

PW1192_Planning Statement - March 2022.
Supporting Statement for Prior Approval Application for
Conversion of Agricultural Barns to Residential at
Elm Farm, Somersham Road, Little Blakenham

1.0 Introduction

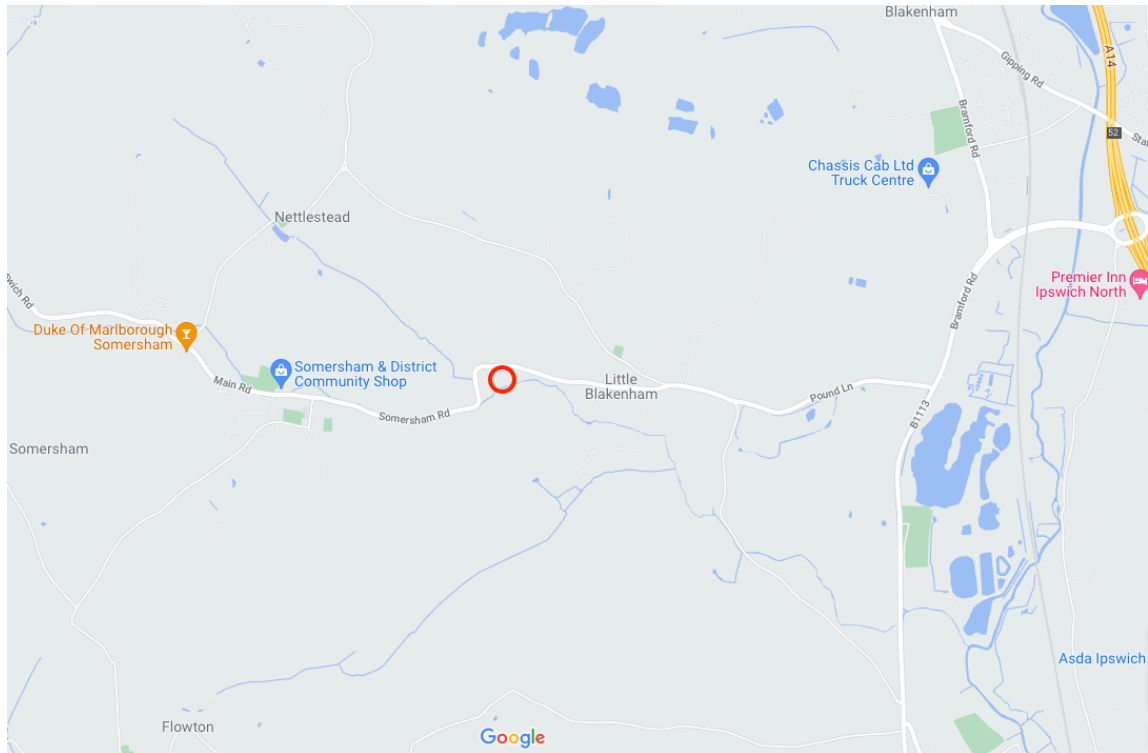
This application is for the change of use of three barns at Elm Farm, Somersham Road, Little Blakenham, from Agricultural Barns to Residential under Class Q of the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2018, which came into effect on 6th April 2018. This application follows a previous application that was submitted in December 2022, but was subsequently withdrawn due to concerns raised during the consultation process. We are now submitting additional supporting information – this is discussed further in section 3 below.

The barns, referred to as barns 'A', 'B' & 'C' are sited on land fronting the public highway, Somersham Road. The site is located on the south side of Somersham Road, between Little Blakenham and Somersham, within the parish of Little Blakenham. The site is not within a Conservation Area or within a special landscape area.

The barns are of modern construction and we have included plans and elevations as existing and as proposed on the drawings PW1192_PL201revA, PL202, PL203, PL204 & PL205 that are included within this application. A curtilage listed barn to the west of the site, has already received approval for conversion into a single dwelling. This barn is considered curtilage listed to the Grade II listed Elm Farmhouse, which sits s further 40m to the west.



Picture 1 – Aerial view with buildings highlighted by red arrows.



Picture 2 – Location of the site (red circle) in Little Blakenham

2.0 Purpose of This Report

Peter Wells Architects have been appointed by the owners of Elm Farm to apply for permission to convert the 3no. barns into 5no. residential dwellings. This report should be read in conjunction with drawings, which describe the barns and site layout as existing and the proposed conversion works.

This Prior Approval application is made for established agricultural units on land occupied as units for the purposes of agriculture on or before 20th March 2013.

3.0 Previous Application

A Class Q application was submitted in December 2021 (ref: DC/21/06654/PN3), but was subsequently withdrawn due to a number of concerns that were raised during the consultation process. All of the concerns have been addressed as follows:

3.1 Ecology

The Ecology consultees commented that *“we are not satisfied that there is sufficient information available for determination. This is because the Bat Activity Survey is out of date to support this application”*.

As a result, an updated building inspection has been carried out by Liz Lord to determine the potential for protected species – most notably bats and nesting birds – to be present and affected by the proposals. A copy of the addendum report is enclosed with this application.

3.2 Environmental Protection

Environmental Protection commented that *“there appeared to be a sewage treatment works to the south of and within 300 metres of the application site and, that if these works are operational, there could be the potential for odours arising from their operation to have an adverse impact on the occupiers of the proposed dwellings”*.

As a result, an Odour Assessment has been carried out by Haze Environmental to identify any potential sources of odour associated with the sewage treatment operations. A copy of the report is enclosed with this application.

3.3 Highways

A number of concerns were raised by Jasmine Whyard/Highways during the consultation process, and these have been addressed as follows:

- *“I would note that it would be very useful to submit a proposed site plan similar to that provided on the previous submission”*.

We now include a proposed site plan layout, which indicates each of the dwelling curtilages and parking areas.

- *“I did also note that there may be the replacement/ alteration of the walls/ roof as detailed within the planning statement. Whilst this is not necessarily opposed, for the purposes of Class Q as we are essentially granting a conversion and noting that I may not be dealing with a resubmission, we will need to be clear on specifically which areas are to be altered and which ones are to be replaced so we understand the extent of the building operations proposed”*.

We have produced a new drawing PL205, that illustrates which parts of the buildings are to be retained and which are to be removed.

- *“For Suffolk County Council to determine the application, visibility splays should be provided to determine the level of visibility the proposed access would be able to achieve”*.

We have added visibility splays to the proposed site plan drawing PL204. These are based on the traffic surveys included with the original approved scheme, that we are also enclosing with this application.

- *“Any new access in this location would need to be designed in accordance with Suffolk County Council's Standard Access Drawing No. DM01”*.

A note has been added to the site plan drawing PL204 to cover this.

- *“Areas have been allocated for bin storage; however, no location has been assigned for presentation. Drawing to be revised with allocated areas for bin presentation on site”*.

We have added bin storage area and presentation points on the site plan drawing PL204.

4.0 Brief Summary of the Proposal

The barns are all single-storey and are of modern construction with asbestos sheet roofing and horizontal timber cladding/timber sheet boards/brickwork/blockwork to the walls.

The proposal is to convert the existing barns to form five residential dwellings under current Permitted Development legislation. There is no demolition work required to allow the conversions.

The works include a new roof covering to the existing structures to replace the asbestos sheeting with a new zinc roof, upgrading the existing structures to meet current building regulations, plus installing new PPC aluminium windows and doors. The conversion will create one “larger dwellinghouse” of 380m², and four “smaller dwellinghouses” of 100m².



Picture 3 – External view of Barn B (Barn A attached behind)



Picture 4 – Internal view of Barn B



Picture 5 – Barn C (foreground), to be converted to 1no. dwelling

5.0 The Agricultural Buildings

5.1 By way of pre-qualification of these buildings/proposals and addressing those matters prescribed in the Prior Notification Procedure (PNP) for the purpose we can state that, in accordance with the restrictions described in paragraph Q.1 of the (amended) GPDO

–

- (a) The barns at the subject site/address were used solely for an agricultural use, as part of an established agricultural unit on 20th March 2013;
- (b) The cumulative floor space of the existing buildings changing use to a larger dwellinghouse or dwellinghouses does not exceed 465 square metres;
- (c) The floor space of any one separate smaller dwellinghouse does not exceed 100 square metres;
- (d) The cumulative number of separate dwellinghouses does not exceed 5;
- (e) The express consent of both the landlord and the tenant have been obtained/the site is not now occupied under an agricultural tenancy;
- (f) As per paragraph (e) above;
- (g) To the applicant's knowledge, no development under Class A(a) or Class B(a) of Part 6 of this Schedule (agricultural buildings and operations) has been carried out on the established agricultural unit since 20th March 2013;
- (h) The proposed development will not result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point;
- (i) The development under Class Q(b) does not consist of building operations other than –
 - (i) The installation or replacement of –
 - (aa) windows, doors, roofs, or exterior walls, or
 - (bb) water, drainage, electricity gas or other services,to the extent reasonably necessary for the buildings to function as a dwellinghouse; and
 - (ii) Partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(i)(i);
- (j) The site is not located on article 2(3) land;
- (k) The site is not nor does it form part of –
 - (i) The site is not a site of special scientific interest;
 - (ii) The site is not located within a safety hazard area;
 - (iii) The site is not, nor is it located within a military explosives storage area;
- (l) The site is not, nor does it contain, a scheduled monument;
- (m) The subject barns are not listed buildings.

5.2 Therefore, the proposed permitted development is not restricted by para. Q.1 of Part 3 of Schedule 2 of the GPDO (amended 2018).

5.3 The Proposed Curtilage of the New Dwellings

Curtilage, for the purposes of Class Q (inter alia) is defined at paragraph X of Part 3 of Schedule 2 of the GPDO:

““curtilage” means, for the purposes of Class Q, R or S only—

“(i) the piece of land, whether enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or

(ii) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building,

whichever is the lesser;”

5.4 The proposed curtilages are identified on drawing PW1192_PL204, and show that the area to become the residential curtilage of the new dwellings is equal to that of the land area occupied by the agricultural buildings.

6.0 The Proposed Development

6.1 The development permitted by Class Q comprises:-

Q. Development consisting of—

- (a) a change of use of a building and any land within its curtilage from a use as an agricultural building to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order; **or**
- (b) **development referred to in paragraph (a) together with** building operations reasonably necessary to convert the building referred to in paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule.

6.2 It can be said, therefore, that there are two elements to Class Q permitted development rights: (1) the principle of the change of use from agricultural to residential and (2) the extent of the works needed to achieve the conversion.

The Extent of the Conversion Works

6.3 Essentially, the works required to achieve these conversions comprise the replacement of the external cladding of the roof, installing new windows and doors and upgrading the external shell to the building to meet contemporary building regulations. Elements of the building to be retained and removed are highlighted on enclosed drawing PW1192_PL205.

6.4 The conversion of these buildings will involve both a change of use and building operations including the replacement/alteration of exterior walls and roof (without changing the present size of the buildings), the installation of new windows and doors commensurate with their use as dwellings, and the installation of services. Exact materials for these can be reserved by condition as necessary.

6.5 Details of the proposed conversions are shown on the submitted drawings.

6.6 All of these building operations, we say, comprise works that are reasonably necessary to achieve the conversion of the barns to new dwellings and to comply with current building regulations.

7.0 Assessment of the Impact of the Development

Paragraph Q.2 of Part 3 of Schedule 2 of the GPDO requires that six conditions be addressed in this prior approval submission. These will be addressed in turn:

- 7.1 Transport and Highways** – As shown on drawing PW1192_PL204, there are two vehicular accesses onto Somersham Road that will be shared by the proposed dwellings. Units 1 & 5 will share the western access and units 2, 3 & 4 will share the eastern access. Both accesses will be constructed in accordance with SCC's Standard Access Drawing No. DM01, and both will have the required visibility splays. Each of the four smaller dwellings have 2no. parking spaces, and the larger dwelling has 3no. parking spaces. There are also 2no. additional visitor parking spaces.
- 7.2 Noise impacts** – It is considered that there will be no adverse impacts with regards to noise resulting from the proposed development either on prospective occupants or on nearby residential properties.
- 7.3 Contamination** – A Phase I Report accompanies this application. Please note that this report was prepared in 2019, and therefore includes superceded drawings, but the site conditions have not changed since the survey was carried out. We note that no concerns were raised during the previous application process, although some conditions were recommended.
- 7.4 Flood Risks** – The site is not within Flood Zones 2 and 3 on the EA Flood Maps.
- 7.5 Location/Siting of the Buildings** – When considering the location/siting of the building it is important to note the following paragraph in the National Planning Policy Guidance:

Paragraph: 108 Reference ID: 13-108-20150305

Is there a sustainability prior approval for the change to residential use?

The permitted development right does not apply a test in relation to sustainability of location. This is deliberate as the right recognises that many agricultural buildings will not be in village settlements and may not be able to rely on public transport for their daily needs. Instead, the local planning authority can consider whether the location and siting of the building would make it impractical or undesirable to change use to a house.

The applicant considers that the location and siting of the buildings does not make it impractical or undesirable to change the former, redundant agricultural use to residential dwellings.

- 7.6 Design/External Appearance of the Buildings** – The proposed dwellings have been designed so that the external appearance of the agricultural buildings is retained. The roofs will be finished with zinc, and the walls will be timber cladding. The Applicant considers therefore that the dwellings will blend in with their agricultural surroundings.

8.0 Structural Integrity of the Building

The applicant understands that the existing buildings are structurally sound, capable of conversion and capable of taking additional loading.

The Applicant considers, therefore, that the proposed scheme complies with the following:

Paragraph: 105 Reference ID: 13-105-20150305

Are any building works allowed when changing to residential use?

Building works are allowed under the change to residential use. The permitted development right under Class Q assumes that the agricultural building is capable of functioning as a dwelling. However, it recognises that for the building to function as a dwelling some building operations which would affect the external appearance of the building, which would otherwise require planning permission, should be permitted. The right allows for the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to include the construction of new structural elements for the building. Therefore it is only where the existing building is structurally strong enough to take the loading which comes with the external works to provide for residential use that the building would be considered to have the permitted development right.

9.0 Conclusion

This proposal has been prepared to comply with Class Q of the Permitted Development legislation (amended in 2018) and the detailed proposals show compliance. We believe that the conversions to residential will provide 5no. attractive dwellings within the countryside, and that the conversion of the structures to dwellings can be easily achieved within the existing structural frame of the barns.

This application follows the withdrawal of a previous application, as a result of a number of concerns being raised during the consultation process. All of these concerns have now been addressed in this revised application.

peterwellsarchitects