

**4. FULL APPLICATION – RESTORATION AND EXTENSION OF THORNSEAT LODGE AND ANCILLARY BUILDINGS TO FORM HOLIDAY ACCOMMODATION AND ANCILLARY GUEST FACILITIES. RESTORATION OF HISTORIC STABLE BLOCK FOR WEDDING VENUE, RESTORATION OF EXISTING ACCESS AND CREATION OF NEW CAR PARK AND ASSOCIATED LANDSCAPING AND MANAGEMENT AT THORNSEAT LODGE, MORTIMER ROAD, SHEFFIELD (NP/S/0620/0511, AM)**

**APPLICANT: THORNSEAT LODGE LTD**

**Summary**

1. Thornseate lodge is located in open countryside adjacent to Bradfield Moors 2.2km west of Low Bradfield.
2. The application proposes the conversion and extension of the Lodge to create six units of holiday accommodation and the erection of a wedding venue and bunkhouse along with alteration to the existing access, creation of internal driveways, car park and associated landscaping.
3. The application would not deliver public benefits to justify major development and would result in harm to the landscape, biodiversity and cultural heritage of the National Park.
4. The application is recommended for refusal.

**Site and Surroundings**

5. Thornseate Lodge is located in open countryside approximately 2.2km west of Low Bradfield and adjacent to Bradfield Moors. The site was originally built and occupied as a shooting lodge and later occupied as a children's home. The building has been unoccupied for the past thirty years and the condition of the building has deteriorated significantly.
6. To the south west of the Lodge is the remains of a former stable block set within woodland comprising conifer plantation and self-set deciduous trees.
7. Land to the west of the site is within the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA), South Pennine Moors Special Area of Conservation (SAC) and the Dark Peak Site of Special Scientific Interest (SSSI).
8. Access to the site is from Mortimer Road along the historic driveway. The nearest neighbouring property is Warden's House located 25m to the northeast of the Lodge.

**Proposal**

**Lodge accommodation**

9. Restoration and extension of Thornseate Lodge and ancillary buildings to form holiday accommodation and ancillary guest facilities.
10. The plans show that the south-east elevation (front), north-east elevation (side), tower and part of the north-west (rear elevation) would be retained. The remaining elevations and roof structure would be re-built and a new floor plan and two-storey rear extension would be constructed. New and replacement window and door frames would be provided. The plans are not clear if the existing external decorative details (including the decorative barge boards) would be retained.

11. The extension would be two storey projecting from the rear of the lodge. The extension would be of a modern design with two projecting gables and connecting flat roof structure reflecting the elevation behind but with the roof and walls clad with dark metallic cladding.
12. The lodge would be sub-divided internally to provide six holiday cottages each with three bedrooms, bathroom, kitchen / living room and a separate external access. A shared lounge / sitting room would be provided at ground floor.
13. The existing pool to the rear of the lodge would be removed / filled in. The existing modern garage to the rear of the lodge would be retained.

#### Wedding venue

14. The application states that the development would restore a historic stable block. However, the stable block buildings no longer exist. Therefore, the application proposes the erection of a new building in the location of the former stable block to be used as a wedding venue.
15. The wedding venue would have a total floor space of 868m<sup>2</sup> and include a dining area, stage, external courtyards, meeting rooms, catering area, entrance foyer, toilets and storage. The building would have a square plan form with one and two storey stone buildings with pitched roofs around the perimeter of an internal courtyard. Part of the elevation to the internal courtyard would be glazed. No roof plan has been submitted.
16. To the south west of the proposed wedding venue, an external courtyard would be created with stone retaining walls and stone steps down to the access road and car park.
17. An existing building known as the 'engine room' would be converted or re-built to create an open space with mezzanine above for use associated with the wedding venue.
18. A new detached building forming two-storey bunkhouse accommodation would be constructed on the ruins of a former building. This building would provide four bedrooms with 13 sleeping spaces, bathrooms, living room and kitchen.

#### Access, parking and landscaping

19. An indicative landscaping scheme has been submitted. This shows that the existing access would be altered. The existing driveway to the lodge would be retained with the existing stone setts, where possible. Two new internal access roads would be created from the main access and existing drive to a proposed parking area. The new access roads along with hardstanding around the Lodge would have a tarmac surface.
20. The car park would provide 80 spaces for cars along with an additional overflow parking area. The main car park would be surfaced with gravel. Outside patio areas would be surfaced with paving flagstones.

#### Sustainable building, climate change and utilities

21. The application states that conversion of existing buildings is a sustainable form of development. The development will be built to meet modern standards of insulation, heating, lighting, glazing and draught-proofing. No low carbon or renewable energy technologies are proposed but the application does state that air source heat pumps will be explored at the detailed design stage.
22. The application states that foul drainage will be to a package treatment plant discharging to a drainage field or ditch. No other information or specification has been submitted with the application.

23. Surface drainage would be dealt with by a sustainable urban drainage strategy (SUDS). This would include cellular trench soakaways, oversized pipes, and storage with a restricted outfall managing runoff from surfaces and connecting downpipes to water butts.

**RECOMMENDATION:**

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

- 1 The development would not be in the public interest and therefore exceptional circumstances do not exist to justify the proposed major development. The proposed development is therefore contrary to policies GSP1, DS1, RT1, E2 and the National Planning Policy Framework.**
- 2 The development would result in very significant harm to Thornseat Lodge, which is a non-designated heritage asset of regional importance contrary to policies L3, DMC3, DMC5, DMC10 and the National Planning Policy Framework.**
- 3 The development would harm valued landscape character, as identified in the Landscape Strategy and Action Plan and tranquillity and dark skies. The application does not demonstrate it can be carried out in a manner that protects and enhances trees on site. The development is therefore contrary to policies L1, DMC1, DMC3, DMC13, DMC14 and the National Planning Policy Framework.**
- 4 Insufficient information has been submitted with the application to demonstrate that the development will conserve and enhance biodiversity on site or that significant effects on adjacent European Sites can be ruled out. The development is therefore contrary to policies L2, DMC11, DMC12 and the National Planning Policy Framework.**
- 5 The development would not be sited in a sustainable location and has not been designed to mitigate the impacts of climate change. The development does not encourage sustainable transport and would exacerbate the impact of traffic in the local area. The application is not supported by a travel plan and would not encourage behavioural change or achieve a reduction in the need to travel. The development is therefore contrary to policies CC1, T1, T2, DMT6 and the National Planning Policy Framework.**
- 6 Insufficient information has been submitted to assess potential impact of noise and other disturbances upon neighbouring properties. In the absence of this information, it is likely that the development would harm the amenity of occupants of the neighbouring property known as Warden’s House contrary to policies GSP3, DMC3 and DMC14.**

**Key Issues**

- Whether there is a justification for the proposed major development
- The impact of the proposed development upon the valued characteristics of the National Park
- Whether the development is acceptable in all other respects.

**Relevant Planning History**

24. 2018: ENQ 34312: Pre-application enquiry about current proposals. Officers advised that the proposal would be major development and normally contrary to our development plan.

Therefore, exceptional circumstances would need to be demonstrated to justify enabling development that achieved the restoration of the lodge. Concerns were raised about the impact of the proposals upon the lodge. Officers also provided advice on information required to support the planning application.

25. 2008 – 2013: Four enquiries received about the dilapidated condition of the building.

### **Consultations**

Parish Council – Do not support or object to application but make general comment raising concerns in relation to problems in relation to previous nearby wedding venues.

Highway Authority – No response to date.

City Council – No response to date.

Environmental Health – No response to date.

Lead Local Flood Authority – No response to date.

Environment Agency – No objections.

Historic England – No comment.

Natural England – Further information required to determine impacts on designated sites. Without this information, Natural England may need to object to proposals. Natural England make the following comments:

*“The application site is in close proximity the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA) and South Pennine Moors Special Area of Conservation (SAC).*

*Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.*

*It is Natural England’s advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make.*

*Natural England advises that there is currently not enough information provided in the application to determine whether the likelihood of significant effects can be ruled out. We recommend you obtain the following information to help you undertake a Habitats Regulations Assessment:*

- *Details of the operation during construction including access and equipment to be used and timing and duration of works*
- *Post construction details including months of operation of venue; start and finish times of wedding parties their scale and location within the application site.*
- *Potential for recreational disturbance from increased access to the SPA*
- *Potential environmental disturbances e.g. fireworks and music and whether these would be likely to cause ongoing disturbance to the species or habitats for which the SPA is designated (for further information please see below).*

*The moorlands in this location are of particular importance for their breeding bird populations, including internationally important numbers of Golden plover, Merlin and Short-eared owl.*

Natural England would be concerned with the impact of firework displays and other disturbances so close to the moor particularly during bird breeding season. In addition to the disturbance factor, there is an increased fire risk associated with the use of fireworks (and potentially the release of sky lanterns).

As listed above we would therefore require further information to be able to rule out Likely Significant Effect on the SPA. It is particularly important that information regarding the timing, frequency and scale of the fireworks displays is fully considered. An estimation of the area which might potentially be impacted and if the birds are limited to the SPA during a particular time of the year would also be helpful. To determine the level of noise disturbance resulting from firework displays and other activity a noise impact assessment may be required.

The site is also within the Impact Risk Zone of the Dark Peak SSSI. Curlew and Twite are important birds in the area associated with the SSSI and could also be subject to disturbance. The above information should therefore also inform any potential impact on the SSSI.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence."

PDNPA Archaeology – Object to the application and make the following comments:

"This application is not supported by all the necessary plans and drawings to make an assessment of the impact.

This application is supported by a heritage statement that describes the significance of the heritage assets affect, and includes appropriate background research, consultation of the historic environment record and map regression. It meets the requirements of NPPF para.189 and policy DMC5 in relation to the supporting information required.

Thornseat Lodge is a 19th century shooting lodge set in a designed ornamental landscape with the remains of several outbuildings that served the main house within its grounds. These structures are in varying state of survival from complete ruin with very little surviving above ground level, to almost complete standing buildings. The whole complex is integrated, serving a single purpose/ original historic function, and is considered to be a heritage asset of regional significance.

The site of the proposed development is a heritage asset of archaeological, architectural and historic interest. The modern garage has no heritage significance or value. It detracts from the historic form and interest of the site.

The site and a number of its buildings are in very poor condition and I support finding a viable use that would conserve the significance of this heritage asset and secure its long term future.

I support the comments of Conservation Officer with respect to her initial assessment of the impact of the proposals on the historic and architectural interest and significance of the Lodge house. The proposals retain only the south-east and north-east façade, with a completely new arrangement internally resulting in the complete loss of the plan form, surviving original decorative features, and of the concealed evidence for the development and use of the Lodge that is retained within the existing fabric. This represents a **very high level of harm** to a heritage asset of regional significance.

The heritage statement demonstrates that the buildings of the stable yard were demolished by the time of the 1962 OS maps. This means that there haven't been buildings at the site for at least 58 years.

*The proposed development is for an entirely new wedding venue development on the site of the historic stable yard. The heritage statement suggests that in replacing the essential mass and scale of the lost stable yard buildings, the new wedding venue building will actually reverse some of the harm and negative effect of the loss of the archaeological remains of historic stable yard, and that this is a positive effect. I fundamentally disagree with conclusion. Replacing an authentic historic element of the Lodge site, the physical remains of which retain legibility of its historic function and relationship to the Lodge, the historic massing and scale of which cannot be known, with a modern structure that is conjectural, albeit partly based in design on historic examples fundamentally compromises the core significance of the remains of the stable yard. The overall impact of this proposal is negative.*

*The groundworks associated with the proposed new building on the site of the former stable yard will result in the **complete loss of archaeological interest** of the historic remains. This is the **highest possible level of harm** to a feature that intrinsically of local interest, but which contributes to the significance of a heritage asset of regional significance (the Lodge site as whole) and which is fundamental to understand the historic development and function of this heritage asset.*

*The modern garage has no heritage significance or value. It detracts from the historic form and interest of the site, and its removal would be considered to be a benefit. The current proposals retain this building.*

*We cannot assess the impact of the development upon the Historic garage/grain store, game larder/cold store, 20<sup>th</sup> century Engine House due to lack of drawings.*

*The groundworks associated with the new building on the ruinous structure to the south west of the stable yard, Referred to as 'The Cottage' will result in the **complete loss of archaeological interest** of the historic remains. This is the **highest possible level of harm** to a feature that intrinsically is of local interest, but which contributes to the significance of a heritage asset of regional significance (the Lodge site as a whole).*

*Ruins to north west of the site – there are no proposals for these ruins, therefore there will be no impact.*

*The changes within the grounds of Thornseat Lodge will result in both harm and enhancement. The infilling of the swimming pool, restoration of the historic access drive and maintenance of the grounds are all positive outcomes. The creation of the car park will change the original design of the grounds, of how they were intended to be utilised and experienced and will therefore result in a degree of harm. Without a site plan as existing I cannot make a full assessment of this.*

*Where an assessment of impact has been able to be made, the level of harm to the identified heritage assets is very high, and the proposed development would not achieve the conservation or enhancement of this regionally significance heritage asset and is therefore contrary to policy DMC5.*

*The key argument for establishing a wedding venue, including a number of new buildings, car parking etc. at the site appears to be that it allows/enables for the conservation and enhancement of the lodge itself. However, the proposed development fundamentally does not achieve this.*

*The development claims to achieve the 'restoration' of a number of structures of which very little remains. There is so little standing fabric left at the site of 'The Cottage' and at the stable yard, that the development as proposed is not a 'restoration' of these structures, it is entirely new buildings on the site of these historic structures. The core significance of these structures lies in the archaeological and historic interest, and siting new buildings over their footprint will result in the complete loss of this interest and significance.*

*As a non-designated heritage asset NPPF para. 197 requires a balanced judgement needs to be made that has regard to the scale of the harm and the significance of the heritage asset affected by the proposed development. **However, the current application contains insufficient information to enable such a balanced judgement to be made.***

PDNPA Conservation Officer – Object to the application and make the following comments:

*“Thornseat Lodge is an important non-designated heritage asset, noted in the Heritage Statement as a building of regional architectural and historical interest: as a fine example of mid to late Victorian architecture; for its association with the Jessop family (of Jessop’s Hospital fame); and as a reflection of the growing fashion for grouse shooting at its time of construction.*

*Both the exterior and interior of the Lodge are of historic interest, illustrating both the mid-19th century ‘shooting box’ and late-19th century gothic enlargements (including ornate timber bargeboards etc.). To the rear, the latter were of subservient single-storey form (at least one of the two wings with a low inset hipped roof). Internally, the plan form (despite more recent collapse of internal walls) still reflects the stages of development of the Lodge. Decorative internal architectural features including skirtings, cornices, door and window architraves and moulded panelling beneath windows still survive in places.*

*The external form and detailing, the surviving internal decorative features and the internal plan-form therefore make an important contribution to the significance of this historic non-designated heritage asset and are integral to its historic integrity.*

*The submitted drawings are inadequate for comparing existing with proposed accurately.*

*The current proposals would effectively result in the retention only of the south-east and north-east facing façades to the Lodge. Internally the historic plan-form would be lost, including the central and south-west chimneybreasts, and the original external 1850s walls between the earliest and later building phases to the rear and adjacent to the later tower.*

*No details have been provided regarding retention of the significant internal decorative features which still remain in part, so it appears that these are also to be lost. As stated above, sufficient evidence remains internally, and through photos, for these features to be replicated and reinstated. It is not clear what is proposed for the cellar: this is not included on any plans.*

*The total loss of the interior, including plan-form and any original decorative features, together with the retention of only 2 facades (and potentially the loss of much of the historic external detailing would fail to conserve or enhance this regionally important heritage asset, harming its significance.*

*The proposed new rear extensions would not respect the architectural hierarchy of the principle building, unlike the existing rear extensions (which are considerably lower, and more subservient), but would instead be dominant structures, visible from both rear and side elevations. The use of modern slate tiles to clad these pitch-roofed extensions would not compliment the traditional, local palette of building materials and would jar with the historic character and appearance of the Lodge.*

*No details of proposals for windows and doors to the Lodge have been provided. Some of the remaining windows appear to be of historic interest (particularly to the rear). In order to better conserve or enhance the non-designated heritage asset, a comprehensive window schedule should be drawn up, identifying the significance of those windows which remain, to form a basis for the any new windows proposed.*

*Insufficient information has been provided, as identified above. This is required in order to provide a more detailed understanding of the alterations proposed to the Lodge, and to enable a full assessment of their impact on its significance.*

*However, based on the information submitted to date I consider that the proposals would result in an unacceptable level of harm to the significance of this regionally important heritage asset, and would not result in either its conservation or enhancement.”*

**PDNPA Ecology** – Object to the application and make the following comment:

*“Whilst mitigation for birds and bats within the site has been adequately covered, mitigation for potential noise and disturbance issues have not been adequately addressed. The mitigation suggested for birds associated with the SSSI and SPA in relation to noise is non-committal and the report has not taken into account potential disturbance as a result of increased access from the holiday lets, which can operate independently. The report does not assess whether the suggested measures would be adequate to prevent disturbance. Noise modelling would be a useful tool to inform what impact the potential development would have on the adjacent SSSI/SPA. Other disturbance factors, such as increased access to the SSSI/SAC from the holiday lets should also be considered.*

*The application cannot be positively determined until the matters highlighted above are adequately addressed.”*

**PDNPA Landscape** – Object to the application and make the following comment:

Insufficient information has been submitted with the application and the application is in conflict with policy L1.

Tree removal is not specified and tree protection measures for retained trees is not defined. Despite the conclusions of the tree survey, no landscape mitigation is proposed. The submitted indicative landscape plan is wholly inadequate. A detailed plan which incorporates planting proposals and woodland management / enhancement is required. A landscape and visual appraisal is required to support the application to assess how this landscape strategy will fit in with wider landscape character and where elements of the scheme will be visible from.

The car park is one large area with no internal landscape treatment to break it up. The number of parking spaces is considered excessive. Proposed tarmac surfacing is poorly considered and materials that are more sensitive should be utilised.

**PDNPA Tree Officer** – No response to date.

## **Representations**

26. We have received four letters of representation. Two letters make general comments on the application. One letter supports the application and one letter objects. The reasons are summarised below:

### **General comment**

- This is a major application in the National Park, with parts of the site footprint very near to or immediately adjacent to designated ecological sites. Strongly request the Authority ensure that the adjacent sensitive sites are adequately buffered from noise and other disturbance, including consideration given to dogs off leads and increase in access.
- Generally support the regeneration of this once beautiful building.



- The development will result in noise and late night activities in an area that is extremely quiet. This may harm the amenity of neighbouring property.
- Concern about people leaving the premises waiting on Mortimer Road for taxis. Request a fence around the neighbouring property to prevent trespass.

### Support

- Restrictions could be put in place to mitigate the noise created by the development.
- The restoration would provide jobs in operation.
- The lodge is tucked away in an inconspicuous place and renovation and wedding use will not cause a major problem.

### Object

- Support the proposed restoration and conversion to holiday lets. This was a fine and imposing building which has been long neglected and left to fall into serious disrepair. However, much detail is missing from the application.
- The imposing south east frontage as seen from Mortimer Road and the north-east wall would be restored. The stone, slate tiles and window stone surrounds would be matched to the existing but there is no indication of what would happen to the surviving internal features, which have been detailed in the Heritage Statement.
- The rear of the Lodge would have a substantial 2-storey extension covered with modern slate tiles on both roof and walls with aluminium glazed windows. Some form of extension is required due to the ruinous state of the Lodge at the rear, and these proposals would complement the historic frontage.
- The conversion of the Lodge could potentially meet the requirements of Policy RT2 and DMC10 Conversion of a heritage asset. The building could accommodate the new use without changes that adversely affect its character and could be converted without compromising the significance and character of the building. The new use for 5 holiday lets is unlikely to be visually intrusive or have an adverse impact on tranquillity, dark skies or other valued characteristics.
- However, in order to comply with National Planning Policy Framework paras 184, 192 and 197 and policies RT2, DMC10 and DMC5 detailed information needs to be presented for both the external and internal works, and floor plans need to be provided (in order to see how the internal structure would change from its historic layout in order to ensure that the proposals are sympathetic and sensitive.
- A landscape impact assessment is required to show how the proposals would conserve or enhance the setting of the Lodge and the valued landscape character.
- The approach towards renewable energy requires revision. The majority of forms are rejected.
- Object in principle to the proposed wedding venue on the footprint of the former stables and its courtyard, conversion of the ruins of an old cottage to a 4-bedroomed bunkhouse for up to 13 wedding guests and 80 car parking spaces in adjacent woodland. The viability assessment shows that converting the Lodge alone to market housing or holiday lets is not financially viable. Only when coupled with significant development relating to

the other buildings on site is it viable to restore the Lodge. Nevertheless, the proposed intensification of use adjacent to significant and sensitive natural assets is unacceptable.

- The cluster of ruins that would become the venue would create a massive area of development out of a currently dispersed and fragmented cluster. There appears to be no attempt to incorporate the limited fragments of 'historic' former walling/ builds and, as for the Lodge, there is no detail given for fenestration and openings. Much more architectural detail is needed.
- The number of guests would be limited to 150 (Transport Statement) with up to 10 staff. The impact of the generated traffic is assumed to be negligible but the frequency of use of the venue is not given. The assessment is only concerned with impacts at peak hours (we are given no baseline traffic flows), accident rates, and access arrangements for which there would be a sweeping one-way new drive. In addition to the 80 car parking spaces there would be an overflow car park to accommodate staff parking at peak times. The claim for traffic impacts to be seasonal in the Planning Statement appears unlikely.
- Core Strategy policies GSP1-3 seek fulfilment of NP purposes and require significant overall benefit to the natural beauty, wildlife and cultural heritage of the area. The application undermines the achievement of these overarching policies and a number of Core Strategy and Demand Management policies.
- This is a proposal for business development in the countryside outside the Natural Zone and the named settlements in policy DS1. It is therefore contrary to Policy E2 as it is isolated development in the open countryside in an unsustainable location, it is not small scale and no evidence has been supplied to show it would support an existing agricultural or other primary business responsible for estate or land management through which income will be returned to appropriate management of the landscape.
- The Design and Access Statement claims that creation of a mixed-use development here would contribute to the economic, social and cultural life of Bradfield but no evidence for this is supplied.
- There is no assessment of landscape impact nor any mention of tranquillity or light pollution. The site lies within one of the most tranquil areas of the Dark Peak. In the National Park great weight should be given to conserving and enhancing landscape and scenic beauty; it has the highest status of protection in relation to these issues. Without a formal landscape assessment the proposals are contrary to NPPF para 172 and to Policy L1 A which requires development to conserve and enhance valued landscape character and other valued characteristics.
- With all guests assumed to arrive by car the application has made no attempt to reduce the need to travel, to encourage sustainable transport, or discourage car use. The distance of the venue from any public transport would mean guests and staff would have to drive to and from the venue, which makes the proposal unsustainable. As a non-residential development greater than 1000sq.m floorspace (it expands from 600sq.m existing floor space to a total of 1659sq.m, or an increase of 1059sq.m), the proposal must achieve a Buildings Emissions Rate at least 10% less than the Target Emissions Rate but no rate has been supplied. The approach towards the energy hierarchy, the generation of traffic and the target emissions rate make the development contrary to policies CC1, T1, T2, T7 and DMT6.
- Events at the venue would generate unacceptable increases in traffic on minor rural roads. The approach from urban areas on all points of the compass would require vehicles negotiating country lanes, all of which are steep and narrow with blind bends, and passing through villages such as High and Low Bradfield. This network of quiet lanes

covering Bradfield Dale and extending to the Sheffield boundary is hugely popular and important to cyclists and walkers, especially Sheffield residents for whom it provides easy and quick access to tranquil and beautiful countryside. The lanes around Damflask Reservoir are also part of a PDNPA Miles without Stiles route for the less mobile. With the Covid-19 crisis the use of these lanes for recreation has intensified greatly. On most stretches there is room for only one vehicle and impatient motorists often take risks overtaking other users. These lanes should be protected from intimidating traffic both for their valuable role in improving people's quality of life and to enhance their character and tranquillity.

- The Bradfield Moors are an area of immense tranquillity, and an extremely important habitat for wild birds and other species. The boundary of designated habitats and of open access land are within close proximity of the development site which lies within the Dark Peak SSSI Impact Zone. A venue which could, depending on the occasion, be extremely noisy, potentially with outdoor announcement systems, loud music and fireworks, is inappropriate on the edge of these habitats. Restricting licensing hours or conditions of use would not limit the impacts of noise arising from traffic and people movements, use of the open courtyard, loud music and general partying. This would prejudice the quiet informal enjoyment of the National Park. Policy L2 B does not permit development, other than in exceptional circumstances, where it is likely to have an adverse impact on any sites that are of international or national importance for their biodiversity. No exceptional circumstances have been provided to meet this policy.
- A comprehensive tree survey accompanies the application but no plan is presented as to how the impacts on habitats and trees would be addressed. The application is therefore contrary to DMC13. Policy DMC11 requires the development to achieve net gain for biodiversity but no evidence of this has been supplied.
- NPPF para 202 requires planning authorities to assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. In our view the disbenefits of the development in total outweigh any benefits of such departure. Three of the special qualities for which the PDNP was designated: internationally important and locally distinctive wildlife and habitats; undeveloped places of tranquillity and dark night skies within reach of millions; an inspiring space for escape, adventure, discovery and quiet reflection, would be harmed by this proposal.

### **Main Policies**

Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, L1, L2, L3, RT1, RT2, CC1, CC5, E2, T1, T2 and T7

Relevant Development Management policies: DMC1, DMC3, DMC5, DMC10, DMC11, DMC12, DMC13, DMC14, DMR3, DMT3, DMT6, DMU1 and DMU2.

### **National Planning Policy Framework**

27. The National Planning Policy Framework (NPPF) 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 our Core Strategy 2011 and the Development Management Policies 2019. Policies in the development plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. There is no significant conflict between prevailing policies in the development plan and the NPPF and our policies should be given full weight in the determination of this application.

28. 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.’
29. Paragraph 172 also states that planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
  - a) 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.
  - b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
  - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
30. Paragraph 175 says that when determining planning applications, local planning authorities should apply the following principles:
  - a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
  - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
31. Paragraph 189 says 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.
32. Paragraph 190 says that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.
33. Paragraph 191 says that where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

34. Paragraph 192 says that in determining applications, local planning authorities should take account of:
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.
35. Paragraph 197 says 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.
36. Paragraph 202 says that local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
37. Paragraph 83 says that planning policies and decisions should enable:
  - a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
  - b) the development and diversification of agricultural and other land-based rural businesses;
  - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
38. Paragraph 84 says that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.
39. Paragraph 111 says that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
40. Paragraph 180 says that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
  - a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and quality of life;
  - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
41. Paragraph 153 says that in determining planning applications, local planning authorities should expect new development to:
- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
  - b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
42. Paragraph 165 says that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

#### Peak District National Park Core Strategy

43. Policy DS1 sets out the Development Strategy for the National Park. DS1.C. says that in countryside outside of the Natural Zone conversion or change of use for housing, community facilities and business uses including visitor accommodation, preferably by re-use of traditional buildings is acceptable in principle. Other development and alternative uses needed to secure effective conservation and enhancement is also acceptable in principle.
44. Policy GSP1 requires all development to be consistent with the National Park's legal purposes and duty. Where there is an irreconcilable conflict between the statutory purposes, the Sandford Principle will be applied and the conservation and enhancement of the National Park will be given priority.
45. GSP1. E says that in securing national park purposes major development should not take place other than in exceptional circumstances. Major development will only be permitted following rigorous consideration of the criteria in national policy. GSP1. F says that where a proposal for major development can demonstrate a significant net benefit to the national park, every effort to mitigate potential localised harm and compensate for any residual harm to the area's valued characteristics would be expected to be secured.
46. GSP2 says that opportunities for enhancing the national park will be identified and acted upon. Proposals must demonstrate that they offer significant overall net benefit to the natural beauty, wildlife and cultural heritage of the area. They should not undermine the achievement of other core policies.
47. Policy GSP3 sets out development management principles and states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide, impact on living conditions of communities, impact on access and traffic levels and use of sustainable modes of transport.
48. L1 says that development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan, and other valued characteristics.
49. L2 says that development must conserve or enhance any sites, features or species of biodiversity or geodiversity importance and where appropriate their setting. Other than in exceptional circumstances development will not be permitted where it is likely to have an adverse impact on any sites, features or species of biodiversity or geodiversity importance.

50. L3 says that 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. 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.
51. RT1 says that proposals for recreation, environmental education and interpretation must conform to the following principles: The National Park Authority will support facilities, which enable recreation, environmental education and interpretation, which encourage understanding and enjoyment of the National Park and are appropriate to the National Park's valued characteristics.
52. RT1. B says that new provision must justify its location in relation to environmental capacity, scale and intensity of use or activity, and be informed by the Landscape Strategy. In the open countryside, clear demonstration of need for such a location will be necessary. RT1. C says that wherever possible, development must reuse existing traditional buildings of historic or vernacular merit, and should enhance any appropriate existing facilities. Where this is not possible, the construction of new buildings may be acceptable.
53. RT1. D says that development must not on its own, or cumulatively with other development and uses, prejudice or disadvantage peoples' enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park.
54. RT2 says that proposals for hotels, bed and breakfast and self-catering accommodation must conform to the following principles. The change of use of a traditional building of historic or vernacular merit to holiday accommodation will be permitted, except where it would create unacceptable landscape impact in open countryside. New build holiday accommodation will not be permitted, except for a new hotel in Bakewell.
55. CC1 says that in order to build in resilience to and mitigate the causes of climate change all development must: make the most efficient and sustainable use of land, buildings and natural resources; take account of the energy hierarchy; be directed away from flood risk areas and reduce overall risk from flooding; achieve the highest possible standards of carbon reductions; achieve the highest possible standards of water efficiency and non-residential major development above 1000m<sup>2</sup> floor space must achieve a Buildings Emissions Rate at least 10% less than the Target Emissions Rate.
56. CC5. C says that development which increases roof and hard surface area must include adequate measures such as Sustainable Drainage Systems to deal with the run-off of surface water. Such measures must not increase the risk of a local water course flooding.
57. E2 says that proposals for business development in the countryside outside of the Natural Zone and named settlements must take account of the following principles:
  - A. Businesses should be located in existing traditional buildings 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 reuse of modern buildings may be acceptable provided there is no scope for further enhancement through a more appropriate replacement building.
  - B. On farmsteads, or groups of estate buildings, small scale business development will be permitted provided that it supports an existing agricultural or other primary business responsible for estate or land management. The primary business must retain ownership and control of the site and building, to ensure that income will be returned to appropriate management of the landscape.

- C. Business use in an isolated existing or new building in the open countryside will not be permitted.

E2 goes on to say that beyond this policy and our recreation policies there is no scope for setting up new businesses in the countryside.

58. T1 aims to reduce the general need to travel within the National Park and encourage sustainable transport. T2. C says that modal shift to sustainable transport will be encouraged. T2. E says that impacts of traffic within environmentally sensitive locations will be minimised. T2. F says that sustainable access for the quiet enjoyment of the National Park, that does not cause harm to the valued characteristics, will be promoted.
59. T2. F says that sustainable transport patterns will be sought that complement the development strategy. Travel plans will be used to encourage behavioural change to achieve a reduction in the need to travel, and to change public attitudes toward car usage and public transport, walking and cycling. Travel plans to reduce traffic movements and safeguard transport infrastructure will be required on appropriate new developments and encouraged on existing developments.
60. T7. B says 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. T7. C says that non-residential parking will be restricted in order to discourage car use, and will be managed to ensure that the location and nature of car and coach parking does not exceed environmental capacity.

#### Development Management Policies

61. DMC1. A says that in countryside beyond the edge of designated settlements any development proposal with a wide scale landscape impact must provide a landscape assessment with reference to the Landscape Strategy and Action Plan. The assessment must be proportionate to the proposed development and clearly demonstrate how valued landscape character, including natural beauty, biodiversity, cultural heritage features and other valued characteristics will be conserved and, where possible, enhanced taking into account: the overall strategy for the relevant Landscape Strategy and Action Plan area, any cumulative impact and the effect of the proposal on the landscape.
62. Policy DMC3. A says where development is acceptable in principle, it will be permitted provided that its detailed treatment is 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.
63. Policy DMC3. B sets out various aspects that particular attention will be paid to including: siting, scale, form, mass, levels, height and orientation, settlement form and character, landscape, details, materials and finishes landscaping, access, utilities and parking, amenity, accessibility and the principles embedded in the design related SPD and the technical guide.
64. Policy DMC5 says that applications for development affecting a heritage asset, including its setting must clearly demonstrate its significance including how any identified features of value will be conserved and where possible enhanced and why the proposed development is desirable or necessary. The supporting evidence must be proportionate to the significance of the asset and proposals likely to affect archaeological and potential archaeological interest should be supported by appropriate information.
65. DMC5. E says that if applicants fail to provide adequate or accurate detailed information the application will be refused. DMC5. F says that development of a non-designated heritage asset will not be permitted if it would result in any harm to, or loss of, the significance,



character and appearance of a heritage asset unless the development is considered by the Authority to be acceptable following a balanced judgement that takes into account the significance of the heritage asset.

66. Policy DMC10 says that conversion of a heritage asset will be permitted provided that: it can accommodate the new use without changes that adversely affect its character (such changes include enlargement, subdivision, other alterations, and major rebuilding); and the building is capable of conversion; the changes brought about by the new use and any associated infrastructure conserves or enhances significance and landscape character; and the new use will not be visually intrusive in its landscape or have an adverse impact on tranquillity, dark skies or other valued characteristics.
67. Policy DMC11. A says that proposals should aim to achieve net gains to biodiversity or geodiversity as a result of development. In considering whether a proposal conserves and enhances sites, features or species of wildlife, geological or geomorphological importance all reasonable measures must be taken to avoid net loss.
68. DMC11. B says details of appropriate safeguards and enhancement measures for a site, feature or species of nature conservation importance which could be affected by the development must be provided, in line with the Biodiversity Action Plan and any action plan for geodiversity sites, including provision for the beneficial future management of the interests. Development will not be permitted if applicants fail to provide adequate or accurate detailed information to show the impact of a development proposal on a site, feature or species including:
  - i. an assessment of the nature conservation importance of the site; and
  - ii. adequate information about the special interests of the site; and
  - iii. an assessment of the direct and indirect effects of the development; and
  - iv. details of any mitigating and/or compensatory measures and details setting out the degree to which net gain in biodiversity has been sought; and
  - v. details of provisions made for the beneficial future management of the nature conservation interests of the site. Where the likely success of these measures is uncertain, development will not be permitted.
69. DMC11. C says that for all sites features and species development proposals must also consider cumulative impacts and the setting of the development in relation to other features of importance, taking into account historic, cultural and other landscape context.
70. DMC12. A says that for Internationally designated or candidate sites, or European Protected Species, the exceptional circumstances where development may be permitted are those where it can be demonstrated that the legislative provisions to protect such sites or species can be fully met.
71. DMC12. B says that for sites, features or species of national importance, exceptional circumstances are where the development is essential for the management of those sites, features or species; or for the conservation and enhancement of the National Park's valued characteristics; or where the benefits of the development at a site clearly outweigh the impacts on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs.
72. DMC12. C says that for all other sites, features and species, development will only be permitted where significant harm can be avoided and the conservation status of the

population of the species or habitat concerned is maintained; and the need for, and the benefits of, the development in that location clearly outweigh any adverse effect.

73. Policy DMC13 says that planning applications should provide sufficient information to enable impact on trees, woodlands and other landscape features to be properly considered. Development should incorporate existing trees and hedgerows which positively contribute which should be protected during the course of the development.
74. Policy DMC14 says that development that presents a risk of pollution or disturbance including soil, air, light, water or noise pollution, or odour that could adversely affect any of the following interests will not be permitted unless adequate control measures are put in place to bring the pollution within acceptable limits.
75. Policy DMR3. A says that where self-catering accommodation is acceptable outside of designated settlements, its use will be restricted to no more than 28 days per calendar year by any one person.
76. DMT3. B says 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.
77. DMT6 is relevant for business parking and says that new or enlarged car parks will not be permitted unless a clear, demonstrable need can be shown. Additional parking should be of a limited nature, whilst being appropriate to the size of the development and taking account of its location and the visual impact of parking.
78. DMU1 says that new or upgraded service infrastructure for new development will be permitted subject to the requirement that full details are provided in the planning application and it: does not adversely affect the valued characteristics of the area; and any new land use does not commence prior to the appropriate delivery of the services.
79. DMU2 A. says that development of utilities infrastructure will not be permitted unless it is to improve or extend the service to the communities and businesses of the National Park, and can be provided without harm to the valued characteristics of the area or to other established uses. Infrastructure and ancillary works or buildings should be located, designed and landscaped to minimise their impact on the built and natural environment, and on any other established activities.
80. DMU2. B says that infrastructure services to new development or improved services to existing uses should be places underground.

#### Supplementary planning documents (SPD) and other material considerations

81. The adopted climate change and sustainable building SPD provides detailed guidance on construction methods and renewable technologies along with a framework for how development can demonstrate compliance with policy CC1.
82. The adopted design guide SPD and supporting building design guide provides detailed guidance on the local building tradition within the National Park and how this should be utilised to inform high quality new design that conserves and enhances the National Park.
83. The adopted transport design guide SPD provides detailed guidance on the design of transport infrastructure including access layouts, parking and future technology such as electric vehicle charge points and autonomous vehicles.

84. English heritage has produced guidance on enabling development (June 2020) including the need for market testing, expert reporting of a schedule of repair costs and appropriate viability assessment establishing the conservation deficit.

## **Assessment**

### Principle

85. The application proposes the conversion and extension of the former lodge to create holiday accommodation along with the erection of a wedding venue, further holiday accommodation and associated landscaping, access drives and car parking on the site.
86. Seven dwellings are proposed through conversion and new building which would be occupied as holiday accommodation. The holiday accommodation is intended to be operated separately from the wedding venue but would be available to be booked by members of the public attending a wedding.
87. The wedding venue would be built in the location of a former stable block. The former stable block has been demolished for a long time and therefore a new building is proposed for the wedding venue with capacity for up to 150 guests. New internal driveways and an 80-space car park would be created for the wedding venue (with additional overflow parking).
88. The site is located in open countryside on the edge of Bradfield Moor and 2.2km west of Low Bradfield. The site is adjacent to the Peak District Moors Special Area of Conservation (SAC), Peak District Moors Special Protection Area (SPA) and Dark Peak Site of Special Scientific Interest (SSSI).
89. Given the scale of the development and the potential impact of the development upon the landscape, biodiversity and cultural heritage of the National Park, we consider that the development is major development within the National Park.
90. Core policy GSP1. E says that major development should not take place other than in exceptional circumstances and will only be permitted following rigorous consideration of the criteria in national policy.
91. National policy is set by paragraph 172 of the NPPF which states that planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) 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.
  - b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
  - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
92. Our development strategy (policy DS1) and policy RT2 allow in principle for the change of use of a traditional building to holiday accommodation. However, policy RT2 states explicitly that new build holiday accommodation (such as the proposed bunkhouse) will not be permitted.
93. Our development strategy and policy RT1 allow for recreation development. However, development proposals must encourage understanding and enjoyment of the National Park

and be appropriate to the National Park's valued characteristics. New major development for a wedding venue in open countryside would therefore not be in accordance with our adopted recreation strategy.

94. Our development strategy otherwise seeks to direct new business development to named settlements within the National Park but makes exceptions for small scale business development in smaller settlements, farmsteads or groups of buildings in sustainable locations. These exceptions are set out by policy E2.
95. This site is located in open countryside with the nearest public transport link being bus connections to Sheffield from Low Bradfield a 3km walk away along Dale Road or Windy bank which are narrow lanes with no pavement for pedestrians. Therefore, new business development on this site would not be in accordance with policy E2. A or E2. C which explicitly says that business use in an isolated existing or new building in the open countryside will not be permitted.
96. Policy DS1. C allows for other development and alternative uses to secure effective conservation and enhancement but policy GSP2. B says that proposals intended to enhance the National Park should not undermine the achievement of other Core Policies such as RT1, RT2 and E2.
97. Paragraph 202 of the NPPF says that we should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
98. The primary justification for the proposed development relates to the poor condition of the former lodge building and that the development is required to achieve the conservation and enhancement of the lodge and its former stable block.
99. Our policies make a clear presumption against the proposed major development unless exceptionally the development meets the tests set out by the NPPF and can be justified on the basis that overall it is in the public interest. The key issues therefore are the impact of the proposed development upon the landscape, biodiversity and cultural heritage of the National Park and whether the development would be acceptable in all other respects.

#### Impact on former lodge and its setting

100. Thornseat Lodge is a 19th century shooting lodge set in a designed ornamental landscape. The lodge is in very poor structural condition and has partially collapsed and the remains of several outbuildings, including a stable yard that served the main house are located within its grounds. These outbuildings are in varying state of survival from complete ruin with very little surviving above ground level, to almost complete standing buildings. The whole complex is integrated and served a single original historic function, and is considered to be a non-designated heritage asset of regional significance.
101. The application is supported by a heritage statement that describes the significance of the heritage assets and includes appropriate background research, consultation of the historic environment record and map regression. The heritage statement meets the requirements of policy DMC5 and paragraph 189 of the NPPF in relation to the supporting information required.
102. The site and a number of its buildings are in very poor condition and in principle; we would welcome development providing a viable use that secured the conservation and enhancement of this heritage asset and its long-term future.

103. The exterior and interior of the Lodge are of historic interest because they illustrate both the mid-19<sup>th</sup> century 'shooting box' and the later gothic enlargements carried out in the late 19<sup>th</sup> century (including the tower and timber bargeboards etc.). To the rear, the extensions were of subservient single-storey form. Internally, the plan form (despite more recent collapse of internal walls) still reflects the stages of development of the Lodge. Decorative internal architectural features including skirtings, cornices, door and window architraves and moulded panelling beneath windows still survive in places.
104. Therefore, the external form and detailing, the surviving internal decorative features and the internal plan form of the Lodge make an important contribution to the significance of the building and are essential parts making up its historic integrity.
105. We are concerned that the submitted drawings are inadequate to compare the existing Lodge building to the proposed development. Given the condition of the building, it is inevitable that parts of the structure will need to be demolished and re-built to facilitate conversion. However, there are discrepancies between the submitted drawings on precisely which elements of the building would be demolished and which retained. No existing floor plans have been submitted and therefore it is not possible to accurately compare the existing situation to the proposed. No plans have been submitted showing the cellar and therefore it is unclear what is proposed.
106. Furthermore, the submitted elevation drawings do not show the retention of important fenestration details such as the ornate timber barge boards and window and door surrounds. It is therefore not clear whether the proposal would result in the removal of these elements or what precisely the impact of the development would be. Therefore, as submitted, the drawings do not allow us to fully understand or assess the extent or impacts of the proposed development upon the Lodge contrary to policies DMC5, DMC10 and the National Planning Policy Framework.
107. Based on the submitted plans the proposals would effectively retain only the south-east (front) and north-east (side) and part of the north-west (rear) facades of the Lodge. The remaining external and internal walls, floor and roof would be demolished and re-built. Internally the historic plan-form would be lost, including the central and south-west chimneybreasts and the original external 1850s walls between the earliest and later parts of the building.
108. The six holiday apartments proposed in the development would have a completely new plan-form unrelated to the historic plan-form of the Lodge and each accessed by an individual external door. The internal plan form would therefore reflect modern apartments and be completely disconnected from the external appearance of the Lodge or its historic use. The significant internal decorative features within the Lodge would also be lost.
109. The development would therefore result in retention of only two facades. On these facades, it is not clear whether historic external fenestration or detailing would be retained or if these would be altered to provide more contemporary detailing as shown on the submitted plans. Within the building, the development would result in the total loss of the interior including plan-form and any original decorative features.
110. The proposed new two storey rear extensions would not respect the architectural hierarchy of the Lodge. The existing rear elements are low subservient elements, but the proposed extensions would be dominant additions and the use of contemporary cladding materials for the walls and roof would not reflect or respect the traditional palette of building materials or complement the historic character and appearance of the Lodge.
111. The heritage statement demonstrates that the buildings of the stable yard were demolished before the 1962 Ordinance Survey (OS) map. Therefore, these buildings have not be present on the site for at least 58 years.

112. The application describes the proposed development as restoration of historic stable block. However, the proposed development is for an entirely new building on the site of the historic stable yard.
113. The heritage statement suggests that by replacing the essential mass and scale of the lost stable yard buildings, the new wedding venue building will reverse some of the harm and negative effect of the archaeological remains of historic stable yard, and that this is a positive effect. However, we fundamentally disagree with this conclusion.
114. The ruins of the former stable yard are an authentic historic element of the Lodge site. The physical remains of the buildings retain legibility of its historic function and relationship to the Lodge. Other than the remains of the building at the site, there is no evidence of the historic massing and scale of the buildings, which therefore cannot be known. The proposed development is for a new building that is conjectural, albeit partly based upon other historic examples.
115. Replacing an authentic historic element of the Lodge which retains the legibility of its historic function and relationship to the Lodge, the historic massing and scale of which is unknown with a conjectural modern structure would fundamentally compromise the core significance of the remains of the stable yard.
116. The groundworks associated with the proposed new building on the site would result in the complete loss of archaeological interest of the historic remains. This is the highest possible level of harm to a feature, which contributes to the significance of a heritage asset of regional significance, which is fundamental to understand the historic development and function of this heritage asset.
117. The proposal to erect a new bunkhouse building on the ruinous structure to the south west of the stable yard would have a similar impact resulting in the complete loss of archaeological interest of the historic remains. The historic function of this ruinous structure is unknown.
118. The development would incorporate standing outbuildings including a historic garage / grain store, the 20<sup>th</sup> century engine house and a modern garage to the rear of the Lodge. The modern garage has no heritage significance or value. It currently detracts from the historic form and interest of the site.
119. No existing drawings have been submitted for either the historic garage / grain store or the 20<sup>th</sup> century engine house and therefore we are unable to assess the impact of the development upon these buildings. It is unclear from the proposed drawings what the extent of alterations would be. Therefore, as submitted, the drawings do not allow us to fully understand or assess the extent or impacts of the proposed development upon these outbuildings contrary to policies DMC5, DMC10 and the National Planning Policy Framework.
120. In general, design terms the proposed wedding venue has been designed using single and two storey buildings constructed from stone with pitched roofs around the former yard. However, the majority of the formerly open yard would be covered by the proposed dining area and entrance foyer, which would be partially glazed. The roof of this element would be formed with a series of parallel roofs abutting the flat roof of the entrance foyer, which would give a suburban appearance unrelated to the historic yard.
121. To the front of the entrance foyer there would be a raised outdoor terrace accessed from the car park by a flight of steps with further steps up to the engine house. This development would cut across the historic track that lead up to the moors from the hunting lodge. The proposed bunkhouse building, store and retaining wall would all be dominant elements

where viewed from the access and within the grounds of the Lodge. No existing survey or proposed ground levels has been submitted and therefore it is not possible to assess the relative heights of the buildings and changes to ground levels.

122. A range of works within the grounds of the Lodge are proposed to facilitate the proposed development. These include alterations to the existing access and drive, the creation of new access drives and car park. No existing site plan has been submitted and therefore it is not possible to make an informed assessment of the proposed works.
123. However, based on the information provided the proposed tarmac driveways and surfaced car park would be very expansive, intrusive and urbanising additions within the designed landscape surrounding the Lodge. The proposed new access would be wider and require the removal of historic gate posts and walling.
124. Insufficient information has been submitted to enable a fully informed assessment of the the impact of the development. However, on the basis of the submitted information the development would result in a very significant level of harm to the significance of the Lodge, its outbuildings and the grounds contrary to policies GSP3, L3, DMC3, DMC5, DMC10 and the NPPF.

#### Justification for enabling development

125. Paragraph 202 of the NPPF says that we should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.
126. Historic England has produced guidance on enabling development (June 2020) and this is a relevant material consideration in the assessment of the proposals. The advice is that the case for enabling development rests on whether a conservation deficit can be established. This is the amount by which the cost of repair (and conversion to optimum viable use if appropriate) of a heritage asset exceeds its market value on completion of repair or conversion, allowing for appropriate development costs.
127. Market testing is required to explore the possibility of different owners or different uses providing an alternative to enabling development, thereby reducing the need for or scale of enabling development needed. Evidence is also required as to whether public or charitable grant funding or ownership could displace or at least reduce the need for enabling development.
128. The harm done by enabling development contrary to other planning policies is likely to be permanent and irreversible. After consideration of all reasonable alternative means to secure the future of the asset, enabling development is therefore likely to be a last resort.
129. The sums of money generated through enabling development are provided to directly solve the conservation needs of the place. The amount of enabling development that can be justified will be the minimum amount necessary in order to address the conservation deficit and to secure the long-term future of the asset.
130. A schedule of repair costs must start from a sound understanding of the condition of the asset and a clear and justifiable standard of conservation repair and maintenance. An expert report is required to evidence the scale and cost of the repairs and, where relevant, the cost of future maintenance.
131. Historic England advise that an enabling development proposal can only be considered for approval if it provides benefits that outweigh the disbenefits, and where we are confident that the scheme would secure the conservation of the heritage asset. This involves

assessing the position now and considering the asset's future. It is good practice to take the decision in the light of a realistic view of the consequences of refusal. Equally, a proven conservation deficit may not automatically lead to a grant of planning permission, where the disbenefits of failing to comply with other planning policies are considered to outweigh the benefits of conserving the heritage asset.

132. We have determined that the proposed development would result in a very significant level of harm to the significance of the heritage asset. Permitting the proposed development would not secure the future conservation of the Lodge and therefore there is no justification for granting planning permission for development that otherwise conflicts with planning policies.
133. Notwithstanding this conclusion, it is necessary to examine the case for enabling development.
134. The applicant has not carried out any market testing. The property has not been market for sale and therefore the possibility of different owners providing an alternative to the proposed development has not been explored. The applicant has not explored whether public or charitable grant funding or ownership could displace or at least reduce the need for enabling development.
135. A schedule of repair costs provided by an expert has not been submitted. The submitted viability appraisal does not establish the conservation deficit, conversion to the optimal use of the development (its original use), or other alternative developments other than conversion to six holiday apartments. Furthermore the appraisal relies on a valuation report carried out in 2015 and is therefore significantly out of date.
136. We are therefore unable to determine if there is a conservation deficit or whether the proposed enabling development is the minimum amount required to address the deficit. Therefore, notwithstanding our conclusion that the development would in fact substantially harm the significance of the heritage asset, the application does not justify enabling development taking into account advice from Historic England.
137. We are also mindful of paragraph 191 of the NPPF which says that where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.
138. The Lodge was last occupied as a children's home, which closed around 1980. There is some evidence that the building may have been later used by a local group as a place for families on low incomes to stay in the early 1990s. Photographs on Sheffield City Council's website dated 1986 show the Lodge in good condition with all elements including roofs, windows and the rear extensions intact.
139. However, it is clear that after the building was no longer in use it began to deteriorate. Photographs on our file show that by 2005 the roof to the single storey element had collapsed along with parts of the rear projecting two-storey element, although the decorative copings to the single storey element and many windows and doors remained intact, as was the main roof.
140. We subsequently received many enquiries from concerned members of the public about the deteriorating state of the building and photographs on file from 2008 to 2019 show continued deterioration including continued collapse of the main roof, loss of the decorative copings to the single storey element and damage to most windows and doors.
141. The site appears to have been sold by Sheffield City Council in 1994 to Hague Plant Excavations Limited. It is not clear what the condition the building was in 1994 but given photograph evidence from 1986 and evidence that the building may have continued to be



occupied in the early 1990s it is likely that the building was in a better condition than shown on photographs taken in 2005.

142. The site was sold to the applicant Thornseat Lodge Limited in 2018. Two of the active directors of Thornseat Lodge Limited were active directors of Hague Plant Excavations Limited in 1994.
143. The submitted planning statement says that after many years of neglect the building has become derelict to the extent that not only is its appearance enormously degraded, but also many elements have structurally failed. Considering the evidence set out above, we agree with this assessment.
144. It is clear that the building has significantly deteriorated. This is primarily due to lack of regular maintenance that a viable long-term use would provide. While unoccupied, the building also appears to have been a target of theft and vandalism. It is unclear what the intentions of the previous owners of the site have been or what measures have been put in place to secure or maintain the structure. Some temporary structural interventions appear to have been attempted but the continued deterioration of the building has not been arrested.
145. We have not received any planning applications or pre-application enquiries for development until shortly after the applicant purchased the site in 2018. Security fencing and cameras have been erected on the site to deter any further theft or vandalism.
146. It is clear that the building has been neglected for a considerable amount of time and this has contributed to the deteriorated state of the heritage asset. It is not possible to ascertain the intentions of the owners of the site but it is clear that there have only been limited attempts to maintain or secure the building or to seek planning permission for a viable use for the site (until the applicant purchased the site).

#### Landscape impact

147. The proposal is for major development on a site on the edge of Bradfield Moor. The development has the potential to have a wide scale landscape impact not only due to the potential visual impact of new development and activity but also due to the potential impact upon dark skies and tranquillity, which are both important valued characteristics of the landscape.
148. Policy L1 is clear that development must conserve and enhance valued landscape character and DMC1. A requires applications to provide a landscape assessment with reference to the Landscape Strategy and Action Plan. No landscape assessment has been submitted contrary to these policies.
149. The site is located within the Dark Peak and specifically within the moorland slopes and cloughs as defined by our adopted landscape strategy. Land to the north and east of the site is improved grassland quickly becoming open moorland, which is open access land and designated as Natural Zone.
150. This landscape is characterised by steep slopes and cloughs rising to open moorland on the high plateau above, with widespread rough grassland and heather moor, grazed by sheep. This is a wild unsettled landscape with exposed views over lower ground.
151. The land to the west and north of the site reflects this character but the former lodge while originally created to facilitate shooting on the adjacent moorland was designed with landscape grounds and there is woodland within the site to the west of the lodge comprising conifer plantation, mature broadleaf trees and dense rhododendron.

152. The majority of new development including the wedding venue, internal access roads and car park would be contained within the existing wooded area which would visually contain the development viewed from the road. But there would be more open views from open access land on higher ground to the north-west where the mass of the proposed wedding venue and car park would be more noticeable.
153. The potential impact of the use of the proposed wedding venue is of particular concern in this context. The proposed wedding venue would have an intended capacity of 150 people. Gatherings of this number of people are very likely to cause a significant amount of noise from amplified music, celebrations and vehicle movements. The applicant indicates that the wedding venue would be used on a seasonal basis but there is the potential for year round use with weddings likely to finish in the late evening or early morning.
154. A noise assessment has not been submitted with the application but the site is within a landscape of national importance enjoyed by the public for a number of reasons including its natural beauty and tranquillity. It is likely that the site and local area enjoys very low background noise levels.
155. The landscape is also relatively undeveloped with dark skies, a valued characteristic of the landscape, and very little light pollution. No detailed lighting scheme has been submitted. However given the scale of the proposed wedding venue it is considered likely that the development could generate uncontained light, especially from the open courtyard and glazed dining area, outside lighting to the terrace and car park and from vehicle movements during times of darkness.
156. Given the potential impact of the development, we consider that the application would fundamentally conflict with the established landscape character of this part of the National Park contrary to policies GSP3, L3, DMC1 and DMC3.
157. As set out earlier in the report a range of works within the grounds of the Lodge are proposed to facilitate the proposed development. These include alterations to the existing access and drive, the creation of new access drives and car park. No existing site plan has been submitted and therefore it is not possible to make an informed assessment of the proposed works.
158. The submitted landscape plan is indicative only and the level of detail submitted is wholly inadequate to assess the proposals. A detailed plan incorporating planting, woodland management and enhancement would be required. However, based on the information provided the proposed tarmac driveways and surfaced car park would be very expansive, intrusive and urbanising additions within the designed landscape surrounding the Lodge.

#### Impact upon trees

159. A key aspect of the site is the existing woodland and our landscape strategy and action plan states that the management and enhancement of woodlands is a priority within this landscape.
160. A tree survey has been carried out and the report submitted with the application. The report identifies that the site is largely covered by plantation woodland, mature broadleaf trees and dense rhododendron. The plantation woodland is mostly conifer species with self-sown native and naturalised broadleaf species distributed throughout. The rhododendron, a non-native invasive species is found in a large area to the northern end of the site.
161. The report concludes that to accommodate the new car park and access it will be necessary to remove a number of trees which have limited amenity value and that this loss can be offset by planting more appropriate species. The report also states that the development

offers an opportunity to improve the woodland through the implementation of a management plan and to remove rhododendron.

162. The tree report includes a survey of the affected trees and a plan showing their position. However, there is no plan indicating which trees would be removed to facilitate the development or what tree protection measures would be implemented for retained trees.
163. Furthermore, despite the conclusions of the tree report the submitted landscape scheme does not propose any replacement or additional planting. No plan for the management of the woodland or removal of rhododendron has been submitted.
164. The application therefore does not demonstrate that it can be carried out in a manner that protects trees on site that make a positive contribution contrary to policy DMC13. The application also does not demonstrate that it would deliver enhancement to landscape character through new and replacement planting, removal of invasive species and ongoing management of the woodland contrary to policies L1, DMC1 and DMC3.

#### Impact upon biodiversity

165. The application site is in close proximity the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA), South Pennine Moors Special Area of Conservation (SAC) and the Dark Peak Site of Special Scientific Interest (SSSI).
166. The proposal development is not directly connected with or necessary for the management of the European Site. Therefore, due to the proximity of the application site to European Sites we are required by regulation 63 of the Habitats and Species Regulations to determine whether the proposal is likely to have a significant effect on any European site and proceed to the Appropriate Assessment stage of the regulations where significant effects cannot be ruled out. This is also a requirement of policy DMC12.
167. We have consulted Natural England who advise that there is currently insufficient information within the application to determine whether the likelihood of significant effects can be ruled out and that further information is required to enable us to undertake a Habitats Regulations Assessment. Our Ecologist also advises that there is insufficient information submitted to enable an assessment to be undertaken.
168. The moorlands around the application site are of particular importance for their breeding bird populations, including internationally important numbers of Golden plover, Merlin and Short-eared owl. We share concerns with Natural England about the impact of potential disturbances created by the development, for example from noise, fireworks or increased access from visitors. There may also be the potential for increase fire risk associated with the use of fireworks and lanterns.
169. The submitted report suggest that mitigation should be provided such as limitations on noise or additional planting but no detailed information has been provided to inform the impact of potential disturbance and no detailed proposals for mitigation. As set out earlier in the report, no noise survey has been carried out and noise modelling would be a useful tool to inform what impact the development could have.
170. The application does not include sufficient information for us to be able to rule out likely significant effect on European Sites. We are also unable undertake an appropriate assessment and positively conclude that the development will not adversely affect the integrity of European sites. The application is therefore contrary to policies L2, DMC12 and the NPPF.
171. In these circumstances we are prohibited from deciding to grant planning permission by section 63 (1) of the Conservation of Habitats and Species Regulations 2017.

172. The site is also within the impact risk zone of the Dark Peak SSSI and Natural England advise that Curlew and Twite are important birds in the area associated with the SSSI and could also be subject to disturbance. Additional information is therefore also required to inform any potential impact upon the SSSI.
173. The survey reports submitted with the application do identify habitat and protected species within the application site that would be affected by the development including bats, birds and a loss of 0.1 Ha of bracken bed where the car park would be located.
174. The surveys propose mitigation in the form of integrating bat and bird boxes into the development and the wider site. The reports also propose mitigation in the form of additional tree and hedge planting around the proposed car park and buildings, the implementation of a Construction and Environment Management Plan (CEMP) and a management plan for trees, reducing rhododendron and providing deadwood habitat.
175. The reports provide detail in regard to mitigation for bats and birds but recommend that the CEMP and landscape management plan are subject to planning conditions requiring submission and implementation. As set out above the submitted landscaping plan is indicative only and does not provide any proposals for additional tree or hedge planting.
176. DMC11. B states that development will not be permitted if applicants fail to provide adequate information including details of any mitigating or compensatory measures and details of provisions for the beneficial future management of the nature conservation interests of the site.
177. Therefore, the application fails to demonstrate that the development will conserve or enhance biodiversity either on site or nearby designated sites. The application is therefore contrary to policies L2, DMC11, DMC12 and the National Planning Policy Framework.

#### Justification for major development

178. Core policy GSP1 says that major development should only be allowed in exceptional circumstances following the criteria set out in national policy. Paragraph 172 of the NPPF says that permission should be refused for major development in the National Park other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
179. The justification for the development is primarily advanced on the basis that it is required to restore and enhance the Lodge and its former stable yard. However, we have established that the development would result in significant harm to the significance of the Lodge, its former stable yard and their setting, that the development would harm the landscape character and tranquillity of the National Park and that insufficient information has been provided to establish impacts upon biodiversity.
180. The application does not establish an overriding need for the development in this location or demonstrate that the creation of the proposed wedding venue is the only means of re-developing this site. The development would result in benefits to the local economy both during construction and operation, however, the public and local businesses benefit from the valued characteristics and recreation opportunities that the National Park affords.
181. In accordance with paragraph 172 of the NPPF we must give great weight to the conservation of the valued characteristics of the National Park. Having considered this case against the criteria set out in national policy we conclude that development would not be in the public interest and therefore that exceptional circumstances do not exist to justify the proposed major development.

### Sustainable building and climate change

182. Core policy CC1 and our adopted climate change and sustainable building SPD are relevant. CC1 makes clear that in order to build in resilience to and mitigate the causes of climate change all development must make the most efficient and sustainable use of land, buildings and natural resources, take account of the energy hierarchy and achieve the highest possible standards of carbon reductions and water efficiency. CC1. E says that non-residential major development above 1000m<sup>2</sup> must achieve a Buildings Emission Rate at least 10% less than the Target Emissions Rate.
183. Paragraph 150 of the NPPF says that new development should be planned for in ways that can help to reduce greenhouse gas emissions such as through its location, orientation and design. Paragraph 153 of the Framework says that local planning authorities should expect new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
184. The proposed wedding venue would have a capacity for up to 150 people and the development has been designed with an 80 space car-park. The site is located in open countryside and a significant distance from any public transport links, the closest being hourly bus routes in Low Bradfield approximately 3km walk from the site. The location of the site and the quantity of parking proposed indicates that the majority of visitors, if not all, would visit the site by private car.
185. The location of the development in this location would therefore be inherently unsustainable reflecting part of the reasoning why our policies direct economic development to named settlements and only allow for major development in exceptional circumstances. The location of the development would not help reduce greenhouse gas emissions contrary to CC1. A and paragraph 150 of the NPPF.
186. The application provides little information about how the development would be designed taking into account the energy hierarchy and achieve the highest possible standards of carbon reductions and water efficiency. The application does not demonstrate how it would achieve a Buildings Emissions Rate at least 10% less than the Target Emissions Rate.
187. No evidence has been submitted to show how the development has been designed to take advantage of passive design elements, sheltering or solar gain. No information has been provided in regard to whether local sustainable materials would be used. No evidence of insulation, glazing, heating systems, lighting or heat recovery systems has been included. No low carbon and renewable energy measures, water saving measures or waste management measures are proposed other than a statement that air source heat pumps will be considered at a later stage.
188. It is not acceptable for a development of this nature and scale to be designed without having regard to the energy hierarchy and not take opportunities to reduce energy and water consumption and use low carbon and renewable energy as far as practicable. These issues relate to the fundamental design, layout and materials proposed along with other measures such as low carbon and renewable energy. This issue could not be dealt with by a planning condition because it is not reasonable to impose a condition, which potentially could require fundamental elements of the scheme to be re-designed.
189. The development therefore would not be a sustainable use of land and has not been designed to mitigate the impacts of climate change contrary to policy CC1, our adopted sustainable building and climate change SPD and the NPPF.

### Transport and highway safety

190. Due to the scale and nature of the development it has the potential to give rise to a significant number of vehicle movements. A transport statement has therefore been submitted with the application.
191. The plans within the transport statement show that safe access can be provided with adequate visibility splays onto Mortimer Road and that there is space within the site for all delivery and service vehicles to turn before returning to the highway. The development therefore would not harm highway safety.
192. As set out above the proposed alterations to the access, appear to include widening the existing historic access and the removal of walling and gateposts. This appears to be to facilitate one of the new internal driveways. The removal of these features would detract from the character and appearance of the site as set out earlier in the report contrary to policy DMT3. B.
193. The transport statement proposes a total of 80 car parking spaces calculated on the basis that two visitors sharing a car plus spaces to accommodate a maximum of 10 staff. The statement assumes that all visitors would be by private car with a maximum of 75 cars for guests. The statement says that trips are likely to occur predominately outside the traditional network peak hours or at weekends and therefore would not result in any material impact on highway capacity.
194. Given the location of the site and the distance to public transport links the assumption made in the transport statement that all visitors will attend by private car is reasonable. However, it is unclear on what basis the assessment concludes that trips are likely to occur outside peak hours. No information is provided in the application in regard to proposed opening times. Weddings can commence at a range of times from morning to late afternoon and it is not uncommon for guests to arrive and leave throughout the day. Weddings and receptions also regularly take place during the week.
195. Furthermore, the transport statement does not provide a baseline for current use of the highway network and it is therefore unclear on what basis potential impact upon highway capacity has been made. The site is located in an area of the National Park popular with members of the public for recreation especially during weekends.
196. The application is located in open countryside where there is a presumption against the proposed development. Visitors to the development would be very likely to only access the development by private car. The application proposes a substantial car park with overflow parking on that basis. The application does not seek to encourage sustainable transport or facilitate alternative means of access for visitors. No travel plan to reduce traffic movements has been submitted.
197. The site has reasonable access to the wider highway network via Mortimer Road. However, it is likely that a number of guests would travel from the direction of High and Low Bradfield along Dale Road and Windy bank which are popular with recreational users. These are narrow lanes with no pavement for pedestrians.
198. The development would therefore fail to encourage sustainable transport and would exacerbate the impact of traffic in an environmentally sensitive location contrary to core policy T1. The application is not supported by a travel plan and would not encourage behavioural change or achieve a reduction in the need to travel contrary to core policy T2. The proposed off-street parking would not be of a limited nature even taking into account the size of the development and its location contrary to policy DMT6.

### Flood risk and drainage

199. A flood risk assessment and drainage strategy has been submitted with the application in accordance with the NPPF. The whole site is located within Flood Zone 1 which has the lowest flood risk. The Environment Agency raise no objection in regard to flood risk and therefore we agree with the submitted assessment that the development will be directed away from flood risk areas and not pose a risk of flooding in accordance with policy CC1. C.
200. Core policy CC5. C and paragraph 165 of the NPPF requires development to incorporate sustainable drainage systems to deal with the run-off of surface water. A sustainable urban drainage strategy (SUDS) has been submitted as part of the flood risk assessment designed to attenuate a 1 in 100 year (+40%) event. The submitted scheme would meet the requirements of policies CC1 and CC5. A planning condition would be required to secure the submission of construction details and implementation in accordance with policy DMU1.
201. Foul drainage would be to a private package treatment plant on site. The nearest main sewer is some 2.7km away and therefore we accept that it would not be practicable or viable to connect to the main sewer. A planning condition would be required to secure the submission of construction details and implementation in accordance with policy DMU1.

### Other issues

202. The nearest neighbouring property is Warden's House located 25m to the north-west of the Lodge building. Given the distance from the development to Warden's House there are no concerns that the development would be overbearing or lead to any significant loss of light or privacy to occupants. The development would also be contained within the site with dedicated access and parking and therefore visitors to the development would be unlikely to trespass on the neighbouring property.
203. We are however concerned about the potential impact of noise upon the residential amenity of occupants of Warden's House. The site is located in a very quiet area and the two properties are closely related that occupants of the neighbouring property would be very likely to hear noise created by amplified music, announcements, vehicle movements and guests themselves.
204. Given the proximity of the properties and quiet environment it is likely that noise from the development would be harmful to the residential amenity of occupants of Warden's House particularly at night during wedding receptions and when visitors are leaving.
205. No noise survey or assessment has been submitted with the application and therefore we are unable to positively conclude that noise from the development can be mitigated. In the absence of this information, it is likely that the development would harm the amenity of occupants contrary to policies GSP3, DMC3 and DMC14.

### Conclusion

206. Thornseat Lodge is a non-designated heritage asset of regional significance. The Lodge building is in a very poor state of repair. The proposed major development is contrary to our development plan policies but is justified by the applicants on the basis that the development is required to conserve and enhance the lodge and therefore that major development is required in the public interest to enable enhancement of the Lodge and its former stable yard.
207. For the reasons set out in this report, we conclude that the development would result in very significant harm to the significance of the Lodge, its former stable yard and their setting.

Furthermore, the development would harm the landscape character and tranquillity of the National Park and represent an unsustainable form of development.

208. The application does not demonstrate that the development will conserve or enhance biodiversity either on site or nearby designated sites. The application does not include sufficient information for us to be able to rule out likely significant effect on European Sites and we are unable to undertake an appropriate assessment and positively conclude that the development will not adversely affect the integrity of European sites.

209. In these circumstances we are prohibited from deciding to grant planning permission by section 63 (1) of the Conservation of Habitats and Species Regulations 2017.

210. Noise and disturbance created by the development would be likely to harm the residential amenity of occupants of the neighbouring property known as Warden's House.

211. The proposal would therefore not be in the public interest and therefore there are no exceptional circumstances to justify the proposed major development.

212. The proposed development is therefore contrary to the development plan. Material considerations do not indicate that planning permission should be granted. The application is therefore recommended for refusal.

### **Human Rights**

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

### **List of Background Papers** (not previously published)

214. Nil

215. Report Author: Adam Maxwell, Senior Planner