Staffordshire Moorlands District Council (SMDC)
Planning Department
<By Planning Portal>

24th February 2023

Dear Sir / Madam,

22-22: Conversion of agricultural storage building on Quarry Bank, Hollington under 'Class Q Prior Approval'

1.0 Description of the Site

1.1 The proposals are associated with an existing agricultural storage building on Quarry Bank; a typical rural lane which runs from North to South between Great Gate and Hollington respectively. The local authority is Staffordshire Moorlands District Council, hereafter abbreviated to SMDC.

1.2 Quarry Bank serves 14 dwellings, 1 public house, 1 commercial stone extraction site (quarry) and 1 pumping station. At the midpoint of the road there is the 'application site' which in 2013 became a modern 'agricultural storage' building, prior to this the site contained a 'Piggery'.

1.3 In the late C19 a Methodist Chapel existed in the position of the current barn, this no longer existed by 1945. To the North of the barn there was a stone-built dwelling within the land owned by the applicant, known as 'Bumbury Castle'. Again this was a C19 structure and a photo from 1960 shows the building to exist. The remnants of this building remain within the landscape.

1.4 On 23-05-2013 permission was granted by SMDC for the erection of an 'Agricultural Storage Building' under 13/00307/FUL.

1.5 The proposals look to convert this building to become a residential dwelling using a Prior Approval application for the 'Change of use' from agriculture to dwellinghouses under a form of 'permitted development' known as Class Q. This is part of The Town and Country Planning (General Permitted Development) (England) Order 2015. The proposed development will comprise Class Q(a) together with development under Class Q(b).

1.6 The host building is in excellent condition and provides around 7.5 x 13.6m of accommodation (106m^2) comprising four structural grids using universal beams (178x102UB) columns and rafters (152x89UB), steel 175x45mm purlins carry the roof cladding which forms the 14.5° pitched roof with three rooflights to either side. The Steel Cladding cloaks the upper part of the building from eaves (circa 3.4m height) down to approximately 1.7m above ground level. The base of the structure uses two layers of pre-cast concrete panels circa 1.1x2.2m in size. These are used to infill the steel frame at low level.

1.7 Given the good condition of the building and to comply with the conditions imposed by Class Q(b) the existing cladding and concrete panels will be retained to ensure the external dimensions of the building does not increase. The existing cladding will be painted Black and extended down to 750mm above Ground Floor level. The existing concrete panels will be reduced to 1m height so that windows do not need to cut through the concrete panels. Two cuts will be made for doors to allow the creation of the Main Glazing to the North Elevation and the Side Utility entrance. Window openings will be used sparingly and the number of rooflights will decrease.

1.8 Internally the existing floor slab is in good condition and can be retained. Insulation and a screed will be installed over this. A new thermal envelope will be formed internally using a SIPs style structurally insulated panel. This will be self-supporting and will not impose any loads on the existing structural walls / roof.

1.9 The site is outside the 'Green Belt' boundaries in an area of 'Open Countryside'. There are no listed buildings on Quarry Bank and it is not a Conservation Area, there are no protected trees within or adjacent to the application site or the other land owned by the applicant. To the West the nearby Broadmoor Wood is an 'Ancient Woodland' and 'Nature Conservation Site' however the proposals our outside these boundaries and there will be no effect on the elements of significance.

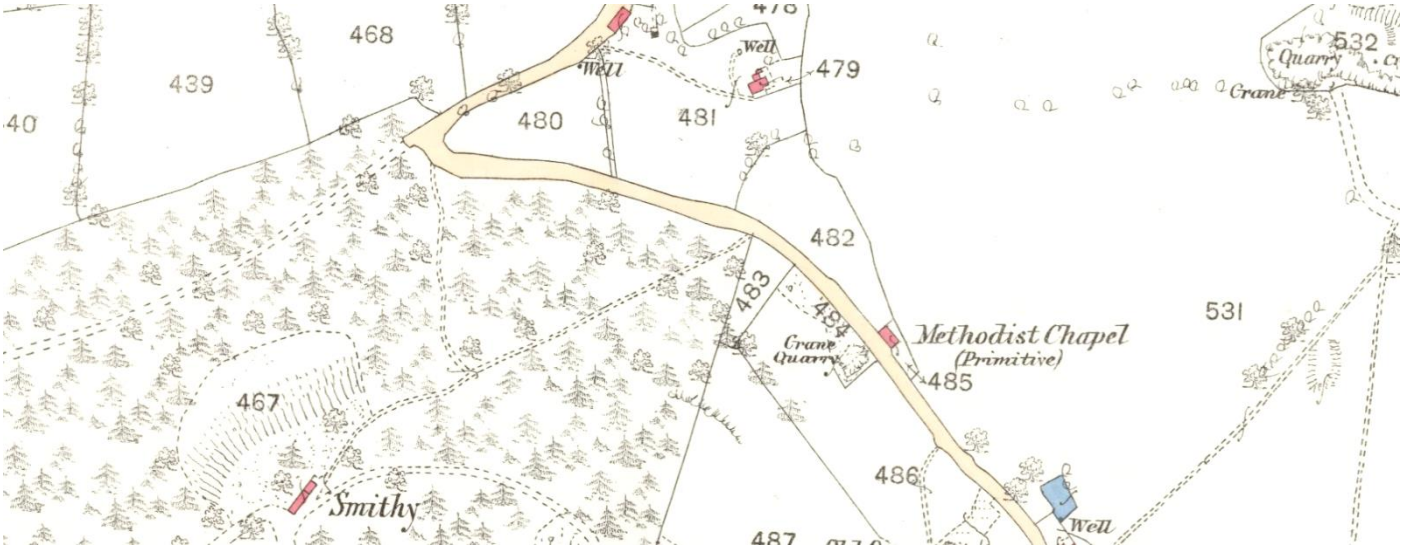


Figure 1: Photo extract from the 1879 OS Series Map records

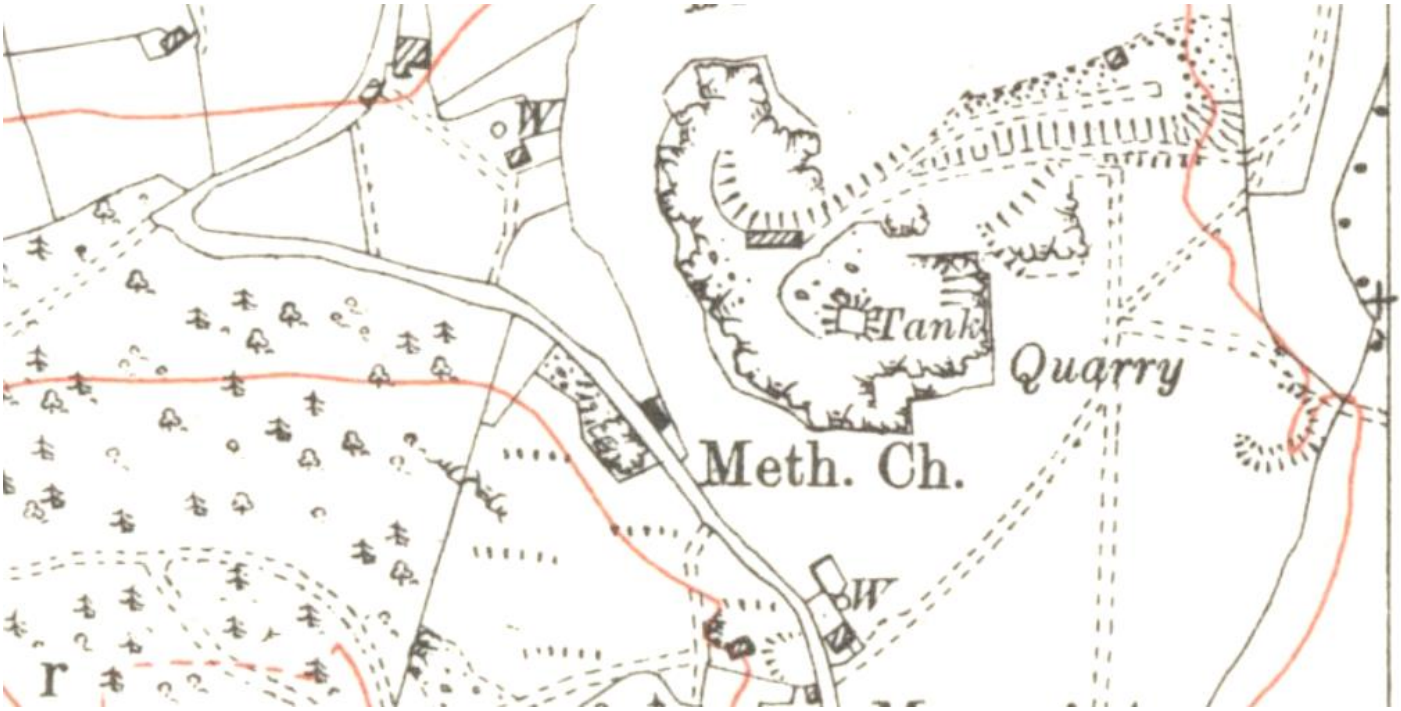


Figure 2: Photo extract from the 1922 OS Series Map records

2.0 Description of the Proposals

2.1 The proposals look to gain 'change of use' of the existing agricultural building to create 1 No. of dwelling using a form of 'Prior Approval' known as 'Class Q'. The proposals seek permission for both Q(a) and Q(b):

Q. Development consisting of—

(a) a change of use of a building and any land within its curtilage from a use as an agricultural building to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order; and

(b) building operations reasonably necessary to convert the building referred to in paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule.

The Town and Country Planning (General Permitted Development) (England) Order 2015

2.2 The site can demonstrate an agricultural use solely for over for over 10 years. Although the building in question was not yet constructed on 20 March 2013. Despite this the site complies with the eligibility requirement below:

(iii) in the case of a site which was brought into use after 20th March 2013, for a period of at least 10 years before the date development under Class Q begins.

2.3 To be eligible for Class Q:

- No more than a total of 5 dwellinghouses can be created (including no more than 3 larger dwellinghouses).
- No single dwellinghouse can exceed 465m^2 of floor space.
- The total combined floor space of all the larger dwellinghouses developed cannot exceed 465m^2.

In comparison the proposals will create 1 No. of 'Larger Units' with the following floor space:

New Unit (single storey):	106m^2
Overall Combined Floor Space:	**106m^2**

2.4 If required a structural appraisal can be prepared by a suitably qualified Engineers to demonstrate that the building is capable of conversion without external 'development' beyond that which is 'reasonably necessary' to convert the building for use as a dwelling. The existing structure fully retained with no more than minor alteration to the concrete wall panels and the lowering of the steel cladding. Neither act would constitute 'Development'.

2.5 The materials selected to carry out the conversion will mostly be the re-use the existing, where new cladding material is necessary this will closely match the existing. The existing Cladding will be painted Black.

3.0 Submitted Documents / Information

3.1 This statement and the following drawings relate to the proposals.

3.2 Existing Building / Drawings

22-22-b3-XX-XX-DR-A-0101_RevA_Location_Plan

22-22-b3-XX-XX-DR-A-0201_Rev-_Existing_Ground_Floor_Plan

22-22-b3-XX-XX-DR-A-0301_Rev-_ All_Sections

22-22-b3-XX-XX-DR-A-0401_Rev-_ Existing_Elevations

22-22-b3-XX-XX-VS-A-0001_Rev-_Existing_Visuals

3.3 Proposed Drawings

22-22-b3-XX-XX-DR-A-0102_Rev-_Proposed_Block_Plan

22-22-b3-XX-XX-DR-A-0202_RevA_Proposed_Plan

22-22-b3-XX-XX-DR-A-0301_Rev-_ All_Sections (Duplicated above)

22-22-b3-XX-XX-DR-A-0402_RevA_ Proposed_Elevations

22-22-b3-XX-XX-VS-A-0002_RevA_Proposed_Visuals

3.4 The proposals show that the extent of building work under Class Q(b) complies with the requirement of Q.1(i). This policy does not permit external 'development' other than the following:

(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);

3.5 Internal works are not seen to be 'development' and as such new floors can be inserted where appropriate. However the intent is to insulate and screed over the existing slab raising the level by no more than 150mm. Given the relatively low eaves and shallow pitch no first floor accommodation is proposed within the Proposed Plans. It would be possible to insert a mezzanine etc, however, even if the floor area was to double it would still comply with the requirements of Class Q(a) requirement Q.1.a.(iii).

4.0 Planning Policy Background & Discussion

4.1 Section 38(6) of The Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires that planning applications be determined in accordance with the development plan unless material circumstances indicate otherwise.

4.2 In Staffordshire Moorlands, 'The Local Plan' was adopted on 9th September 2020 and sets out the council's vision and strategy for the district until 2033.

4.3 National guidance in the form of the National Planning Policy Framework 2021 (NPPF) underpin the general strategy for development with which all development plans must be in broad conformity.

4.4 Given that the proposals represent a form of 'permitted development' under The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 3 which relates to 'Class Q – agricultural buildings to dwellinghouses' the proposals are thought to be acceptable in principle. The compliance with the eligibility requirements has already been demonstrated within the previous sections of this report. There remains 'Conditions' to the Permitted Development and local and national policies may apply to Q.2-(1) (a-g).

4.5 The following policies are relevant to the proposals, and these will be appraised in the following section of this report:

5.0 Local Plan

5.1 The Local Plan sets out how SMDC would like to see the district develop by 2033. Section 5 sets out Spatial Aims and Spatial Objectives.

- Spatial Aim SA1 has the aspiration to create "distinctive, sustainable, self-supporting settlements".
- Spatial Aim SA2 outlines policy should meet "the needs of our communities."
- Spatial Objective SO8 looks to "To promote local distinctiveness by means of good design and the conservation, protection and enhancement of historic, environmental and cultural assets throughout the district."
- Spatial Objective SO9 looks to "To conserve and improve the character and distinctiveness of the countryside and its landscape, heritage, biodiversity and geological resources."

5.2 Policy SS10 is a Strategic Strategy for 'Other Rural Areas Strategy' within Staffordshire Moorlands. Policy states: SMDC will allow "the conversion or replacement of an existing rural building in accordance with Policy H 1" and will also "Allowing extensions or additional domestic outbuildings to existing dwellings provided they are appropriate in scale and design and do not have a detrimental impact on the existing dwelling and the character of the rural area."

5.3 Policy H1 relates to 'New Housing Development'. Paragraph 5 (c) states: "Proposals for replacement dwellings, provided they do not have a significantly greater detrimental impact on the existing character of the rural area than the original dwelling or result in the loss of a building which is intrinsic to the character of the area."

5.4 Also from Policy H1. Paragraph 5 (d) states: "The conversion of rural buildings for residential use where the building is suitable and worthy in physical, architectural and character terms for conversion; or where such

development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets".

5.5 Policy DC3 relates to 'Landscape and Settlement Setting' policy states the council will resist proposals which have a "prominent intrusion into the countryside".

5.6 To be eligible for Class Q no form of enlargement to the building is possible. Additionally, it is the conversion of a rural building which both Policy SS10 and H1 would permit even within an open countryside setting.

6.0 National Planning Policy Framework 2021 (NPPF)

6.1 Chapter 2 of the NPPF relates to 'Achieving sustainable development':

6.2 Paragraph 7 defines 'sustainable development' and states; "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". To elaborate on this, a proposal in the Open Countryside which reduced the openness or caused loss of the area's status (made the site brownfield) would affect the future generation's ability to enjoy this open land. However, where the development uses existing buildings within the Open Countryside and does not alter the openness of the site this would comprise sustainable development, that supplies the current housing need without any effect on the openness of the surrounding area.

6.3 Paragraph 8 describes how forms of 'sustainable development' can have an 'economic objective', 'a social objective' or an 'environmental objective'. The proposals primarily have an 'social objective' by allowing the applicant to adapt their building to meet the needs of the wider housing market for minor economic gain.

6.4 As result of paragraph 6.2 and 6.3, the proposals are thought to be 'sustainable development'. The NPPF Paragraph 11 states that local authorities should have a 'presumption in favour of sustainable development' as the proposals do not conflict any area of the development plan.

6.5 Chapter 10 of the NPPF relates to 'Delivering a sufficient supply of homes'. Paragraph 78 states "in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs."

6.6 Chapter 12 of the NPPF relates to 'Achieving well-designed places'. Paragraph 126 states that "good design is a key aspect of sustainable development, creates better places in which to live and work". Paragraph 130(b) states that planning authorities should support developments which "are visually attractive as a result of good architecture, layout and appropriate and effective landscaping". Paragraph 132 states "Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes." Paragraph 134 states "Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design".

6.7 Chapter 13 of the NPPF relates to 'Protecting Green Belt land'. Paragraph 137 begins by stating "The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open". Paragraphs 147 – 151 relate to 'Proposals affecting the Green Belt'.

6.8 Paragraph 150(d) states that "Certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it" such as (d): "the re-use of buildings provided that the buildings are of permanent and substantial construction".

6.9 Chapter 14 of the NPPF relates to 'Meeting the challenge of climate change, flooding and coastal change'. Paragraph 158 states local authorities should *"recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions".* The conversion of an existing building is inherently sustainable activity as it delivers another home with reduced 'embodied energy' versus new build.

7.0 Class Q – agricultural buildings to dwellinghouses

7.1 Conditions of eligibility (Q.2) outlined in Schedule 2, Part 3 of The Town and Country Planning (General Permitted Development) (England) Order 2015 are as follows:

7.2 Q.2— (1) states that where the proposals involve development under Class Q(a) and Class Q(b), development is permitted subject to the condition that prior to any development, an application must be submitted to the local planning authority for a determination as to whether the prior approval of the authority will be required as 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 building makes it otherwise impractical or undesirable for the building to change from 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 building and

(g) the provision of adequate natural light in all habitable rooms of the dwellinghouses.

7.3 The final condition applicable to the proposals is that 'Development' under either Q(a) or Q(b) must be completed within a period of 3 years starting with the prior approval date.

8.0 Conclusion

8.1 The proposal of 1 'larger' unit of 106m^2 / less than 465m^2 is permitted by Class Q. The host building is of substantial and permanent construction and if required a Structural report can be used to confirm that the building is capable of conversion within the requirements of Class Q. However, this is not a mandatory document with the submission of a Class Q application and Paragraph 1.6 of this report and the Existing Drawings demonstrate the existing building construction.

8.2 Although the site is within Open Countryside both the Local Plan policies and the NPPF would support and advocate the re-use of this existing building.

8.3 The drawings show that the conversion to a habitable use can respect and retain the host buildings proportions and re-use the historic opening to the frontage. The number of roof windows will reduce from 6 down to 4 and across all elevations only 6 new window/door openings are required. In doing so, this ensures that every habitable room receives a window for natural light, ventilation, and escape where necessary; this meets another condition of Class Q Permitted Development.

8.4 The building is located on a minor country-lane; however, this is a short distance from the main arterial routes and the settlements of Hollington, Great Gate within the wider Parish of Checkley.

8.5 Flood risk and contamination risk have been assessed in the application forms and no threat is posed. A Flood risk map from the Environment Agency is submitted to demonstrate this.

8.6 The proposals provide a desirably located single storey dwelling, ideal for all types of owners. There is the opportunity to create a self-built / custom built internal layout, the proposals have adequate parking, garden space, and floor area to meet government space standards. The 'custom home' / 'accessible dwelling' potential should not be overlooked as this is in demand nationally.

8.7 The conversion is sustainable from an 'embodied energy' perspective and the new dwelling will be an energy efficient conversion fit for modern living needs and compliant with all Building Regulations.

8.8 For the reasons rehearsed above it is anticipated that the proposals can be **supported.** We look forward to receiving your 'Prior Approval' to complete the conversion.

Yours Faithfully,

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of: B3architectural

on behalf of applicant: Mr L. Finlayson