

7. PEAK DISTRICT NATIONAL PARK AUTHORITY CONVERSION OF HISTORIC BUILDINGS SUPPLEMENTARY PLANNING DOCUMENT – CONSULTATION DOCUMENT (SW)

1. Purpose of Report

- 1.1 To seek Committee approval to adopt the Conversion of Historic Buildings Supplementary Planning Document (SPD)

2. RECOMMENDATION

- 1. That the Peak District National Park Authority adopts and publishes the Conversion of Historic Buildings SPD (Appendix 2).**
- 2. That any final amendments to the SPD be delegated to the Head of Planning Services in consultation with the Chair and Vice Chair of Planning Committee prior to publishing.**

3. History

- 3.1 The Peak District National Park Authority's Conversion of Historic Buildings SPD has been under development since the Development Management Policies (DMP) Development Plan Document was approved by Authority on 24th May 2019. It provides clarification to DMP policy *DMC10: Conversion of a heritage asset*.¹
- 3.2 The conversion of buildings forms a significant part of the PDNPA planning casework. The need for a Conversion of Historic Buildings SPD has been recognised, to interpret national guidance in the landscape context specific to the National Park, and to provide the level of detail necessary to guide choices about form, design and materials for those wishing to convert historic buildings. Although the highest planning pressure is upon the conversion of agricultural buildings, other building types have been included.
- 3.3 The Conversion of Historic Buildings SPD has its origins in a number of spheres. The first are the Authority's 1987 'Building Design Guide' and the 2007 'Design Guide' which superseded it. The 2007 Design Guide was formally adopted as a Supplementary Planning Document, but the 1987 guide contains many additional details which are still very useful and it now forms a technical supplement to the 2007 Design Guide SPD. While both documents also contain a short section on conversions, these lack detail.
- 3.4 Between 2015 and 2017 the Cultural Heritage team carried out extensive research into farmsteads, field barns and outfarms across the whole of the Park giving us a very detailed understanding of form, trends in survival and condition across all landscape types. In addition, in 2017 Historic England updated its planning advice notes 'The Adaptive reuse of Traditional Farm Buildings' and 'Adapting Traditional farm Buildings' acknowledging the

¹ https://www.peakdistrict.gov.uk/data/assets/pdf_file/0024/95091/Webpage-Final-Branded-DMP-Doc-Copy.pdf

contribution that these buildings make to landscape character and the planning pressures that they face. This work has heavily influenced the Conversion of Historic Buildings SPD.

4. Main Policies

- 4.1 Relevant Development Management Policies:
- DMC10: Conversion of a heritage asset

National Planning Policy Framework (NPPF)

- 4.2 It is considered that this SPD will provide greater consistency between the NPPF and Local Plan policies by clarifying the way that historic buildings can be converted to new uses within the National Park.

5. Consultations

- 5.1 An informal consultation with internal colleagues and members of the Local Plan Review Steering Group was carried out for 2 weeks (24 February – 10 March 2021). Comments were received from colleagues in Policy and Communities team and members of the Local Plan Review Steering Group which resulted in a number of changes being made to the SPD to improve the understanding of terminology used and general clarity.
- 5.2 The Draft Conversion of Historic Buildings SPD was presented to Planning Committee members on 30th April 2021. Approval was granted for public consultation on the draft SPD which took place 12th July – 6th September 2021. In accordance with the Statement of Community Involvement, the Authority consulted statutory consultees, Parish and Town Councils, planning agents and internal colleagues in the Planning Service. The draft SPD was available on the Authority's website during this time.

6. Representations

- 6.1 In total, 19 representations were received from:
- Town/Parish Councils: Bakewell, Edale, Grindon, Bamford, Holme Valley, Peak Park Parishes Forum
 - Statutory Consultees: Historic England, Natural England, Environment Agency, Staffordshire Police, Coal Authority, Derbyshire County Council, Sheffield City Council, Exolum Pipeline
 - Planning Agents and individuals (5).
- 6.2 The consultation asked a number of questions to focus responses on particular areas, these were:
- Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets?
 - Has the SPD been pitched at a level which is accessible to all those who need to use it?
 - Do you think the six core principles are appropriate?
 - Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles?

- Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use?
- Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (eg Affordable Housing)

6.3 In summary the representations responded positively to these questions and highlighted the following:

- Need to identify the different policy approach and building regulation requirements between designated and non-designated heritage assets
- Greater clarity on explaining a proportionate approach depending on the significance of the asset to avoid unnecessary expense
- General support for the 6 principles
- General support for the document to be used for all kinds of conversion but noted an emphasis on residential
- Good referencing to Historic England documents
- The need to adapt to climate change is more important than what the building looks like after conversion
- Some criticism that the SPD was too prescriptive or not prescriptive enough
- The language of the SPD should align more with the NPPF
- Use softer language to allow for flexibility rather than being too rigid
- It is not necessary to have professionally qualified people to assess all forms of conversion

6.4 Appendix 1 is a summary table of the representations made. It includes an officer response and information on what changes to the SPD were made to address the issues raised by the representations.

6.5 To summarise, the following main changes were made to the SPD:

- Greater alignment with the wording in the NPPF
- Less prescriptive language
- Clarity provided between the policy requirements for designated and non-designated assets in Section 7

6.6 Advice was sought from and provided by Derbyshire Building Regulations Alliance regarding Part L Building Regulations.

6.7 Some photographs will be removed as they are not of sufficient resolution to be included in the final version of the SPD. They will either be replaced with a higher resolution photograph of the same image, replaced with an image depicting a similar example, or not at all. They are at paragraphs:

- 1.11 Open-sided barn converted for outdoor domestic use. (© Bench Architects)
- 5.5 This former school is now a domestic dwelling, but retains its institutional character. (© PDNPA)
- 5.41 The barn adjoining the farmhouse has been converted to domestic use but retains a distinct utilitarian character. (© PDNPA)

- 5.72 New interior structures in this barn conversion float free of the historic fabric and keep the full height space legible. (© CE+CA Architects)

7. Human Rights

- 7.1 It is not considered that the publication of the Conversion of Historic Buildings SPD will raise any human rights issues, as it simply provides further guidance on how to apply the relevant planning policies contained in the DMP.

8. Sustainability

- 8.1 The government's Planning Practice Guidance (2019) states:

'Supplementary Planning Documents (SPDs) do not require a Sustainability Appraisal to be undertaken. They may, in exceptional circumstances, require a Strategic Environmental Assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. A Strategic Environmental Assessment is unlikely to be required where an SPD deals only with a small area at a local level.'

- 8.2 The SPD deals with the conversion of historic buildings. The complexity of a conversion of a historic building can vary and is dependent on its significance, state of disrepair and location to name a few of the constraints. All conversions require planning permission and if a designated heritage asset, Listed Building Consent too. The Conversion of Historic Buildings SPD deals with a specific area of planning policy at a local level that does not result in significant environmental effects.
- 8.3 The SPD provides further guidance to DMP policy DMC10: *Conversion of a heritage asset* which was subject to a Sustainability Appraisal as part of the Local Plan development process.
- 8.4 It is for these reasons that neither a Sustainability Appraisal nor a Strategic Environmental Assessment is required to be undertaken for the Conversion of historic buildings SPD.

9. List of Appendices

- 1) Representations and officer comments
- 2) Conversion of Historic Buildings SPD