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Dear ██████████

**Stroud District Local Plan Review – Draft Plan for Consultation November 2019 – Delivery Policy DES1**

We write regarding your emerging Local Plan Review but with specific regard to Policy DES1 and associated Policy CP15.

Policy DES1 relates to the conversion of *redundant agricultural or forestry buildings* to an alternative use that are situated outside of existing settlement boundaries. The Policy is generally supportive of their conversion and re-use *subject to* the seven criteria listed in the Policy.

Firstly, it should be recognised that the conversion of existing buildings is supported by National Planning Policy and provides a valuable source of new dwellings to support the delivery of new housing in the country.

Government statistics on ‘Housing supply; net additional dwellings, England: 2018-19’ shows the number of dwellings achieved through change of use amounted to 29,260 during 2018-2019 equating to approximately 12% of the overall housing land supply in England. This figure has doubled since 2013-2014, simply because of more explicit policy supporting the change of use of buildings to other uses.

There remains a need to significantly boost the supply of homes, and the National Planning Policy Framework recognises that a sufficient amount and variety of land is required to come forward to meet this demand. The conversion of existing buildings is one of these sources of housing supply.

In order to assist in boosting the supply of housing from a ‘variety of sources’ the Government introduced a range of permitted development rights to ensure that it was easier to change the use of existing buildings in unrestricted areas to residential uses. Existing uses that can now be changed to residential use include office, light industrial, storage and agricultural uses.

With regard to permitted development rights to change agricultural buildings to residential, the Planning Practice Guidance states:

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

Paragraph: 108 Reference ID: 13-108-20150305

With regard to the meaning of impractical or undesirable with regard to a residential change of use, the Planning Practice Guidance sets out that:

*Impractical or undesirable are not defined in the regulations, and the local planning authority should apply a reasonable ordinary dictionary meaning in making any judgment. Impractical reflects that the location and siting would “not be sensible or realistic”, and undesirable reflects that it would be “harmful or objectionable”.*

*When considering whether it is appropriate for the change of use to take place in a particular location, a local planning authority should start from the premise that the permitted development right grants planning permission, subject to the prior approval requirements. That an agricultural building is in a location where the local planning authority would not normally grant planning permission for a new dwelling is not a sufficient reason for refusing prior approval.*

*There may, however, be circumstances where the impact cannot be mitigated. Therefore, when looking at location, local planning authorities may, for example, consider that because an agricultural building on the top of a hill with no road access, power source or other services its conversion is impractical. Additionally the location of the building whose use would change may be undesirable if it is adjacent to other uses such as intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals.*

*When a local authority considers location and siting in this context it will not therefore be appropriate to apply tests from the National Planning Policy Framework except to the extent these are relevant to the subject matter of the prior approval. So, for example, factors such as whether the property is for a rural worker, or whether the design is of exceptional quality or innovative, are unlikely to be relevant.*

Paragraph: 109 Reference ID: 13-109-20150305

Utilising existing buildings and structures for residential uses is considered to be a sustainable pattern of development and paragraph 148 of the National Planning Policy Framework states:

*“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; **encourage the reuse of existing resources, including the conversion of existing buildings**; and support renewable and low carbon energy and associated infrastructure.” (our emphasis)*

Paragraph 79 of the National Planning Policy Framework also allows isolated homes in the countryside where this involves the re-use of a redundant or disused building and enhance its immediate setting.

The National Planning Policy Framework also sets out that for Plans to be sound, they will need to be consistent with national policy, enabling the delivery of sustainable development in accordance with policies within the Framework.

### Concerns with Policy DES1

It is apparent that the Government considers the re-use of existing buildings is a sustainable form of development and the Government’s housing supply figures demonstrate that this now provides a valuable source of new housing that is assisting in boosting the supply of housing in England.

Therefore, it is considered that Policy DES1 should follow the spirit of National Planning Policy relating to the change of use of existing buildings and provide clearly written policy guidance that is unambiguous and consistent with the national planning policy approach so that it is evident how a decision maker should react to a development proposal.

As currently written, it is considered that Policy DES1 is not consistent with National Planning Policy or Policy CP15 and does not positively promote the reutilisation and conversion of existing rural buildings and limits itself only to the conversion of redundant agricultural buildings or forestry buildings. It is considered that the Policy should more positively promote the re-use of *all* suitable rural buildings as a sustainable way to deliver new development, including new residential uses.

The Policy as worded only embraces redundant agricultural or forestry buildings and it is considered that the Policy should be consistent with Paragraph 79 of the Framework to include all redundant or disused buildings outside of existing settlement boundaries. Such a policy is more inclusive and consistent with paragraph 148 of the Framework.

Criterion 1 of DES1 only allows the conversion of agricultural or forestry buildings where they are well related to existing infrastructure. The Planning Practice Guidance recognises that *many agricultural buildings will not be in village settlements and may not be able to rely on public transport for their daily needs* and therefore does not apply a test with regard to a sustainable location. This is considered to be eminently sensible because many rural buildings may be in isolated locations, but their suitable re-utilisation remains more sustainable than developing a greenfield site with new structures and infrastructure. Equally paragraph 79 of the Framework does not impose a sustainability test. It is therefore considered that Policy DES1 should be written to more closely reflect the criteria set out in paragraph 79 of the Framework.

Criterion 5 relates to non-traditional buildings and seeks the conversion of 'all traditional' buildings before non-traditional buildings are considered. National Policy does not apply such a test and it is considered that the sequential approach adopted in criterion 5 does not reflect the need to positively re-utilise existing buildings as a sustainable form of development and does not allow the applicant to consider each building on its merits. The test that needs to be applied in this instance is simply whether the building is redundant or disused and then whether the building is structurally sound and capable of conversion. Beyond this, the criterion should also seek an enhancement in its immediate setting in conjunction with the requirements of paragraph 79 of the Framework.

Criterion 6 is also considered to be too prescriptive and does not provide clear and unambiguous guidance. Firstly, the criterion relates only to agricultural or forestry buildings and should be re-written to embrace all redundant or disused buildings. Secondly the impact on the character of the building is a subjective matter and may preclude the insertion of new openings that are necessary for residential and other uses. It is considered that this criterion needs to be re-written to ensure that the inclusion of suitable new openings and modest adaptation and extension of the building will be acceptable where this maintains the character of the building and provides an enhancement to the buildings immediate setting.

Criterion 7 provides a hierarchy of new uses that are considered to be acceptable for the conversion of the building. It is considered that this hierarchy is unacceptable and does not support the sustainable re-use of existing buildings contrary to the requirements of the Framework. Such a hierarchy does not exist in National Planning Policy and simply discourages the suitable re-use of existing buildings and makes the delivery of new homes from this source difficult to achieve. Equally, the policy precludes the economic re-utilisation of rural buildings that are not associated with agricultural or forestry uses.

It is considered that criterion 7 and its explanatory test should be deleted from the Policy.

It is recommended that Policy DES1 should be re-written as follows:

***Delivery Policy DES1***

***Conversion of redundant or disused rural buildings***

*The conversion of redundant or disused buildings outside of defined settlement development limits to an alternative use will be permitted where:*

- 1. The original building is structurally sound and capable of conversion without substantial reconstruction or significant new extensions to accommodate the new use;*
- 2. The provision of new openings, adaptation and modest extensions to the building to accommodate the new use will be acceptable, provided that this does not alter the overall character of the building;*
- 3. The conversion of the building should provide an enhancement to its immediate setting; and*

4. *The existing vehicular access is suitable in landscape terms for the use proposed;*

In order to provide consistency between the policies, it is considered that criterion 'v' of Policy CP15 should also be amended to state:

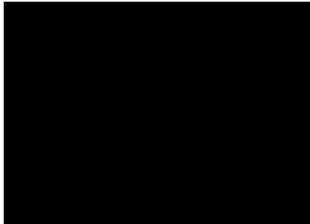
*"in the case of proposals to re-use redundant or disused rural buildings, these should be capable of conversion without substantial reconstruction or significant new extensions to accommodate the new use. Any such conversion should maintain the character of the original building and provide an enhancement to its immediate setting."*

An amendment to Policy DES1 and CP15 as set out above will ensure that they provide a conversion policy that is consistent with National Planning Policy and will also assist in the sustainable re-utilisation of redundant and disused buildings as well as assist in boosting the supply of sustainable new housing within the District.

I trust you will consider these amendments in the on-going review of your Plan.

Please do not hesitate to contact me should you need any further information.

Yours sincerely



Ridge Planning