

## **7. FULL APPLICATION – CONVERSION OF BARN TO DWELLINGHOUSE – OULDS BARN GREENLOW ALSOP EN LE DALE (NP/DDD/1220/1171, MN)**

### **APPLICANT: MR BRADBURY**

#### **Summary**

1. The proposed development seeks to convert a remote and isolated field barn in to a dwellinghouse.
2. The submitted heritage appraisal is insufficient to allow a full assessment of the building's significance and the impacts of the proposals on it to be made. However, it is clear that the following harm would arise:
  - Domestication of the building's setting, resulting in harm to its significance and agricultural character, and to the character and appearance of the landscape of the National Park
  - Harm to the building's character arising from proposed alterations and impacts of domestic use
3. The application also fails to demonstrate that the use of the site access would not adversely affect highway safety, or how the development would contribute to climate change mitigation.
4. There are no other policy or material considerations that would indicate that planning permission should be granted.
5. Accordingly, the application is recommended for refusal.

#### **Site and surroundings**

6. Oulds Barn is an agricultural barn located in open countryside approximately one kilometre northwest of the village of Alsop en le Dale.
7. The barn is set back from the western side of the A515 by approximately 55 metres, and is accessed off it through a roadside field gate in the adjacent field, with a further gateway between the fields providing access to the site itself. A public right of way passes the site approximately 90m to the south and west.
8. The barn is of typical field barn form, with a simple rectangular shape and a pitched roof. It is constructed of coursed limestone with a clay tiled roof, and with gritstone dressings to openings. The west gable of the barn is built in to the field boundary wall, and a small area of field in front of the barn is partly enclosed by a further drystone wall.
9. The building appears to be in structurally fair condition, although the roof is beginning to fail.
10. Whilst there are some small copses of trees in the wider landscape around the site, the immediate setting of the building is open fields.
11. The nearest building is a dwellinghouse set adjacent to the A515 approximately 130m south of Oulds Barn. The next nearest properties are over 500m to the south and over 650m to the east/north east.

12. The Tissington Trail passes the site to the west curving east as it passes north of the application site. It affords views of the application building over a distance of approximately 300m as it passes the site.
13. The site is outside of any designated conservation area.

### **Proposal**

14. The proposed development seeks to convert the barn in to a dwellinghouse.

### **RECOMMENDATION:**

**That the application be REFUSED for the following reasons:**

- 1. The development would result in alterations to the building and domestication of the building's setting that would harm its historic agricultural character, contrary to policies L3, DMC3 and DMC10. This harm is judged to outweigh the benefits of the development, meaning that it is also contrary to policy DMC5 and to paragraphs 172 and 197 of the NPPF.**
- 2. The development would result in domestication of the landscape in this location, harming its historic agricultural character, contrary to policies L1, L3, DMC3 and DMC8. This harm is judged to outweigh the public benefits of the development, meaning that it is also contrary to policy DMC5 and to paragraph 172 and 196 of the NPPF.**
- 3. The application includes insufficient information to show the effect of the development on the significance, character and appearance of the heritage asset and its setting, contrary to policy DMC5 and paragraph 189 of the NPPF.**
- 4. The application fails to demonstrate that forward visibility for vehicles approaching the site from the south and towards any vehicles turning right in to the site would have an acceptable impact on highway safety, contrary to paragraph 109 of the NPPF.**
- 5. The application fails to demonstrate that the development would make the most efficient and sustainable use of land and resources, take account of the energy hierarchy, and achieve the highest standards of carbon reduction and water efficiency. This is contrary to Core Strategy Policy CC1.**

### **Key Issues**

- Whether the barn is suitable for conversion to a dwellinghouses under the Authority's housing policies in principle
- The impact of the development on the heritage interest, character and appearance of the building
- The landscape impacts of the development
- Highway safety impacts

### **History**

15. No relevant planning history.

## **Consultations**

16. **Highway Authority** – Advise that the applicant should be providing emerging visibility sightlines of 2.4m x 149m over controlled land in both directions, the area in advance of the sightlines being maintained throughout the life of the development clear of any object greater than 1m in height (0.6m in the case of vegetation) relative to adjoining nearside carriageway channel level, clearly demonstrated on detailed plan.
17. It's recommended that the applicant also provides details demonstrating forward visibility for oncoming vehicles to a vehicle turning right into the site due to the horizontal alignment of the road.
18. They advise that any shortfall in visibility sightlines should be supported by speed readings, with sightlines being provided in accordance with 85th percentile wet weather speeds.
19. Suggest that 2no off-street parking bays are provided to meet current recommendations along with sufficient space for the manoeuvring of resident's vehicles and a typical supermarket delivery type vehicle (typically 9m x 9m).
20. The highway authority's full comments can be viewed on the Authority's website.
21. **Parish Council** – No response at time of writing.
22. **PDNPA – Archaeology** – Comment on the submitted heritage statement as follows:
  23. Advise that the submitted heritage statement has not been prepared by someone with appropriate expertise to make the assessment or judgement of significance and it fails to adequately describe the significance of the site. They note that there is no evidence that the Historic Environment Record or the PDNPA Historic Buildings, Sites and Monuments Record has been consulted.
  24. They also advise that guidance documents (e.g. Historic England guidance, Farmstead assessment framework etc.) are referred to and then not followed, and that the interpretation of the site, the building and its features and its historic use and development is very basic and appears to be incorrect. They observe that no drawings identifying features of interest or phasing have been provided.
  25. They summarise that it shows a fundamental lack of understanding of heritage values and significance and how to assess and articulate these, for the building, the site or its wider landscape setting. They state that the application does not meet the requirements of NPPF or PDNPA's own policies because it does not describe the significance of the heritage assets or provide enough information to allow understanding of the impacts of the development on their significance.
  26. With respect the landscape setting of the barn the archaeologist advises that they are concerned about the impact of residential conversion on the historic landscape, in the following regards:
    27. Although we don't currently have the appropriate supporting information, even without this it is evident that the development of the barn into a residential use will harm both the agricultural setting of the barn, which likely positively contribute to its significance as a heritage asset and will harm the area of historic landscape within which the barn is located.

28. Currently as a historic field barn, it sits in an isolated position and is integrated within its surrounding agricultural landscape, and it owes its existence and position to the way this landscape, enclosure and farming practice has developed in this area.
29. The introduction of a residential and domestic use into this location with everything this entails (domestic curtilage and paraphernalia, parking, provision of services, light pollution, movement of vehicles, provision of a bin store etc.) would introduce elements that are out of place, incongruous and are harmful to both the barn and the historic landscape character of the area.
30. The Archaeologists full comments can be viewed on the Authority's website.
31. **PDNPA – Landscape** – Advise that the site lies within the Limestone plateau pastures a key characteristic are isolated stone farmsteads and field barns, this property reads as an isolated field barn, rather than a domestic dwelling. Whilst they acknowledge that there are other more modern domestic dwellings in the locality, they note that this is the main historic agricultural building, which the applicant has pointed out is a visual focal point of users to the Tissington Trail – and that a change of use to a domestic dwelling would be detrimental to the character of the area.
32. They note that whilst reference is made to the preservation of the barn to maintain its historic character and visual agricultural landscape it is unclear how this is to be achieved in the case of the latter point, as there is a lack of detail provided.
33. They conclude that domestication of the barn and surrounding with lighting, washing lines, parking etc. would be harmful to the character of the area, which cannot be mitigated.
34. **PDNPA – Ecology** – Advise that no evidence of bats or nesting birds was found during the survey and that the barn was assessed as having low suitability as a roost. The observe the barn to be too open and derelict to provide suitable habitat for bats and birds apart from some crevices in the walls and, since the consultants found nothing, they conclude that it would be unreasonable to ask for any habitat replacement.
35. **Natural England** – No objections.

### **Representations**

36. 37 letters of support have been received, all but 3 of which are worded identically. The grounds for support are:
  - That the development would provide a house for a local person
  - That the conversion is preferable to holiday let conversion, which causes isolation in local communities
  - It is not desirable for the building to fall in to ruin

### **Main policies**

37. Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, L2, L3, HC1, CC1.
38. Relevant Development Management Plan policies: DMC3, DMC5, DMC10, DMT8.

### **National planning policy framework**

39. The National Planning Policy Framework (NPPF) was published on 27 March 2012 and replaced a significant proportion of central government planning policy with immediate effect. It was updated and republished in July 2018. 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 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. 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.
40. Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
41. Paragraph 172 states that '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.'
42. Paragraph 189 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
43. Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
44. Paragraph 198 continues that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
45. Paragraph 199 advises that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible<sup>64</sup>. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

## **Development plan**

46. Core Strategy polices 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.
47. Core Strategy policy DS1 outlines the Authority's Development Strategy, and in principle permits the conversion of buildings to provide housing.
48. Policy HC1 of the Core Strategy sets out the Authority's approach to new housing in the National Park in more detail; policy HC1(C) I and II say that exceptionally new housing will be permitted in accordance with core policies GSP1 and GSP2 if it is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings or where it is required in order to achieve conservation or enhancement within designated settlements.
49. It goes on to state that any scheme proposed under CI or CII that is able to accommodate more than one dwelling unit, must also address identified eligible local need and be affordable with occupation restricted to local people in perpetuity, unless:
50. III. it is not financially viable, although the intention will still be to maximise the proportion of affordable homes within viability constraints; or
51. IV. it would provide more affordable homes than are needed in the parish and the adjacent parishes, now and in the near future: in which case (also subject to viability considerations), a financial contribution<sup>102</sup> will be required towards affordable housing needed elsewhere in the National Park.
52. Core Strategy policy CC1 requires development to make the most efficient and sustainable use of land and resources, to take account of the energy hierarchy, to achieve the highest standards of carbon reduction and water efficiency, and to be directed away from flood risk areas.
53. Development Management Policy DMC3 requires development to be of a high standard that respects, protects, and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place. It also provides further detailed criteria to assess design and landscaping, as well as requiring development to conserve the amenity of other properties.
54. Policy DMH11 addresses legal agreements in relation to planning decisions, as provided for by Section 106 of the Town and Country Planning Act 1990. As a result, these are known as Section 106 Agreements. The policy states that in all cases involving the provision of affordable housing, the applicant will be required to enter into a Section 106 Agreement, that will:
  - (i) restrict the occupancy of all affordable properties in perpetuity in line with policies DMH1, DMH2 and DMH3; and

- (ii) prevent any subsequent development of the site and/or all affordable property(ies) where that would undermine the Authority's ability to restrict the occupancy of properties in perpetuity and for the properties to remain affordable in perpetuity.
55. Development Management Policy DMC5 provides detailed advice relating to proposals affecting heritage assets and their settings, requiring new development to demonstrate how valued features will be conserved, as well as detailing the types and levels of information required to support such proposals. It also requires development to avoid harm to the significance, character, and appearance of heritage assets. It explains development resulting in harm to a non-designated heritage asset will only be supported where the development is considered by the Authority to be acceptable following a balanced judgement that takes into account the significance of the heritage asset.
56. Development Management Policy DMC8 addresses Conservation Areas, requiring development in them, or affecting their setting or important views into, out of, across or through them, to assess and clearly demonstrate how the character or appearance and significance of the Conservation Area will be preserved or enhanced.
57. It notes that applications should be determined in accordance with policy DMC5 and the following matters should be taken into account:
- (i) form and layout of the area including views and vistas into and out of it and the shape and character of spaces contributing to the character of the historic environment including important open spaces as identified on the Policies Map;
  - (ii) ii) street patterns, historical or traditional street furniture, traditional surfaces, uses, natural or manmade features, trees and landscapes;
  - (iii) (iii) scale, height, form and massing of the development and existing buildings to which it relates;
  - (iv) (iv) locally distinctive design details including traditional frontage patterns and vertical or horizontal emphasis;
  - (v) (v) the nature and quality of materials.
58. It also states that development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the effect of their proposals on the character, appearance and significance of the component parts of the Conservation Area and its setting.
59. Development Management Policy DMC10 addresses conversion of heritage assets, permitting this where the new use would conserve its character and significance, and where the new use and associated infrastructure conserve the asset, its setting, and valued landscape character. It also notes that new uses or curtilages should not be visually intrusive in the landscape or have an adverse impact on tranquility, dark skies, or other valued characteristics.
60. Development Management Policy DMT3 states that development, which includes a new or improved access onto a public highway, will only be permitted where, having regard to the standard, function, nature and use of the road, a safe access that is achievable for all people, can be provided in a way which does not detract from the character and appearance of the locality and where possible enhances it.

61. Development Management Policy DMT8 states that off-street parking for residential development should be provided unless it can be demonstrated that on-street parking meets highways standards and does not negatively impact on the visual and other amenity of the local community. It notes that the design and number of parking spaces must respect the valued characteristics of the area, particularly in conservation areas.

## **Assessment**

### Principle

62. Policy DMC10 permits the conversion of non-listed buildings to dwellinghouses in accordance with policy HC1 in principle where they have been demonstrated to be non-designated heritage assets.
63. In this case the application has been accompanied by a heritage assessment confirming that the building pre-dates 1884. The heritage assessment is lacking in some regards – see the consultation response of the Authority’s Archaeologist - and the following section of this report, below. However, we agree with the report’s conclusion that the barn represents a heritage asset.
64. On this basis, the building is concluded to be a non-designated heritage asset, and its conversion to a permanent dwellinghouse would comply with policies DS1 and policy HC1 in principle if it would secure the conservation and enhancement of the heritage asset.
65. As the barn is only suitable for conversion to housing under policies HC1 and DMC10 due to its heritage interest, if permission was granted it would be necessary to remove permitted development for extensions, alterations, and outbuildings because each of these have the potential to significantly harm or alter the significance of the building, undermining the reason for permitting its conversion in the first place.
66. Any conversion of the building must also comply with the conservation provisions of DMC10.
67. This is considered in the following sections of this report.

### Impacts of the development on the character, appearance and significance of the building, its setting, and the landscape

68. The Peak District National Park Historic Farmstead Character Statement (FCS) forms part of the suite of guidance for development of historic farmsteads within the Park. It provides guidance on the character and significance of the Peak District’s traditional farmsteads and buildings, and is an evidence base for decision-making and development in context.
69. This identifies field barns as an important and highly characteristic part of the Peak District’s heritage and landscape, that they are highly characteristic, and that they strongly contribute to local distinctiveness.
70. The Authority’s Archaeologist advises that the submitted heritage statement is not sufficient to allow a full understanding of the building’s heritage significance or the impacts of the development upon this. As a result it does not meet the requirements of NPPF paragraph 189 because it does not describe the significance of the affected heritage asset using appropriate expertise to a level of detail proportionate to the significance of the asset, or the minimum requirements that the local Historic Environment Record should be consulted.



71. Without this information it is not possible to understand:

- any features of heritage significance the building might possess and how the development would affect them
- the historic floor plan of the building, the importance of this to the buildings heritage significance, to understanding its historic function and relationship with the landscape, and to understanding the impacts of the proposed changes on this. The level of subdivision proposed is likely to adversely affect significance however, as it is unlikely that the building was formerly so divided.
- Any historic use or ownership that might affect the heritage importance of the building and therefore its sensitivity to change

72. The application is therefore unacceptable on the grounds of insufficient information being available to make a full assessment of the extent of harm to the heritage assets significance, contrary to paragraph 189 of the NPPF, and to policy DMC5.

Landscape and setting

73. The Authority's Archaeologist advises that even without this information it is evident that the development of the barn into a residential use will harm both the agricultural setting of the barn – a view also supported by the objection of the Authority's Landscape Architect – which is likely to positively contribute to its significance as a heritage asset, and that it will also harm the area of historic landscape within which the barn is located. We agree with these conclusions.

74. As noted above, field barns are specifically identified as an important part of the Peak District's landscape by the FCS, being highly characteristic and strongly contributing to local distinctiveness.

75. They allowed the land to be managed remotely without the need to move stock and produce to the main farmstead and are illustrative of agricultural management practices and their changes overtime.

76. This importance and their position outside of settlements makes them particularly sensitive to changes to their setting, which can harm both their character and that of the landscape.

77. The Authority's adopted Landscape Strategy categorises the landscape character of this area of the Park as 'Limestone Plateau Pastures', and identifies the pastoral farmland enclosed by limestone walls, and isolated stone farmsteads and field barns as key characteristics of this landscape. It notes that tree cover is mostly limited to occasional tree groups, or small shelter belts, allowing wide views to the surrounding higher ground.

78. In this instance the site is very clearly of this character, as is the surrounding countryside.

79. The site is very open, with clear views of it afforded on approach along the A515 from the north-east and south-west, and with the site in constant view from the higher ground to the north east at a distance of up 500m. The building is also prominent from a stretch of the Tissington Trail to the west and north.

80. It is proposed to provide gardens and parking to the front of the building. This would have a high impact on the setting of the building. The parking of domestic vehicles alone - typically up to two and potentially more at times if the occupiers of the dwellings were to

have guests – adjacent to the building would be entirely at odds with its agricultural appearance.

81. The same can be said of the creation of what would effectively be a garden immediately in front of the barn; domestic maintenance, activity, and paraphernalia would all change the setting to be one of domestic appearance.
82. Potentially the most significant and domesticating intervention in this case would be the introduction of lighting. The barn has a number of large openings that are seen prominently on approach from both the north and south of the site along the highway. The internal illumination of these during hours of darkness would be particularly incongruous given the volume of openings around the building, its character, and its isolation away from the roadside and other buildings. It would result in significant harm to both the buildings character and that of the wider landscape. Such lighting cannot be reasonably or acceptably controlled by condition or amendment.
83. Collectively, these changes would all have a high adverse impact on the character of the barns setting, and would consequently significantly harm its significance and character, contrary to policies L3, DMC3, DMC5, and DMC10.
84. These impacts would not be limited to within the site itself, or even to short distance views, but would be apparent from some distance on approach towards the site from any direction.
85. It is therefore concluded that the development would result in less than substantial harm to historic and current character of the landscape more generally. This is contrary to policies L1, L3, DMC3, DMC5, and DMC8.

#### Summary and planning balance

86. In summary, the development would result in the following harm:
  - Domestication of the buildings setting, resulting in harm to its significance and agricultural character
  - Harm to the character and appearance of the landscape, for these same reasons
87. In terms of the harm to the buildings itself, as a non-designated heritage asset there is a need to reach a balanced judgement that has regard to the scale of any harm or loss and the significance of the heritage asset, as required by the NPPF.
88. The benefits of the scheme extend to the provision of housing, securing a future viable use for the barn, and providing a modest amount of short-term (potentially) local employment during construction., officers consider that these considerations do not outweigh the harm described.
89. However, in this remote location the conversion of the building would do so at a high cost to its character and that of the locality. This weighs heavily against the proposal.
90. Having taken the above in to account, it is concluded that the benefits that the development would result in would not be sufficient to outweigh the heritage harm arising from it and the proposal is therefore in conflict with policies DMC5 and DMC10, as well as the historic environment policies of the NPPF.
91. Further to this, the development would result in harm to the historic landscape character of the area. This harm doesn't just alter the legibility of the historic landscape, but also alters and detracts from the present rural character of the landscape in this location. The

National Park has the highest level of landscape protection afforded to any UK landscape through national legislation and national and local planning policy.

92. Accordingly, the development would also be contrary to policies L1, DMC3, and the landscape protection provisions of the NPPF.

#### Ecological impacts

93. The application has been accompanied by a bat report, which found no evidence of bat and birds use of the building.
94. The Authority's own Ecologist advises that the barn appears too open and derelict to provide any habitat of note, and that requiring compensating habitat replacement would therefore be unreasonable.
95. The impacts of the development on the ecology of the locality are therefore concluded to be negligible and to accord with policy E2.

#### Amenity impacts

96. Due to the position of the building away from any other residential property the proposed development would not result in any loss of privacy, any additional disturbance, or otherwise affect the amenity of any other residential property, complying with policy DMC3.

#### Highway impacts

97. Amended plans have been submitted in response to the highway authority requests to demonstrate sufficient parking areas and visibility splays at the site access.
98. The visibility splays shown in each direction are 125m and not the 150m required by the highway authority; although it appears likely that these could be achieved over land in the applicant's control.
99. However, the highway authority also recommend that the applicant provides details demonstrating forward visibility for oncoming vehicles towards a vehicle turning right into the site, due to the horizontal alignment of the road. This has not been provided. We estimate that such forward visibility would extend to between 80m and 90m when approaching from the south, taken across highway verge but not including other land outside of the applicant's control. This is well below the 150m visibility recommended by the highway authority for a 50mph road.
100. The highway authority advise that any shortfall in visibility sightlines should be supported by speed readings, with sightlines being provided in accordance with 85th percentile wet weather speeds. This has not been undertaken.
101. When travelling north, this section of road levels out as it passes Pine View and has meandering corners, both of which lead to high vehicle speeds in officers' experience. It is therefore anticipated to be unlikely that a speed survey would justify the considerable shortfall in forward visibility that appears capable of being achieved.
102. In summary, there is insufficient information to allow a proper assessment of the highway safety impacts of the development, and an unacceptable impact on highway safety therefore cannot be ruled out, contrary to paragraph 109 of the NPPF.

### Service provision

103. Details of power, drainage, water supply, and other services to the site have not been submitted with the application. It would be important for these to be routed underground to ensure that they did not further impact on the character of the site and setting of the building and, in the case of drainage, were sufficient to avoid groundwater pollution. In the case of approval, conditions would be required to secure this.

### Environmental management

104. An environmental management statement has been submitted, essentially stating that the development will be sustainable due to being a conversion of an existing building.
105. It makes no mention of additional energy efficiency measures that have been considered (beyond the broad statements that insulation and double glazing would be installed), or whether the applicant has considered the potential to introduce renewable energy measures.
106. This fails to address matters of energy efficiency, carbon emission reductions, or water efficiency in any meaningful way, and the development is therefore concluded to be contrary to policy CC1.

### Conclusion

107. We conclude that the proposal fails conserve the heritage significance of the buildings setting and the character of the landscape.
108. The application also includes insufficient heritage assessment for the impacts on the building's interest as a heritage asset to be fully assessed.
109. We have weighed the benefits of the development against this harm as required by planning policy, and conclude that the identified harm would outweigh them.
110. For these reasons the proposal conflicts with policies L1, L3, DMC3, DMC5, DMC8, and DMC10, as well as the historic environment policies of the NPPF.
111. The development also fails to demonstrate that it would not have an unacceptable impact on highway safety, contrary to paragraph 109 of the NPPF.
112. Further, the development fails to demonstrate that it has sought to make the most efficient and sustainable use of land and resources, to take account of the energy hierarchy, or to achieve the highest standards of carbon reduction and water efficiency. This is contrary to policy CC1.
113. There are no other policy or material considerations that would indicate that planning permission should be granted.
114. We therefore recommend that the application be refused.

### Human Rights

115. Any human rights issues have been considered and addressed in the preparation of this report.
116. List of Background Papers (not previously published)

117. Nil

118. Report Author: Mark Nuttall, Senior Planner (South)