

Consultee	Comment No	Comment	Officer response
Edale Parish Council	1	No Specific Comments to pass	Noted
Environment Agency	2	The Environment Agency generally has no comments on the requirements of historic buildings.	Noted
Environment Agency	3	We note that the SPD highlights that any conversion of a historic building will need to produce a flood risk assessment where the development is situated in a flood zone. We would also highlight that any conversion to a residential use, could mean a change in the vulnerability classification to a more vulnerable use, and this would also need to be considered as part of any future planning application.	Noted. This can be addressed as part of the planning application and doesn't need to be specifically referred to in this SPD.
Exolum pipeline	4	We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to <a href="http://www.lsbud.co.uk">www.lsbud.co.uk</a> , our free online enquiry service.	This would happen as part of the planning application process.
Historic England	5	Historic England is fully supportive of this very detailed and informative SPD. We welcome that non-designated heritage assets are included,	Noted
Historic England	6	we are especially pleased to note the references and links to Historic England publications and guidance throughout the document.	Noted
Historic England	7	We consider that the SPD fulfils its aim of offering guidance for the conversion of buildings that are designated or non- designated heritage assets and is relevant to a range of projects.	Noted
Historic England	8	In particular we welcome reference to: "Conservation Principles: policies and guidance for the sustainable management of the historic environment"; "Adapting Traditional Farm Buildings"; and to our guidance on climate change mitigation and achieving energy efficiency in historic buildings.	Noted
Historic England	9	We welcome the reference in para.1.4 that this SPD should be used when it has been determined that the principle of the conversion of a building is acceptable in planning policy terms; ensuring that inappropriate schemes are not taken forward.	Noted
Historic England	10	Historic England has undertaken research on historic farmsteads and appropriate conversion, including a 'Farmstead Assessment Framework' and the following may be of assistance: <a href="https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/">https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</a>	Noted. Link already in.
Historic England	11	We are also pleased to see reference to listed building consent in para.2.2 and it may be useful to signpost to the National Heritage List for England (NHLE) register for details of each listing. This can be found at: <a href="https://historicengland.org.uk/listing/the-list/">https://historicengland.org.uk/listing/the-list/</a>	Noted. Will add link.
Historic England	12	With regard to the criteria for acceptability listed at para.2.2, we suggest adding the 'Setting of heritage assets' as a separate bullet point, as this will distinguish from 'Heritage significance' and 'Impact on the surroundings and wider landscape' criteria.	Noted. Will give own bullet point.
Historic England	13	Where the conversion of the building may have an impact on the setting of a heritage asset/s, or on the wider historic landscape, we suggest requesting visual impact assessments, as well an up-to-date structural report as cited in para.2.3.	Add comment about depending on circumstance an LVIA may be required.
Historic England	14	Historic England is supportive of the six core principles of conversion identified within the SPD and considers that the SPD offers sufficient flexibility in its approach to conversion within these six core principles. We especially welcome reference to Historic England's definition of conservation (para.5.26) and are pleased to see that on serving and enhancing the setting of historic buildings has been included as a core principle.	Noted.
Historic England	15	It is noted that the document offers mainly advice and examples for, and illustrations of, conversion to domestic use. Whilst there is the inclusion of an example of a former smithy converted to a café (p.16), we consider that there may be scope to include further examples of conversions to non-domestic use.	Noted. Possibly look for more non-domestic e.g.s

Historic England	16	With regard to 'Sustainability', included within Section 6 of the document, another publication you may also wish to refer to is: "Planning Responsible Retrofit of Traditional Buildings". Buildings Alliance, supported by Historic England, and can be accessed via the following link: <a href="https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/">https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/</a>	Agree. In the resources section refer to Sustainable Traditional Buildings Alliance website, their document and guidance wheel.
Peak Park Parishes Forum	17	With climate-change issues now so key, it seems indefensible not to allow converted historic buildings to have very good insulation, to avoid heat escape. This applies to windows, doors and all other aspects of building insulation. PPPF believes this to be more important than worrying about ensuring the building continues to look as it did in times past. The Guidance needs to reflect that greater flexibility of approach now needed.	Disagree. There is plenty of good clear guidance to allow sensitive adaptation whilst retaining character.
Peak Park Parishes Forum	18	PPPF believes that there needs to be more flexibility around allowable re-use of redundant agricultural buildings (e.g. barns). Because the current rules are quite restricting, they too often lead to redundant buildings being left derelict, as (from the owner's perspective) the "better" option. More flexible Guidance is needed, to allow more of these buildings to be used for a worthwhile purpose, even if that means some historical features being lost.	This SPD is setting the framework within which reuse can happen.
Bakewell Town Council	19	(i) Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? YES this offers both asset type guidance, it is very useful that non-designated are specifically categorised and included to highlight the importance of these assets within communities. An example would be the shelter within Rutland Recreation Ground Bakewell.	Noted.
Bakewell Town Council	20	(ii) Has the SPD been pitched at a level which is accessible to all those who need to use it? YES the text and language is understandable but its whereabouts for would-be developers needs to be made obvious if it is to be used as an initial guidance document.	Need to add SPD to the pre-application page on the website and validation list.
Bakewell Town Council	21	(iii) Do you think the six core principles are appropriate? YES they are written in a logical order and keep sub-chapters concise.	Noted
Bakewell Town Council	22	(iv) Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? YES they clearly show how a mixture of historic assets can be mixed with contemporary design, which is a very important consideration when trying to upgrade to modern standards.	Noted.
Bakewell Town Council	23	(v) Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? YES the illustrations give good examples of what is clearly possible, it is weighted towards domestic use but there is no reason why these examples could not be used in a non-domestic setting and could open up lateral thinking at design stage.	Look to add some pictures of non-residential development to address comment that makes the point the SPD is weighted towards residential.
Bakewell Town Council	24	(vi) Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing) YES overall, but it may be unusual within Bakewell to offer conversion for Affordable Housing. There is no reason why some historic features should not be included in new build making it more in context with the environment of the Town including Affordable Housing.	The SPD is about conversions, not new builds, but understand the point about having regard for a building's location and drawing references from nearby buildings. This is already addressed in the current Design Guide SPD and other SPDs. Detail on affordable housing is set out clearly in the Local Plan.
Bakewell Town Council	25	It is essential that this document, if adopted, is made obviously available for those considering a conversion build and not lost in a massive list of other documents that may be linked to building within the PDNPA. It should be promoted as a first read when considering a build.	Noted. Will add to pre-app webpage and validation list.
Bakewell Town Council	26	The non-designated heritage considerations are well highlighted as many people may not even realise they exist and may be relevant to any building conversion project viability.	Noted.



Bamford with Thornhill PC	27	Much of the wording of the SPD is quite broad, and therefore capable of wide interpretation. It was felt that the habit of the Authority of expressing its policies in such broad terms leads to the oft-quoted problem of "different officers interpret the rules in different ways" - which irks residents a lot. The Authority is therefore urged to write in a more specific way, so that there is greater clarity about what is actually intended.	The 6 Principles set out the process applicants are recommended to follow. As every building is different in terms of age, condition, interest and setting, some flexibility is required but within the context of the 6 Principles.
Bamford with Thornhill PC	28	Use of historic buildings for affordable housing should be encouraged whenever possible.	Noted. Current Local Plan policy supports the reuse of historic buildings for affordable housing.
Coal Authority	29	The Coal Authority has no specific comments to make on the Conversion of Historic Buildings Supplementary Planning Document.	Noted.
Coverland UK (Sarah Foster)	30	In general, the Draft SPD is a useful guidance document offering comprehensive advice on common issues that arise in many conversion projects.	Noted.
Coverland UK (Sarah Foster)	31	However, its main weaknesses are some significant inconsistencies with national guidance on conserving and enhancing the historic environment, and a lack of clarity about which elements of this guidance fall under the control of the Authority (i.e. how designated and undesignated assets will be considered differently).	Para 5.1, 5.93, 7.4 and 7.5 refer back to NPPF requirements.
Coverland UK (Sarah Foster)	32	1.5 '...while the best use is the one for which the building is designed'. This comment needs to be revised. It is both untrue in many circumstances (e.g. 'agriculture' is a use but agriculture today is very different to the agriculture a building may have been designed for in the 18th century) and is also inconsistent with national policy. PPG 'Conserving and Enhancing the Historic Environment' para 015 states that 'the optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use'.	Noted. Revise word and remove reference to best use is its original use.
Coverland UK (Sarah Foster)	33	1.7 It should be acknowledged that there are no Building Regulations exemptions for undesignated heritage assets in terms of energy performance and so any conversion is likely to require renewable technologies as well as enhanced methods of insulation which may be at odds with the aspirations of the Cultural Heritage Team. This is different to the regime for listed buildings. This should be explained.	Noted, however this SPD is about the principles of conversion within the context of Planning. Officers contacted Derbyshire Building Regulations Consultancy for advice and included a reference to Building Regulations requirements in Section 6.
Coverland UK (Sarah Foster)	34	1.8 'Residential conversion remains the most popular option for the re-use of traditional rural buildings, but it is also the most difficult...' Is this assertion true? There are multiple examples across the National Park of heritage assets being used for car repair workshops, heavy industry, builder's merchants etc. which are far more detrimental to the character and appearance of the asset than a well-designed residential conversion would be. This should be reworded.	Noted. Reworded.
Coverland UK (Sarah Foster)	35	1.9 Wording in this paragraph should be consistent with PPG para 015 which states that: 'By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure. In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.' The wording used in para 1.9 is unnecessarily restrictive and negative when compared to the above.	Noted. Revised wording to include significance and removed the last sentence that was restrictive and negative.
Coverland UK (Sarah Foster)	36	2.3 The exception cited here is odd without any further context. It would be better to say that substantial rebuilding would not be approved unless a reasonable and comprehensive justification can be provided as to why the rebuilding would not compromise the significance of the building or its setting.	Local Plan policy does not support substantial rebuild. Removed second sentence of para 2.3.
Coverland UK (Sarah Foster)	37	3.3 The wording here is inconsistent with the statement that is later made in paragraph 5.3. The wording here is, however, closer to the wording of NPPF para 194.	Noted. Wording aligned with the NPPF. Added: 3.3 The interpretation of the historic building should be proportionate to the assets' importance.

Coverland UK (Sarah Foster)	38	5.1. This is a misinterpretation of para 194 of the NPPF and needs to be reworded. NPPF states that 'LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by its 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'. There is no mention of 'commissioning a formal assessment'. The work could be carried out by the applicant themselves in many cases.	Noted. Wording aligned with the NPPF. Removed reference to 'commission a formal assessment.'
Coverland UK (Sarah Foster)	39	5.2 As above, remove reference to 'commissioning'.	Noted and removed. The NPPF para 194 states using appropriate expertise where necessary.
Coverland UK (Sarah Foster)	40	5.3 Para 194 of the NPPF does not require all Heritage Statements to be completed by a 'suitably qualified person'. The NPPF requires heritage assets to be assessed 'using appropriate expertise where necessary'. It would be helpful to define what 'suitably qualified' or 'appropriate expertise' means if this document is to be accessible to applicants with no background in the built environment. In our experience the definition of 'appropriate expertise' being used by the Authority is often limited to a handful of local practitioners (usually archaeologists) and this is not fair or reasonable in terms of what national guidance envisages. Bullet point 3: '...this will include consideration of archaeological information in the building and below ground'. This is not necessary for all sites and is inconsistent with para 194 of the NPPF which requires the level of detail to be 'proportionate and no more than is sufficient to understand the potential impact of the proposal on their significance'. Rephrase to state 'this may include consideration of archaeological information in the building and below ground where the HER indicates that there is a strong possibility of significant archaeological remains being located on or near the site'. Otherwise, this requirement is disproportionately onerous to the majority of conversion schemes. In many cases archaeological investigations are totally unnecessary but are increasingly being requested by officers on even the most mundane 19th century agricultural buildings at significant expense to applicants and no quantifiable gain to the understanding of our built heritage.	See previous comment. Reference to archaeological work is about consideration, not necessarily action required. Rephrased to ensure point made is clear and aligned with the NPPF.
Coverland UK (Sarah Foster)	41	5.22 '... likely to be resisted unless there is a clear justification for the insertion of a first floor based on an assessment of the significance of the asset'. There are many examples around the National Park of full height spaces that are of very low significance and where horizontal sub-division was not harmful e.g. Green Cowden. This paragraph as it stands is too simplistic and, again, unduly negative.	If justification can be provided and the significance is low, the case can be made. Revisited the language used to remove negative stance but retain wording on the requirement for clear justification.
Coverland UK (Sarah Foster)	42	5.28 On undesignated heritage assets, exact like-for-like replacement of roof materials is an unrealistic ambition and has never previously been a requirement. Stone slate is a limited local resource, and an unintended consequence of this paragraph will be the stripping of stone slates from other assets to meet demand. There should continue to be an option to use another roofing material that is equally appropriate where this will not harm the significance of the asset. This is an example of where there needs to be a differentiation between what will be appropriate for listed buildings, and what will be appropriate for other designated and undesignated heritage assets.	In most cases, like for like materials would be preferred. But where other materials would present an enhancement a case may be made. Wording the state that any replacement roof materials should be appropriate and sympathetic to the significance of the asset.
Coverland UK (Sarah Foster)	43	5.63. Although we agree with the inappropriateness of porches etc., the suggestion of creating an internal lobby seems at odds with advice elsewhere in the document to limit internal subdivision.	Agreed. This is why the text says it is 'sometimes possible' as it will not always be appropriate for the internal space.
Coverland UK (Sarah Foster)	44	5.66 – 5.73 In general, this advice needs to make clear what is and is not within the control of the Authority. For example, the section on fireplaces, detailing on staircases, fire protection, ironmongery and internal door types whilst useful advice is not within the Authority's control on unlisted buildings.	The SPD focuses on principles and guidance. No change required.
Coverland UK (Sarah Foster)	45	5.89. See 1.7 above.	Traditional materials are preferable and maintain building character (the assessment of significance will provide the appropriate steer on this.

Coverland UK (Sarah Foster)	46	Section 6 – Please ensure that this is consistent with validation criteria. There are specific circumstances in which a protected species survey will be required; to say it ‘will usually be required’ is insufficiently precise.	Noted. Made reference to validation list.
Coverland UK (Sarah Foster)	47	6.10-6.11 Structural Survey – There is no need for undesignated heritage assets to be surveyed by those with proven conservation credentials or those on the CARE. A competent and qualified structural surveyor or engineer will be able to adequately advise on the structural stability of an unlisted field barn, for example, and recommend remediation strategies as necessary. In many cases they are equally able to advise on structural issues on listed structures when working in tandem with a heritage specialist. To channel all applicants to a very limited number of niche companies (few of whom are based locally) will only serve to increase costs unnecessarily. These costs would be better channelled into the conservation and enhancement of the asset themselves.	It is preferable to engage a structural engineer with conservation credentials, but appreciate this is not a requirement. The CARE register is an example for people to use if required. Agree that the assessment needs to reflect the significance of the building and needs to be proportionate.
Coverland UK (Sarah Foster)	48	1. Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? Yes, but it is muddled. As above, there is insufficient clarity within the document as to those elements that apply only to designated heritage assets i.e. usually listed structures. The document needs to make clear what is ‘guidance only’ for non-designated heritage assets.	See para 1.2 for further clarification made. The SPD is about historic buildings in general and conversion is permitted if it meets Local Plan policy DMC10. The approach is led by the understanding of significance for that building.
Coverland UK (Sarah Foster)	49	2. Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes, in many ways it has. However, in some respects it would serve to mislead those who do not regularly engage with the planning system that they need to use conservation accredited structural engineers for all schemes or that they need to ‘commission’ full heritage assessments including archaeological analysis undertaken by ‘suitably qualified professionals’ (undefined) regardless of the significance of the asset. This is not what is required by the NPPF or PPG which instead recommend a proportionate approach.	Addressed language to align with NPPF more clearly.
Coverland UK (Sarah Foster)	50	3. Do you think the six core principles are appropriate? Yes, in general these principles are appropriate; it is the detail of how they will be expected to be achieved on a site-by-site basis that needs refinement.	No details on refinement given.
Coverland UK (Sarah Foster)	51	4. Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? No, see above.	Addressed the points made above.
Coverland UK (Sarah Foster)	52	5. Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? No, only one photograph relates to a non-domestic conversion. Would this document be better to restrict its scope to ‘conversion of historic buildings for residential purposes’? To envisage every possible end use and provide bespoke advice and examples for how a conversion could be carried out is unrealistic.	The majority of the PDNPA caseload is residential. However the 6 principles can be used for all development.
Coverland UK (Sarah Foster)	54	6. Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing) No. See comments above relating to the disproportionate requirement to use a niche set of professional advisors and to undertake archaeological assessment regardless of the significance of the building.	Noted. Language aligned with NPPF.
DCC - Councillor Ann Clarke	55	Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? Yes	Noted.
DCC - Councillor Ann Clarke	56	Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes	Noted.
DCC - Councillor Ann Clarke	57	Do you think the six core principles are appropriate? Yes	Noted.



DCC - Councillor Ann Clarke	58	Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? Yes	Noted.
DCC - Councillor Ann Clarke	59	Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? Yes	Noted.
DCC - Councillor Ann Clarke	60	Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing) Yes, but in the current housing market I do feel that the conversion of any buildings of this nature should prioritise opportunities for social/affordable housing.	Current LP policy priorities landscape conservation and enhancement over affordable housing (purpose before duty) and acknowledges the cost of enhancement can make the provision of affordable housing unviable. This is an issue for the Local Plan Review.
DCC - Officers	61	DCC considers the document to be an extremely useful piece of guidance to which both lay people and professionals will be able to refer and is wholly supportive of its objectives.	Noted.
DCC - Officers	62	Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? Yes	Noted.
DCC - Officers	63	Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes	Noted.
DCC - Officers	64	Do you think the six core principles are appropriate? Yes	Noted.
DCC - Officers	65	Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? Yes.	Noted.
DCC - Officers	66	Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? Yes	Noted.
DCC - Officers	67	Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing) Yes	Noted.
DCC - Officers	68	Landscape and Visual Amenity - DCC has no comments to make on these aspects of the document.	Noted.
Home Valley PC	69	1. Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage asset? Yes. It provides clear guidance, with copious references to additional guidance, should this be required.	Noted.
Home Valley PC	70	2. Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes. The layout and tone of the document make it fully accessible to those with an interest in the subject but with no specialist knowledge. The language is very clear and the careful choice of photographs helps greatly with understanding	Noted.
Home Valley PC	71	3. Do you think the six core principles are appropriate? Yes. For a non-specialist, they appear to provide a clear framework and a route map for anyone involved in a conversion project.	Noted.
Home Valley PC	72	4. Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? Yes. Alternatives are given at several points in the text.	Noted.
Home Valley PC	73	5. Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? No – possibly There is much more emphasis in the text - as in the photographs - on the conversion of buildings to residential rather than non-residential use. This, presumably, reflects demand.	Yes. It reflects that the majority of our casework is conversions to residential.
Home Valley PC	74	6. Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing)No - possibly. Illustrations and examples refer mostly to smaller farm buildings, rather than larger factory building conversions. Again, this presumably reflects demand.	Sought to provide a more varied visual representation of conversions.
James Darwent Architecture	75	We welcome this helpful document which will in time become I'm sure a useful design aid in working practice. There are however some significant areas of concern that need addressing as we believe some aspects are not consistent with National guidance on historic conservation. The document also fails to clearly differentiate between designated and undesignated heritage assets, yet in practice the amount of planning information required on submission and ongoing technical detailing through construction is inherently different.	Similar comment made by Coverland UK. SPD is focused on historic buildings and the assessment of significance drives the approach.
James Darwent Architecture	76	As a general formatting point, full justification of text stretched across the page is tiring and difficult to read, especially on a text heavy document. Left justification is much preferred if not quite as attractive!	Noted. The document will be published using an in house designer.

James Darwent Architecture	77	1.7 There is no differentiation highlighted here between designated and no-designated assets. Any non-designated asset must comply with current building regulations thermal requirements as well as implementation of sustainable technologies for both residential and commercial buildings. Designated assets do get some relaxation if implementation affects the heritage value of the asset.	Noted. Similar comment made by Coverland UK. See above regarding building regulations.
James Darwent Architecture	78	1.8 We disagree that residential is the most difficult and challenging conversion of historic buildings. There are many inappropriate re-uses of commercial buildings.	Noted. Revised text to remove 'most difficult'.
James Darwent Architecture	79	1.9 This statement is too restrictive when compared with the PPG 015 national guidance.	Noted. Removed last sentence in 1.9. Referred to Policy Section para 7.6 and 7.7.
James Darwent Architecture	80	2.3 Can the exception be expanded here please to clarify? Substantial re-building would need justification based on the significance of the building within the landscape i.e. total loss of a building within a sensitive setting might benefit from significant re-building if it safeguarded the wider area or landscape. There are a number of important non designated heritage assets that fall into this category that will soon be totally lost unless that aspect of some re-building can be accommodated.	Removed last sentence of paragraph to align with DMP policy DMC10.
James Darwent Architecture	81	2.4 Garages and sheds should be discussed in more detail as there are some instances that can be considered appropriate provided the character of the surroundings of the host building are not detrimentally affected or domesticated. As architects, this is one of our most common questions when designing a residential conversion. We need stronger guidance on when an outbuilding might be acceptable to advise clients more clearly.	Para 2.4 is flexible and allows for justification. The acceptability of additional buildings to facilitate storage/garaging would be apparent from an assessment of the setting.
James Darwent Architecture	82	5.1 We believe the requirement to “formally assess” the significance of ALL conversion projects is disproportionate to the NPPF requirements. The NPPF states: ‘LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by its 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’.	Noted. Revised wording.
James Darwent Architecture	83	Within this text there is no requirement for a formal assessment. We understand that in many instances a full heritage assessment may be required to justify the significance of a building’s suitability for conversion however there are many buildings where the significance is either clearly not in doubt, or the building is so small or project so small that the commissioning of a formal heritage statement is needless, expensive red tape for an applicant that will ultimately make the project unviable. For reference, heritage statements for a residential conversion range from £1,200-2,000 + vat which is significant on top of Architects fees, ecology survey, and engineers report. Architects or planning consultants with appropriate experience should also be able to describe the significance in a manner suiting the NPPF requirements.	Noted. Revised wording to align with NPPF but retain meaning.
James Darwent Architecture	84	5.2 As above – remove the requirement to ‘Commission’ an assessment.	Noted. Revised wording to align with NPPF but retain meaning.
James Darwent Architecture	85	5.3 General points as above. Clarity required on who is a suitably qualified person. Architects should fall into that category and not just a limited number of archaeology consultants. Bullet point 3: The requirement for archaeological assessment at planning submission stage is too onerous and not required for all sites. NPPF requires a proportionate approach to enable understanding of significance. We strongly believe the current request for archaeological assessments on nearly all conversions or listed projects is disproportionate and out of balance with national requirements.	Noted. Revised wording to align with NPPF but to retain meaning to 'assess the overall significance of the building as well as the significance of its individual components; this will include consideration of archaeological information in the building and below- ground archaeological potential'.
James Darwent Architecture	86	5.21 Clarification required between designated and no-designated buildings.	The assessment of significance will determine the level of alteration acceptable.
James Darwent Architecture	87	5.22 This sentence is too restrictive. Not all open spaces have significance to the building. If inserting a floor, heritage significance needs justifying.	The heritage assessment would make clear the significance, and if subdivision was appropriate.



James Darwent Architecture	88	5.28 Modern roofs are installed with either breathable or bitumen underlays if bats are present. All non-designated assets will be required to insulate the roof. Any newly laid roof is also required to have mechanically fixed ridge tiles, NOT cement pointed to be compliant with British Standards 2015. This is at odds with the statement and traditional practices. Replacement with like for like is also onerous as grey stone slate is scarce so unrealistic and beyond previous requirements.	Revisited wording of para 5.28 to allow for enhancements and to include Building Regulations information.
James Darwent Architecture	89	5.34 Suggestion of frameless doors with weather strips is totally unrealistic for non-designated assets as they do not meet building regulation requirements of a maximum U-value of 1.8W/m2k.	Representation refers to para 5.33. Need advice on this and make clearer distinction between listed and nonlisted requirements for Part L compliance. Consider text revision.
James Darwent Architecture	90	5.36 Retention of historic floors in non-designated heritage assets is unrealistic as Building Regulations requires some form of insulation, structural slab and damp proof membrane with a maximum u-value of 0.22W/m2k. The Peak District is also one of the worst radon areas in the country so full protection is a necessity even in listed buildings for the occupant's health. Lifting of historic floors, labelling and re-laying over modern substrate should be encouraged.	Checked Building Regs requirement and amended text to state 'The assessment of significance will drive the approach'.
James Darwent Architecture	91	5.44 Remove- ".... Rising off the eaves instead of ridge." As the height of the flue would rise 600mm higher than the ridge if sited just off the back of the ridge. This will in many instances be more appropriate as less flue will be seen above the roofline than is starting at eaves level.	Amended wording to address comment.
James Darwent Architecture	92	5.57 Radon pipes need to be excluded from this requirement as they can't be installed internally if a pump and external pipe to high level are required.	Footnote added to address Radon pipes.
James Darwent Architecture	93	5.66-73 It is not made clear what control the PDNPA has over internal elements. Needs clarifying what is and isn't required to be applied for i.e. All internal changes on a listed building but no onward control over the interior of a non-designated heritage asset. Clients will otherwise be confused.	See previous comment made on these paragraphs.
James Darwent Architecture	94	5.76 None required on modern ridge fixings as above	Do not understand the comment made.
James Darwent Architecture	95	5.79 Windows without projecting timber sills sat on a flat stone sill will last less than 10 years. Installation needs assessment on the suitability of the existing stone sill to the window design. Only stone sills with a raised stool are appropriate. We have serious concerns over planning requirements leading to extremely poor installation of windows and resultant negative attitude to timber windows from clients when they don't last. A simple snub nose sill may therefore be appropriate, but secured by condition or detail provided at the time of application.	Noted. Amended text to address comments made.
James Darwent Architecture	96	5.83 Should there be mention that orange / light brown staining of timber is not considered appropriate. Dark staining of painting as described is more sensitive.	Text in SPD is clear as is. No change made.
James Darwent Architecture	97	5.86 This suggests unfinished completely. Timbers require some form of protection in a newly heated environment. Bees wax is the most natural protective finish.	Added beeswax to the text as a suitable finish.
James Darwent Architecture	98	5.89 Clarification needed – As above points, non-designated need insulating to modern Building Regulation Standards.	See comment above for 5.89.
James Darwent Architecture	99	6.11 There should be no requirement for engineers to be registered on the CARE register for designated or non-designated assets. There are currently no local engineers on the register even though a number are very experienced in working with heritage buildings. There is also no appetite to sign up to the register amongst engineers (we have asked a number). Employing engineers unused to the local building styles traditions is in our eyes counterproductive and unnecessarily expensive for clients. Local engineers working in tandem with a heritage consultant is more than adequate to form a valid assessment.	See comment above re 6.11. In the case of heritage assets, specialist knowledge is preferred and can be essential, but acknowledge it needs to be proportionate to significance.
James Darwent Architecture	100	1. Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? Yes but more clarification required on differences between designated and non-designated assets and mandatory requirements or just purely guidance.	The SPD refers to historic buildings in the round. Added clarity to para 1.2 regarding planning tests and designated/non-designated assets.



James Darwent Architecture	101	2. Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes, however anyone reading it would feel there appears to be a good deal of red tape to navigate. Needs more clarity of proportionality to each scheme.	Noted. Revised text to ensure proportionality is addressed.
James Darwent Architecture	102	3. Do you think the six core principles are appropriate? Yes	Noted.
James Darwent Architecture	103	4. Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? No. The document treats all projects the same and has too many mandatory, expensive requirements out of proportion to NPPF Guidance.	Noted. Revised text to align with NPPF [but also our own policies - these go beyond NPPF].
James Darwent Architecture	104	5. Does this SPD offer sufficient advice/examples for and illustrations of conversion to non- domestic use? No- very few images relate to non-domestic conversions.	Noted. Inserted a wider range of examples.
James Darwent Architecture	105	6. Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (eg Affordable Housing) No- See above comments	Noted. Revised text to align with NPPF proportionality.
Lichfields (on behalf of Litton Property Group)	106	To ensure appropriate weight can be given to the document as a material consideration, it is important that there is meaningful public consultation and engagement with developers on any standards or requirements in advance of adoption. It is also important that the SPD is consistent with the National Planning Policy Framework.	Revised text to align more clearly with NPPF wording.
Lichfields (on behalf of Litton Property Group)	107	Our client appreciates the aims of the guidance and acknowledges that it provides helpful information regarding the conversion of buildings, and is pitched at a level that is accessible to all those who need to use it. Our client also endorses the support for conversion of historic buildings to residential use.	Noted.
Lichfields (on behalf of Litton Property Group)	108	Whilst we feel the principles of the SPD are generally reasonable, the document as currently drafted is highly prescriptive, reading as a list of imperative and very specific requirements, rather than guidance (through use of words such as “need”, “must”, “essential”). In this context, the SPD as currently worded is not consistent with the National Planning Policy Framework [the Framework]. The Framework acknowledges that developments may lead to harm to designated heritage assets. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Substantial harm may be permissible under circumstances including (for example) if the harm is outweighed by the benefit of bringing the site back into use. There is no legislation or national policy basis for the highly prescriptive approach set out in the SPD and this should be acknowledged and reflected in the wording of the document. There is a risk that the SPD as currently written will result in unduly rigid requirements if applied to all applications indiscriminately, possibly preventing the delivery of new viable uses for historic buildings and investment opportunities in the area.	New sentence added to para 1.2 to address the planning tests. Reviewed wording and amended text in response to comments made about “need”, “must”, “essential”.
Lichfields (on behalf of Litton Property Group)	109	The guidance should recognise that a blanket approach to all development is not appropriate and a degree of flexibility is important in order to respond to a site’s context and unique circumstances. This is a practical, pragmatic and proportionate approach that takes account of the need for flexibility.	Noted.
Lichfields (on behalf of Litton Property Group)	110	We would strongly urge that the SPD makes clear within the introductory section of the document that there may be scenarios where it is not feasible to adhere to all of the recommendations set out within the guidance, and in such scenarios applications will be determined in line with the approach set out in paragraphs 199 to 203 of the National Planning Policy Framework.	New wording in Section 7 makes clearer reference to the planning tests in the NPPF. This SPD is about principles of conversions.
Lichfields (on behalf of Litton Property Group)	111	Paragraph 5.12 “...subdividing the spaces [full/double height spaces] can destroy that character. It is desirable to keep such interiors as open as possible. “We would seek to add a line stating that it is recognised that in certain instances, subdivision is required to facilitate a viable end-use. In such situations, sympathetic solutions which allow the original space to be understood (for example mezzanines structures which ‘float’ with shadow gaps) and are capable of being removed with minimal harm to historic fabric, can be appropriate.	Agreed. Text amended to address this comment.

Lichfields (on behalf of Litton Property Group)	112	Paragraph 2.4 "Historic buildings must be large enough to accommodate the proposed new use and any associated storage without extensions or new ancillary building; extensions to standalone building is a building separate from the group will require strong and convincing justification." And 5.14 "Schemes should work with the shell of the existing building, avoiding the need for alterations, additions and extensions." We would ask for the language to be softened here i.e. avoiding (where possible) or minimising the need for alterations, additions and extensions. Where extensions are proposed, these should be carefully considered and should read as new additions which do not dominate the host building	Removed 'alterations' from para 5.14.
Lichfields (on behalf of Litton Property Group)	113	5.17 "New openings should only be inserted into roofs and walls where essential" We would request that clarification that, circumstances which can be considered 'essential', could include (for example) providing light to habitable/important rooms to facilitate and end use.	It is too prescriptive to list every possible essential scenario. Text provides flexibility.
Lichfields (on behalf of Litton Property Group)	114	5.28 "existing traditional roof coverings should be retained, and repaired if necessary. If beyond repair, any replacement roof should be exactly like for like." We would seek to add that in situations where it is necessary to provide light internally, sympathetic window openings such as conservation roof lights may be appropriate.	Agreed. Conservation rooflights referred to in para 5.48.
Lichfields (on behalf of Litton Property Group)	115	5.31 "Original cast iron windows, often found in chapels and mill buildings, will usually be an important feature, and should be retained." We would suggest that "where possible" is included within paragraph 5.31.	Text modified to state they can be repaired....
Lichfields (on behalf of Litton Property Group)	116	Summary- Litton Property Group welcomes the consultation on the draft SPD. We trust that these comments on the SPD consultation will be taken into account and used for further development of the SPD.	Noted.
Natural England	117	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:	Noted.
Natural England	118	Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	This SPD should be read in conjunction with Local Plan policies. DMP para 3.106 refers to conversion of historic assets and impact on biodiversity signposting applicants to Core Strategy policies GSP2 and L2 and Development Management Policies DMC11, DMC12 and DMC13.
Natural England	119	Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.	Agreed with comment. However other Local Plan policy/design guide SPD address these issues.

Natural England	120	Protected species Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.	Noted. Added reference in document.
Natural England	121	Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	Report to Planning Committee (for permission to go out for consultation on draft) explains the SPD doesn't require an HRA as it is guidance to explain policy approach in Local Plan that has already been assessed under HRA regs.
Natural England	122	Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.	Noted.
Nick Marriot	123	1. Has the SPD been pitched at a level which is accessible to all those who need to use it? – Uhm... Yes! it's an easy read and gets its point across. I think my obvious comment is in regard to the subtext within the introduction which tells the reader that "This guidance is intended for use by property owners, estate managers, agents and architects". Er....planning officers?? It suggests that planning officers have a better grip of what is required. I know that isn't what is meant but that is how the document is pitched. To be blunt, (and I know I don't know it all) there was nothing in the document which made me think "Oh, I didn't know that" and frankly anyone who is surprised by the content perhaps shouldn't be dealing with heritage assets. Which begs the question, who is it aimed at and why? I think the document is the sort of thing that should be attached to sales particulars or given to owners who suddenly have aspirations for development but who have no idea what a 'heritage asset' is let alone how to appropriately develop it.	Noted. Amended wording to state 'This guidance is for everyone considering the conversion of a historic building'.
Nick Marriot	124	2. Do you think the six core principles are appropriate? – Yes! But I do have overarching concerns with ANY SPD. That is that the unintentional effect simply kerbs innovation as a result of the 'designers' trying to comply with prescriptive text contained within a document. Which is the exact opposite of its purpose. I don't disagree with the aim of the document, but I don't believe the same can be achieved in an SPD for heritage assets as can be achieved with say 'extensions and alterations'. Things are simply much more complex. Heritage assets require a collaborative design approach.	The SPD provides the framework. Disagree that it stifles good innovation and design.
Nick Marriot	125	3. Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? – No - But I acknowledge I have a far more pragmatic approach to 'heritage' than most. I believe if the principle of conversion / development is ok, which can be determined very early on IMO, innovation and imagination should be encouraged way ahead of prescribed solutions. The SPD is a great set of base guides for developers who, for example, may not need planning permission to develop a heritage asset.	Noted.
Nick Marriot	126	4. Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? – No – nor should it. I think trying to offer photographic examples can be dangerous on this topic. It can drive precedent and can blinker approaches to solutions in each specific case. By all means, applaud a successful solution. But that doesn't mean it is a good solution for the next problem. These are bespoke problems requiring bespoke solutions in all cases. I think it is equally insightful to condemn solutions that haven't achieved everyone's aspirations. We all make mistakes, and understanding those mistakes is important, But equally important is being allowed to make the mistakes, because the bravery to make them will also inevitably lead to innovation! But ironically, that's the sort of generic aspirational statement which is in the SPD. It doesn't need putting in writing, the people who are involved in this process know that and it's all just part of finding the right solution. Which requires care, imagination and a little bravery. Oh, and a lot of money!	Noted.



Nick Marriot	127	5. Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (eg Affordable Housing) – Yes – within the scope of my comments above	Noted.
Nick Marriot	128	Final comment – As with all SPD's I am wary that the document may (on occasion) simply become a tool that case officers hide behind to prevent the very innovation we're all trying to achieve. I hope these comments are helpful in shaping the final document.	Noted.
SE Wyatt	129	I have read the above document and agree with all the recommendations within it. I am passionate about old buildings and the necessity for them to be retained and restored in keeping with their original look.	Noted.
SE Wyatt	130	What I am extremely concerned about is the number of people who start conversion/restoration projects prior to getting planning permission, hoping to 'get away' with not being found out. Perhaps a register of historic buildings, farms and barns etc., could be maintained, if one does not already exist, with regular inspections of those vulnerable to inappropriate development.	A register of listed buildings is maintained (and some undesignated assets are on the HER record).
SE Wyatt	131	I have taken a keen interest in planning matters for many years and have access to additional advice from a very senior planning inspector. I have commented in detail on many local applications. In addition, I have in fact informed the PDNPA and HPBC of breaches of planning of which they were previously unaware, leading to enforcement action. However, as a member of the public, it should not be up to me, as one can very quickly be regarded as a nuisance by the authorities (as well as alienating those 'found out').	Noted.
SE Wyatt	132	It is my belief that anyone wishing to undertake any work on an historic building should first be legally required to lodge their proposals before starting, with appropriate penalties for those who fail to comply. Planning Officers should be aware in advance and it not be left to members of the public like myself to bring these people to the notice of the authorities. All too often, work is started in the hope and expectation that planning permission (and Listed Building Consent) will be granted, and often, too, with the hope that no-one will find out. This means that often inappropriate alterations are made and inappropriate building materials used, such as modern plaster vs lime plaster. However, owners are seemingly not penalised for having done inappropriate work before getting permission, and are not forced to apply for retrospective permission (which would alert planning committees to the fact that they have already carried out work without permission) for what has been done. Sometimes applicants for permission are 'economical with the truth' in their applications (such as claiming the work is necessary for family use only but the intention is actually to make it compliant with the rules for holiday lets) and seek to minimise the impact of their proposals. In a local situation, extensive work has been carried out to a Grade II Listed dwelling without PP or LBC, but no official mention of the retrospective nature of the work in the permits applied for.  /	Unable to comment on individual cases. Overall this is an issue for the planning and enforcement teams. All structures are in place.
SE Wyatt	133	Another issue about which I feel very strongly, is compliance with Planning Inspectors' rulings. I know of two particular cases in the PDNPA where 'illegal' structures are still in existence despite having been ordered to be demolished by a Planning Inspector, one of them several years on. This is being complicit with and effectively condoning people breaking the law. There does need to be effective enforcement. If someone is ordered by a PI to have an illegal structure demolished, it should happen, otherwise people will continue to believe they can get away with doing whatever they want.  I would like to see such safeguards built into the document and the future policy of the PDNPA.	Planning and Enforcement issue to address. Not the role of the SPD.
Sheffield City Council	134	1. Does the SPD fulfil its aim of offering guidance for the conversion of buildings that are designated or non-designated heritage assets? Yes the SPD fulfils its aim.	Noted.
Sheffield City Council	135	2. Has the SPD been pitched at a level which is accessible to all those who need to use it? Yes the SPD has been pitched at the right level and is not too technical.	Noted.

Sheffield City Council	136	3. Do you think the six core principles are appropriate? Yes the six core principles are appropriate and would be the ones Sheffield City Council would use. It is good to have clear guidance too.	Noted.
Sheffield City Council	137	4. Do you think the SPD offers sufficient flexibility in our approach to conversion within the six core principles? Yes – there has to be flexibility.	Noted.
Sheffield City Council	138	5. Does this SPD offer sufficient advice/examples for and illustrations of conversion to non-domestic use? The use of more detail may be useful i.e. doors and windows.	Difficult to get into this level of detail without becoming overwhelming, see our Design Guides that already exist.
Sheffield City Council	139	6. Do you think the SPD is relevant to a range of project sizes and budgets, regardless of end use? (e.g. Affordable Housing) Yes – there should be no difference in the approach.	Noted.
Staffordshire Police	140	The following consultation comments should be considered in the light of the following: <ul style="list-style-type: none"> <li>• Under the heading Promoting Safe and Healthy Communities, Para 91(b) of the NPPF states “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.”</li> <li>• Under the heading Achieving Well-Designed Places, Para 127(f) of the NPPF states “Planning policies and decisions should ensure that developments create places that are safe ... and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”</li> <li>• Under the heading Planning Should Address Crime Prevention, Design Para 10 of the NPPG states “Designing out crime and designing in community safety should be central to the planning and delivery of new development”;</li> <li>• The statutory obligation placed on local authorities to do all they reasonably can to prevent crime and disorder in accordance with Section 17 of the Crime and Disorder Act 1998;</li> </ul>	PDNPA Design Guide addresses safe streets and safe and accessible environments. Added text in Section 7 to address security comments raised by Staffordshire Police.
Staffordshire Police	141	The Conversion of Historic Buildings SPD Consultation Draft document appears to be comprehensive, informative, well-drafted, easy to read and navigate, and is aided by some excellent best practice example photographs.	Noted.
Staffordshire Police	142	Clearly of overriding importance is that ‘Any new use should conserve and be compatible with the form, function, fabric, interior, context and setting of the building, including its wider landscape setting’ (para 1.9). Paragraph 1.8 states that there could be conversion to ‘Low-key uses such as offices, studios, light industrial workshops, training, research facilities or similar’, aside from the more popular conversion to smart residential use. Certainly the former categories as well as the (converted to) residences along with any attendant desirable vehicles and items stored in outhouses could prove attractive targets for offenders. This is set against a backdrop of an increase in rural crime. The NFU Rural Crime Survey 2020 identified that the cost of rural crime in the UK in 2019, increased by almost 9% on the previous year.	Noted. See above response.

Staffordshire Police	143	<p>There is the potential that the need to adhere to demanding requirements of conservation, which are stringent and absolute may in some circumstances compromise the ability to provide an appropriate level of security thereby rendering a property more vulnerable than would otherwise be the case. Ideally, there should be a degree of flexibility both in terms of policy and decision making, which recognises that security plays an integral part to the ongoing and future successful repurposed function and use of a converted historic building. Good security contributes to sustainable usage.</p> <p>Staffordshire Police would welcome any amendments to this document which acknowledge/reflect this and provide some scope for the inclusion of appropriate crime prevention measures, where those seeking to convert a building or buildings can justify their inclusion.</p>	Noted. See above response.
----------------------	-----	--	----------------------------