conversion of the barn to residential use is in accordance with local and national policy which support the reuse of historic buildings, sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. Its conversion will enable the removal of unsympathetic 20<sup>th</sup> century alterations to the historic building, contributing to improving its setting and the understanding of its significance. In addition, due to the proximity to other heritage assets, the proposal will make a significant contribution to improving the setting of those assets and the understanding of the significance of the farm cluster as a whole.

### 5.3 Principle of conversion to a new residential unit

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It is noted that the Mid Suffolk Local Plan is out of date and that policies CS1 and CS2 of the Core Strategy and Policy H7 of the Local Plan are inconsistent with the National Planning Policy Framework. The Local Plan therefore holds limited weight and the NPPF's presumption in favour of sustainable development should apply.

Paragraph 11(d) of the National Planning Policy Framework provides for permission to be granted, unless adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

The benefits of the development include:

- i. **Boosting local housing supply.** The proposal will create a new home which will be of benefit in boosting the supply of housing. As a small site of less than 1 hectare the site can come forward for development immediately and contribute towards maintaining housing supply in the district.
- ii. **Developing a new homes in a sustainable location which supports local services.** The site is within a short walk of the village centre and has a safe and well lit footpath/footway all the way. The village is a sustainable settlement classified in the Emerging Local Plan as a Hinterland Village. It has a wide range of local services including convenience store and other shop, pub, preschool and primary school, local strategic employment, village hall and church, playground, allotments and a regular bus service. This forms a sustainable location for new homes such as this proposal, and will help meet the need for local homes.
- iii. **Developing a new home in a location which does not have a negative impact on the character or appearance of the area.** The proposal reuses an existing building with no extension required, so the proposal will not have a negative impact on the appearance of the area. The proposal will, in contrast, have a positive impact on the character and appearance of the area by renovating the heritage asset, removing unsightly later alterations to the structure and reinstating the original roof form
- iv. **Improving the condition of a heritage asset and preserving a historic building through alternative uses.** The listed barn requires extensive restoration and repair which would not be viable on the basis of the value generated for non-residential uses. Non-residential uses (employment or community use) would generate a need for far more parking on the site, increased traffic movements and other negative impacts to the adjacent residential dwellings. Residential conversion therefore represents the most suitable use for the listed barn and will preserve it through an optimum viable use.
- v. **Improving the setting of heritage assets and the understanding of an important cluster of historic buildings.** The proposal will also substantially improve the setting of the adjacent heritage assets including a Grade 2\* listed building and a Grade 2 listed building. Together, these three listed buildings form a farmstead cluster and should be understood as such within the landscape. Currently the building detracts from the setting and significance of these heritage assets as it has been substantially altered and does not have its original historic form or external materials visible.
- vi. **Economic benefit.** Employment will be generated during construction and there would be additional expenditure in the local economy from the occupier of the dwelling.

The proposal demonstrates substantial public benefits which greatly outweigh the less than substantial harm to the heritage asset, represents a sustainable form of development, and therefore should be supported under the NPPF.

## 5.4 Design of the listed barn conversion



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The current condition of the barn does not reflect its historic significance and it would be difficult for a lay person to distinguish that there is a heritage asset there at all, as it has been so significantly remodelled and is in such poor repair. From the public viewpoints along the road and the public right of way, the barn presents an undistinguished appearance due to the non-historic low profile roof, the cement render and the foliage which obscures the whole of the south elevation. It does not currently make a positive contribution to its setting or the grouping with the other listed buildings adjacent to it.

This proposal will ensure that the heritage asset is restored to a condition commensurate with its significance and will mean that it makes a far more positive contribution to its setting. It represents a high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. The design of the conversion respects the structure, form, internal spaces, and materials of the original building and uses existing openings as far as possible, with very limited new openings in an informal arrangement that accords with the existing character of the building.

The conversion will be achieved with very minimal changes to the surviving historic fabric and has been designed by an award-winning architectural practice with extensive experience in historic building conservation and conversion. It has been subject to extensive pre-application discussions with MSDC's planning and heritage officers, and informed by a full structural timber frame survey and heritage assessment to identify historic fabric to be retained.

- The existing roof is not original and of a low pitch which detracts from the significance of the barn. This will be removed and replaced with a new roof, reinstating the likely original historic roof form of the barn, i.e. a traditional steeper pitched roof.
- The existing steel sliding door with external steel frame will be removed and replaced with sympathetically designed glazing into the opening. The existing door assembly visually detracts from the significance of the barn.
- The existing cement render will be removed and replaced with black painted timber weatherboarding, a traditional cladding material. At low level, the cement covering the original brick plinth will be removed so that this important historic feature will be revealed and visible.
- The fabric of the barn is generally in very poor repair and as part of this proposal can be fully repaired and reinstated where necessary.
- Internally the central core of the barn will remain a single volume with the full height of the space unobstructed
- The existing hayloft mezzanine floor at the southern end of the barn will be retained and reused, as will the existing boarded wall which separates the hayloft from the main barn. A new spiral stair will give access to the hayloft, to avoid any openings needing to be made in the historic beams which make up the floor, and which are one of the parts of the barn with the most historic significance.
- A new mezzanine added to the northern end of the barn providing additional accommodation, but of a design which clearly differentiates it from the historic hayloft so that the evolution of the building is legible.
- The existing timber frame will be insulated both between existing studs and to the outside of the structure allowing the remaining internal wattle and daub panels to remain exposed.
- The existing brick floor, where it remains, will be lifted and relaid so that this part of the historic fabric remains visible.

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- Very limited openings in historic fabric will be made – a total of 2 historic studs will be removed, and small parts of 4 tie beams will be removed. This represents an extremely low level of intervention, as the team have been keen to ensure that the minimum amount of historic fabric is affected by the proposals.
- A sensitive external landscaping scheme has been developed to ensure that the setting of the barn is improved and allowing its significance to be understood.

The proposals do not result in harm to the heritage asset as while very small amounts of historic fabric are affected, overall the proposals will improve the condition of the asset and reinstate important historic features which were previously demolished, and therefore represent substantial betterment.

Further detail on the design can be found in the accompanying Heritage, Design and Access Statement.

## 5.5 Transport and highways impacts of the development

To promote, encourage and support the principles of sustainable transport as outlined in the National Planning Policy Framework, safe and suitable access is required for bus services, pedestrians and cyclists to and from the site. There is a footway from the site towards Somersham village. The closest bus stops are approx 200m from the site which is within walking distance to catch public transport with limited bus services. The catchment primary school is in Somersham and 900m from the site with a safe walking route to school except a short section on Main Road but a recent planning consent is providing a solution to this area.

The site's access to the highway network lies within the 30 mph zone and a speed survey undertaken by Cottee Transport Planners and visibility splays have been calculated based on the 85<sup>th</sup> percentile recorded vehicle speeds.

Access will be via the existing access track from Ipswich Road which will serve the listed barn and the three new dwellings which have already been consented to the west, as well as the existing cottages and the Tudor Grange adjacent to the site. The access track will be slightly realigned and relandscaped into an attractive rural lane and will include a turning head. The works associated with this have been consented as part of the planning consent for the three new dwellings. Also as part of this planning consent, a new agricultural- use only access road will be created to the west of the site, which will remove all agricultural traffic and Rookery Farm traffic from the existing access track. This will improve safety and amenity for the existing homes which use the current access, as well as the new homes. It also allows the access lane to be realigned and relandscaped as it will only be required to take a small amount of residential traffic and not large agricultural vehicles.

Pre-application consultation with SCC Highways confirmed that the above approach was acceptable and no objection would result.

There will be a minor increase in traffic due to the additional home on the site but this is not considered to constitute an unacceptable impact given the location of the site and the amount of traffic the road currently takes. Cycle and car parking will be provided to meet current standards and encourage the use of sustainable modes of transport wherever possible.

## 5.6 Noise impacts of the development

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The proposal is not in close proximity to the existing dwellings adjacent to the site and will have no unacceptable noise impacts on these properties.

## 5.7 Flooding risks on site

The site does not lie within Flood Zone 2 or 3.

## 5.8 Ecology impacts of the development

An ecology survey has been conducted for the whole of the Watering Farm cluster and is submitted with the application. Bat roosts were found in building B2 (numbers as per the ecology report) which is the brick outbuilding to the north of the site which will not form part of the site or the development. Compensatory measures are therefore not required.

## 7.0 Conclusion

The proposed conversion of the listed barn at Watering Farm will preserve the building and secure its future with a sustainable and optimum viable new use. This is in accordance with local and national policies which support the reuse of historic buildings, sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

The proposal represents substantial levels of public benefits, including:

- i. **Boosting local housing supply.**
- ii. **Developing a new home in a sustainable location which supports local services.**
- iii. **Developing a new home in a location which does not have a negative impact on the character or appearance of the area.**
- iv. **Improving the condition of a heritage asset and preserving a historic building through alternative uses.**
- v. **Improving the setting of heritage assets and the understanding of an important cluster of historic buildings.**
- vi. **Economic benefit.**

This proposal represents substantial betterment to the condition of the heritage asset and do not result in any harm. This proposal therefore represents a sustainable form of development, and therefore should be supported under the NPPF.

We accordingly respectfully request that planning permission and listed building consent be granted.