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PRE-APPLICATION PLANNING STATEMENT

For

**CHANGE OF USE OF BARN AND ASSOCIATED LAND TO 1 RESIDENTIAL
PROPERTY, EXTENSIONS AND ALTERATIONS - ASSOCIATED LISTED
BUILDING CONSENT**

At

**BARN AND CART SHED AT GREAT RYE FARM TO WEST OF FARMHOUSE, RYE
COMMON, ODIHAM, HOOK, RG29 1HT**

**D&M REF: 064/23/MS
October 2023**

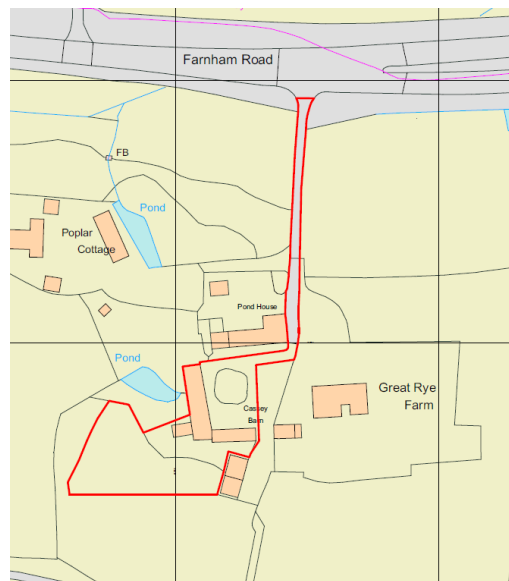
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1.0 INTRODUCTION

- 1.1 This Pre-Application Planning Statement is submitted on behalf of our client and seeks pre-application views in support of this comprehensive proposal relating to the barn at Great Rye Farm, Rye Common, Odiham and its associated land.
- 1.2 The pre-application scheme is for the change of use of the building and the land to a single residential property as well as proposed alterations and extensions. The proposal would result in a single five bedroom property.
- 1.3 The application site, as shown on the plan below, is located to the south of Farnham Road and includes a barn, cart shed, former stables and field shelters as well as associated land.



- 1.4 The building was entered into the Historic England Listing (Grade II) in June 1987. The listing describes it as:
- C18. 5 bays with aisle on west side, and attached 3 bay cart shed to the north. Timber-frame on brick base wall, truss has curved braces and struts, Queen post frame in cart shed. Weather boarded walls. Half-hipped roofing in corrugated iron.*
- 1.5 The history of the barn for its original agricultural purpose is still visible. It is now, however, redundant for this agricultural use. A combination of factors including the size of the holding, the decrease in profit from farming, modern farming practises and cost of

adaptation have prevented it from being reasonably needed for such purposes or any other rural enterprise and it has instead now been used for ad-hoc storage by the occupiers of the Farmhouse at Great Rye Farm.

- 1.6 As will be apparent to officers during the course of a site visit, the building is clearly in need of repairs. Whilst some modern additions have been undertaken, including some breeze block, the timber frame remains intact but is at risk from exposure to the elements etc. Owing to a range of factors there is no reasonable prospect that the barn would be used for an agricultural purpose and under its current use would not benefit from the investment required for its upkeep. It is therefore proposed that the use of the building as a five bedroom residential property would provide a use that justifies the works and its ongoing maintenance.
- 1.7 We are therefore seeking pre-application advice on both the wider planning considerations and principles and the detailed listed building elements.
- 1.8 This pre-application submission specifically seeks the Council's comments on the following matters.
- a) The principle of development – namely whether the Council agrees this represents the most viable use for the site and with regards to the location of the development.
 - b) The suitability of the proposed layout and design approach particularly within the historic context of the site.
 - c) The acceptability of the access within the scheme both onto the highway and with regard to the arrangement with neighbouring properties/land entry.
 - d) The Council's comments regarding the impact of the proposal on neighbouring properties.
 - e) The Council's view on the proposed external and internal amenity provision.
 - f) The Council's comments regarding the proposed parking and cycling arrangement and provision of space for bins etc.
 - g) Notwithstanding what we believe to be the heritage assets likely to be affected by the proposal, that may need to be addressed as part of a full application.
 - h) Views regarding the level of detail provided for the heritage statement and plans relevant for the listed building consent – whether more should be shown as part of the application stage.
 - i) Whether, from a heritage perspective, there is any suggested alterations or approaches that would be encouraged.

- j) The Council's views on whether additional supporting information is required and justified for the application.
- k) Comments regarding the mitigation of the impact on the Thames Basin Heath.
- l) Requirements in terms of the level of detail required to accompany a submission to minimise the number of pre-commencement conditions.
- m) Advice on the formal planning application documents in light of the Council's current and adopted Local Requirement List.
- n) Whether officers and the Council could support the development and any amendments that may be required.

1.9 This pre-application submission is accompanied by the relevant forms, appropriate fee and supporting evidence and drawings.

1.10 The following documents are included with the submission:

- Existing and Proposed Plans prepared by Stedman Blower Architects
- Heritage Assessment prepared by Jo Evans of RPS Group
- Ecology Report from Darwin Ecology

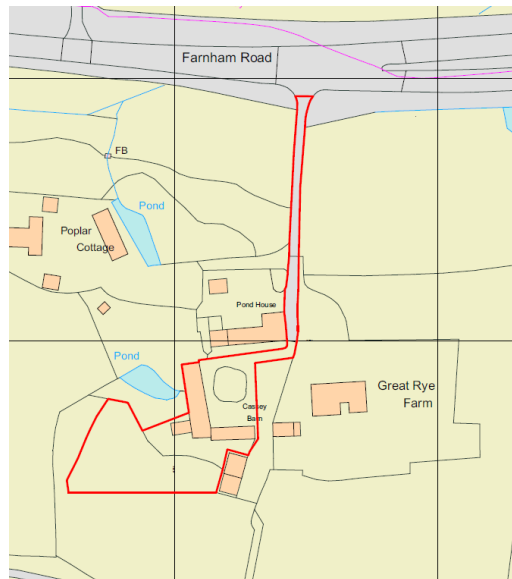
1.11 The aim of this pre-application is to allow for positive and proactive dialogue with the Council to allow for a fully supported planning application to eventually come forward which will provide the needed investment into the Grade II Listed Building.

2.0 EIA STATEMENT

- 2.1 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571) Part 2 4(3), the development scheme has been ‘self-screened’ to ascertain whether the proposed development comprises a project subject to EIA Regulations 2017.
- 2.2 The proposed development does not comprise of development within Schedule 1 of the EIA Regulations 2017. The development could be considered to comprise of development contained within Schedule 2 Column 1 10B development contained namely Infrastructure Projects and “Urban Development Projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas”. However, the development does not meet the applicable thresholds and criteria within Column 2 of Schedule 2 as amended within The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (2017 No. 571):
- (i) The development includes more than 1 hectare of urban development which is not dwelling house development; or
 - (ii) The development includes more than 150 dwellings; or
 - (iii) The overall area of the development exceeds 5 hectares.
- 2.3 The proposal would result in the creation of a single residential property with associated works on a land which is less than 5 hectares in total. The proposal would therefore fall well within the above thresholds. We would welcome confirmation that the Council concurs and that there is no need for a screening opinion.
- 2.4 The proposal is considered not to result in a significant effect upon the environment and does not meet criteria contained within Schedule 3 of the EIA Regulations 2017 or result in a variation/amendment to a previous EIA development nor taken in conjunction with other development is it likely to have a significant environmental effect.
- 2.5 On this basis, the proposal would not represent EIA development in accordance with the Regulations 2017.

3.0 DESCRIPTION OF SITE AND LOCALITY

- 3.1 The site, as shown on the location plan below, is located to the south of Farnham Road and measures approximately 0.28ha. It is set back from the main highway by virtue of a shared access track and forms part of a historic farmstead. The farmstead includes the Grade II Listed Farmhouse to the east and the converted Grade II Listed Barn to the north.



- 3.2 The land includes the main barn and cart shed, attached stables, field shelters and land to the south and west. A courtyard to the front with a focal tree is also present.
- 3.3 The building is an 'L' Shaped Grade II Listed Building having been first entered into the listing in June 1987. The main barn is timber framed with a brick base wall and incorporates trusses with curved braces and struts. The roof is made of corrugated metal. The cart shed is to the north and sits marginally lower than the main barn; it includes a Queen post frame. The building is largely clad in weather boarded timber.
- 3.4 The base of the 'L' includes a more recently added former stabling building with concrete roofing and brick construction. It includes the stable doors though is now used for storage purposes by the occupiers of the Farmhouse.

- 3.5 There is a utilitarian field shelter to the immediate west of the main barn – this is proposed for demolition.
- 3.6 Beyond the surrounding farmstead the land is predominately rural in character consisting of various fields. The land associated to Great Rye Farm being circa 4.8ha.
- 3.7 There are some residential properties in the area including those to the west along Calf Lane and those within Mill Lane to the east.
- 3.8 There are limited public transport provisions within the area with the nearest bus stop being by Mill Lane. Mill Lane itself includes some amenity provision in the form of the BP service station which also hosts a Marks and Spencer’s provision.
- 3.9 The two neighbouring listed buildings, Great Rye Farmhouse and the Barn, have undergone more recent building work including the conversion of the barn and the extension of the farmhouse.
- 3.10 There is a further cottage located between this site and the farmhouse. To the south, outside of the application site, there is also a pole barn used for the storage of items for the maintenance of the land such as timber posts etc.

4.0 PLANNING HISTORY

- 4.1 There is no relevant planning history for the buildings subject of this pre-application. There is evidently planning history for both the Farmhouse and the Barn to the north; we do not consider these relevant to the proposal now before officers and would welcome confirmation of such.

5.0 PLANNING POLICY AND GUIDANCE BACKGROUND

5.1 It is understood that the site is subject to the following planning opportunities/constraints:

- Grade II Listed Building
- Setting of 2 x Grade II Listed Buildings
- Countryside Location
- Thames Basin Heath 5km buffer zone

5.2 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 38(3) states that the Development Plan includes and any other Development Plan documents.

Development Plan

5.3 The main planning policy document background comprises the National Planning Policy Framework issued in 2023, the Council's Sutton Local Plan (2018), and the Hart Local Plan (Strategy and Sites) adopted April 2020.

Hart Local Plan

5.4 The relevant local plan policies are considered to be:

- SD1: Sustainable Development
- SS1: Spatial Strategy and Distribution of Growth
- H1: Housing Mix: Market Housing
- H6: Internal Space Standards for New Homes
- NBE1: Development in the Countryside
- NBE2: Landscape
- NBE3: Thames Basin Heaths Special Protection Area
- NBE4: Biodiversity
- NBE7: Sustainable Water Use
- NBE8: Historic Environment
- NBE9: Design
- NBE10: Renewable and Low Carbon Energy
- INF1: Infrastructure

- INF2: Green Infrastructure
- INF3: Transport
- INF6: Broadband or Successor Services

5.6 The site is within the Odiham and North Warnborough Neighbourhood Plan area wherein the following policies are of relevance:

- 1 – Spatial Plan for Parish
- 5 – General Design Principles
- 12 – Natural Environment

5.7 The following documents are also considered to be of relevance to the proposal.

- Parking standards
- Biodiversity – technical note
- Thames Basin Heath Special Protection Area Delivery Framework
- Planning technical advice note – privacy, daylight and sunlight
- Planning (Listed Buildings and Conservation Areas) Act 1990
- NPPG

National Planning Policy Framework

5.8 The National Planning Policy Framework has recently been updated, 2021. There is a presumption in favour of sustainable development.

5.9 Paragraph 7 of the NPPF states:

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

5.10 It goes on to state that there are three dimensions to sustainable development: economic, social and environmental, and these roles should not be undertaken in isolation, because

they are mutually dependent. We will demonstrate as part of any formal submission the proposal would comply with all three aspects of sustainable development.

5.11 The most relevant sections of the NPPF 2019 are considered to be as follows, and will be referred to in any formal planning submission:

- Section 2- Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment

5.12 Section 2 relates to achieving sustainable development. It outlines the three key objectives of such: economic, social and environmental. It states that Local Planning Authorities should apply a presumption in favour of sustainable development. It is contended that the proposed development would contribute towards these three key objectives. The development would introduce employment during the construction phase; it would provide housing; the development would be of a high-quality design and provide environmental and landscape benefits.

5.13 Section 4 encourages Council's to engage with early pre-application engagement as it offers significant potential to improve the efficiency and effectiveness of the planning application system.

5.14 Section 5 states that it is the Government's objective to significantly boost the supply of homes. To deliver this it requires Council's to identify the appropriate housing need for the district and to establish an appropriate buffer. Although the Council can demonstrate a five year housing land supply this, nevertheless provides, needed housing.

5.15 Section 8 of the NPPF states that planning policies and decisions should aim to achieve healthy, inclusive and safe places. Planning should promote social interaction, safe and

accessible developments and enable healthy lifestyles. The proposed development has been designed to provide safe and inclusive access with high quality external space.

- 5.16 Section 9 requires development to promote sustainable transport. It is acknowledged that occupiers of the dwelling would be largely reliant on private motor vehicles, however, given the other material considerations we consider this to be justified in this location.
- 5.17 Section 11 encourages development to make appropriate and effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment. The proposed development has been designed to be of an appropriate density given the location and the historic features of the building.
- 5.18 Section 12 deals with good design. At the core of the NPPF is the importance of delivering high-quality design. It is contended that the development is of a high-quality and appropriate design given the context and constraints of the site. As part of the pre-application, we are looking specifically for the view of officers on the design.
- 5.19 Section 14 requires development proposals to support the transition to a low carbon future and be proactively planned to mitigate and adapt to a changing climate. The development would seek to optimise the potential of the development to meet these demands as is appropriate for a listed building.
- 5.20 Section 15 requires development to conserve and enhance the natural environment. The pre-application is accompanied by an ecology report prepared by Darwin Ecology and includes a number of enhancements. It is noted that the site is also within the 5km zone of influence of the Thames Basin Heath; specific questions on the mitigation are asked in the following sections.
- 5.21 Section 16 sets out that development should conserve or enhance buildings of historic value. The property is a Grade II listed building which is evidently in need of some repairs. The proposal is intended to provide a use which would ensure the building's repair and ongoing maintenance. We are specifically seeking comments on behalf of the Council on this matter and are open to meeting with them on site to discuss.

6.0 POLICY ASSESSMENT AND PLANNING PERMITS

6.1 Having regard to the location and nature of the proposal, and the planning policy background set out above, the principal material considerations are considered to be the following:

- Principle of development
- Housing Land Supply
- Location of development
- Impact on the Heritage Assets
- Design and Appearance
- Standard of Accommodation
- Impact on Neighbouring Amenity
- Highway Impacts
- Impact on Thames Basin Heath
- Ecology/Biodiversity
- Other Matters

Principle of development

6.2 The pre-application submission would result in the change of use of the building and associated land to provide one residential dwelling as well as associated extensions and alterations.

6.3 The building is a Grade II Listed barn and cart store which would have previously been deployed as part of the wider agricultural estate. This estate is now substantially diminished, and it no longer serves any formal agricultural purpose.

6.4 Policy SD1 sets out that the Council will take a positive approach which reflects the presumption in favour of sustainable development, whilst having regard to *the need to assess, and where appropriate, mitigate against, the likelihood of a significant effect on the Thames Basine Heaths Special Protection Area.*

6.5 Polic SS1 sets out that the Council will seek to delivery 423 homes per annum over the plan period. It continues to set out that such provision should come from development

within defined Settlement Boundaries, through Hartland village and through neighbourhood plan allocations.

6.6 It is acknowledged that the site is outside of a settlement boundary and is not allocated. It is therefore within the countryside and policy NBE1 is of relevance. NBE1 is restrictive policy only allow for support subject to certain exceptions; one of these is *converting previously used permanent buildings or redundant agricultural buildings for appropriate uses*.

6.7 Of further relevance, Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that:

In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

6.8 This clearly sets out the responsibility of the local planning authority to protect the character and appearance of a listed building when considering proposal for development which may impact on their special interests.

6.9 Section 16 of the NPPF sets out at paragraph 197 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.

6.10 Paragraphs 199 through to 201 set out the requirements for assessing impact on heritage assets and the balancing of harms and public benefits.

6.11 In terms of the principle of development it is therefore contended that regard needs to be given to both the suitability of the proposal in the countryside location and consideration on the impact to and preservation of the heritage asset.

- 6.12 As we will discuss below, we are seeking specific comments as to whether the Council agree with our conclusion that when regard is given to these factors the conversion of the barn to a residential property is wholly justified and would represent a long term sustainable use for the building ensuring its ongoing maintenance.
- 6.13 We will discuss the location and compliance with the countryside policies below as well as the other matters of principle. We would welcome comments about whether the Council agree that this framework of balancing the location of the development and the requirements to preserve the heritage assessment is appropriate.

Housing Land Supply

- 6.14 The NPPF makes it clear that Councils must be able to demonstrate and sustain at least a 5 year housing land supply. In the event that one cannot be demonstrated then the tilted balance test at paragraph 11 is engaged.
- 6.15 The most recent monitoring report (April 2023) puts the Council's delivery at meeting its target through the period indicates it is equivalent to 10.8 years over double the minimum requirement, and a small reduction from the 10.9 referenced in December 2022.
- 6.16 Although there is a supply in excess of the five year minimum we would highlight that this is a minimum requirement and not a maximum. We would also highlight that in 2026/2027 and 2027/2028, 50 units per annum are identified as being from windfall development. The proposal would constitute one such provision and would therefore help to contribute to the housing land supply of the borough.
- 6.17 We would welcome comments if there have been any changes to this position by the Council.

Location of Development

- 6.18 Policies SS1 of the Development Plan seeks to direct new housing towards the major settlements within the district, the new village and sites allocated within neighbourhood plans. By inference it seeks to avoid housing in the countryside.
- 6.19 The application site is located outside of any defined settlement boundary. The closest settlement boundary being that identified at Mill Lane to the west. Mill Lane has been identified as a Tier 5 smaller village within the development plan.

6.20 Although a short distance from Mill Lane and the provision of the BP Petrol Station, it is acknowledged that in recent appeal¹ proposals for housing outside of the identified settlement boundary have been found to be reliant on the private car. Consequently, Inspectors have concluded that those sites are not in a sustainable location for housing when regard is given to the development plan as a whole particularly the requirements of SS1. As the Council can demonstrate a housing supply in excess of five years SS1 carries full weight.

6.21 Within countryside locations policies NBE1 of the Local plan is applicable. This states:

Development proposals within the countryside (the area outside settlement policy boundaries and designated Strategic and Locally Important Employment Sites, as defined by the Policies Map) will only be supported where they are:

- a) meeting the proven essential need of a rural worker to live permanently at or near their place of work; or*
- b) providing business floorspace to support rural enterprises (Policy ED3); or*
- c) providing reasonable levels of operational development at institutional and other facilities; or*
- d) providing community facilities close to an existing settlement which is accessible by sustainable transport modes; or*
- e) providing affordable housing on rural exception sites (Policy H3); or*
- f) providing specialist housing (Policy H4); or*
- g) providing either a replacement dwelling, an extension to an existing dwelling or the subdivision of an existing residential dwelling; or*
- h) converting previously used permanent buildings or redundant agricultural buildings for appropriate uses; or*
- i) are for a replacement building that is not temporary in nature, or for an extension to an existing building, provided that the proposal does not require substantial rebuilding, extension or alteration; or*
- j) located on suitable previously developed land appropriate for the proposed use; or*
- k) proposals for small scale informal recreation facilities such as interpretation centres and car parks which enable people to enjoy the countryside; or*
- l) To secure the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets (Policy N BE8); or*

¹ APP/N1730/W/22/3292887 & APP.N1730/W/22/3302554

- m) Of exceptional quality or truly innovative in design and which significantly enhances its immediate setting and is sensitive to the local character; or*
- n) For traveller sites that comply with Policy H5*

- 6.22 It is contended that the proposal would potentially fall within exception h) or l) of NBE1, namely that it would constitute the converse of a redundant agricultural building that would secure the future of the heritage asset.
- 6.23 We note that in the above referenced appeal decisions, whilst some of the exceptions may have been applicable, the respective Inspectors still gave regard to the spatial strategy of the Council. At this juncture we would highlight that both exceptions referenced in those appeals (h and j) refer to appropriate uses, unlike such exception l) does not. Accordingly, even if it is concluded that the site would rely on private motor vehicles exception l) allows for such eventualities.
- 6.24 Having regard to the above it is our consideration that the location of the development, despite being in the countryside, is acceptable. To this extent we ask whether officers agree with such, namely that the exception at point l) does not infer reference to the suitability of the proposed use (though we accept this is also fundamentally part of the heritage assessment). We would welcome comments on the suitability of the location in light of the proposed development.

Impact on Heritage Assets

- 6.25 The pre-application is accompanied by a heritage statement prepared by Jo Evans of RPS Group. This outlines in detail the relevant legislative and policy framework as well as an assessment of the impact of the proposal on the various heritage assets. We do not seek to repeat these points but will provide points we are seeking specific comments on within this statement.
- 6.26 As identified, the building subject of this application is a Grade II Listed Building and forms part of a farmstead of other Grade II Listed Buildings including the converted barn to the north and the farmhouse to the east. There is a further cottage in the farmstead which is not listed.
- 6.27 The barn and cart store remain clearly in its agricultural form and, as will be apparent to officers during the course of a site visit, is evidently in need of repairs for its long term

preservation. There are dropped timbers, gaps within the weatherboarding, holes in the roof etc which has left the building exposed to the elements.

- 6.28 By contrast the lower profile former stables has been used as storage for the benefit of the occupiers of the Farmhouse. These remain in reasonable condition but based on the form and the materials within the construction it is not of the same age as the main part of the building.
- 6.29 As is common across the country the agricultural need for such buildings has significantly diminished. Not only has the farm holding been reduced, but with the reduction in subsidies and market conditions there is fundamentally less money to be made in farming. The size of the wider holding is 4.8 ha which would not lend itself to any commercial farming practices. We ask if the Council recognise such an analysis of modern agricultural practices and agree that the holding would not be viable for such purposes.
- 6.30 Additionally, the building is not of an appropriate size of form for any modern day agricultural machinery that could otherwise be stored within the building and used as part of any other farm holding. Even if such a use was found the building would require significant investment to ensure it was suitable for such purposes (weathering and security etc).
- 6.31 Having regard to the above it is our conclusion that there is no reasonable prospect that the buildings could be used for any agricultural purpose. We ask if the Council agree with such a conclusion.
- 6.32 Regard has also been given to the prospect of alternative rural uses as part of a program of agricultural diversification for example as an equestrian enterprise such as a livery. Whilst the land might be of sufficient size for a small scale enterprise the barn and cart store themselves are not of a suitable layout for stabling and therefore additional buildings would be required to accommodate such; this is notwithstanding the need for a sand school etc. Accordingly, whilst this may provide a use for the land it would not provide a reasonable use for the whole of the building in question.
- 6.33 Consideration has also been given as to whether the buildings could be repaired and used for purposes ancillary to the farmhouse. This would still result in the need for significant repairs and for the change of use to residential purposes albeit as an extension of the farmhouse. Whilst this may not result in the formation of a new planning unit the required works would continue to be extensive and highly unlikely to see any return on investment.

We have therefore dismissed this consideration as there would not be a justifiable economic reason for such investment.

- 6.34 We ask at this juncture if the Council agrees with the assessment of the above and the establishment that these options are unlikely.
- 6.35 Having regard to the above it has been concluded that the only viable use, which therefore forms its optimal use, is the conversion of the building into a single family dwellinghouse. The dwellinghouse must be of the appropriate size, layout and form to justify the expense incurred in the proposed conversion and to ensure the long term care for the building to ensure its future. To this extent we contend that the use of the building for a generous family dwellinghouse represents its optimum viable use. We are specifically asking if the Council agree with such a conclusion.
- 6.36 The proposed physical works to the buildings are detailed within the proposed plans and the supporting heritage statement. The aim has been to minimise interventions within the older Barn and Cart Store with those necessary focused into the more recent stable addition. Accordingly, the more private, intimate and smaller rooms such as bedrooms which require partitions are focused in this element. The Barn would remain open providing an open plan living environment with the Cart Store providing additional habitable space and servicing.
- 6.37 In order to minimise interventions to the older aspect of the building, interventions to the stables include a new dormer, and the lowering of the internal floor to provide suitable bedroom accommodation. Interventions to the barn, other than those necessary, would be largely limited to fenestration. The Cart Store requires more repairs, but this is proposed to be undertaken in a sympathetic manner retaining much of the character of the building.
- 6.38 As part of this pre-application submission we ask whether the Council are satisfied by the proposed works and the level of detail provided or whether further is required. We would specifically ask that officers and the conservation officer (or assistant) come to the site to talk through the works so that a greater appreciation of the building and the requirements are fully explored prior to the submission of a formal application.
- 6.39 We are happy to discuss the proposal with officers during the course of the pre-application process to reach a mutually agreed design that allows for the needed investment into the building. We would also ask, having regard to the NPPF, what level of harm is identified and comments regarding the public benefits and the relevance balancing exercise.

Design and Appearance

6.40 We acknowledge that the design and appearance of the development will be inherently linked to the suitability of the proposal from a heritage perspective. We have for the purposes of this pre-application separated the two as we contend it will allow for a division between the heritage principles (i.e., optimum viable use) and the design details. We would ask that officers treat the response the same so as to allow for clarity of understanding when issuing their response.

6.41 Policy NBE9 sets out:

All developments should seek to achieve a high quality design and positively contribute to the overall appearance of the local area.

Development will be supported where it would meet the following relevant criteria:

- a) it promotes, reflects and incorporates the distinctive qualities of its surroundings in terms of the proposed scale, density, mass and height of development and choice of building materials. Innovative building designs will be supported provided that they are sensitive to their surroundings and help to improve the quality of the townscape or landscape;*
- b) it provides or positively contributes to public spaces and access routes and public rights of way that are attractive, safe and inclusive for all users, including families, disabled people and the elderly;*
- c) the layout of new buildings reinforces any locally distinctive street patterns, responds to climate change, and enhances permeability by facilitating access by walking or cycling modes;*
- d) it respects local landscape character and sympathetically incorporates any on-site or adjoining landscape features such as trees and hedgerows, and respects or enhances views into and out of the site;*
- e) it protects or enhances surrounding heritage assets, including their settings;*
- f) it includes sufficient well-designed facilities/areas for parking (including bicycle storage) taking account of the need for good access for all users;*
- g) the design of external spaces (such as highways, parking areas, gardens and areas of open space) should be designed to reduce the opportunities for crime and anti-social behaviour and facilitates the safe use of these areas by future residents, service providers or visitors, according to their intended function;*

- h) the future maintenance and servicing requirements of buildings and public spaces have been considered, including the storage and collection of waste and recycling;*
- i) it reduces energy consumption through sustainable approaches to building design and layout, such as through the use of low-impact materials and high energy efficiency;*
- and*
- j) it incorporates renewable or low carbon energy technologies, where appropriate.*

Development proposals should demonstrate compliance with the above criteria through a Planning Statement or a Design and Access Statement (where one is required), submitted alongside a planning application.

Proposals must also demonstrate that they have taken account of any local supplementary guidance (such as any local town or village design statements, design codes or conservation area appraisals) and design related policies in Neighbourhood Plans.

- 6.42 Policy 5 of the Neighbourhood Plan also sets out a number of design principles.
- 6.43 The detailed design considerations are set out within the proposed plans. The plans have been developed by Stedman Blowe Architects, a well-respected architectural practice, who have undertaken a number of similar projects within Hampshire and the surrounding counties. The design approach is identified within the supporting statements but essentially it is to minimise intrusion to the more open barn and consolidate divisions within the former stables.
- 6.44 It is proposed that some of the detailing within the works is contemporary in nature including the large dormer, fenestration detailing etc. This provides a juxtaposition of form which we contend elevates the retained and preserved historic features of the barn whilst respecting the wider farmstead.
- 6.45 We are seeking dialogue on the design approach and would welcome a discussion on site to discuss the merits of such.
- 6.46 Externally it is proposed that the building would be separated from the remainder of the farmstead courtyard by way of a post and rail fencing with 5 bar gate. The courtyard would remain simple and uncluttered, retaining the grass turnaround and the tree. The hardstanding will remain largely as it is though there will be a need for utilities to be provided.

- 6.47 The remaining rear garden is intended to be a mixture of soft and hard landscaping to provide a usual garden space with various areas though full details we would anticipate being forthcoming at a condition stage further to the grant of permission.
- 6.48 As set out we welcome and are expressly seeking comments of the Council's officers on the design approach and the detail.

Standard of Accommodation

- 6.49 Policy H6 of the Development Plans states that:

Where planning permission is required development proposals for new homes must meet the nationally described space standard.

- 6.50 The Government set out minimum space standards in 2015. This includes both an overall measurement as well as internal bedroom sizes.
- 6.51 The overall size would exceed even the highest measurement within the guidance and accordingly as overall space would easily comply with these standards.
- 6.52 The proposal would include 2 double bedrooms, both of which exceed the minimum standards for a bedroom, and 3 additional bedrooms all larger than the minimum 7.5sqm.
- 6.53 Furthermore, more than 75% of the building would exceed the internal height of 2.3m referenced within the space standards.
- 6.54 Every habitable room would also benefit from natural light being provided by windows. These windows are also on multiple aspect providing opportunity for air flow.
- 6.55 Externally the property would be provided with a generous garden providing ample room for quiet enjoyment and for provisions such as laundry etc.
- 6.56 We would welcome confirmation that officers agree that the standard of accommodation would exceed the minimum standard expected.

Impact on Neighbouring Amenity

- 6.57 Paragraph 130 f) of the NPPF states that decisions should ensure that development provides a high standard of amenity for existing and future users.
- 6.58 Various policies within the plan seek to protect amenity of neighbouring properties. In this instance there are three such properties: the cottage, the farmhouse and the converted barn.
- 6.59 Save from the dormer there is very little alterations proposed to the building that would add to its overall scale, bulk or mass. The result being that there would unlikely be any impact by reason of overbearing, overshadowing, or loss of light to these neighbours. It is therefore our contention, and we seek the view of officers here, that the only harm would be by way of the proposed use and the potential impacts including privacy, noise and disturbance.
- 6.60 In terms of privacy the proposal would be well-separated from the main Farmhouse to prevent a material loss of amenity. There would be no windows serving habitable rooms angled toward The Cottage with the closest room in this location being a bathroom; any views would be oblique.
- 6.61 Towards the previously converted barn the closest windows would be those within the first floor of the Cart Store. The rooflight to the bedroom would be at an oblique view and vaulted to prevent any overlooking. The window to the bathroom would be fixed shut and obscurely glazed.
- 6.62 We therefore contend there would be no harm by way of a loss of privacy to neighbouring properties and seek officers' confirmation of such.
- 6.63 In terms of the disturbance from the introduction of the residential use it is our consideration that given the limited size of the development as a single dwellinghouse this would not result in significant harm by way of noise or disturbance. We again welcome officers' comment on the matter.

Highway Impacts

6.64 The NPPF advises at paragraph 111 that development should only be refused on highways grounds if there would be *an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*

6.65 Policy INF3 of the Development Plan states:

Development should promote the use of sustainable transport modes prioritising walking and cycling, improve accessibility to services and support the transition to a low carbon future.

Development proposals will be supported that:

- a) integrate into existing movement networks;*
- b) provide safe, suitable and convenient access for all potential users;*
- c) provide an on-site movement layout compatible for all potential users;*
- d) provide appropriate parking provision, in terms of amount, design and layout, in accordance with the Council's published parking standards, or as set out in Neighbourhood Plans;*
- e) provide appropriate waste and recycling storage areas and accessible collection points for refuse vehicles;*
- f) do not have a severe impact on the operation, safety or accessibility of the local or strategic highway networks;*
- g) mitigate impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development; and*
- h) protect and where possible enhance access to public rights of way.*

Development proposals that generate significant amounts of movement must be supported by a Transport Statement or Transport Assessment and will be required to provide a robust Travel Plan

6.66 The proposal would make use of the existing access which serves the other properties in the Farmstead. This access is largely owned by the Council, and we would welcome officer's views on the proposed access arrangement.

6.67 In terms of parking there would be sufficient parking within the courtyard provision to the front of the property. The Council's parking standards indicate that there would be a

need for 3 allocated and 1 unallocated parking space. This would be delivered to the front of the property.

6.68 Provision is also made within the cart shed for bin and bike store.

Impact on Thames Basin Heath

6.69 Policy NBE3 of the Development Plan states:

New development which is considered to have a likely significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (TBHSPA) will be required to demonstrate that adequate measures will be put in place to avoid or mitigate any potential adverse effects.

When considering development proposals for residential or similar forms of development the following principles will apply:

- a) there is an 'exclusion zone' set at 400m linear distance from the TBHSPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone unless it can be demonstrated through an Appropriate Assessment that there will be no adverse effect on the integrity of the TBHSPA;*
- b) there is a "zone of influence" set at between 400m and 5km linear distance from the TBHSPA boundary. Mitigation measures will be required for all net new dwellings and must be delivered prior to occupation and in perpetuity. Measures must be based on a combination of Strategic Access Management and Monitoring (SAMM) and the provision and maintenance of Suitable Alternative Natural Greenspace (S A N G).*
- c) Residential development of over 50 net new dwellings that falls between five and seven kilometres from the TBHSPA may be required to provide mitigation measures. This will be assessed on a case-by-case basis in consultation with Natural England and where appropriate an appropriate assessment may be required to ascertain whether the proposal could have an adverse effect on the SPA.*

The provision of S A N G will meet the following standards and arrangements:

- i) a minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided in perpetuity per 1,000 new occupants;
- ii) developments must fall within the catchment of the SANG that provides mitigation, except developments of fewer than 10 net new residential units.

Where further evidence demonstrates that the integrity of the TBHSPA can be protected using different linear thresholds or with alternative mitigation measures these must be agreed with the Council and Natural England.

- 6.70 The Council's policy mapping indicates that the site is marginally within the 5km zone of influence. This zone of influence is set out as a linear 'as the crow flies' line; the closest area being that to the west. This approach does give regard to considerations that occupiers would need to turn left on to Farnham Lane when exiting the site away from the SPA.
- 6.71 We would ask that the Council provide clarity on how this would be addressed during the planning application stage. We note that the policy requires delivery prior to occupation and would ask whether firstly the likely level of mitigation required and secondly how this would be delivered. We would not give the considerable need to invest into the building any substantial costs prior to commencement would likely inhibit the potential build out, whereas finance can be delivered prior to occupation.

Ecology/Biodiversity

- 6.72 A preliminary Ecological assessment accompanies the submission which identifies that there is no need for further surveys on site though some mitigation is suggested.
- 6.73 We would welcome the Council's view on this matter.

Other Matters

- 6.74 Although not detailed within this submission any construction would be carried out in a sustainable manner utilising energy efficient appliances and fittings. It will also be fitted out with connections to the highest available broadband speed.
- 6.75 We would like to understand at this juncture whether the Council would expect further information upfront on the details of such or whether these would be reserved for condition/building control.

- 6.76 Please also let us know if there are any other considerations you would likely include in the balancing exercise and what information would be required upfront to assist.

7.0 CONCLUSIONS

- 7.1 This pre-application relates to the conversion of the Grade II Listed Barn to the west of Great Rye Farm. The building is evidently in need of substantive repairs, and it is our consideration that the proposed residential use represents the optimum viable use of such a building to secure its long term future.
- 7.2 The pre-application submission proposes necessary internal and external alterations which we contend balance the historic elements of the buildings with the delivery of a suitable modern living environment.
- 7.3 We are seeking pro-active engagement with all departments of the Council to assist with the longer term aspirations for the site and consider this an exciting opportunity to help preserve the historic interest of the listed building.
- 7.4 We would welcome officers and Conservation Officers to an on-site meeting to discuss the proposal at length.
- 7.5 As part of the pre-application we are specifically seeking the views of the Council on the following points as well as those raised in the above sections:
- a) The principle of development – namely whether the Council agrees this represents the most viable use for the site and with regards to the location of the development
 - b) The suitability of the proposed layout and design approach particularly within the historic context of the site
 - c) The acceptability of the access within the scheme both onto the highway and with regard to the arrangement with neighbouring properties/land entry.
 - d) The Council’s comments regarding the impact of the proposal on neighbouring properties
 - e) The Council’s view on the proposed external and internal amenity provision
 - f) The Council’s comments regarding the proposed parking and cycling arrangement and provision of space for bins etc
 - g) Notwithstanding what we believe to be the heritage assets likely to be affected by the proposal, that may need to be addressed as part of a full application

- h) Views regarding the level of detail provided for the heritage statement and plans relevant for the listed building consent – whether more should be shown as part of the application stage
- i) Whether, from a heritage perspective, there is any suggested alterations or approaches that would be encouraged
- j) The Council's views on whether additional supporting information is required and justified for the application
- k) Comments regarding the mitigation of the impact on the Thames Basin Heath
- l) Requirements in terms of the level of detail required to accompany a submission to minimize the number of pre-commencement conditions
- m) advice on the formal planning application documents in light of the Council's current and adopted Local Requirement List
- n) Whether officer's and the council could support the development and any amendments that may be required

7.6 We trust we have provided you with sufficient information, however, should you require additional information please do not hesitate to contact me.

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12.0 APPENDICES