

9. FULL APPLICATION – CHANGE OF USE OF EXISTING DAIRY MILKING PARLOUR TO FORM BUNK HOUSE ACCOMMODATION WITH FACILITIES AND MEETING ROOM SPACE AT BLAZE FARM, BUXTON ROAD, WILDBOARCLOUGH (NP/CEC/0319/0308, ALN)

APPLICANT: MR M W WALLER

Note: The applicant is the husband of Caroline Waller, one of the Members of the National Park Authority

Summary

1. The application is for the conversion of a modern portal framed agricultural shed which is of no historic or vernacular merit to holiday accommodation. This is contrary to Core Strategy polic RT2 which seeks to restrict proposals for self-catering accommodation to traditional building or historic or vernacular merit, E2 which prioritises the use of traditional buildings or appropriate replacement buildings for business uses and DME2 in relation to farm diversification. The application is recommended for refusal.

Background

2. A report on this application first went to the meeting of the Authority's Planning Committee in June this year Officers recommended refusal for the change of use of the milking parlour to visitor accommodation because the proposal was contrary to the Authority's adopted planning policies. The Committee was informed that granting permission contrary to adopted policies would represent a significant departure from the Authority's Development Plan.
3. The Committee was minded to grant planning permission but was informed that under the Authority's Standing Orders this application needed to be heard a second time before a decision can be reached. The second hearing is required so that the Committee can consider the impact of an approval on adopted policies and therefore the statutory purposes of the National Park. The applicant was also asked to provide further information with regard to the current business arrangements and how the various elements of the business interrelate; a financial appraisal to demonstrate the scale of the existing farm business and to ensure that the tourist uses remain ancillary; information with regard to how the business contributes to National Park purposes; and details about how the proposals would comply with Core Strategy policy CC1 (climate change, mitigation and adaption). A planning statement has now been supplied which addresses these points (full details of this can be viewed on the Authority's website).
4. This report includes the information provided in the committee report in June but expands and where necessary amends it to answer the questions that were raised in deferring the application.

Site and surroundings

5. Blaze Farm is located in open countryside between Winkle and Wildboarclough, on the northern side of the A54. It is a working mixed beef and sheep farm and it also provides a range of ancillary visitor development including tea rooms, pottery studio, holiday accommodation and animal petting.
6. To the north-east of the farmhouse and traditional former barn there is range of three portal framed agricultural sheds. The current proposals relate to part of the southernmost of the three sheds. The part of the shed in question was until recently used as a milking parlour and for calf housing.

Proposal

7. Planning permission is sought for the alteration and conversion of the former milking parlour/calf shed to form 'bunkhouse' holiday accommodation. The accommodation would be spread over two floors with a total floor area of 432 sqm. On the ground floor would be two bunk rooms (each sleeping twelve people) plus three further bedrooms (sleeping seven) together with showers, toilets and a laundry/boot room. On the first floor would be two meeting rooms, a quiet room, a lounge and a kitchen/dining room.
8. Parking spaces would be created in an existing yard area to the north west of the building.

RECOMMENDATION:

That the application be REFUSED for the following reasons:

1. **The proposals are for the conversion of a wholly untraditional modern portal framed farm building which has no historic or vernacular merit to holiday/bunkhouse accommodation contrary to Core Strategy policies GSP1, GSP2, GSP3, RT2 and E2 and Development Management Policies DME2.**
2. **By virtue of the scale of the proposed use when taken with the existing and extant tourist uses, the tourist business would be unlikely to remain ancillary and subsidiary to the agricultural business contrary to Development Management Policy DME2.**
3. **The proposals would perpetuate the presence of a building that by virtue of its massing, detailing and materials does not contribute to the character of the area and which is prominent from public vantage points contrary to Core Strategy policies GSP2 and GSP3 , Development Management Policy DMC3 and advice in the Authority's Adopted Design Guide**

Key Issues

9. Whether the principle of the conversion of the building is acceptable under policies RT2 and E2 and the impact on the character of the area.
10. Farm diversification.

History

February 2018 – pre-application sought including with regard to the current proposals. We advised that the conversion of the modern farm building to bunk house accommodation would be contrary to policy and could not be supported.

March 2019 – planning permission granted for construction of detached art and craft studio and change of use of part of traditional barn to holiday accommodation.

November 2003 – planning permission granted for use of farm building for ice-cream production.

April 2002 – planning permission granted for use of shipping as tea room, replacement calf building, creation of new parking area and new sewage treatment plant

December 2001 – planning permission granted for use of buildings as tearoom and toilets, creation of walkway to picnic area and creation of pond.

April 2000 – planning permission granted for creation of new access and closure of existing access.

September 1996 – planning permission granted for change of use from shippon/barn to display area, craft units and cafeteria.

March 1996 – planning permission granted for erection of sheep building.

April 1993 – planning permission granted for erection of cubicle shed.

April 1993 – planning permission granted for erection of silage building.

Consultations

Highway Authority – no response to date.

Parish Meeting – support the application. The proposals will provide local employment and attract and boost tourism bringing visitors and trade to other businesses in the area. There is shortage of bunkhouse accommodation in the locality. The changes to the building will improve the ecological and environmental standard of the current structure.

Authority's Tree Conservation Officer – no objections subject to conditions. The proposed development will require the removal of a mature ash tree. The ash tree is situated in a highly visible position as part of a row of trees along a field boundary. However, the tree is not in a good condition and would require significant remedial works or removal in the near future.

Right of Way Officer – the development does not appear to affect a public right of way.

Representations

11. A total of 21 letter of support have been received from local people, business owners and leaders of groups many of whom visit the farm at present. In summary they raise the following points:

- Hill farms are facing challenging conditions and rural diversification schemes are key to their survival.
- The development would provide welcome additional accommodation and would boost tourism in the wider area.
- The accommodation would be well used by local groups including D of E, Motorbike Groups, agriculture students/children with Special Education Needs and more.
- The farm already has an established footfall of visitors to the café/farm/lambing and craft facilities.
- It would provide overnight access to a wider demographic population.
- The building is within an established setting of traditional farm buildings.
- The proposals would benefit other business in the area.

12. Two letters of objection have been received which raise the following points:
- There is already bunkhouse accommodation locally that would be adversely affected by the proposals.
 - Impact on the heritage of the farm by domination by holiday lets.

Main policies

13. Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, L1, E2 and RT2
14. Relevant Development Management policies: DMC3, DME2 and DMT6

National planning policy framework

15. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales which are to conserve and enhance the natural beauty, wildlife and cultural heritage and promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public. When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks.
16. The National Planning Policy Framework (NPPF) has been revised (2019). This replaces the previous document (2012) with immediate effect. The Government's intention is that the document should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In particular Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, which have the highest status of protection in relation to these issues.
17. In the National Park the development plan comprises the Authority's Core Strategy 2011 and the Adopted Development Management Policies. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and more recent Government guidance in the NPPF with regard to the issues that are raised.

Development plan

18. Core Strategy policies GSP1, GSP2 and GSP3 together say that all development in the National Park must be consistent with the National Park's legal purposes and duty and that the Sandford Principle will be applied where there is conflict. Opportunities for enhancing the valued characteristics of the National Park will be identified and acted upon and development which would enhance the valued characteristics of the National Park will be permitted. Particular attention will be paid to impact on the character and setting of buildings, siting, landscaping and building materials, design in accordance with the Design Guide and the impact upon living conditions of local communities. Core Strategy policy GSP4 highlights that the National Park Authority will consider using planning conditions or obligations to secure the achievement of its spatial outcomes.
19. Core Strategy policy RT2 allows for the provision of self-catering accommodation provided that the change of use involves a traditional building of historic or vernacular merit and provided the proposals would not create unacceptable landscape impact in open countryside.

20. Core Strategy policy L1 states that development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan and other valued characteristics.
21. Core Strategy policy E2 states the proposal for business development in the countryside outside the Natural Zone and named settlements should be located in existing traditional buildings of historic or vernacular merit on farmsteads and in groups of buildings in sustainable locations. However where no suitable traditional building exists, the reuse of modern buildings may be acceptable provided that there is no scope for further enhancement through a more appropriate replacement building. On farmsteads small scale business development will be permitted provided that it supports an existing agricultural or other primary business responsible for estate or land management.
22. Development Management Policy DMC3 provides detailed criteria to assess design and landscaping.
23. Policy DME2 (Farm Diversification) states that development will be permitted if there is clear evidence that the new business use will remain ancillary to the agricultural operation of the farm business, meaning that the new business use is a subsidiary or secondary use or operation associated with the agricultural unit. It further states that new buildings may be permitted if the proposed development cannot be appropriately located in existing buildings of cultural heritage significance or in other buildings which remain appropriate within the farm building group.

Assessment

24. Whether the principle of the conversion of the building is acceptable

25. A statement submitted by the applicant explains that he ceased dairy farming in March 2018 for a number of reasons including low milk prices and rising costs. As a result, the large milking parlour is now redundant. The farm started to diversify 17 years ago and now operates an ice cream parlour, tea room and pottery studio. Planning permission was also granted in 2018 for the conversion of part of the traditional barn to a 3-bed holiday unit and for the erection of a new build arts and craft studio. This consent has been implemented and the craft studio is under construction. A submitted agricultural appraisal explains that although milk production has ceased, Blaze Farm is still a working farm with 200 acres of land owned and rented, and a stock of 330 breeding ewes and 19 store beef cattle (to be increased to 40-50 head).
26. The applicant now wishes to expand the tourist based enterprise further by providing accommodation for groups including school groups, Duke of Edinburgh (D of E), veterinary and agricultural student groups, and for groups using the recently approved craft studio.
27. The Authority recognises that accommodation for staying visitors can contribute to the local economy and enable visitors to enjoy the National Park. Consequently, Adopted Core Strategy policy RT2 allows for the provision of new self-catering accommodation through the conversion of traditional buildings of vernacular merit, as this has the benefit of enhancement through the preservation of those buildings of merit. It was on this basis that planning permission was granted for the conversion of part of the traditional shippon to a holiday cottage in 2018. A number of additional appropriate farm diversification projects have already been supported by the Authority.
28. However, in this case the subject building is a modern portal framed agricultural shed, which appears to have been constructed in the 1980s. It is constructed in a mixture of concrete blocks and grey corrugated sheeting. It is a very large building measuring

6.1m wide by 36.8m long with an eaves height of approximately 4.1m to the eaves and 5.6m to the ridge. It is fairly well screened from the A54 by an adjacent cattle housing building but its tall gable end is visible from the south and its north west elevation is visible from the minor road to the north west in the winter months

29. Large portal framed farm buildings are permitted in the National Park as an exception to normal design standards because it is accepted that they are necessary in order to facilitate the agricultural management of the landscape paragraph 4.15 in the Development Management Policy Document states: *The Authority recognises that modern agricultural buildings are usually portal framed buildings, constructed off-site and assembled on the farm. These buildings are functional by design and their presence in a National Park landscape is justified for the land management benefits that agriculture provides, as such structures would not otherwise be acceptable..* However, because of their wholly untraditional massing, materials and detailing their re-use for holiday accommodation is inappropriate and wholly contrary to policy RT2. Policy RT2 only supports the conversion of traditional buildings that are of historic or vernacular merit to holiday accommodation. There are many modern buildings like this one scattered throughout the landscape of the Park and if the Authority adopted a practice of allowing them to be converted to living accommodation then the quality of the built environment of the National Park would be severely degraded. In fact, Core Strategy policy GSP2 makes it clear that opportunities should be taken to enhance the National Park by the treatment or removal of undesirable features or buildings. The supporting text of policy RT2 also sets out that conversions and changes of use of existing traditional buildings of historic or vernacular merit will provide ample opportunities for small scale holiday developments. If modern buildings were allowed to be converted to holiday use it is likely that there would be less incentive to convert historic buildings and the heritage benefits of giving historic buildings new uses would be lost.
30. In the light of the type of building proposed to be re-used and discussions at the last committee meeting in June, it is useful to consider the impact of such buildings across the National Park. Between 2001/2 and 2017/18 some 854 large new modern buildings (only justified for an agricultural purpose) have been approved through full planning and GPDO decisions. A further 350 further permissions were granted for replacement agricultural buildings and extensions to existing buildings across the Peak District National Park. The proliferation of large, modern, industrial scale buildings has a significant impact on the National Park. The conversion of this building into business and commercial use could set a harmful precedent for potential conversion of the many thousands of buildings that exist in the National Park.
31. In developing planning policies, it was important that a strategic approach was taken to managing change in ways that drive the conservation and enhancement of the landscape in the long term and in national interest. Policy drivers for tourism and rural business seek the re-use of traditional buildings and the replacement of modern buildings in order to achieve these aims and allow farms to evolve and diversify.
32. Simply permitting re-use of large modern buildings on a case by case approach does not allow this long term strategy to succeed. To the contrary it permits the retention of potentially hundreds of large non-traditional buildings in non-agricultural use, often in the open countryside. This outcome is fundamentally at odds with the intent of the development plan and its aims to further national park purposes.
33. The landscape first approach to making decisions is explained at Development Management Policies Document Page 18 paragraphs 3.10 – 3.15. It concludes by saying that development that can no longer serve an essential purpose such as supporting sustainable farming and conserving and enhancing, should be removed.

34. Permitted Development Rights

35. As with householders and other landowners, farm businesses often enjoy some flexibility and freedom from normal planning controls. This is known as permitted development. Recent changes to permitted development rights allow the conversion of modern agricultural buildings such as this to other uses including residential and business uses. However, in adopting these changes the government specifically excluded National Parks from some of this permitted development in recognition to the harm that would be caused to the special qualities of the nations' best and most important landscapes if buildings such as these were converted for other uses. This decision by Government is an explicit acknowledgement that National Park landscapes should be given greater protection than other areas.

36. Policies RT2 and E2 – understanding the different policy drivers

37. When the application came before planning committee in June the officer report argued that the primary Core Strategy policy for consideration of this scheme is RT2 (hotels, bed and breakfast and self-catering accommodation) because the proposals are for the creation of new visitor accommodation. The intent of RT2 is to steer investment in accommodation to the traditional building stock rather than modern industrial scale buildings. The objective of RT2 is to ensure that development conserves and enhances valued landscape features, promotes the enjoyment and understanding of special qualities and supports farm diversification.

38. However the supporting text to RT2 acknowledges that visitor accommodation can have business benefits and contribute to the local economy and it is acknowledged that the applicant is not proposing to use the accommodation for standard 'holiday' purposes (but intends that it would be more directed towards groups of educational and environmental users). This is classed as 'sui generis' use. As such, it could be argued that the proposals represent 'business development' and thus merit consideration under Core Strategy policy E2.

39. For clarity, firstly, the Authority considers that the main value of visitor accommodation on farms is that it furthers the Parks' second purpose by providing opportunities to understand and enjoy the National Park. Business benefits are understood but are secondary to achieving statutory purposes. Small scale holiday accommodation within traditional buildings can help the viability of the farm business. RT2 is intended for this type of scale and activity. Policy E2 is primarily for business development in its own right. In the case of Blaze Farm, this building has not conserved and enhanced valued landscape or cultural heritage and was permitted only to enable modern farming. No other use would justify this building in the National Park. Simply converting the building to accommodation does not make the building more acceptable and in the event that a building of this scale massing and design was proposed anew for this use, it would be entirely contrary to the design guide.

40. The Authority's long standing policy position is to encourage the re-use of traditional farm buildings rather than intensify built development, or perpetuate the existence of purpose built modern portal frame farm buildings. It is certainly not the objective of the spatial strategy to use policy E2 to justify more intensive business development on farms such as Blaze Farm.

41. Notwithstanding this point, policy E2 A focuses on small-scale business use on farms by way of a change of use of traditional buildings. It states '*Businesses should be located in existing traditional building of historic or vernacular merit in smaller settlements, on farmsteads, and in groups of buildings in sustainable locations. However where no suitable traditional building exists, the re-use of modern buildings may be acceptable provided that there is no scope for further enhancement through a*

more appropriate replacement building’.

42. The sequential approach of the policy clearly seeks enhancement through more appropriate replacement buildings before conversion of existing buildings can be considered. This approach enables farms to diversify whilst at the same time enhancing the Park, a sustainable approach to development that reflects National Park purposes and duty. The submitted Planning Statement assesses compliance with this part of the policy and confirms that Blaze Farm is a working farm and that there are no suitable traditional buildings available. We concur with this. The statement also confirms that the existing building is now redundant for agricultural purposes and again officers would agree. However the Planning Statement fails to address whether the is scope for further enhancement through a more appropriate replacement building. We consider that given that the shed is redundant, there is scope to demolish it and provide a smaller replacement building that has a reduced and more traditional massing and with better materials and detailing (in keeping with the Authority's Design Guide). Whilst this would result in new build holiday accommodation (contrary to RT2) there could be significant enhancement that might offset and outweigh the policy conflict. The agent has recently confirmed that the applicant does not wish to consider this option and would like the application to be determined as submitted (and with the amended information). Consequently there is no more compelling justification for the proposed re-use of the building under E2 than there is under RT2.

43. Impact on the character of the area

44. Further guidance is given in policy DME2 (Farm Diversification) in the recently adopted Development Management Plan. This clarifies that even if there were no scope for a replacement building, any converted modern building must *‘remain appropriate within the farm building group’*. In this case because of its scale and massing the retention of the building is not appropriate.

45. The submitted plans show that alterations would be made to the building to try to improve its overall appearance. These include replacing the existing grey sheeting with dark-stained vertical boarded timber on the sides and with dark coloured sheeting on the roof; and by cladding the concrete blockwork in natural stone. It is also proposed to add two sets of ridge style rooflights, and to screen some of the wider openings with sliding panels of timber fins. These features would not create an building which would in it's own right comply with the Authority's design guide, and would create a confused identity, lacking architectural integrity and with not relevance to the built environment of the Peak District, in addition, they overcome the fundamental policy objections. We consider in particular that the proposed high level of glazing together with the proposed new window openings in the stonework would outwardly demonstrate that the building is in residential use, which would create an uneasy domestic appearance alongside the agricultural scale and massing. The untraditional and large massing of the building its domination of the setting of the adjacent traditional shippon would remain unaltered and indeed would be perpetuated by allowing a permanent residential use.

46. For clarity the Authority's Adopted Design Guide confirms at page 19 that large buildings such as agricultural sheds are inappropriate and alien in the landscape. It identifies that the 3 main factors in identifying and respecting the Peak District building style are form, detailing and materials. Buildings traditionally have low eaves, narrow gables, simple detailing and a predominance of local natural stone as the building material. Clearly the building in question is completely at odds with this style and hence its retention beyond its useful life for agriculture would be wholly inappropriate. If the application is granted then the opportunity to enhance the National Park through the construction of a better building in line with the Design Guide will be lost forever.

47. As stated above the building is visible from the minor road that runs approximately 800m to the south of the site. From here the new high level windows in the south elevation of the barn would in particular signal the residential use of the building, especially at night when internally lit.

Farm Diversification

48. The Authority's policies seek to support appropriate farm diversification schemes as has been demonstrated by the previous planning approvals at Blaze Farm. However, policies E2 and DME2 make it clear that there should be clear evidence that new business uses should remain ancillary to the agricultural operation of the farm business, meaning that the new business use is a subsidiary or secondary use or operation associated with the agricultural unit. It is for the applicant to demonstrate that the tourist uses would remain subsidiary to agriculture and at the time of the previous committee meeting no information had been provided in these respects (hence it was included as a reason for refusal). In deferring the application in June, Members requested that the applicant be asked to provide more detail with regard this issue. The submitted Planning Statement addresses this by pointing to an agricultural appraisal that was submitted with the application. It emphasises that Blaze Farm comprises 170 acres of grassland, 10 acres of woodland, with 330 breeding ewes, 600 lambs per annum and is working towards accommodating 60 beef cattle following the sale of the dairy herd. It also confirms a labour demand of 1.42 full time workers. The Statement argues that there is no requirement in policy for a financial appraisal and states simply that while the proposed accommodation would represent a significant increase in floorspace it would nonetheless remain subsidiary to the farm business. It is acknowledged that that policies do not require a financial appraisal but nonetheless they require 'clear evidence' that the new use would remain ancillary and if the relative size and status of the two sides of the business is not measured in monetary terms, the only other means of assessment is by comparing the physical extent of the two uses. It is accepted that Blaze is a substantially stocked working farm, but the tourist based uses when taken cumulatively are also substantial. They occupy a significant area of floorspace including the majority of the two storey traditional barn and modern lean-to (as holiday unit, café and shop), the new arts and crafts studio (floorspace 174 sq m) and the proposed holiday accommodation (432 sqm). Given the scale of the building to be converted, we consider that insufficient evidence has been provided to demonstrate that the new use would remain ancillary to the agricultural operation.
49. For clarity, the agent has confirmed that the applicant and his wife, his parents and his daughter each have an equal share in the farming business and the ice cream business. Mr and Mrs Waller own the farmhouse and land, pottery studio, cubicle shed, former milking parlour (the application building), silage pit and two further livestock buildings. A sheep shed and the ice cream building (with holiday unit) are owned by Mr and Mrs Waller Senior. An amended site plan has been received which excludes these buildings from the red edged application site. As such, if planning permission were to be granted a section 106 agreement could be drawn up to prevent the proposed bunkhouse accommodation from being sold or otherwise separated from the farm business.

Environmental Management

50. Core Strategy policy CC1 requires that development should seek to build up resilience to and mitigate the causes of climate change. Little information was provided with the application with regard to sustainability other than a brief statement to say that the proposals would incorporate an air source heat pump and pv cells on the roof and that rainwater collection and grey water systems would be incorporated. No details were

submitted. Following the committee meeting in June we asked for further details. The recent planning statement explains that a ground source heat pump (gshp) and log burning stoves would be incorporated. No mention is made of an air source heat pump or pv cells. Officers have requested details of the ground source heat pump but the agent has stated that the applicant is reluctant to incur additional costs in the preparation of plans until they know whether planning permission will be forthcoming. They have asked for the matter to be dealt with by condition.

51. The application also fails to address the energy hierarchy and the reduction in energy use that could be made. This is particularly relevant with a scheme such as this which proposes the domestication of a building never designed to be heated or lived in by humans, and with little insulation.
52. We need to understand the contribution the scheme might make to climate change mitigation so that this can be weighed in the planning balance. Without details we cannot assess this or, for example, what the impact of solar panels might be on the area or whether it is feasible to install a gshp on land in ownership. Consequently the proposals do not accord with CC1 in this respect.

Contribution of the farm business to National Park purposes.

53. In considering issues of farm diversification it is important to understand if approval were to be granted for the current scheme, whether the scheme would be helping to support a farm business that itself contributes to National Park purposes through its agricultural practices. The submitted Planning Statement explains, amongst other things, that Blaze Farm is one of the founding business members of the PDNPA Environmental Quality Mark. Farming practices include, in summary weed control by spot spray; agronomist services to tailor optimum/minimum fertiliser to match soil test results, monitoring of grass growth to enable optimum grass height, drainage systems maintained and repaired. Biodiversity projects have include management and rebuilding of drystone walls, field 3873 designated as local BAP priority habitat; archaeological features maintained and protected; fields fenced from watercourse to prevent water contamination; 10 fields have 4m buffer strips around perimeter for wildlife; new 1400m permissive footpath created to allow visitors to access highest part of the farm, 3 new ponds created. Consequently we are satisfied that high environmental standards are being maintained at the farm

Other Issues

54. A protected species survey was submitted with the application but it does not cover the subject building. A protected species survey is not in fact required in the case because of the age and materials of construction of the building.
55. Because of the relatively remote nature of the application site there would no impact upon residential amenity because of the proposed development.
56. Visibility from the access onto the A54 is adequate and there would be sufficient parking space within the existing yard to meet the needs of the development in accordance with DMT6.

Conclusion

57. In conclusion, the additional policy analysis and assessment of the points raised by members at the Planning Committee meeting in June do not change the officer recommendation. The proposals are for the conversion of a wholly untraditional modern portal framed agricultural shed, which is of no historic or vernacular merit, to holiday accommodation contrary to Core Strategy policies GSP2,RT2 and E2 and Development Management Policy DME2. The proposal would perpetuate the continued presence of a building that does not accord with the local building tradition because of its massing, detailing and materials. It has not been demonstrated that a more appropriate replacement building could not be accommodated within viability constraints. The proposed changes to the external appearance of the building would not outweigh the fundamental policy objections, and would in themselves not address the problems of scale or massing. The proposals are of a scale that, when taken cumulatively with the existing uses, mean that the tourist based business would be unlikely to remain ancillary and secondary to the use of the site for agriculture contrary to DME2.

58. The proposal is contrary to the strategic policies of the National Park. To permit the development would be a departure from the development plan and would be contrary to the fundamental principles of the National Park policies.

59. **Human Rights**

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

61. List of Background Papers (not previously published)

62. Nil

63. Report Author: Andrea Needham, Senior Planner (South)