



SUPPORTING PLANNING STATEMENT

Hole Street Farm, Kingsdown Road, Lynsted

September 2022

SUPPORTING PLANNING & HERITAGE STATEMENT

In support of a full planning application for the
**conversion of a barn to a dwellinghouse including all associated landscaping and
biodiversity enhancements**

at

Hole Street Farm, Kingsdown Road, Lynsted, Sittingbourne, ME9 0QX

On behalf of

Mr & Mrs D Anderson

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1. Introduction

- 1.1. This application is being submitted on behalf of Mr and Mrs D Anderson and seeks full planning permission for the change of use and conversion of the barn to a dwellinghouse.
- 1.2. This Planning, Design and Access Statement demonstrates an assessment of the context of the site and its surroundings. This includes the physical, social and economic characteristics as well as showing an understanding of the relevant existing planning policies.
- 1.3. This Planning, Design and Access Statement (also incorporating heritage) justifies the need for the proposed dwellinghouse and sets out how it complies with the guidance set out in the National Planning Policy Framework and the Bearing Fruits Local Plan for Swale Borough Council.
- 1.4. The application site is situated within the hamlet of Kingsdown, close to the village of Lynsted. The application site forms part of a wider site which includes a number of agricultural buildings, dwellinghouses and agricultural land that are situated within the Conservation Area of Kingsdown. The site appears to be part of a former farmstead which includes a listed oast house and farmhouse; Hole Street Oast and Hole Street Farmhouse.
- 1.5. The application building is situated adjacent to the range of farm buildings that were previously granted permission to be holiday lets and then independent dwellinghouses. and opposite the oast house to the east. The more modern agricultural buildings which support the farm holding are to the south as shown in figure 1.

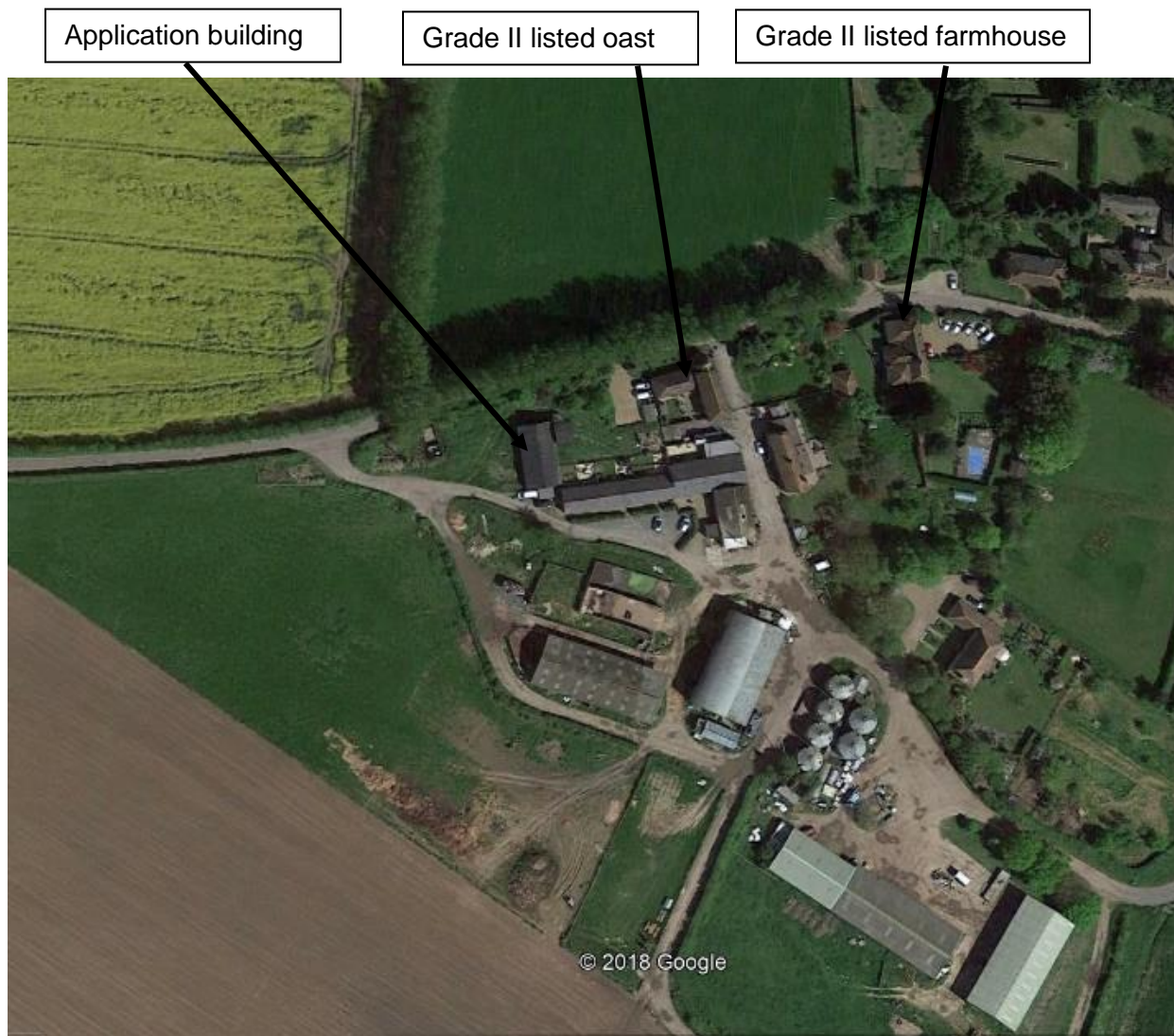


Figure 1 Google image of site context

2. Proposal

- 2.1. This application seeks planning permission for the barn's conversion to a dwellinghouse.
- 2.2. Hole Street Farm is a small sheep and cattle farm which runs 600 breeding ewes and 70 Sussex beef cattle. The herd and flock are rotated with arable crops of linseed, wheat and beans for natural fertilisation. Hole Street Farm supplies the local abattoir/butcher SW Doughty in Doddington and The Good Shed butchers in Canterbury.

- 2.3. Diversification is required by Hole Street Farm to ensure that it can continue to trade. The uncertainties surrounding Brexit, farm subsidy loss and the instability of the markets make this diversification requirements even more profound.
- 2.4. Previously the farm sought to diversify its income through the provision of four holiday lets. The costs associated with running these holiday lets combined with the lack of uptake of the short term lets meant that the farm needed to diversify to provide long term lets. Planning permission was obtained, retrospectively, to change the use of the holiday lets to independent dwellings to provide a diversified income.
- 2.5. The barn that is the subject of this application is currently redundant and does not benefit from The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) Schedule 2, Part 3, Class Q given its situation within the Kingsdown Conservation Area. In order to provide a suitable use for the barn alongside an income, permission is being sought for its conversion to a dwellinghouse rather than a commercial use.

3. Planning History

- 3.1. In 2011 planning permission was granted for the conversion of farm buildings to form four holiday lets with reference SW/11/0517. Condition 14 of this permissions states *“The holiday accommodation hereby permitted shall be used solely for the purpose of holiday accommodation, shall not be used by a person or persons as their sole or main residence and shall not be let or occupied by any person or group of persons for more than four weeks in any calendar year.”*
- 3.2. In 2018 an enforcement case was opened by the Council with reference 18/500142/ENF against the use of the holiday lets as dwellinghouses. An enforcement notice was issued. This notice was appealed by the applicant.
- 3.3. In 2019 an enforcement appeal was dismissed and the notice was upheld (with corrections) with reference APP/V2255/C/18/3203845. The appeal decision highlighted that the case supporting the justification for the removal was limited.

- 3.4. In 2020 planning permission was granted for the change of use of the holiday lets to four dwellinghouses with reference 20/500738. That application made the case for the continued use of the holiday lets as separate dwelling houses with the routes of the justification in respect of lack of viability and having regard to the wider farm business.
- 3.5. The other planning history at Hole Street Farm relates to the change of use or erection of other farm buildings as well as the old gun site and is not readily applicable to this application as it does not lie directly within the red line area.

4. Design and Access Statement

Use

- 4.1. The lawful use of the proposal building is agricultural. The barn is an aisled barn and has been used for the storage of agricultural machinery and equipment as well as animal feed in more recent times. Historically it appears to take the form of a barn for the threshing and storage of grain and/or the keeping of animals.
- 4.2. It is proposed that the barn is converted to a dwellinghouse, so the change of use from agriculture to C3 dwellinghouse use is proposed. This use has been sought as an appropriate use within the Conservation Area and in proximity to residential uses, where a commercial use would cause amenity concerns and would require a greater extent of parking and external curtilage areas.

Amount, Layout & Scale

- 4.3. There are no proposed alterations to the building, its scale, or layout at Hole Street Farm. The application seeks permission for the conversion of the existing building, to a dwellinghouse. The land associated with the proposed residential use, to form the garden and parking area has been kept to a minimum to ensure that it does not impinge the outlook of the Conservation Area.

Appearance

- 4.4. The barn is currently clad in black weatherboard and is of a traditional form, with a corrugated tin roof.

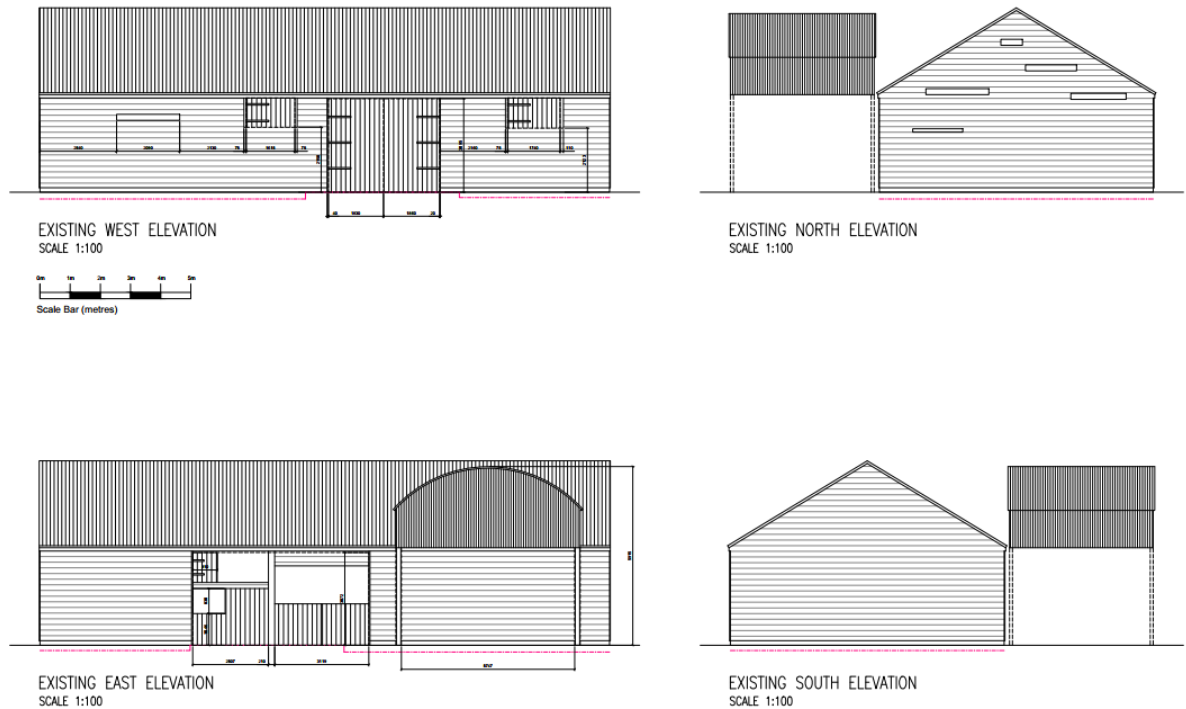


Figure 2 Existing elevations

- 4.5. It is proposed that the roof of the barn is replaced with profile metal and the existing black stained feather edged weatherboarding is made good or replaced where necessary. The necessary thermal breathable membranes and works to ensure that the barn conversion will comply with the building regulations, will be provided internally.
- 4.6. Care has been taken with the design to continue to showcase the existing form of the barn, whilst also taking the opportunity to make a feature of the existing internal timber framework, through the inclusion of gable end windows to add light and showcase the framework.

Landscaping

- 4.7. The barn and proposal site already benefit from existing landscaping features in the form of existing hedging, internal access tracks and general hardstanding for parking. It is proposed that a garden and parking area is proposed to the east of the barn, with a small garden area wrapping around the barn to the north and west. The existing hedge will be used which delineates the boundary with the oast to the north east, with hedging being proposed to the new boundary to the east.

Access

- 4.8. The proposal site is accessed from Kingsdown Road, which is more than adequate in terms of visibility and for the vehicle users. The change of use of the building to a dwellinghouse will not alter the amount or type of vehicles using the access significantly, as the barn is not currently in active agricultural use with associated vehicle movements. There are no proposed alterations to the existing access arrangement.

5. National Planning Policy Analysis

National Planning Policy Framework

- 5.1. Paragraph 7 of the National Planning Policy Framework sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. The three overarching objectives of sustainable development in the planning system are economic, social and environmental. These three facets combined aim to ensure that sustainable development is pursued in a positive way. Paragraph 10 of the National Planning Policy Framework confirms this point, setting out that *“at the heart of the Framework is a presumption in favour of sustainable development”*
- 5.2. For decision taking this means, in accordance with Paragraph 11 that development proposals that accord with an up-to-date development plan without delay or where there are no relevant development plan policies then planning permission should be granted unless there are any adverse impacts that would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework as a whole.

- 5.3. With this Paragraph in mind, it is important to consider that Swale Borough Council does have a policy which controls the development of buildings within the countryside. It is considered that this proposal complies with the Bearing Fruits Local Plan so should therefore be approved without delay.
- 5.4. Paragraph 38 of the National Planning Policy Framework requires that local planning authorities approach decisions on proposed development in a positive and creative way. The Paragraph states that local planning authorities should *“work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*
- 5.5. In respect of housing supply, Paragraph 60 sets out that to support the Government’s objective of significantly boosting the supply of homes, it is important for a sufficient amount and variety of land to come forward and that land with permission is developed without delay. In this regard Paragraph 119 refers specifically to making effective use of land in meeting the need for homes and other uses, with Paragraph 120(d) stating that planning policies and decisions should *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained...”*. Footnote 48 acknowledges that this should include bringing empty homes and other buildings back into residential use.
- 5.6. Chapter 5 of the National Planning Policy Framework specifically deals with housing, with paragraphs 78 to 80 dealing with Rural housing.
- 5.7. Paragraph 79 requires that housing should be located where it will enhance or maintain the vitality of rural communities, in order to promote sustainable development. It seems logical that an area and buildings that have already been deemed to be acceptable firstly for a C3 restricted holiday let use then an unrestricted C3 use, in terms of location should also be an acceptable location for a solely residential use, especially to maintain the vitality of the rural community.
- 5.8. It is not considered that the building, in close proximity to five residential dwellings and commercial uses, can truly be considered as isolated and therefore paragraph 80 is not considered to fully apply. However, as the barn is not currently in agricultural use given its size and inability to house modern day agricultural machinery, its use is now redundant.

- 5.9. Paragraph 80 does allow for the re-use of redundant or disused buildings which would result in an enhancement to their immediate setting. When considering this aspect of the policy, it is of note that the building is situated within Kingsdown Conservation Area and within the setting of a listed Oast house. This enhancement therefore needs to be carefully considered against these constraints.
- 5.10. The use of the building as a holiday let would not be viable, given the required investment for the conversion and extent of return from rental. The four holiday uses that failed at Hole Street Farm demonstrate this. The farm still requires a use and financial income beyond that which the farming enterprise can currently supply. The conversion of the barn to a commercial use, whether this is Class E or B8, would potentially have more of an impact upon residential amenity or the Conservation Area, given the requirement for external storage and parking areas, associated traffic movements and opening hours.
- 5.11. The use of the barn as a dwellinghouse would be complimentary of the surrounding residential uses and would not create any amenity concerns for the neighbouring uses. The barns conversion is therefore considered to make a positive enhancement to its setting.
- 5.12. Considering this in the round as providing an enhancement to the setting in accordance with Paragraph 80 of the National Planning Policy Framework it is strongly put forward that a C3 use, would have far less of a negative impact upon the Conservation Area and Oast house than its change to a commercial use or its continued redundancy and falling into a further state of disrepair. Support should therefore be given, in line with National policy, to convert the redundant agricultural building to a residential use to ensure an enhancement to the area.
- 5.13. Paragraph 84 of the National Planning Policy Framework sets out the national policy support for the rural economy. Paragraph 84 states *“Planning policies and decisions should enable:*
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;”*

- 5.14. Planning permission is sought to convert the barn, which is a farm asset, to a dwellinghouse. Given the farms limited income from the more traditional farming practices, permission was previously sought for the change of use of a range of buildings to holiday lets alongside an application to SEEDA for a grant to fund the works. The diversification of the farm business was necessary to fund its survival, due to the low returns from agriculture. The grant funding was removed in 2012, so the farm business had to take out a number of secured business loans to secure the conversion work. The holiday lets were unviable as short term lets and Hole Street Farm sought their retrospective change of use to independent dwellinghouses, which was granted in 2020.
- 5.15. In order to provide an additional income stream, permission is sought to convert the redundant barn to an independent dwellinghouse to provide additional rental income for the farm holding. This aligns with the policy support given in Paragraph 84 of the Framework, which supports the diversification of agricultural businesses. Given the previous unviability of a holiday let use at this location, both in terms of initial investment and poor returns, it is proposed that the building is diversified to provide income from long term rental.
- 5.16. Paragraph 127 of the National Planning Policy Framework requires 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;...*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not preventing or discouraging appropriate innovation or change.*
- 5.17. The proposed conversion has been designed to enhance the setting of the Kingsdown Conservation Area and listed Oast house, whilst also ensuring that the proposal building does not fall into a state of disrepair, due to a lack of viable use.

- 5.18. The change proposed will not be dissimilar to that which was allowed for the adjacent range of buildings, ensuring that the building is still sympathetic to the character of the Conservation Area and listed oast house. Within the delegated report for application 20/500738 the Council considered that “... *the works done to the buildings as part of their conversion did indeed enhance the surrounding landscape setting and the wider character of the conservation area as a whole in accordance with policy ST3 and the NPPF.*”
- 5.19. It is therefore put forward that the conversion and continued use of the barn within the Conservation Area would also ensure that the surrounding area is enhanced and prevented from falling into a state of disrepair that could become apparent due to lack of use.

6. Heritage Statement

Heritage Policy Context

- 6.1. When considering the heritage aspect of the proposal, consideration has been given the Chapter 16 of the National Planning Policy Framework as well as the wider legislation.
- 6.2. Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. Sections 66(1) of the Act place a duty on the decision maker to have special regard to the desirability of preserving listed buildings and their settings. Section 72 of the Act places a similar duty on the decision maker with respect to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 6.3. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that: “*In considering whether to grant planning permission for General duty as development which affects a listed building or its setting, the local respects listed planning authority or, as the case may be, the Secretary of State shall have buildings in special regard to the desirability of preserving the building or its setting or exercise of any features of special architectural or historic interest which it possesses.*”

- 6.4. The decision maker is required to give considerable importance and weight to the desirability of preserving listed buildings and their settings, and where there is conflict with the statutory objective in section 66(1), the question for the decision maker is whether the presumption is overridden by other considerations of public interest.
- 6.5. It is essential that in applying the subsequent advice in Section 16 of the National Planning Policy Framework), which is expressed in terms of a balance rather than expressly referring to issues of weight and significance, the approach of the decision maker is consistent with the statutory obligation under Section 66(1).
- 6.6. The National Planning Policy Framework constitutes the Government's national guidance and policy regarding development in the historic environment. It is a material consideration and includes a succinct policy framework for local planning authorities and decision takers. It relates to planning law by stating that applications are to be determined in accordance with the local plans unless material considerations indicate otherwise.
- 6.7. Within Annex 2 the glossary defines 'Significance' as *"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*
- 6.8. Paragraph 194 of the National Planning Policy Framework places a duty on the local planning authority to require an applicant to describe the significance of any heritage assets affected by a proposal, providing a proportionate level of detail. The effects of any development on a heritage asset therefore need to be assessed against the four components of its heritage significance: its archaeological, architectural, artistic and historic interests.
- 6.9. This assessment needs to identify and assess the particular significance of the heritage asset to avoid or minimise any conflict between the heritage asset's conservation and the proposal, in accordance with Paragraph 195.
- 6.10. Importantly, Paragraph 197 requires that 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;"* as well as *"b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;..."*

- 6.11. In terms of potential harm, Paragraph 199 states that *“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...”*
- 6.12. Harm is defined by English Heritage as a change which erodes the significance of a heritage asset.
- 6.13. Conservation (for heritage policy) is defined in Annex 2 of the National Planning Policy Framework: *“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.*
- 6.14. It is considered that the importance and relevance of this definition centres around the fact that it does not suggest conservation to be the same as preservation. Indeed, what sets conservation apart is the emphasis on proactively maintaining and managing change and not on a reactive approach to resisting change. In its simplest interpretation conservation could amount to a change that at least sustains the significance of a heritage asset.
- 6.15. Paragraph 206 notes that proposals which preserve those elements of the setting of heritage assets that make a positive contribution to or better reveal the significance of that asset should be treated favourably. It also requires that *“local planning authorities should look for opportunities for new development within Conservation Areas... to enhance or better reveal their significance.”*
- 6.16. Annex 2 of the NPPF describes the setting of a heritage asset as: *“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”*

Historic Maps

- 6.17. The historic maps consulted are shown in **Figures 3 to 6** The farm was previously named Oldstreet Farm and forms a loose courtyard farmstead with the farmhouse to the east, barn to the west, a larger long building to the south, smaller building to the south east and single kiln oast to the north east.

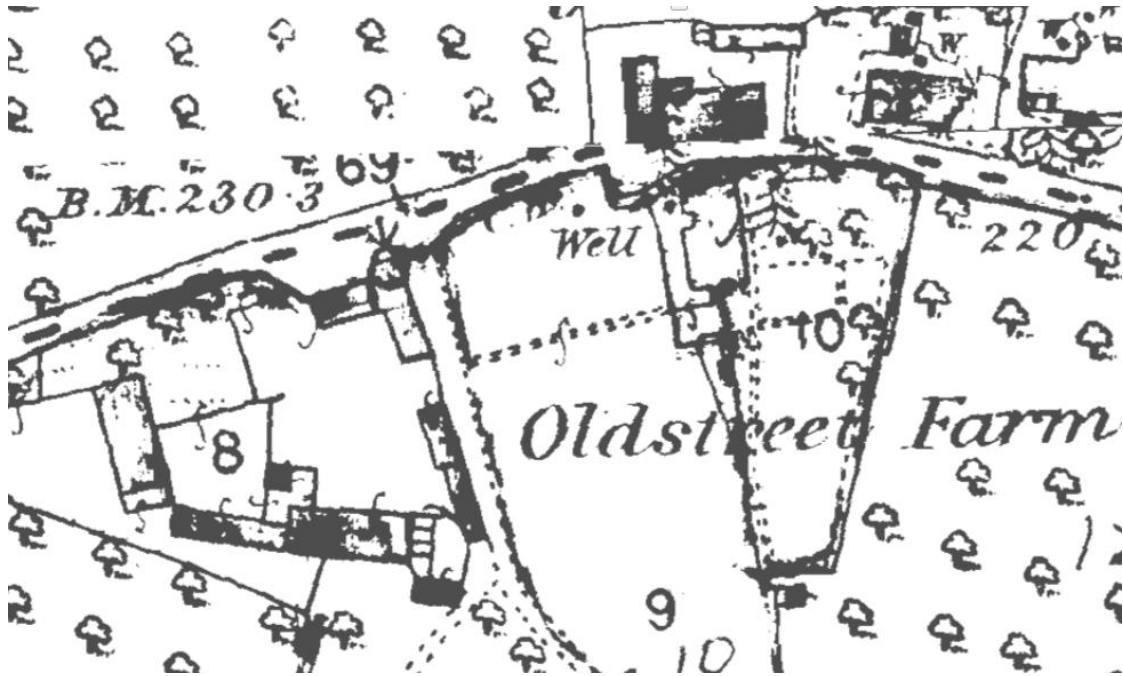


Figure 3 1871 to 1891 map taken from KCC Heritage Maps

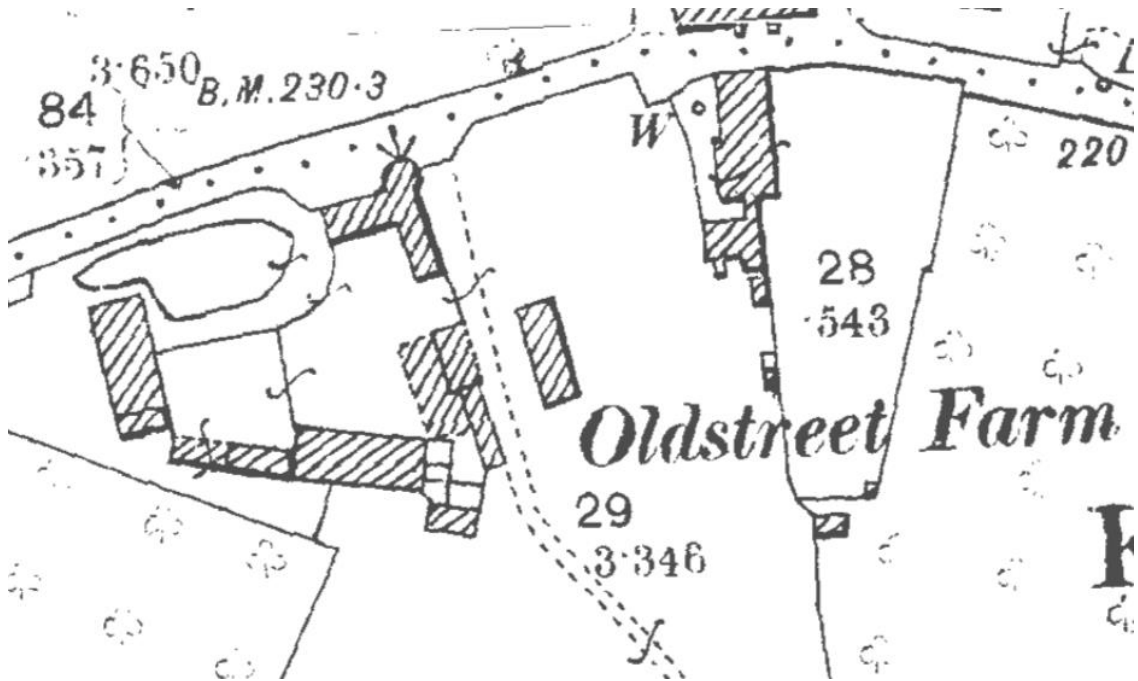


Figure 4 1891 to 1900 map taken from KCC Heritage Maps

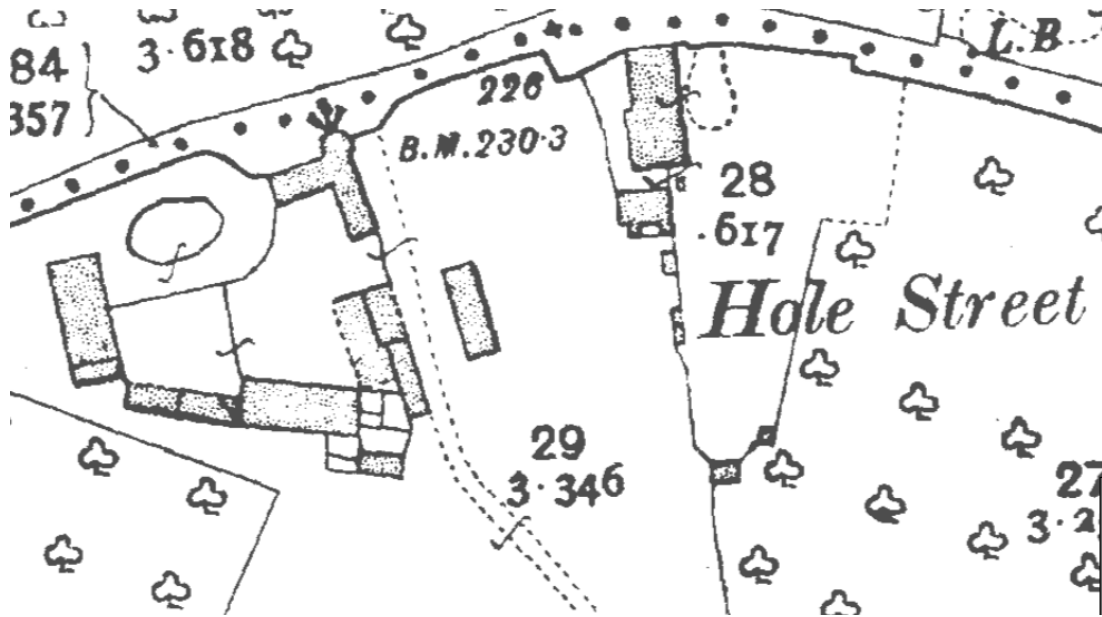


Figure 5 1907 to 1923 map taken from KCC Heritage Maps

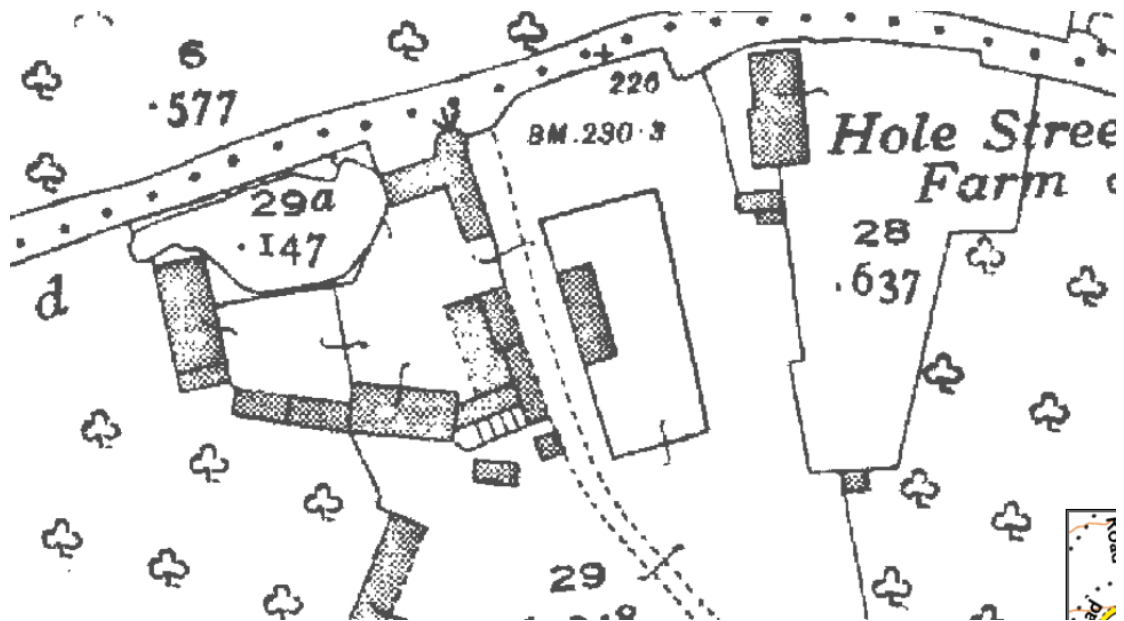


Figure 6 1929 to 1952 map taken from KCC Heritage Maps

- 6.18. The barn that is the subject of this proposal is situated to the west of the farmstead and is a timber framed aisled barn with weatherboard walls under a shallow pitched corrugated metal sheet roof with gable ends. The barn has four bays and appears to have been constructed using many re-used timbers, with the original roof trusses having been truncated resulting in the lower pitch to the roof.
- 6.19. The barn is a threshing aisled barn with an attractive internal timber framework, with timbers of varying ages. Externally the building is beginning to fall into a state of disrepair due to a lack of current agricultural use, with missing sections of weatherboarding.



Figure 7 Photo of barn roof



Figure 8 Photo of internal part of the barn

- 6.20. The proposed conversion of the barn to a residential use will provide a viable use of a unlisted heritage asset, whilst also ensuring that it can be retained as a contribution to Kingsdown Conservation Area.



Figure 9 Photo of internal section of the barn



Figure 10 Photo of internal part of the barn

6.21. The location of the proposal site within Kingsdown Conservation Area is shown in **Figure 11**.



Figure 11 Kingsdown Conservation Area extent

- 6.22. As can be seen, the building plays a role in the transition and entrance to the Conservation Area from the west. It is associated with the oast and will be seen as part of this group of buildings as part of a former farmstead.
- 6.23. When considering the barn in terms of “*archaeological, architectural, artistic and historic interests*” it is important to note that the barns value lies within its contribution that its setting makes to the Conservation Area and Hole Street Oast. The barn is not listed in its own right. On the face of it, the barn does not provide any archaeological value in its own right. The provenance and variety of beam ages in itself are archaeologically valuable in dendrochronology terms Whilst its architecture is reflective of aisled threshing barns of historic value in Kent, it is not unique in form or style. It is considered that the historic interest of the barn is important due to its setting within the farmstead and the heritage value of its form through time. Its retention with a viable residential use will ensure that this historic value is retained and the archaeological value of the beams is conserved for future generations.

- 6.24. It is considered that the potential impact upon the listed building and the Conservation Area's for the buildings adjacent to the proposal barn use as C3, were considered as part of the applications in 2011, 2019 and 2020 by the Council and Planning Inspectorate. No concerns were raised about the impact upon the heritage by the Council or Planning Inspectorate. The building that was the subject of these considerations, were of a much later date than the proposal barn and appear to be less historic in character. The proposal barn, although not listed in its own right, does have a historic character in its form. It's conversion to a dwellinghouse will secure its future and provide a viable use to preserve this form.
- 6.25. It is put forward that the potential redundancy in use of the building that would come about by the refusal of this application, or the requirement for a commercial use would have more harm upon these heritage matters than the conversion to a C3 use.
- 6.26. A commercial use would inevitably require more parking, storage, deliveries and the intensity of this use would negatively impact upon views from and to the Conservation Area and the setting of the oast would be eroded. A residential use would match the surrounding residential uses in the adjacent building as well as the listed Oast.
- 6.27. It is therefore considered that the use of the buildings for residential would be the most appropriate use of the buildings within the Conservation Area and setting of the listed Oast that would ensure that they can continue to make a positive and viable contribution.
- 6.28. The proposed conversion has been designed to retain and respect the existing form of the building, as well as its scale. The re-use and use of matching materials to retain the black stained weatherboard clad exterior and roof covering will ensure that the building remains true to its heritage. Although not listed in its own right, the proposal seeks to ensure that the a non designated heritage asset can be conserved for future generations whilst also preserving its setting within the Conservation Area and listed setting.

7. Local Plan Policy Analysis

Swale Borough Council's Bearing Fruits Local Plan

- 7.1. The relevant policies from Swale Borough Council's Bearing Fruits Local Plan 2031 include:

- Policy ST1 Delivering sustainable development in Swale
- Policy ST3 The Swale settlement strategy
- Policy CP3 Delivering a wide choice of high quality homes
- Policy CP4 Requiring good design
- Policy CP7 Conserving and enhancing the natural environment- providing for green infrastructure
- Policy DM 3 Rural Economy
- Policy DM14 General Development criteria
- Policy DM 24 Conserving and enhancing valued landscapes
- Policy DM 28 Biodiversity and geological conservation

7.2. Policy ST 1 covers the general requirement to deliver sustainable development in Swale. The relevant parts of this policy include parts 7, 8, 10, 11 and 12.

7.3. Part 7 requires the delivery of a wide choice of high quality homes through a number of criteria. It is considered that the conversion of the barn at Hole Street Farm to provide a dwellinghouse will support this delivery of houses across the borough. It will also allow for the use of existing built form, which in itself is sustainable. The building's conversion will maintain the character and scale of the building and its setting within the Conservation Area and listed oast house.

7.4. Part 8 of Policy ST 1 discusses the requirement of good design and requires this to be achieved through a reflection of the best of an areas characteristics. Given the historic characteristics of the proposal building, the farmstead setting as well as its situation within the Conservation Area, the conversion has been designed to be sympathetic and complementary. The design has been proposed to make use of the existing openings as much as possible, whilst also providing gable windows to enhance the buildings shape.

- 7.5. The use of the building as a dwellinghouse will ensure that the buildings' heritage and layout can be maintained, without the requirements of excessive parking, partitioning or a more intensive commercial use which is not considered to be appropriate in this location. The proposed change of use offers an opportunity to maintain the buildings' original layout and design as there will be minimal external alterations to facilitate the conversion. The use as a dwellinghouse will also respect the sites agricultural heritage and surrounding amenity.
- 7.6. Part 10 of Policy ST 1 considers ways in which to meet the challenge of climate change, flooding and coastal change. This proposal is inherently sustainable through the use of existing built form. The building is not located within an area that is at risk from flooding or will be impacted by coastal change.
- 7.7. It is proposed that the building will make use of renewable technology to provide heating, hot water and electric. This will be achieved through the use of an air source heat pump combined with photovoltaic solar panels for energy efficiency. It is put forward that details of these can be confirmed via condition.
- 7.8. Part 11 of this policy considers the conservation and enhancement of the natural environment. It is not considered that the change of use of this building to a dwellinghouse would impact upon the natural environment and therefore its conservation would be maintained. In accordance with the recommendations of the ecologist, bat boxes will be provided as part of the conversion to ensure that no bat roosting habitat is lost; this in turn ensures that the natural environment is conserved.
- 7.9. Part 12 of Policy ST 1 requires that the historic environment is conserved and enhanced by applying national and local planning policies through the identification, assessment and integration of development with the importance, form and character of heritage assets. Although the proposal building is not listed in its own right, it lies within the Conservation Area of Kingsdown and are situated adjacent and in close proximity to the Grade II listed Hole Street Oast.

- 7.10. It is proposed that the conversion of the building to a dwellinghouse, makes the most viable and appropriate use of a non designated heritage asset. Being mindful of the close proximity of the listed oast house and neighbouring residential properties, it is considered that a residential use of the now redundant agricultural building would be more appropriate, to reduce any impacts upon residential amenity. The potential traffic movements and external activities that would be associated with a commercial use would have the potential to impact upon neighbouring amenity. The noise associated with such uses would be detrimental to neighbours, whilst the additional required parking and potential external storage areas would also alter the layout and character of the conservation area.
- 7.11. Policy CP 3 sets out the necessities for delivering a wide choice of high quality homes. It is considered that the proposed use of the barn as a dwellinghouse would be appropriate in scale, context and character of the area.
- 7.12. The proposal also offers the opportunity to provide a dwellinghouse, which would make a contribution to the housing supply of the borough, albeit modest in size.
- 7.13. Policy CP 4 sets the context and requirement for good design. Point 2 requires that development proposals *“Enrich the qualities of the existing environment by promoting and reinforcing local distinctiveness and strengthening sense of place;”* The proposed conversion of the barn will maintain the scale and form of the Conservation Area and setting of the listed oast. The proposed change of use and conversion to a dwellinghouse would not alter the existing environment, by reasons of minimal external alterations and retention of the existing design, form and scale. The alternative uses for other commercial uses of the building are put forward as potentially being more damaging to local distinctiveness due to the intensity of these uses and the requirement for car parking, external storage and deliveries to name but a few.
- 7.14. In terms of the conservation and enhancement of the landscape (point 6) the proposal will not cause any alterations to the existing landscape. The proposed garden and parking area which will provide the residential curtilage for future occupiers make use of the existing parking area and a small amount of land already associated with the building.

- 7.15. Policy CP 8 considers the conservation and enhancement of the historic environment in order for it to be sustained. It is considered that the proposal will sustain and enhance Hole Street Oast given its close proximity and associated historic relationship with the application buildings. The agricultural character has and will be retained with the incorporation of existing features included within the design, in accordance with the supplementary guidance detailed within the leaflet Conservation of Traditional Farm Buildings.
- 7.16. Policy DM 3 considers the rural economy and states that *“Planning permission for residential development will not be permitted where this would reduce the potential for rural employment and/or community facilities unless the site/building(s) is demonstrated as having no demand for such purposes or its use would be undesirable or unsuitable.”*
- 7.17. Policy DM3 goes on to say in 3 that *“For the agricultural/forestry sectors: a. enable the diversification of a farm;”* Hole Street Farm has sought to diversify their agricultural income previously, through the conversion of buildings to the east of the proposal barn to holiday lets. Their conversion and subsequent rental was not viable, so long term lets were sought to provide income to the farm.
- 7.18. Given the previously failed commercial tourism use as a farm diversification income alongside the restrictions of the Conservation Area and listed setting, it is strongly put forward that it would not be desirable or suitable for the barn to be converted to a commercial use. Given the proximity of existing residential uses in the vicinity, it would also be more detrimental in terms of amenity impacts upon existing occupiers to have a more intense commercial use in an adjacent building.
- 7.19. The potential noise impacts from machinery use, deliveries being loaded and unloaded would be far more intensive in association with a commercial use rather than a residential one. The potential impacts upon the setting of the listed building and Conservation Area are also going to be greater in association with a commercial use. The increased demand for parking for employees, external storage, yard area for deliveries and the greater demand for more windows to provide natural light for individual offices will also impact upon heritage and historic character more than a residential use. It is therefore affirmed that a commercial use would not be a suitable or desirable use of the barn.

- 7.20. A community use would not be a suitable or desirable use of the barn either, given the lack of viability of such a scheme and the size of the barn. The income from the rent or sale of the barn as a residential use or residential conversion would provide sufficient diversified funds for the farm. A community use would not provide sufficient income either through a rent or sale, to provide the farm with the means to continue to prosper.
- 7.21. Villages within the local area have existing village hall facilities which are shared amongst the parishes such that no shortfall exists for the local community. Even if the local population of Lynsted and Kingsdown wanted to purchase and utilise their own hall for community use, it is strongly contended that the barn is of a size which is too big for such a use and would not be a viable option for the parish. A community use would therefore not a suitable or desirable use for the barn.
- 7.22. It is considered that the failing use of the previous buildings as holiday lets demonstrates that this aspect of the rural employment has been proven to be unviable at this location and for this farm.
- 7.23. The policy requirements for rural based employment could not be successfully met should the buildings at Hole Street Farm be converted to an employment use; there would be harm to the historic, landscape and rural character of the area and the potential for significantly high levels of traffic generation incompatible with the rural character is great.
- 7.24. The pre-amble to Policy DM3 sets out at paragraph 7.1.11 that *“Policy DM3 is the means to highlight the needs of specific sectors and the protection and expansion of rural services, whilst balancing support for the sustainable growth and expansion of business and enterprises whilst limiting and managing adverse impacts upon the wider countryside.”* This provides policy support for farm diversification. Policy DM3 states that *“Planning permission will be granted for the sustainable growth and expansion of business and enterprise in the rural area.”* One of the ways that this can be met for the agricultural sector is to enable the diversification of farms, of which the conversion of disused heritage farm buildings is a method to raise income.

- 7.25. It is therefore put forward that the diversification of the farm into the use of the barn as a dwellinghouse, would provide supplementary income to support the business in the same way that the conversion of the other buildings at Hole Street Farm did. It is also supported by Policy DM3 as a form of diversification and has been designed in such a way that it is not considered to cause adverse impacts upon the wider countryside or historic environment. It is strongly put forward that the potential alternative commercial uses would have adverse impacts upon the wider countryside, the Conservation Area and listed buildings due to the extent of parking, potential for outside storage requirements and intensity of Class E or B8 uses.
- 7.26. The diversification into residential letting or sale would not only allow the farm to continue to function and meet all of its overheads, it would also offer some future security.
- 7.27. Due consideration has been given to the general development criteria detailed in Policy DM 14. It is put forward that the proposed conversion of the barn at Hole Street Farm accords with all policies contained within the Development Plan and supplementary planning documents and the submission contains enough information to determine the application in line with points 1, 2 and 3 of the policy.
- 7.28. In line with point 4, the proposal seeks to convert existing built form which is an inherently sustainable concept. The use of renewable technology for heating and hot alongside the barns situation within an area that is not at risk from flooding, seeks to ensure that the development proposal will resist and respond to the threat of climatic change and natural processes.
- 7.29. Point 5 of Policy DM14 seeks to ensure that all development proposals will “...*reflect the positive characteristics and features of the site and locality;*” with point 6 seeking to “*Conserve and enhance the natural and/or built environments taking in to account the desirability of sustaining and enhancing the significance of heritage assets;*” In due regard to these requirements as well as point 7, the barn has been proposed to be converted to a residential use which will respect the surrounding residential uses and historic environment. There are no proposed alterations in scale, form or layout of the barn or its environs with only limited alterations to roof materials and window insertions to ensure a weatherproof envelope, insulation and building control compliance.

- 7.30. The use of the building as a dwellinghouse would retain the positive characteristics and features of the site and Conservation Area locality, ensuring that the heritage assets and landscape are conserved and enhanced and prevent the building from falling into a state of disrepair from continue disuse.
- 7.31. In accordance with point 8 of Policy DM 14, no harm to the adjacent residential amenity will be brought about by this proposal. The use of the barn as a dwellinghouse is compatible with the residential neighbouring uses in comparison to a commercial use with its associated noise, intensity, delivery and parking provisions.
- 7.32. The proposed use and conversion of the building as a dwelling at Hole Street Farm is considered to fully complies with Policy DM 32.
- 7.33. Although the proposal building is not listed in its own right, it is situated and make a positive contribution to the Conservation Area of Kingsdown, especially with the proximity to the oast. Although Kingdowns Conservation Area has not been appraised, it is considered that the re-use of the building would ensure that they it does not fall into a state of disrepair which would detract from the Conservation Area's setting, in accordance with Policy DM 33.
- 7.34. **The Town and Country Planning Act General Permitted Development (England) Order 2015 (as amended)**
- 7.35. As previously set out, the proposal building is situated within the Kingsdown Conservation Area, so cannot benefit from the Class Q permitted development rights which allow for the change of use and conversion of agricultural buildings to a residential use.
- 7.36. To the rear of the proposal buildings, outside of the Conservation Area, there are a number of more modern agricultural buildings which are considered to be suitable and could benefit from the agricultural permitted development rights. It is therefore an important material consideration that slightly to the south of the proposal buildings, five smaller dwellinghouses of up to 100 square metres each could be provided, alongside up to 465 square metres of larger dwellinghouses.

- 7.37. It is therefore put forward that the fact that housing at Hole Street Farm could be provided by the Class Q permitted development rights, is a material consideration that should be given significant weight when considering the suitability of the proposal site for the change of use of the holiday lets to purely a residential use.
- 7.38. It also highlights the main thrust of the government wishes, with the provision of rights which would otherwise allow for the conversion of the barn if it weren't for its position within the Conservation Area.

8. Summary Analysis

- 8.1. The main policy requirement in relation to the rural economy is policy DM3, which requires that rural employment or community facilities are considered before any residential use, unless the site/building is demonstrated as having no demand for such purpose or its use would be undesirable or unsuitable.
- 8.2. Policy DM3 also provides support for the agricultural sector, with the policy setting out that planning permission will be granted for the sustainable growth and expansion of business and enterprise in the rural area, specifically to enable the diversification of a farm in the agricultural sector.
- 8.3. It is strongly put forward that the barn would not be suitable or desirable for a holiday let use given its position within the Conservation Area and proximity of listed buildings and residential uses. The fact that previous holiday let uses were not viable at the site, demonstrates that a tourist use would not be suitable or viable.
- 8.4. It was established by approval 20/500738 that the required income to meet the investment and expenses by the farm cannot be met by the holiday lets and without the rental income that was obtained from the use of the holiday lets as independent unrestricted dwellinghouses, Hole Street Farm would not have been able to continue farming.

- 8.5. This application therefore duly seeks to further diversify the income of the farm by converting a redundant agricultural building and preserve the setting and form of its heritage and historic fabric. This diversification and conversion of buildings to a residential use where a commercial or community use would be undesirable or unsuitable, is supported by Policy DM 3 as well as National Planning Policy which supports the use of redundant farm buildings to create an enhancement to the area.
- 8.6. It is therefore put forward that the conversion use of the barn as a dwellinghouse would provide income to further diversify the farms cattle, sheep and arable income, whilst also making use of an existing heritage asset that makes a positive contribution to the setting of the oast and Conservation Area. This complies with DM3's specific policy requirements.
- 8.7. The restriction of farm diversification also goes against the national policy support that is provided for the rural economy and agriculture that is included within the National Planning Policy Framework.
- 8.8. The social and economic aspects of sustainability place a demand upon the efficient use of buildings, particularly when housing need is in question. Swale Borough Council have a housing shortfall and cannot currently demonstrate a five-year housing supply. Although this doesn't mean that a blanket requirement and green light for housing exists, it does focus the tilted balance of housing provision in favour of delivery where the site is not constrained by landscape designations.
- 8.9. The constraints of the setting of the listed oast and Conservation Area alongside the surrounding residential properties mean that the conversion and use of the barn to a commercial use, would not only be unviable, it would be damaging in scale, visual impacts, layout and form. A commercial use would therefore be unsuitable and undesirable.
- 8.10. It is therefore put forward that the provision of a dwellinghouse within a barn at Hole Street Farm would contribute to the housing requirement across the borough, albeit a small but positive amount. The location of Hole Street Farm has previously been considered to be sustainable and suitable for housing, as the reliance of the occupiers of holiday lets upon cars, public transport, and the accessibility to local services is comparable to single dwellinghouses. The subsequent allowance of these holiday lets as independent unrestricted dwellinghouses demonstrates that a residential use is sustainable and suitable at this location.

- 8.11. It is put forward that it is inherently sustainable to convert the existing building to a dwellinghouse, both in terms of the use of a undesignated heritage asset, support for farm diversification at a local and national level as well as the delivery of a dwelling in a borough with a housing shortfall.

9. Conclusion

- 9.1. This application offers the opportunity to provide Hole Street Farm with a diversified income stream alongside the traditional livestock and arable sales. This diversification is supported by both national and local plan policies. The current redundant use of the building and its location within the Conservation Area and setting of the listed Hole Street Oast, mean that a commercial use is not suitable or desirable coupled with the close proximity of existing residential uses.
- 9.2. The National Planning Policy Framework requires that under utilised land and buildings should be brought back in to use and that these assets can be used to provide much needed homes. The National Planning Policy Framework also gives policy support to the conversion of redundant or disused buildings where this would enhance their setting. These policy requirements coupled with the overarching support for agricultural diversification and sustainable development at a national level and through Policy DM3 should set the scene for the approval of this application.
- 9.3. The National Planning Policy Framework also requires that Swale Borough Council can demonstrate and provide a five year housing supply. As Swale cannot demonstrate this, the balance tips in favour of approving housing development proposals where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the National Planning Policy Framework as a whole.
- 9.4. The conversion of the building as a dwellinghouse is inherently sustainable, given the use of existing built form. It is concluded that the conversion would not create any adverse impacts upon the amenity of neighbouring occupiers and would conserve and enhance the Conservation Area and listed buildings. It is therefore considered that there would not be any adverse impacts that would significantly and demonstrably outweigh the benefits of the provision of a dwellinghouse and the support for a farm business that would be brought about by this development.

- 9.5. It is respectfully concluded that this application should be approved, to allow Hole Street Farm to continue to survive, diversify its income stream and contribute to the housing shortfall across the borough.