



## SUPPORTING STATEMENT

Prior Notification of the change of use of building and land within it's curtilage from a use as an agricultural building to a residential dwelling and reasonably necessary building operations to facilitate such use, in respect of Class Q of the Town and Country Planning (General Permitted Development) (England) (Order) 2015 (as amended) at:

Building at Primrose Hill Farm, Hemingstone, Suffolk,  
IP6 9RL

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## 1.0 Introduction

1.1 This statement is prepared in support of a prior notification application in respect of the conversion of an agricultural building on land at Primrose Hill Farm, Hemingstone.

1.2 The development proposed is the conversion of the building to a residential dwelling.

1.3 The extract below shows the location of the site relative to nearby development and the village of Hemingstone.



1.4 The application is supported by plans prepared by Bright Architecture, a Phase 1 Land Contamination Assessment, Preliminary Ecological Appraisal, Flood Map for Planning extract and a Structural Survey.

## 2.0 The Site

- 2.1 Primrose Hill Farm lies in a remote position some distance to the east of Main Road. It is accessed via an access track that serves a group of dwellings lying close to Main Road and which then continues into the farm.
- 2.2 In the 1980s/early 1990 permissions were sought to use some of the buildings here as an animal boarding facility along with an associated retail outlet. The rest of the buildings remained in agricultural use. The animal boarding facility has ceased use some time ago, and some of the buildings previously used for that purpose were demolished as part of an approved proposal in 2017 for the conversion of buildings on the site to a residential dwelling.
- 2.3 The building that is the subject of this proposal is a former piggery building located within the group of buildings at Primrose Hill Farm. The structural appraisal which accompanies this application describes the building as:

*“The building is a detached single storey timber framed barn built circa 1960s. Previously used as a pig shed and currently used for storage of agricultural machinery. The building construction generally comprises of timber framed portals of 9.0m span x 4.0m high spaced at 4.0m centres with corrugated profile asbestos cement roof cladding. There are internal studwork partitions spaced at 6.0 maximum centres. The external walls are timber framed panels on 140mm thick x 1200mm high concrete blockwork dwarf walls. The internal floor is concrete ground bearing slab”*

- 2.4 The building and land lies outside of any specific landscape designation and is not within a Conservation Area. It is not a listed building.
- 2.5 The site lies within Flood Zone 1, is not within close proximity to any noise generating uses, benefits from lawful and active vehicular access and is not known to be contaminated.

### **3.0 The Proposal**

- 3.1 The proposal is to convert the building to a single residential dwelling, under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 3.2 Details of the conversion are shown within the submitted drawings and associated documents. Works to the building are limited to works that are reasonably necessary to enable the building to function as a dwellinghouse, and do not include structural works.
- 3.3 Accommodation is set out across a single level and provides a kitchen/dining space, living room two bedrooms with ensuite facilities and associated storage and utility spaces.
- 3.4 Car parking is proposed adjacent to the building, served directly off the access drive.

### **4.0 Planning Considerations**

- 4.1 Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 provides for the use of agricultural buildings as dwellinghouses subject to a number of criteria. Class Q has been amended (as of 6<sup>th</sup> April 2018 and August 2020) and the new criteria will now be considered in detail.
- 4.2 The restrictions as to when Class Q does not permit development, and how the proposed development responds to those, is considered below:
- The site is in agricultural use and has not been used for any other purpose;
  - The cumulative floor space of the building changing use under Class Q within this established agricultural unit does not exceed 465 square metres;
  - The cumulative number of separate dwellinghouses developed under Class Q within the established agricultural unit would not exceed 3 (or 5 smaller dwellinghouses);
  - The site is not occupied under an agricultural tenancy;
  - 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;

- The development would not result in the external dimensions of the building extending beyond the external dimensions of the existing building at any point;
- The development under Class Q (together with any previous development under Class Q) would not result in a building or buildings having more than 465 square metres of floor space having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order;
- The development under Class Q(b) would 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 building 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);
- The site is not on article 2(3) land;
- The site is not, nor does it form part of—
  - (i) a site of special scientific interest;
  - (ii) a safety hazard area;
  - (iii) a military explosives storage area;
- The site is not, nor contains, a scheduled monument;
- The building is not a listed building.

4.3 As such, none of the specific restrictions set out in Class Q would restrict the development from being permitted.

4.4 Paragraph Q.2(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) confirms that the Council's consideration of the Class Q(a) Prior Notification procedure is limited to:

- a) Transport and highways impacts of the development;
- b) Noise impacts of the development;
- c) Contamination risks on the site;
- d) Flooding risks on the site;

- e) Whether the location or siting of the buildings makes it otherwise impractical or undesirable for the buildings to change from an agricultural use to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes order;
- f) The design or external appearance of the buildings, and;
- g) The provision of adequate natural light in all habitable rooms of the dwellinghouses.

#### Transport and Highways Impacts of the Development

- 4.5 The site benefits from an established vehicular access, and this would be utilised for the new dwelling also.
- 4.6 The image below shows the access point with the site located outside of the image.



- 4.7 The proposal would result in an additional dwelling which would utilise the existing access to the site. The resultant traffic from the provision of one additional dwelling would not be such that would give rise to any highway safety impacts, and needs to be balanced in the context



of the removal of this building from agricultural use where the building and site could be/has been subjected to larger vehicles than those which would access the residential dwelling.

- 4.8 The existing access is safe and suitable for the additional use. It benefits from significant visibility in both directions due to the straight nature of the road outside the site and the extensive grass verges along the roadside edge. There would be no requirement for the cutting back of vegetation here to preserve appropriate splays as the verges are unobstructed.
- 4.9 For the reasons given above, the proposal complies with this part of Class Q.

#### Noise Impacts

- 4.10 There are no adjacent uses such as intensive livestock sheds or farm workshops which would expose the converted building to any risk of noise disturbance. Furthermore, the use of the building as a dwelling will cause no material impact on any other adjacent uses. Part of the site was previously in use for boarding kennels, but that use has long since ceased.
- 4.11 The site lies in a countryside setting where the primary noise source is vehicle noise from the adjacent roads. The road is a considerable distance from the barn and there would be no resultant noise impacts from that which would warrant refusal of this proposal. Furthermore, it is recognised that there are no industrial uses for some distance, thereby ensuring that the development would not impact on, nor be impacted by, noisy uses.
- 4.12 The proposal would, therefore, comply with this part of Class Q.

#### Contamination Risks on the Site

- 4.13 The application is supported by a Phase 1 Assessment prepared by Sue Slaven which identifies that the site is not at risk of contamination.
- 4.14 This assessment finds, therefore, that the proposal can be carried out without risk. As such, the proposal is also considered to comply with this part of Class Q.



### Flooding Risks on the Site

- 4.15 The Environment Agency Flood Map and the Council's online mapping system confirm that the building is located within Flood Zone 1 (FZ1), which is land which is not at risk of flooding. The site remains in FZ1 when taking into account climate change. Consequently, the site is not at risk of flooding and, as the development involves the use of an existing building, it will not result in any increase in flood risk elsewhere.
- 4.16 Suitable drainage can be provided on the site, and there is no impediment to delivery of suitable drainage provisions to ensure that the site can be seen to accommodate all of the infrastructure required to deliver suitable drainage.
- 4.17 As such, the proposal does not give rise to any flood risk to future occupants, nor to existing property, and is therefore in accordance with this element of Class Q.

### Suitability of the Location of the Building

- 4.18 Revised Planning Practice Guidance issued by the Government on 5th March 2015 confirms that the consideration of location does not apply a test in relation to sustainability. Instead, the local planning authority can only consider whether the location and siting of the building would make it impractical or undesirable to change to a dwelling.
- 4.19 In this case, there is nothing about the location of the building which would make it undesirable to change to a dwelling. The building could be used as a dwelling without impacting on any interest of acknowledged importance. It is sited close to existing residential properties and on the edge of the village, such that its location would also not be impractical.
- 4.20 As already set out, the site does not lie adjacent to any noisy uses, and this equally applies to any uses that would give rise to undesirable living conditions to future occupants in terms of smell, dust, smoke etc.
- 4.21 The site is neither undesirable nor impractical and, for these reasons, is entirely appropriate for this form of development.

### The Design and External Appearance

- 4.22 Class Q permits works including the installation or replacement of windows, doors, roofs, or exterior walls, or water, drainage, electricity, gas or other services, to the extent reasonably necessary for the buildings to function as dwellinghouses; and partial demolition to the extent reasonably necessary to carry out those building operations.
- 4.23 The proposed alterations are limited to the installation of windows and doors to the exterior facades and some internal subdivision to form rooms. None of these works would go beyond the existing dimensions of the building at any stage. The submitted plans show the nature of the alterations proposed to the building and these are considered to provide a pleasing and sensitive conversion of the building such that meet the design aspirations of the NPPF.
- 4.24 There is, therefore, nothing about the design or external appearance of the proposed works that would conflict with the provisions of Class Q

### The Provision of Adequate Natural Light

- 4.25 All habitable rooms in the proposed dwelling will have access to natural light, with windows available to all main aspects.

### Ecology

- 4.26 Whilst not a matter that is listed for consideration under Class Q, the Council has a duty to consider the impacts of development on protected species and habitat. In this regard, the building is a relatively modern building that demonstrates no visible signs of occupation by bats or barn owls. The application is supported by a Preliminary Ecological Appraisal that fully addresses the ecological aspects of this proposal.
- 4.27 As such, it can be concluded that there is no evidence of use by any species which would preclude the conversion of the building in the manner proposed.

### Suitability for Conversion

- 4.28 The application is supported by a structural report prepared by RKM Consulting Building & Structural Engineers. This finds the building capable of conversion and thereby suitable for consideration under Class Q. No works are proposed that are requisite for structural stabilisation nor is there any requirement for underpinning or frame reinforcement.
- 4.29 In light of these findings, it can be seen that the proposal meets with each and every one of the criteria set out in Class Q, and does not give rise to any concerns with respect to the matters for which prior approval is required.

### **5.0 Conclusion**

- 5.1 The proposal seeks approval for the conversion of this agricultural building to a single dwelling under Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.
- 5.2 The proposal has been tested against the provisions of Class Q and has been found to be acceptable in terms of the highway and transport impacts, noise impacts, contamination and flooding risks, the suitability of the location and the design and external appearance of the building.
- 5.3 The building has been demonstrated to be of solid construction and capable of conversion. The proposal is not restricted by the elements of Class Q which preclude the principle of a change of use of the building.
- 5.4 For all of these reasons, the proposal accords with Class Q and it is requested that the Local Planning Authority confirm this position accordingly.