

6. FULL APPLICATION - CONVERSION OF REDUNDANT WATER TREATMENT WORKS INTO 16 APARTMENTS, CONVERSION OF STONE OUTBUILDING INTO A STUDIO APARTMENT AND FOUR NEW COTTAGES AT FORMER TREATMENT WORKS, MILL LEE ROAD, LOW BRADFELD (NP/S/0914/1007, P.7042, 22/09/14, 426261/391743, JK)

APPLICANT: BRADFELD WATER WORKS LTD

Site and Surroundings

The Bradfield Filter Works is a 1.3ha site located on the west side of Mill Lee Road at the southern edge of Low Bradfield village. It was built in 1913 to purify water from Strines, Dale Dyke and Agden Valley reservoirs, serving Sheffield until it closed in 1995. It comprises the original 1913 Treatment Works building which is built in typical local Water Board style in natural gritstone under a double pile pitched Welsh slate roof with patent glazed lantern ridge lights. In the 1950's the original building was extended with a number of stone faced, flat roofed extensions to the south and west elevations.

The application site, comprising the main filter works and its associated curtilage, is rectangular in shape, with a 140m frontage to the road and approx. 88m deep. It wraps around the former Bradfield Methodist Chapel which fronts onto the road, being a dwelling in separate ownership. To the north, the site is bounded by Dale Dyke stream. The western boundary abuts open countryside with the southern boundary defined by Plumpton Lane, an unsurfaced track and public footpath, with open countryside beyond.

The main access into the site is directly off Mill Lee Road between the Treatment Works building and the converted Methodist Chapel. To the rear of the Methodist Chapel there are two settlement ponds beside the Dale Dyke Brook.

There is a detached two storey dwelling, Filter Cottage, to the rear of the Filter works building. This was the former caretaker's dwelling and although it is within the applicant's ownership, it is excluded from the application site area. To the south of Filter Cottage there is a detached single storey stone garage/outbuilding which straddles the western boundary wall.

A large mound on the southern part of the site conceals an earth sheltered concrete water storage tank covered in soil and grass.

Although the Filter Works have been redundant for some time, the water main from Dale Dyke Reservoir still passes under the site on its way to the new Loxley Water Treatment Plant. This main has a minimum 4.5m easement either side. Close to where it passes under the Mill Lee Road, a small area of the land above is excluded from the application site as it houses a low stone equipment box containing Water company operational infrastructure. There is also an electricity sub-station currently sited between the Filter building and the covered water tank.

The majority of the site, apart from the settlement ponds, lies within the Low Bradfield Conservation Area which also includes the adjacent Methodist Chapel. The Conservation Area includes most of the village to the north and was specifically extended in 2010 to include the

Water Treatment Works. This was in recognition that public water supply is an important integral part of the National Park which has shaped its landscape, as well as the fact that the original 1913 building is a fine example of the Victorian/early twentieth Century Neo-Classical stone buildings constructed for water treatment. The Works is therefore defined for these reasons as an 'important unlisted building' in the Conservation Area Appraisal. This also noted that the works are in a poor condition and that repair and renovation of the building should be encouraged as it is in a very visible gateway position.

Unfortunately, all the internal water works pipework and equipment related to the former filter use has been stripped out, eroding much of the interest in the site. The empty rooms are of no interest in the 1950's section, compared to the main 1913 section which comprises an impressively large two storey open hall lit from above by patent glazed ridge lanterns running down each ridge. The site has now stood empty for many years and has been the subject of vandalism and anti-social activity. As a result of its increasing dereliction and prominent location beside the main street it is having a significant adverse impact upon the special quality of the Conservation area, the street scene and the local community, and has done so for a long time.

The nearby Bradfield Council Office building to the north-east of the site is a Grade II listed building and marks the southerly limit of the Conservation Area on the opposite side of Mill Lee Road.

A narrow section of the site lying between the settlement ponds and the Dale Dyke Brook is designated flood zone.

Proposal

The amended proposal has three main elements. Firstly, there is the conversion with extensions and alterations of the Filter Works building to provide 16 market apartments. Secondly, there is the removal of the underground water tank and the construction of a terrace of 4 two storey, four bedroom open market houses facing Mill Lee Road, and thirdly, it is proposed to convert the old stone garage at the back of the site into a one bed open market studio apartment.

Associated external works include the landscaping of the outside space with a communal garden together with the provision of 36 car parking spaces, 2 of which would be disabled spaces. Plans also propose the erection of a building housing a bin store, a cycle store and space for a biomass boiler. The plans also provide for the relocation of the existing electricity substation to the southern boundary. The current vehicular access into the site between the Filter works building and the Methodist Chapel would remain as the entrance to the site.

The application has been the subject of extensive discussions between the applicants and officers. Whilst these have covered concerns over the design of the scheme, they mainly related to officer concerns over the financial viability case put forward by the applicant as justification for the inclusion within the scheme of the later flat roofed sections, the new build houses and the garage conversion.

Following these negotiations, final revised plans and an updated financial viability appraisal have been received. The application is also supported by a Historic building assessment, Heritage Report, Ecological survey and report, a Flood Risk Assessment and Archaeological walkover survey and assessment.

The proposal shown on the amended plans comprises of the following detailed elements:

Main Filter Works Building

Conversion with extension of the 1950's section of the building to provide 16 open market apartments comprising 11 x 4 bed units, 2 x 3 bed units and 3 x 2 bed units. The units would be arranged as follows:

- 6 x 4 bed two storey units would be accommodated within the original 1913 pitched roof building and take up the northern half and the front, road facing section of both gable ends facing the street. This leaves the majority of the southern part of the 1913 structure, forming one half the former large open machinery/filter hall, as a full height open internal courtyard/atrium space for shared residential amenity use, lit from above by the patent

glazing ridge lights.

- 3 x 2 bed units would be accommodated within the 1950's single storey flat roofed section to the rear of the 1913 section.
- 7 units, 5 x 4 bed and 2 x 3 bed units, would be sited within the southern 1950's flat roofed addition, the main section of which would be raised by 1 metre to give space to accommodate a first floor, making each of these units two storeys in height.

Garage/outbuilding Conversion

Plans show a simple conversion to a one-bed studio style apartment, with a mezzanine forming the bedroom space. The alterations would comprise replacing the existing garage door with a 3-light glazed screen, re-glazing an existing side window and supplementing these with two new roof lights. To the front would be a single designated parking space

New Houses

The four 4 bed houses would be constructed in stone as a single terrace of four under a double pile (i.e. two parallel gables), blue slate roof to accommodate the deep plan form. The site slopes so the terrace would be formed with a single step down in the middle of the roof ridge. The windows and doors would be timber. Boundary walls would be stone and each plot would have front and rear gardens with two designated parking spaces in the rear curtilage.

Bin/Cycle Store Building

This would be a simple rectangular building constructed from stone under a slate roof divided internally into three bays accessed by external timber planked doors. It would be sited beside the parking area and could accommodate six large bins in one bay, eight bikes in another, with the third for the accommodation of a CHP biomass boiler.

Supporting information

An amended Development Financial Viability Appraisal with supporting cost plans and potential sale valuations has also been submitted. This has been assessed by an independent Chartered Surveyor on behalf of the Authority and the initial findings have been incorporated in the assessment section below.

The application is also accompanied by a Historic Building Report, and Ecological appraisal, an archaeological appraisal and a Planning Statement and a Design and Access Statement.

RECOMMENDATION:

That the application be REFUSED for the following reason:

It has not been demonstrated that the development of the additional open market housing in the form of the new build houses, conversion of the detached garage and the later 1950s extensions are necessary as an exception to adopted housing policy to achieve a viable development securing the future of the original 1913 building and delivering the enhancement of the site and the Conservation Area.

Key Issues

1. The principle of redevelopment of the redundant water works building for housing.
2. Whether the conversion with extension of the later flat roofed 1950's extensions to the south and west elevations along with the converted garage and new build houses are necessary to achieve a viable development to conserve the valued character and interest of the 1913 building as a non-designated Heritage Asset as well as delivering the enhancement of the site and the Conservation Area.
3. Whether the design, layout, and landscaping of the proposal is appropriate to its setting within Bradfield Conservation Area.
4. The impacts of the development upon the amenity of neighbouring properties, with particular regard to converted Methodist Chapel
5. Highway/Access issues.
6. The impact of the development in respect of Ecology, Cultural Heritage and Archaeology, and the Water Environment.

Planning History

2013 – Application withdrawn before determination for the conversion of the Filter works into 16 apartments and a fish farm plus five new cottages following officer objections to the scheme. Although any proposals to repair and renovate the original 1913 building and to improve the site as a whole were welcomed the submitted scheme fell short of this aim because of the following main concerns:

- It proposed removal of part of the roof structure of the 1913 building and both of the roof lanterns, which would negatively affect the building's significance and that of the Conservation Area.
- It proposed the insertion of a new, central front door to the main east elevation, which is of particular architectural importance, and which would have disrupted its symmetry and balance.
- It proposed a pitch-roofed first floor extension to the 1950's flat roof, which conflicted with the original building by matching its massing and prominence rather than remaining subservient.

Overall, it was considered that the 1950's extensions do not make a positive contribution to the character or appearance or historic interest of the Conservation Area and have a negative impact on the original 1913 building. Their removal would be justified under adopted policy to enhance the architectural and historic integrity of the original 1913 building, and enhance the character and appearance of the Conservation Area.

There were also objections to the use of the former garage for the studio apartment as this is of no architectural interest so there is no value in its retention and conversion. Other concerns related to the car parking location and the wholly unacceptable design of the new-build cottages.

Consultation Responses

These are summarised below, with the originals available to view in full on the Authority's website.

Bradfield Parish Council – Object.

The Council acknowledge the revised costings but note they do not address their original

concerns, which still stand. The Council draw attention to residents' concerns and also reiterate their own further concerns regarding a lack of affordable housing.

The Parish Council's initial response was that it would support some redevelopment of the site but object to this proposal as it is over-development of the site. The Parish Council also have concerns regarding lack of parking with reliance on a rural bus service, traffic congestion, the overlooking of close neighbours and the situation with local fields which have recently changed hands which could bring potential residential spread. Also concerned over possible location of a new septic tank facility, current over-capacity in local schools, a lack of amenities for children and the lack of affordable housing.

The Council also note that the history of the building should be recognised and reflected somewhere in the development. They also query the reference to the trout farm on the amended plans, which was understood this is no longer part of the application. The drawings show a gate way to be installed from the site to the adjoining community orchard. The Parish Council currently lease the community orchard site from Yorkshire Water and as part of the lease there should be no encroachment or easements on to the land without the prior permission of Yorkshire Water.

Historic England - No objection to the application on heritage grounds.

Consider that the issues and safeguards outlined in our previous advice letter (comments set out below) need to be addressed in order for the application to meet the requirements of paragraphs 58, 84, and 132 of the NPPF. Refers the Authority to the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Previously commented by offering the following general observations:

The Conservation Area was specifically extended in 2010 to include the area around the former water treatment works. This highlights the importance of the site to the history and character of the conservation area; the water treatment plant is a key unlisted building, and the site is associated with the surrounding reservoirs whose construction contributed to the growth of the village from the mid-nineteenth century onwards.

The site is currently redundant and detracts from the appearance of the conservation area when entering from the south. We are therefore supportive of a sensitive redevelopment of the site. This revised proposal retains more of the existing water treatment building thus retaining more of the significance of the undesignated heritage asset, along with the contribution it makes to the conservation area.

Detailing is important to ensure any development integrates well with its surroundings and contributes to local character and distinctiveness, as required by the National Planning Policy Framework (paragraphs 58 and 64). If the Authority is minded to accept the principle of development, suggest details and materials for the conversion and new-build, landscaping and boundary treatments be agreed with the Authority's specialist conservation adviser.

Urge the Authority to address the above issues, and recommend that the application be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Natural England - Lengthy comments provided under the following headings:

Statutory nature conservation sites – no objection

This application is in close proximity to the Dark Peak Site of Special Scientific Interest (SSSI - forms part of the South Pennine Moors Special Area of Conservation (SAC) and South Pennine Moors Phase 1 Special Protection Area (SPA))

The proposal is not likely to have a significant effect on the interest features for which South Pennine Moors SAC and SPA has been classified. Therefore the Authority is not required to undertake an Appropriate Assessment.

In addition, the proposed development will not damage or destroy the interest features for which the Dark Peak SSSI has been notified. We therefore advise your authority that this SSSI does not represent a constraint in determining this application.

Protected species

We have not assessed this application and associated documents for impacts on protected species and have published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy. PDNPA should apply our Standing Advice to this application as it is a material consideration in the determination of applications.

Local sites

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.

Landscape enhancements

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts

The Coal Authority – No objections - recommend informative on standing advice.

The application site falls within the defined Development Low Risk Area meaning that there is no requirement under the risk-based approach that has been agreed with the LPA for a Coal Mining Risk Assessment to be submitted or for The Coal Authority to be consulted. Therefore, if this proposal is granted planning permission, it will be necessary to include The Coal Authority's Standing Advice within the Decision Notice as an informative note to the applicant in the interests of public health and safety.

PDNPA Conservation Officer – Considers application represents overdevelopment particularly in relation the additional new cottages and conversion of the garage but, if a decision is made to approve the application suggests conditions covering agreement over precise detailed design matters and the landscaping of the site.

The original 1913 building is of historic interest as an early C20th, purpose-built plant for the pressurised filtration of raw water– only the second such plant to be built around Sheffield; the building itself includes a number of features of architectural interest, internally and externally. The 1950s extensions are of limited historic interest and have no features of architectural interest. As stated previously, therefore, it would have been preferable to retain and convert only the original 1913 building, and to demolish the 1950s extensions.

Assuming that the viability assessments require the retention of the 1950s extensions, the revised proposals are an improvement on the earlier proposals. However, this is still an overdevelopment of the site, in particular the additional new cottages and conversion of the garage.

Comments on submission:

Retention of 1950s flat-roofed extensions:

Unfortunately the proposal still retains and extends the later flat roofed elements of the building *“which in our view detract from the building”* as advised in pre-application advice. This asked the applicants to look at alternatives to convert just the original building and demolish the later flat roof extensions, *“tested with sketch schemes and backed up with viability evidence to test the financial and physical viability of this option.”* If this demonstrated that a conversion retained within the main building would not be viable, only then *“should an assessment move on to look at options for further enabling development”*.

I can see no strong justification for the retention of the 1950s extensions. As the 2 reports produced by The Jessop Consultancy conclude, *the “total loss of all of the internal plant, pipework and machinery has had a dramatic impact upon the understanding of the former function of the building”*. The original 1913 building is of historic interest as an early C20th, purpose-built plant for the pressurised filtration of raw water– only the second such plant to be built around Sheffield; the building itself includes a number of features of architectural interest, internally and externally. Without the machinery which they were constructed to house, the 1950s extensions are of limited historic interest and the buildings themselves have no features of architectural interest (the Cultural Heritage Team are in unanimous agreement on this).

The Officer then outlines a large number of comments regarding concerns over the proposed details under the following headings. (*Planning officer’s comment: These are not all recorded here as some have been resolved by the amended plans and had the proposal been recommended for approval then either, further plans would have been requested or the detailing reserved by condition*).

Detailed Design issues re. alterations to the original building:

Design issues re. the altered 1950s extensions:

Design and detailing of the New cottages:

I think that if the flat roof extensions are retained and extended, and with the number of flats proposed for the entire former Water Works building, then to add an additional four houses to the site is over-development.

Conversion of Garage:

Cannot see the justification for converting this to living accommodation and then constructing a totally new bike shed on the site. Couldn't the existing garage be used for this purpose? Converting the garage seems like over-development and removes the only potential storage facility already on site.

PDNPA Archaeologist – No objections in principle subject to conditions to secure the archaeological monitoring set out in the submitted desk based survey and historic building report.

PDNPA Landscape Architect – Generally happy with the landscape response subject to minor comments below;

Some concerns over grass mixes chosen. The new hedgerow structure is generally positive but it should be noted that low stone walls are the typical boundary features in this landscape. I note the existing tree has been removed from the plan. As this is a Conservation Area the applicant needs to clarify the species / condition of this tree, if this tree is proposed to be retained and any protection measures to BS 5837 or if this tree is proposed to be removed.

Yorkshire Water Ltd – No objections but make the following comments;

If permission is granted, a condition should be attached in order to protect the YW existing live water mains located within the red line site boundary:

No objection to the conversion of existing buildings, however, the proposed new cottages may be affected. If this is the case, then the water main can be diverted under s.185 of the Water Industry Act 1991. These works would be carried out at the developer's expense. The cost of these works may be prohibitive.

The public sewer network does not have the capacity to accept any additional discharge of surface water. Sustainable Systems (SUDS), for example the use of soakaways and/or permeable hardstanding, may be a suitable solution for surface water disposal that is appropriate in this situation. The use of SUDS should be encouraged and the LPA's attention is drawn to NPPF. The developer and LPA are advised to seek comments on the suitability of SUDS from the appropriate authorities.

The developer must contact the Highway Authority with regard to acceptability of highway drainage proposals.

The developer is advised to contact the relevant drainage authorities with a view to establishing a Suitable watercourse for the disposal of surface water. It is understood that a pond/watercourse is located adjacent the site. Restrictions on surface water disposal from the site may be imposed by other parties.

Environment Agency - No objections, in principle, recommends if planning permission is granted the following planning conditions are imposed regarding;

- 1. Development carried out in accordance with an approved non-mains drainage assessment including specified mitigation measures:*
- 2. Development not be commenced until a scheme to dispose of foul and surface water has been submitted and approved in writing by the Authority.*

Informatives are also suggested re;

the need to apply for an Environmental Permit to discharge treated sewage effluent into the receiving water course, the Dale Dyke.

Bunding of any storage tanks/facilities for oils, fuels or chemicals.

recommend that developers should follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination and refer to the Environment Agency Guiding Principles for Land Contamination for the type of information that the Agency would require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.

Representations

There have been one letter of support and 14 letters objecting to the proposal.

Supporters points summarised as:

- The site has been an eyesore for a number of years and the proposed development would be an enhancement.

Objectors points summarised as follows:

- The proposal is over development of the site.
- The proposal is insensitive to the heritage and architectural merit of the building.
- The buildings were included within the Low Bradfield Conservation Area for specific reasons: as an integral part of The National Park and a fine example of Victorian and early 20thC Neo-Classical stone buildings. Conversion to a range of apartments poses a great threat to its integrity.
- The flat extension was a later addition to the existing building and therefore should not be included in the renovation.
- The proposed cottages are too close to the road, spoiling the open aspect of the road junction.
- This area is designated as light industrial usage and not housing.
- The proposal would result in a significant increase in the population of Low Bradfield.
- The proposal would create a large number of traffic movements and on-street parking. Residential development generates on average 6 additional vehicle movements per day per dwelling, and the rural location with poor public transport services suggests the traffic generation will be greater than this; so we can expect in the region of 130-150 additional vehicle movements per day, plus exacerbation of parking congestion. This would be unsustainable and detrimental to local environmental quality.
- On-street parking on Mill Lee Road will cause congestion and reduce visibility for drivers at the junction with New Road and the access to the site. This poses a greater risk for cyclists using this route who come down Mill Lee Road at pace.
- There is insufficient parking provided on the site.
- There is only one access onto the site which is single car width with no passing areas.
- The development brings no benefit to local young people who cannot afford to stay in the area or older local people who would like to downsize.
- New build houses should not be allowed on the west side of Mill lea Road as this is expanding the village un-necessarily and creating precedent for future development applications.
- The proposal would result in pressure on local schools which are already full.
- Children living at the development would be in danger from traffic and no adequate

provision appears to have been made for them within the development.

- There is insufficient private garden space within the development
- The development would create noise and disruption to the neighbouring property.
- There would be over-looking from the development towards the dwelling called Holly Chapel to the north. This would result in a loss of privacy to the occupants of the dwelling. The proposed fence / hedge planting would not resolve this issue.
- The proposal could result in sewerage and drainage problems.
- No proposal has been made for the old filter beds which need to be an integral part of any redevelopment proposals.
- The site and buildings have been allowed to deteriorate for many years and no application should be considered until the site has been improved.
- The proposal would lead to significant light pollution and would spoil the village.

Planning policies and Legislation

Legislation

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and Section 70 (2) of the Town and Country Planning Act 1990 require the Authority to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.

Section 72 of the Listed Building Act 1990 contains a requirement for the Authority to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

Development Plan Policy

Major Development in a National Park

Major Development is defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015/595. The relevant parts of the definition meaning that this application for is classed as Major Development are that for 21 dwellings it exceeds the threshold of 10 and at a site area of 1.3ha it exceeds the 1 ha threshold.

Whether a proposed development in the Park should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, is stated by the National Guidance to be a matter for the relevant decision taker, taking into account the proposal in question and the local context. In this case the current proposals have been treated as major development by officers because of the overall scale and impact of the development upon the village.

GSP1(D) in the Authority's Core Strategy says in securing National Park purposes major development should not take place within the Peak District National Park. Major development will only be permitted following rigorous consideration of the criteria in national policy which is set out in paragraph 116 of the NPPF.

Paragraph 116 of the NPPF ('the Framework') says planning permission should be refused for major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

1. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
2. the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

3. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

These tests and the provisions of Paragraph 116 are supported by the provisions of the preceding paragraph, Paragraph 115 of the Framework, which states that great weight should be given to conserving landscape and scenic beauty in National Parks, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are also important considerations in a National Park. Paragraph 14 of the Framework also cross refers to the English national parks and the broads: UK government vision and circular 2010 which provides further policy guidance on development in National Parks.

The Authority's Local Development Framework Core Strategy Development Plan Document adopted in 2011

This provides, along with saved policies in the 2001 Local Plan, the policy starting point for considering the development. The following list of policies are those of which account has been taken in the consideration of the application:

Core Strategy - GSP1, 2, 3, 4, DS1, L1, L2, L3, CC1, CC2, CC5, HC1, T2, T3, T6, T7.

Saved Local Plan Policies - LC4, LC5, LC8, LC15, LC16, LC17, LC18, LC19, LC21, LC22, LC24, LH1, LH2, LT11, LT17, LT21, LT22.

In summary, General Strategic Policy GSP1 requires all new development in the National Park to respect and reflect the conservation purpose of the National Park's statutory designation and promotes sustainable development. GSP2 supports development that would enhance the valued characteristics of the National Park and sets out the criteria upon which proposals intending to enhance the park must meet and states that they must demonstrate significant overall benefit to the natural beauty, wildlife and cultural heritage of the area and not undermine the achievement of other policies. Furthermore, work must be undertaken in a manner which conserves the valued characteristics of the site and its surroundings. Policy GSP3 sets out the principles and finer criteria for assessing impact on valued characteristics stating that development must respect, conserve and enhance all valued characteristics of the site and buildings that are subject to the development proposal. Policy GSP4 covers the use of Planning conditions and/or legal agreements to achieve the spatial outcomes in the plan.

GSP3 is supported by the provisions of saved Local Plan policy LC4 (a), which says where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, conserves and where possible it enhances the landscape, built environment and other valued characteristics of the area. Local Plan policy LC4(b) goes on to say, amongst other things, that particular attention will be paid to scale, form, and mass in relation to existing buildings, settlement form and character, landscape features and the wider landscape setting along with design matters, landscaping the amenity of nearby properties and any nuisance or harm from lighting schemes

Local Plan policy LC5 also seeks to preserve and enhance the National Park's historic built environment and respectively address development that would affect the special qualities of a designated Conservation Area and its setting. Local Plan policy LC5 requires that development within Conservation areas should assess and clearly demonstrate how the existing character and appearance of the Conservation Area will be preserved and, where possible, enhanced. Proposals involving demolition of existing buildings which make a positive contribution to the character and appearance or historic interest of the Conservation Area will not be permitted unless the demolition is to remove an unsightly or otherwise inappropriate modern addition to the building.

Core Strategy (CS) Policy DS1 sets out the development strategy for the park and states that the majority of new development (including about 80 to 90% of new homes) will be directed into Bakewell and named settlements like Low Bradfield. In all settlements it states that the following forms of development (relevant to this case) will be acceptable in principle; extensions to existing buildings; conversion or change of use for housing, preferably by re-use of traditional buildings; other development and alternative uses needed to secure effective conservation and enhancement.

Policy DS1 further states that where there is pressure for development and the National Park Authority is uncertain about the capacity for this in a named settlement, an assessment of site alternatives will be required to demonstrate the extent of development which may be permitted. This process should involve the Parish Council or Parish Meeting and demonstrate that the proposed development complements the settlement's overall pattern of development; the character and setting of nearby buildings and structures; and the character of the landscape in which the settlement sits.

L1 requires that development must conserve and enhance valued landscape character as identified in the Landscape Strategy and Action Plan, and other valued characteristics. L2 requires that development must conserve and enhance any sites, features or species of biodiversity importance and where appropriate, their setting. L3 seeks to ensure the National Park's historic built environment is conserved and enhanced for future generations and set out three criteria under which the current application should be assessed because of the potential impacts proposed development on cultural heritage assets of archaeological, architectural, and historic significance:

- A. Development must conserve and where appropriate enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings, including statutory designations and other heritage assets of international, national, regional or local importance or special interest;
- B. Other than in exceptional circumstances development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset of archaeological, architectural, artistic or historic significance or its setting, including statutory designations or other heritage assets of international, national, regional or local importance or special interest;
- C. Proposals for development will be expected to meet the objectives of any strategy, wholly or partly covering the National Park, that has, as an objective, the conservation and where possible the enhancement of cultural heritage assets. This includes, but is not exclusive to, the Cultural Heritage Strategy for the Peak District National Park and any successor strategy.

Policy CC1 seeks to build in resilience to and mitigate the effects of climate change and requires all development, amongst other things to; make the most efficient and sustainable use of land, buildings and resources, take account of the energy hierarchy and achieve a minimum sustainability standard in all new housing. CC2 and CC5 cover low carbon and renewable energy development and flood risk and water conservation respectively.

Policy HC1 sets out the Authority's approach to new housing in the National Park. The supporting text to policy HC1 clearly sets out at paragraph 12.18 that new housing in the National Park is not required to meet open market demand. However, paragraph 12.19 goes on to acknowledge that the provision of open market housing is often the best way to achieve conservation and enhancement or the treatment of a despoiled site.

Policy HC1 states that exceptionally new housing (whether newly built or from re-use of an existing building) can be accepted where it A) addresses eligible local needs B) provides for key workers or C) in accordance with core policies GSP1 and GSP2 it is required to achieve conservation or enhancement in settlements listed in DS1 like Low Bradfield. For schemes like this which propose more than one dwelling they must also address identified eligible local needs and be affordable with occupation restricted to local people unless a) it is not financially viable, or b) it would provide more affordable homes than are needed in the parish and adjacent parishes, in which case a financial contribution will be required towards affordable housing elsewhere in the park.

In respect of affordable housing (although none is proposed as part of this development) Local Plan policies LH1 and LH2 are relevant as they set out the requirements in terms of the occupancy of affordable housing units.

Policy T1 aims to reduce the need to travel by unsustainable means. Paragraph 15.25 of the Core Strategy states that the Landscape Strategy and the Design Guide give a design context for infrastructure projects and complement the Manual for Streets for settlements. Streets should be places where people want to live and spend time, rather than just being transport corridors. Nationally, high standards of urban design are expected in towns and villages with transport infrastructure contributing positively to the quality of the street scene. In a national park nothing less is acceptable. T3A therefore states that Transport infrastructure, including roads, bridges, lighting, signing, other street furniture and public transport infrastructure, will be carefully designed and maintained to take full account of the valued characteristics of the National Park.

Policy T7B states that residential parking and operational parking for service and delivery vehicles will be the minimum required for operational purposes, taking into account environmental constraints and future requirements.

Local Plan Policies LC16, LC17 and LC18 refer to the protection of archaeological features; site features or species of wildlife, geological or geomorphological importance; and safeguarding nature conservation interests respectively. All seek to avoid unnecessary damage and to ensure enhancement where possible.

Transport policy LT11 refers to minimising the impact of car parking.

Other Relevant Documents

Landscape Strategy and Action Plan

The Peak National Park Design Guide and its technical supplement The Building Design Guide

Climate Change Action Plan

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published in 2012. The Government's intention is that the document should be considered to be a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises the Authority's Core Strategy 2011 and saved policies in the Peak District National Park Local Plan 2001. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. The Authority has considered the relationship between the Core Strategy and the National Planning Framework and resolved that they are consistent. This application does not raise matters that suggest otherwise.

As a material consideration in planning decisions, the NPPF recognises the special status of National Parks and the responsibility of National Park Authorities, as set out in the National Parks and Access to the Countryside Act 1949 (as amended). In line with the requirements of primary legislation, paragraph 14 of the NPPF recognises that in applying the general presumption in favour of sustainable development, specific policies in the Framework indicate that development should be restricted, for example policies relating to National Park.

Along with the need to give great weight to considerations for the conservation of wildlife and cultural heritage, paragraph 115 of the Framework confirms the highest status of protection in relation to landscape and scenic beauty, reflecting primary legislation, whilst paragraph 116 sets out guidance on major developments in designated areas (this application is for “major” development):

“115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.*

It also points out (footnote 25) that further guidance and information, including explanation of statutory purposes, is provided in the English National Parks and the Broads Vision and Circular 2010.

The NPPF sets out the Government’s planning policies to achieve sustainable development and sets out the three dimensions to sustainable planning with the planning system needing to perform an economic role in building a strong economy support growth, a social role in supporting strong healthy communities by providing housing to meet needs and creating a high quality environment with services that reflect a communities needs and support its health social and cultural well-being and an environmental role to protect and enhance the natural, built and historic environment and mitigate and adapt to climate change. The plan contains a presumption in favour of sustainable development.

Chapter 11 of the framework covers conserving and enhancing the natural environment with Chapter 12 containing policies covering conserving and enhancing the historic environment

The National Planning Policy Guidance was published in 2014 to support the framework.

Officer Assessment

The Principle of Development of the site

The conversion of the filter works building:

The site lies within the village of Low Bradfield, a named settlement identified in Core Strategy policy DS1. This states that new development in the village will be acceptable in principle if it

comprises conversion or change of use for housing, preferably by re-use of traditional buildings. Housing Policy HC1 states that provision will not be made for housing solely to meet open market demand. However, exceptionally, new housing (whether newly built or from the reuse of an existing building) can be accepted where it addresses eligible local needs for affordable homes or it is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings (HC1CI) or designated settlement like Low Bradfield. NPPF paragraph 111 states that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

Development is therefore acceptable in principle on this brownfield site, subject to compliance with national and local planning policy considerations and provided the normal scale, layout, design and landscaping considerations are all satisfied.

The original 1913 section of the filter works is clearly a valued vernacular building and a non-designated heritage asset. However, the advice from the Authority's Cultural Heritage Team is that the later 1950's extensions are not of the same quality to warrant conserving on their own merit. This is because these later additions are of no particular vernacular merit and especially since all equipment inside has been stripped out. Therefore only the conversion of the 1913 section of the Filter building to housing is considered acceptable in principle under current housing policy provided the amount of affordable housing provision in the scheme is maximised within viability constraints (to accord with HC1C) and subject to the normal design, layout, access and landscaping considerations being satisfied.

Whilst the principle of converting the 1950s extensions would not accord with Authority policy they nevertheless do still represent later development of its time to extend the filter house use. Officer advice has therefore been clear that given the aim of seeing the 1913 building conserved and enhanced through a new use, retention and development of the 1950's extensions could only be accepted exceptionally if it were demonstrated that it was essential to secure a viable development which would otherwise not be the case if only the 1913 structure alone was converted.

New build housing:

As a named settlement Low Bradfield is also considered, in policy terms, to have additional scope to maintain and improve the sustainability and vitality of the community via new build development for affordable housing (as well as community facilities and small scale business and retail development). Therefore whilst new build housing on the site in accordance with policies HC1 and LH1 and LH2 would be acceptable in principle if it were to meet local needs for affordable housing, the policy is clear that the application proposal for new build market housing will not be permitted other than in exceptional circumstances. The case put forward by the application is that the new houses are justified, together with the conversion of the 1950s flat roofed extensions and the garage conversion, to achieve a viable development that would conserve and enhance the 1913 building, which is acknowledged to be a heritage asset.

Consequently, the acceptability or otherwise of the principle and scale of open market housing proposed on the site therefore turns on the evidence provided by the applicant's development viability appraisal. In this regard, officers have engaged the services of a consultant surveyor specialising in development viability appraisals, to provide independent analysis and verification of the applicant's viability case. This is discussed in detail below.

The issue of Major development in the Park

In proposing 21 dwellings, the proposed development exceeds the 10 unit threshold which is used to define major development in The Town and Country Planning (Development Management

Procedure) (England) Order.

The NPPF states in paragraph 116 that major development in the National Park should be refused except in exceptional circumstances and where it can be demonstrated to be in the public interest. It also states that consideration of such applications should include an assessment of :

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.

In this case, conversion to of the building to housing would be an appropriate reuse to conserve a non-designated heritage asset as well as bringing about major enhancement for the village, the conservation area and the Parks landscape. Such a use would meet several policy objectives and the new households in the village would boost the viability and vitality of the local community as well as the wider local economy. It would also bring wider benefits by meeting the demand for homes and thereby reducing pressures in the protected landscape of the National Park and elsewhere for new housing on greenfield sites. As a conversion of an existing building the scheme could not be relocated outside the Park and achieve the necessary enhancement to this site or the benefits to the local economy. It is therefore considered these are the exceptional circumstances and a clear public interest which supports the principle of this ‘major development’ being acceptable in the Park.

The key issue therefore in the consideration remains whether the detailed proposal itself would be acceptable in terms of its impacts on the 1913 works as a heritage asset, the environment, the landscape and neighbouring interests.

Interim conclusion

In principle, a development which provides an appropriate scale of housing, preferably confined within the valued traditional 1913 building, has the potential to realise the enhancement opportunity sought by Development Plan policy and, provided the impact on landscape is acceptable, meet the ‘major development test’ in paragraph 116 of the framework.

As this scheme proposes more than one dwelling, the application is also required by policy HC1C to maximise the opportunity to address the local needs for affordable housing, unless this is proven to be unviable. The applicant has presented evidence that the re-use of the 1913 building alone for open market housing is not viable and that only with conversion of the later 1950’s flat roofed extensions for open market housing, along with the four separate new build dwellings and the garage studio, can the scheme be viable, conserve the key internal space and character of the 1913 building, and achieve the enhancement sought by policy. As this is the minimal necessary enabling development to achieve viability they have not proposed any affordable housing.

Whether the retention and conversion with extension of the later flat roofed 1950’s extensions together with the new build housing is justified enabling development/necessary to secure a viable development which conserves the valued character and interest of the 1913 building as a non-designated Heritage Asset and delivers the enhancement of the site.

The applicant’s case:

The proposal to convert the 1950’s flat roofed sections of the Filter building, convert the garage and erect four new houses is argued to be necessary enabling works to secure a financially viable

redevelopment. They also point out that all three are needed to deliver a scheme which best conserves the valued internal, as well as the external, character of the 1913 section by retaining a large part of the main hall with its high level ridge lanterns lights as a full height undeveloped space. This latter objective is fully supported by officers who consider this to be essential to conserve the internal character of the building. It would also provide an interesting internal amenity space giving the units within the building an outlook from the internal facing rooms. This would be particularly important on amenity grounds for the units on the north side as it would to offset the restricted outlook of those units on the north side, which would have to have with obscure glazing to part of the windows facing north. This is because in the current layout their only outside wall contains windows which overlook directly the principal windows of the adjacent Methodist Chapel conversion.

The Authority's consultant surveyor raised a number of concerns about the figures and methodology used by the applicants in their first appraisals and concluded at that time that he remained *"unconvinced that the scheme proposal accords with the objective of the Low Bradfield Conservation Plan policy 11.10 and at the same time achieves optimum viable use with the minimum of enabling works"*. (Officer Note – Conservation Policy 11.10 from the CA appraisal was the aim of seeing the 1913 valued part of the works conserved).

Since that interim feedback the applicants have responded to the consultant's points of concern, providing additional supporting evidence and amended their costs plans and conclusions accordingly. They now consider the corrected appraisals to be accurate and up to date and consequently the Authority now have all the information they need to determine the application.

The latest appraisal now sets out that:

- i) Conversion of the 1913 building alone to 10 apartments (Note: this does not retain the internal courtyard) would result in a significant conservation deficit of circa £1.2 million and would therefore not be viable.
- ii) Conversion of the 1913 building and the extended 1950's additions to give 16 apartments (Includes retaining a large atrium space in the 1913 section) would result in a significant conservation deficit of circa £671,000 and thus not be viable.
- iii) Conversion of the works to 16 apartments as ii) above plus four new houses and conversion of the garage to a studio apartment (i.e. the application proposal) would be viable.

Officers noted, however, that whilst viable, iii) would return a much reduced developers profit of only 11.88% instead of the normal 20% sought. The applicant has explained that this was acceptable to them at the time on the basis of an annual income that would have been earned as a result of feed-in tariffs from the proposed renewable energy heating scheme. Officers were obviously concerned this was not accounted for in the appraisal and it is understood are no longer available at the same rate.

The full appraisals and cost plans are available on the Authority's web-site.

The Officers assessment and conclusions;

The clear view from the Authority's consultant is that the applicants have still not demonstrated their case in the appraisal for numerous reasons, most notably due to flawed figures in the cost plan and the valuation applied for the site value. There are issues of double counting and inclusion of work which does not need to be done in relation to determining if there is a conservation deficit in relation to conversion of the 1913 structure. Furthermore, the consultant considers that with these concerns corrected it would appear that a smaller scheme to convert just the 1913 section to 10 apartments can be achieved without a conservation deficit.

It is noted that such a scheme would not leave enough space internally to preserve the full height atrium space in half the building. However, it does demonstrate to officers that a modified scheme, based on the 1913 building, but with the addition of the less intrusive rear facing flat roofed sections, could be both viable and deliver the internal atrium space. Crucially, in such an amended scheme, the removal of the large south facing 1950's flat roofed extension opens up the opportunity to 'hand' the internal layout. This would enable the atrium to move over to the northern side of the building and the apartments to the south thus taking advantage of the southerly aspect and the access to open space. Such a layout would also avoid the current overlooking issues from the northern apartments to the Methodist Chapel conversion next door. Overall these changes would boost the attractiveness and value of those apartments to support viability.

Although policy HC1 seeks to maximise the amount of affordable housing, subject to viability constraints, in the case of a reduced scheme based on the 1913 structure, the work undertaken by the consultant surveyor demonstrates to officers' satisfaction that no affordable housing could be accommodated.

Conclusion

Despite the applicant's assurances about the revised appraisal figures, officers, as advised by the independent consultant remain wholly unconvinced by the evidence in the latest submission.

It does not demonstrate conclusively that there is any overriding need for enabling development outside the envelope of the 1913 filter works building and possibly the rear extensions. As a result, officers have no option but to recommend refusal of the current application.

Design layout and landscaping considerations

Access

There has been no response from the Sheffield Highways department to date although Authority officers consider that there should be no objections to its continued use, as the main vehicular access into the site off Mill Lee Road. It already serves the existing dwelling, Filter Cottage to the rear of the site so its retention is both necessary, practical and logical.

Layout

There are also no objections in principle to the amended layout of the site. It would provide a parking layout which gives two spaces within the curtilage of each new build house and a single space for the studio apartment. For the 16 apartments however, only 26 spaces are shown, including two disabled spaces by the main door. In the officer's experience of similar developments in traditional rural Peak villages, this would give rise to a short fall in parking, especially as most of the units are four-bedroomed dwellings. Space is available to increase the parking provision but, in the absence of any comments from the Highway Authority and given the strong objections to the scale of development, officers have not requested amended plans to increase parking provision.

Design

Leaving aside the fact that the garage is of no architectural or historic merit to be justify conversion under Authority policy, there are no objections to the design details of the simple conversion of the garage to a studio apartment.

In relation to the design of the new build houses, there are some concerns over their deep plan form which has necessitated a double pitched roof form rather than the simpler local tradition for a more modest property with single pitched form. Nevertheless, these would be acceptable had they been justified as exceptional enabling development. There are also no objections to the design details as the houses would be built in natural gritstone with slate roofs, stone chimneys and timber windows and doors.

The proposals for the conversion and extension of the filter building into 16 apartments include two extensions to the current envelope of the building. Firstly, a 7m x 7.5m single storey flat roofed infill extension to the rear (west) elevation to provide more space to create a useable apartment in this corner. The flat roofed form, materials and fenestration would match the existing extension it sits alongside and therefore, leaving aside concerns over the principle, there are no objections to its overall design.

Secondly, due to a lack of height within the southern 1950's extension, the amended plans propose that this section be raised by 1m to provide sufficient height to accommodate a second storey. Again, leaving aside concerns about the principle, the amended design of the extension follows the advice of officers to cut back the new work from the edges of the existing roof and treat it in a contemporary manner in terms of external cladding to complement rather than copy the existing building. Plans therefore show it clad in a lead coloured material and overall it is considered to be appropriate in design terms.

The conversion itself uses all existing openings, with new openings confined to the north elevation. Here 20 new window openings are proposed for the 6 apartments on this side, 7 of which at first floor, would need to be partially obscure glazed in the lower half to protect the adjoining chapel conversion from harmful overlooking. All new windows would have traditional proportions with divided frames and are considered to be appropriate in this setting.

In conclusion, subject to minor detailed conditions there would be no objections to the design details of the proposed conversion and extension of the filter works.

Landscape considerations

As a disused and dilapidated site, the Filter works currently has a significant harmful impact on the landscape from the immediately vicinity of the village street and particularly in views down into the village from further up Mill Lee Road. The appropriate redevelopment of the site within policy constraints is therefore welcomed to bring about much-needed improvement to the area. The overall landscape approach taken in the scheme is welcomed by the Authority's Landscape Architect, who raises no objections to the details of the proposed landscaping scheme subject to detailed matters which can be covered by planning condition. A condition would also be required to control external lighting on the site to protect the character of the area, the amenity of local residents and the National Park's dark skies.

Impacts upon the Conservation Area

The Conservation Area was specifically extended to include the Filter Works site in recognition of its importance of the building to the history of the area and for its contribution to the street scene and the significance of the conservation area. In its current dilapidated state the site is having a significant detrimental impact upon the character of the area. A high quality refurbishment and re-use of the site for housing would clearly bring significant enhancement to the Conservation Area, the extent of which is dependent upon the scale of development required to achieve viability.

Ecological Considerations

The ecological report states that bat roosts and nesting birds were found to be using various parts

of the filter works building and the garage. It therefore recommends specific protection/precautionary methodology to be followed in carrying out the works together with specific mitigation and enhancement measures for each roost in the form of either retention of existing features or the provision of replacement housing (bat boxes). For birds similar specific works are suggested to protect nesting birds with mitigation measures to compensate for the loss of nesting sites. Had the application been recommended for approval, planning conditions would have been recommended to secure these measures.

Archaeological Considerations

The filter building is of archaeological interest as it is a good example of a purpose built plant for the pressurised filtration of water. The submitted desk based archaeological assessment notes the building fabric remains intact but that the total loss of all the internal plant, pipework and machinery has had a dramatic impact upon understanding the former function of the building. The report goes on to recommend that the demolition of the external fabric should therefore be avoided to allow the historical development of the building to be read and understood. No pre-20th Century archaeological features were identified within the site boundary, so the impact of the conversion works on any remains is considered low or negligible. It is therefore recommended that a level 1 survey would be an appropriate form of mitigation which the Authority's own archaeologist supports and would normally recommend an appropriately worded condition had the development been recommended for approval.

Environmental Management

The application details state that, at the time it was made, the scheme would be designed to the code for sustainable homes Level 4, principally as a result of the proposed biomass CHP unit which would provide a district hot water supply and some electrical power, alongside, double-glazing, rainwater harvesting and grey water recycling. The agent rules out the use of solar panels on the south facing roofs on the basis that this would be in conflict with the conservation aims of the project. He further points out that cycle storage would be provided and the site is within a village with a good range of local services as well as being on a bus route with links into the nearby city of Sheffield.

The application also proposes a packaged treatment plant to deal with waste from the site which would discharge treated water into the Dale Dyke. It also states that the settling ponds could form part of an attenuation system for storm surge of surface water, although no details of a sustainable drainage system based around such a feature is detailed in the application documents.

Due to an absence of detail on the above matters, had the application been considered acceptable by officers, conditions would have been suggested to require details to be submitted and agreed in due course to ensure compliance with Core Strategy policy CC1. With such conditions there would be no objections in principle to the approach taken over the environmental management of the scheme.

Overall Conclusion

The original 1913 Filter works building is a valued vernacular building and a non-designated heritage asset of some local significance arising from its associated use with the water industry. It makes an important contribution to the village street scene and the conservation area but currently this is spoiled by the increasing dereliction of building. National and local planning policy supports the reuse of the site in principle for housing and there are therefore no objections to the principle of redeveloping the 1913 works, indeed it is positively encouraged by officers.

In contrast the later 1950's flat roofed additions are of no particular architectural interest to warrant conservation in their own right through a new use and especially so now that the internal

equipment has been stripped out, further and substantially eroding the limited functional interest they once had.

The applicant's viability appraisal to support the scale of development proposed in the application purports that the redevelopment of the 1913 structure cannot be viable without the inclusion of significant extra enabling development in the form of the conversion of all the 1950's extensions, the new build houses and the garage conversion.

Officers, advised by an independent consultant specialising in viability appraisal, have found the applicant's amended viability appraisal still contains significant errors and inconsistencies, as well as failings in terms of standard methodology. It therefore fails, by some margin, to provide credible evidence to justify any enabling development to support conversion of the 1913 structure. For this reason alone officers have no option but to recommend refusal of the application.

There are also no overriding concerns over the design, layout, landscaping or in terms of any ecological or archaeological impact of the proposal subject to detailed conditions.

Whilst officers are disappointed in having not reached agreement with the applicants over an acceptable scale of development, consideration of the application has shown officers the likely viability of a much more modest scheme based on converting the 1913 building with limited enabling development, comprising just the rear west facing flat roofed 1950's section. It is therefore hoped that if the recommendation in this report is endorsed the Planning Committee can give the applicants a clear steer as to the form of development they would wish to see and to encourage continued discussions with officers to find a resolution to achieving the much-needed enhancement of this derelict site.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

Nil