

FULL APPLICATION - CHANGE OF USE OF SOUGH MILL TO A RESIDENTIAL DWELLING, ASSOCIATED INTERNAL AND EXTERNAL ALTERATIONS INCLUDING A REPLACEMENT GROUND FLOOR ROOM, WORKS TO THE SLUICE GATE, WORKS OF HARD AND SOFT LANDSCAPING, PARKING AND OTHER WORKS INCIDENTAL TO THE APPLICATION PROPOSALS AT SOUGH MILL, OVER HADDON (NP/DDD/1224/1403/GG)

APPLICANT: MR & MRS THOMPSON

Summary

1. The application is for the conversion of the former mill, which is a Grade II listed building, to an open market dwelling with associated internal and external works.
2. The application is recommended for approval.

Site and Surroundings

3. Sough Mill is a Grade II listed building and is on Historic England's Heritage at Risk (HAR) Register. The site comprises the mill building, associated structures, hard standing and bare ground with pockets of tall ruderal vegetation.
4. The building contains structural elements and fabric that date to the late-17th and early 19th centuries, with later additions. It is a well-preserved example of a post medieval water powered corn mill, including mill wheel, power infrastructure, hurst frame and milling machinery.
5. The site is in a picturesque setting set towards the south western edge of the Over Haddon Conservation Area. It is accessed via the steep winding road down from Over Haddon village to the north. There are also footpaths to the north, south and east of the site. The River Lathkill forms the southern edge of the site beyond which is the Twin Dales Ancient Woodland.
6. Some 200m to the east is the Lathkill Lodge Regionally Important Geological Site (RIGS) and the application site is also within an area defined as a protected species buffer area. The National Nature Reserve (Derbyshire Dales) and the Lathkill Dale SSSI extend into the curtilage of the site to the west and south and the site abuts the public highway and footpath to the north and east. There are lead workings dating from the 18th and 19th centuries within the vicinity of the site.

Proposal

7. Full planning permission is sought for the conversion of the former mill to an open market dwelling. The principal external alterations to the Mill building relates to the replacement of the wheelhouse element on the south side. It is proposed to retain a limestone plinth but then replace the elevations above with vertical timber boarding, behind which it is proposed to have 'clerestory' glazing in part: this would be set under a flat roof. Other external alterations to the Mill building include:
 - replacement windows and doors;
 - replacement of modern tiles;
 - conservation rooflights;
 - provision of a black flue pipe; and
 - black, cast iron gutters on rise and fall brackets.
8. Internally, the mill machinery would be left in situ and glass walkways would be installed over the existing void, as well as over the drying kiln and wheel pit. The wheelhouse

would be converted to a kitchen and dining room, whilst living and sleeping accommodation would be spread over the rest of the building to create a three bedroomed property.

9. Given the nature of the site, and the proposals for residential conversion, a number of groundworks are proposed, both inside the building and across the site, including but not limited to:
 - reduction of historic floors for the installation of radon protection measures, insulation and new floors;
 - installation of drainage – both foul and surface water;
 - installation of services;
 - footings for new or replacement boundary walls;
 - a package treatment plant;
 - regrading the bank to the north east, with erection of drystone retaining wall, to accommodate parking area, bin storage and oil tank; and
 - new surfacing of external areas in the proposed garden, parking areas, etc.
10. With regard to the conversion works, it is proposed to have three spaces set aside for the storage of plant and materials to the front, rear and south side of the building; these are proposed to ultimately become garden areas. Loading/unloading would be undertaken to the front of the building and it is proposed to retain a caravan on the site during the works of conversion; this area will ultimately become an area for vehicle parking and manoeuvring space.
11. With regards to landscaping, it is proposed to grow a 1.2m high native species hedge along the northern boundary of the site with the footpath. To the west, it is proposed to rebuild the boundary wall to define the rear curtilage. The retaining wall to the south is proposed to be rebuilt with gritstone (initially proposed as gabions) and the riverbank is proposed to be seeded with native wetland wildflower seeds to increase biodiversity. The sluice gate to the west of the site is also proposed to be restored.

RECOMMENDATION:

That the application be APPROVED subject to the following conditions:

1. **Statutory time limit**
2. **Approved plans**
3. **Details of doors and door and window frames, rooflights, rainwater goods, roof slates and flue to be submitted and approved.**
4. **Sample of the timberwork to the wheelhouse elevations to include colour and treatment**
5. **Sample of roofing material to wheelhouse**
6. **Sample panel of retaining walls**
7. **Details of the oil tank and its screening**
8. **Details of screening to bin store**
9. **Sample/details of all hard surfacing materials and retention**

10. **Soft landscaping provision**
11. **Soft landscaping maintenance**
12. **Scheme/programme of archaeological works**
13. **Compliance with mitigation and enhancement measures identified in the Ecology Survey and approved drawings**
14. **Compliance with the Construction Environment Management Plan (CEMP) by Dunelm Ecology**
15. **Safeguarding nesting/breeding birds**
16. **In accordance with the additional information regarding surface water, foul drainage and waste water run-off details received on 12 March 2025**
17. **Approve scheme to treat and remove suspended solids from surface water run-off during construction works**
18. **Provision, monitoring and maintenance of the package treatment plant**
19. **Construction site layout provision during conversion in accordance with plan**
20. **Provision of parking space prior to occupation and retention of such**
21. **Removal of caravan from the site within two months of occupying the dwelling and thereafter no caravan to be stationed on the land.**

Key Issues

- the impact of the proposed development on the special historic and architectural character and appearance of listed building
- archaeology
- landscaping
- amenity
- highway and rights of way matters
- sustainability and climate change
- ecology and biodiversity
- flood risk and drainage.

History

None relevant

Consultations

12. Derbyshire County Council (Highway Authority):
 - no objection
 - request informative with respect to Over Haddon Public Bridleway No. 24 and Over Haddon Footpath 6 (FP 6) be attached to any grant of planning permission.
13. Derbyshire County Council (Flood Team):
 - No comment received

14. Environment Agency:

Final response 30/05/25 – No Objection (following submission of a foul drainage assessment by the applicant)

- Following the publication of the updated national flood risk assessment (NaFRA2) the Environment Agency considers the site to be located within Flood Zone 1 and therefore have no fluvial flood risk concerns regarding the proposals
- As the package treatment plant will be discharging in or near to the Peak District Dales Special Area of Conservation(SAC), the proposed method of disposal of foul drainage will not meet the requirements of the general binding rules (specifically Rule 17).

Instead, a Permit application will need to be submitted to the Environment Agency and there is no guarantee that the Permit will be issued.

If a Permit is granted, the package treatment plant must be monitored and maintained appropriately

Private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

Any granting of planning permission must include the following Condition being placed on the decision notice:

Condition - The development hereby permitted shall not be commenced until such time as a scheme to treat and remove suspended solids from surface water run-off during construction works has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved. The construction of the development should adhere to the submitted

Construction Environmental Management Plan (CEMP)

The construction of the development should adhere to the submitted CEMP.

1st response 08/04/25 - Objection:

- We object to the proposed development as submitted because it involves the use of a non-mains foul drainage system but an inadequate assessment of the risks of pollution to surface waters and the water environment has been provided by the applicant.

The application form indicates that foul drainage is to be discharged to a non-mains drainage system. In these circumstances the planning practice guidance (PPG) (ref ID 34-020-20140306) advises that applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment. In this instance inadequate information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to surface waters and the water environment arising from the proposed development.

15. Over Haddon Parish Council:

- will not alter the situation regarding light and privacy for the residents of the Mill or the nearby neighbours.
- there will be increase traffic from the existing situation - as it is such a steep and winding road, there should be highway conditions applied to this application as it could

be a danger to people on what is a regular walking/hiking/cycling/horse riding route by users of the bridleway through Meadow Place

- would support any recommendations for traffic safety, in particular, speed control due to the national speed limit on that section of road
- currently, it is a rundown historic corn mill and so any development will alter this, such as creating a garden or car parking, will alter the character of the area.
- any development and work which takes place at the Mill will change the character and appearance of the building in the existing landscape and area
- Lathkill Dale is such an important scientific and ecological site it cannot be left to chance that all species and habitats have not been carefully assessed in this process
- have concerns about the "clean" water that will be released into the River Lathkill from the sewage system and other materials that could find their way into it from everyday living in a previously untenanted building - would like it noted that the River Lathkill is one of the cleanest rivers in England and feel that it is vital this is preserved.
- Mill is one of only four listed structures in the village as the last surviving mill building, and a listed building, on the River Lathkill, Sough Mill and its machinery, have high heritage significance - it would be of public benefit if the Mill and its workings could be made accessible, otherwise the heritage importance is lost to everyone but the owners of the mill
- plans for this building as they stand do not benefit the community of Over Haddon in any way but it should be noted that the Parish Council supports the conservation of the Mill as an important heritage asset
- uncertain whether the proposed alterations will have a detrimental impact on the river and increase the risk of flooding in the area - upstream of the Mill, the river has certainly seen a significant increase in rising water levels, flooded paths and erosion in recent years
- feel that the proposed design for the building is very good but the landscaping is a concern though if it is kept simple, this would be less of a problem
- requests that the application be sent to Committee for decision and, should the application be passed, requests that the following conditions be placed:
 - 1. The property should be opened to the public on an annual basis, especially to residents of Over Haddon and this should be covered by a covenant in order to retain this access in perpetuity
 - 2. There should be no domestic paraphernalia left outside the property, at any time, to prevent harm to the character of the site and landscape.

Officer comment: It was made clear to the Parish Council during the application that the first request could not be secured by condition as it would not be a reasonable requirement imposed on the future occupiers of the proposed dwelling and so would not pass the reasonableness test to do so as is required by the paragraph 57 of the NPPF. The Parish were also informed that the Authority could not control the use of domestic paraphernalia which is not deemed to be development within the curtilage of the proposed dwelling.

16. PDNPA Conservation Officer:

Amended proposals:

'I am happy with the response and the amended plans. I would say that at this point, whilst there is harm proposed, it is outweighed by the public benefits of securing the long term conservation of the building. If you approve the scheme I would recommend the conditions in my previous response, as well as a condition requiring a methodology for the dismantling and rebuilding of the drying kiln. The archaeological condition should include continued monitoring of the kiln and (if not already mentioned by the Archaeologist, the monitoring of any internal excavations for the floor'

First response 14/03/25 – No Objection:

'Overall, the design principles of the scheme are sound and it has the potential to effectively conserve the significance of the building. However I have concerns about the

extent of work to the hurst frame, mill machinery and other timber structures, as well as the proposed reconstruction of the drying kiln and aspects of the landscape works. At present the level of harm proposed would be a high degree of less than substantial which, according to Chapter 16 of the NPPF, would need to be weighed against the public benefits arising from the scheme.

17. PDNPA Archaeologist:

- proposed development will provide the mill buildings with a viable future use to secure their future and long-term conservation
- welcome that it includes proposals for the conservation of the sluice gate as well as the mill buildings
- proposed conversion scheme appears to work well with the historic fabric of the building overall, but will result in some loss of historic fabric and limited changes to planform, which will result in minor harm to the archaeological interest of the building
- a full analytical building recording is required, at level 3-4 with interpretation of the development of the mill and its fabric and the Written Scheme of Investigation (WSI) should provide for a dendrochronological assessment to inform the dating of its fabric.

18. PDNPA Landscape Architect:

- a unique scheme and, although dwellings are not typical and in most situations wouldn't be appropriate or possible in the Limestone Dales LCT (in the White Peak LCA), the restoration and retention of this building as a feature outweighs the negative impact of the introduced domestic elements, the visual impact of which is to be greatly reduced by the sensitively laid out landscape scheme put forward
- the parking and bin stores are neatly tucked away into the bank
- existing and proposed drystone walls add to the screening of these along with partial screening of the new outbuilding to house the biomass and water purification equipment
- materials proposed are appropriate and to a high specification
- would like to see details/sections through the gabion wall, along with the specification of seed mix for the river bank for comment.

19. PDNPA Ecologist:

- all surveys have been undertaken in line with the relevant guidelines and an appropriate impact assessment has been undertaken along with details for appropriate mitigation/compensatory methods for all surveyed species/habitats
- the mitigation measures for bats are welcomed.

20. Natural England:

Final response 14/04/25 – No Objection subject to mitigation being secured:

- Natural England considers that without appropriate mitigation the application would:
 - have an adverse effect on the integrity of Peak District Dales Special Area of Conservation
 - damage or destroy the interest features for which Lathkill Dale Site of Special Scientific Interest has been notified.In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured:
 - Secure condition that the Package Treatment Plant will be monitored and maintained appropriately.
 - Habitats Regulations Assessment. We advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.
- 1st response 22/01/25 - Objection:
As submitted, the application could have potential significant effects on Peak District Dales SAC (Special Area of Conservation) and Lathkill Dale SSSI (Site of Special Scientific Interest). Natural England requires further information in order to determine the

significance of these impacts and the scope for mitigation. The following information is required:

- Habitats Regulations Assessment (HRA)
- Construction Environment Management Plan (CEMP)

Without this information, Natural England may need to object to the proposal

21. Campaign for the Protection of Rural England (CPRE):

- support the re-use of the mill for a single home for the open market and the investment offered by the applicant
- this is contingent on the applicant addressing adequately the concerns of the PDNPA officers in respect of achieving the conservation of the building and its setting, and protecting biodiversity and protected species
- there is a policy requirement to protect the sensitive and tranquil setting and surroundings of the site - with this in mind the landscaping scheme, including introduction of boundary, retaining and river gabion walling, and hard surfacing should be carefully considered by officers in terms of potential impact on heritage significance, local character and wildlife in accordance with PDNPA Core Strategy policies GSP1, L2, L3, HC1(CI) and Development Management Plan policies DMC 3, 7, 5, 10, 11, 12 and 13
- gabion walling and southernmost boundary walling may well not conserve or enhance the natural beauty or cultural heritage of the site and its setting, contrary to the opinion offered in the statement of heritage significance in respect of the southernmost boundary walling
- the site is sensitive for cultural and environmental reasons and it is crucial that the opportunity for investment in the building and curtilage achieves the conservation and enhancement of natural beauty, wildlife and cultural heritage in the Peak Park.

Representations

22. To date the Authority has received six representations from four people supporting the proposal. The following reasons are given:

- will rescue and restore an old historic mill which would otherwise become derelict
- will retain the character of the building and save the mill workings
- people have spoken with are fully in favour of the plans to convert the mill and save the internal workings, as has been achieved with the mill at Ashford in the Water
- believe that the comments from the Parish Council are an overreaction and represent a minority view rather than the views of the wider community in Over Haddon
- the volume of traffic is very low and there is no current issue regarding safety for walkers/cyclists and horse users
- given the road is a cul-de-sac there is no through traffic and there is no right of way past the small car park
- the nature of the road prevents cars driving at the national speed given the very short section of road and sharp bends
- is highly unlikely there will be any increase in the number of vehicles using the road from the existing residents
- do not see how the change of use and conservation of the building will adversely impact the character and appearance of the local area; proposals will enable the mill and its workings to be preserved and encompassed within a dwelling as was achieved with the Ashford in the Water mill
- do not see how the creation of a garden or car parking area will change the character of the area - vehicles have been parked at the mill for many years when the mill was more recently used by the local gamekeeper and their associates
- given Sough Mill has been in private ownership for many years and there has been no public access it therefore is unreasonable for the Parish Council to suggest that

the public are given access following its conversion into a private dwelling; there is no public access to the mill at Ashford in the Water so why should there be public access to Sough Mill

- suggestion of conditions regarding no domestic paraphernalia being left outside is unreasonable given that there is an adjacent property which has no such conditions imposed on it

Main Policies

23. Relevant Core Strategy policies: GSP1, GSP2, GSP3, L1, L2, L3, CC1, CC5 & HC1

24. Relevant Local Plan policies: DM1, DMC3, DMC5, DMC7, DMC8, DMC10, DMC11, DMC12, DMC13, DMC14, DMH6, DMH8, DMT3, DMT8 & DMU1

Wider Policy Context

25. National Park designation is the highest level of landscape designation in the UK. The Environment Act 1995 sets out two statutory purposes for national parks in England and Wales:

- Conserve and enhance the natural beauty, wildlife and cultural heritage
- Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public
- When national parks carry out these purposes they also have the duty to:
- Seek to foster the economic and social well-being of local communities within the national parks.

National Planning Policy Framework

26. The National Planning Policy Framework (NPPF) is a relevant factor for the purposes of the regulations. Development plan policies relevant to this application are up-to-date and in accordance with the NPPF and therefore should be given full weight in the determination of this application.

27. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and the NPPF.

28. Paragraph 189 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks.

29. Paragraph 212 of the NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

30. Paragraph 215 of the NPPF states that, where a development 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 including, where appropriate, securing its optimum viable use.

31. Paragraph 217 of the NPPF states that local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Peak District National Park Core Strategy

32. GSP1 & GSP2 - *Securing National Park Purposes and sustainable development & Enhancing the National Park*. These policies set out the broad strategy for achieving the National Park's objectives, and jointly seek to secure national park legal purposes and duties through the conversion and enhancement of the National Park's landscape and its natural and heritage
33. GSP3 - *Development Management Principles*. This 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 and impact on living conditions of communities.
34. DS1 - *Development Strategy*. This sets out what forms of development are acceptable in principle within the National Park.
35. CC1 – *Climate change mitigation and adaptation*. This requires all development to make the most efficient and sustainable use of land, buildings and natural resources to achieve the highest possible standards of carbon reductions.
36. CC5 - *Flood risk and water conservation*: This states that development proposals which may have a harmful impact upon the functionality of floodwater storage, or surface water conveyance corridors, or which would otherwise unacceptably increase flood risk, will not be permitted unless net benefits can be secured for increased floodwater storage and surface water management from compensatory measures. Where flood management schemes are proposed to reduce the risk of flooding to established material assets, they should wherever possible secure wider benefits for the natural environment, such as habitat creation or landscape enhancement.
37. L1 - *Landscape character and valued characteristics*. This states that all development must conserve and enhance valued landscape character and valued characteristics, and other than in exceptional circumstances, proposals in the Natural Zone will not be permitted.
38. L2 - *Sites of biodiversity or geodiversity importance*: This states that development must conserve and enhance any features or species of biodiversity importance and, where appropriate, their setting. It also advises that, other than in exceptional circumstances, development will not be permitted where it is likely to have an adverse impact on any features or species of biodiversity importance.
39. L3 - *Cultural heritage assets of archaeological, architectural, artistic or historic significance*: This states that development must conserve and, where appropriate, enhance or reveal the significance of archaeological, architectural, artistic or historic assets and their settings. 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.
40. HC1 – *New housing*: This advises that, exceptionally, new housing from re-use of an existing building can be accepted where it is required in order to achieve conservation

and/or enhancement of valued vernacular or listed buildings in accordance with core policies GSP1 and GSP2.

Local Plan Development Management Policies

41. DM1 - *The presumption of sustainable development in the context of National Park purposes*: This advises that, when considering development proposals, the National Park Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework
42. DMC3 - *Siting, design, layout and landscaping*. This states that 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.
43. DMC5 – *Assessing the impact of development on designated and non-designated heritage assets and their settings*. This relates to development impact on designated and non-designated heritage assets.
44. DMC7 – *Listed Buildings*. This relates specifically to listed buildings and advises that planning applications for development affecting the setting of a listed should be determined in accordance with Policy DMC5 in terms of how their significance will be preserved and why the proposed development and related works are desirable or necessary.
45. DMC8 - *Conservation Areas*: This states that applications for development in a Conservation Area, or for development that affects its setting or important views into, out of, across or through the area, should assess and clearly demonstrate how the character or appearance and significance of the Conservation Area will be preserved or enhanced.
46. DMC10 – *Conversion of a heritage asset*: This states that the conversion of a heritage assets will be permitted provided where it can accommodate the new use without changes that adversely the significance and character of the building and any valued landscape character. In all cases, attention will be paid to the impact of domestication and urbanisation brought about by the use on landscape character and the built environment.
47. DMC11 - *Safeguarding, recording and enhancing nature conservation interests*: This advises that proposals should aim to achieve net gains to biodiversity as a result of development. In considering whether a proposal conserves and enhances sites, features or species of wildlife, all reasonable measures must be taken to avoid net loss by demonstrating that, in the below order of priority, the following matters have been taken into consideration:
 - (i) enhancement proportionate to the development;
 - (ii) adverse effects have been avoided;....
 - (iv) appropriate mitigation; and
 - (v) in rare cases, as a last resort, compensation measures to offset loss.

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.

48. DMC12 - *Sites, features or species of wildlife, geological or geomorphological importance*: This advises that development will only be permitted where significant harm

to protected species can be avoided and the conservation status of the population of the species or habitat concerned is maintained or the need for, and the benefits of, the development in that location clearly outweigh any adverse effect.

49. DMC13 - *Protecting trees, woodland or other landscape features put at risk by development*: This advises that hedgerows which positively contribute to the visual amenity or biodiversity of the location will be protected and, other than in exceptional circumstances, development involving loss of these features will not be permitted.
50. DMC14 – *Pollution and disturbance*: This advises that development that presents a risk of pollution, disturbance or odour that could adversely affect the amenity of neighbours and neighbouring uses will not be permitted.
51. DMH6 – *Re-development of previously developed land to dwelling use*: This advises that re-development of previously developed land for housing will be permitted provided that the development conserves and enhances the valued character of the built environment or landscape on, around or adjacent to the site.
52. DMT3 - *Access and design criteria*. States amongst other things, that a safe access should be provided in a way that does not detract from the character and appearance of the locality and where possible enhances it.
53. DMT8 - *Residential off-street parking*: This advises that appropriately designed, off-street car parking for residential development should be provided, rather than on-street parking, in accordance with the Parking Standards and that protected as such if there is evidence that a loss of such space would exacerbate local traffic circulation problems.
54. DMU1 - *Development that requires new or upgraded service infrastructure*: This states that new or upgraded service infrastructure for new development will be permitted subject to it not adversely affecting the valued characteristics of the area and that any new land use does not commence prior to the appropriate delivery of the services.

Supplementary Planning Guidance

55. The PDNPA Design Guide, Conversion of Historic Buildings (2022), Building Design Guide (1987) and Alterations and Extensions (2014) supplementary planning documents refer to the principles of good design and designing in harmony with the local building tradition. The Climate Change and Sustainable Building (2013) Supplementary Planning Document seeks to mitigate against the carbon footprint of development. However, these must only be applied where a development is otherwise justified by other policy criteria.

Assessment

Principle of the development

56. The site is located in open countryside and not within a named settlement for the purposes of policy DS1. With regard to the principle of the residential re-use of the building, Policy HC1 of the Core Strategy states that new housing from re-use of an existing building can be accepted where it is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings in accordance with core policies GSP1 and GSP2.
57. HC1 states that where more than one dwelling can be provided that the subsequent dwellings should be affordable dwellings. However, such is the size of the building, and the constraints to conversion, that the building can only be realistically converted to a

single dwelling. As such, it is considered that the conversion of the building to a dwellinghouse is acceptable in principle subject to an assessment of the proposals against other material criteria set out below.

Impact on the listed building and its setting

58. The Mill is in a state of disrepair and, without intervention, this important heritage asset, and the historic mill workings contained within may be lost. The Conservation Officer advises that the overall significance of the Mill is very high, derived from its largely historic and legible plan form and the survival of historic machinery and an historic drying kiln. The vernacular construction of the mill, and its setting within Lathkill Dale, also contribute strongly towards its significance. To this end, it is considered that a viable reuse of the building is imperative if the building, and the contribution this makes to the character and appearance of the area, is to be retained and preserved for future generations.
59. There are considered to be significant public benefits in seeking the viable reuse of the building, subject to those proposals being appropriate to conserving the special historic and architectural character and appearance of the building, inclusive of its historical workings, in the proposals as presented. Officers have engaged with the Applicants in seeking to achieve this end, through pre-application discussions and also through amendments sought during the consideration of the application proposals.
60. The Conservation Officer advises that, overall, the design principles of the scheme are sound and it has the potential to effectively conserve the significance of the building. Initial concerns were raised about the extent of work to the hurst frame, mill machinery and other timber structures, as well as the proposed reconstruction of the drying kiln and aspects of the landscape works which included the proposed outbuilding. Amendments have been submitted to the initial proposals which include the following:
- the use of gabions has been amended to a gritstone retaining drystone wall construction to the south of the building;
 - the initial proposal for a detached outbuilding has been removed from the plans and has resulted in the following proposals:
 - an oil boiler is now proposed to be housed within the utility/ground floor wc
 - an oil tank would be located in within the parking area
 - other water purification plant, etc. will now be housed in the wheelhouse below the kitchen;
 - replacements of floorboards are proposed to be sourced in a like for like manner; and
 - the insulated walls with tanking will have a loosefill insulation and have reverted to an approved limecrete radon detail.
61. There were a number of concerns raised by the Conservation Officer which included tanking, the reconstruction of the drying kiln, limewash removal, insulation and timber replacement to which the Applicant has provided further information. The tanking to the walls is proposed to remain where internal areas are below external ground, as external drainage alone cannot control the moisture ingress due to the site location at the foot of a hill.
62. The reconstruction of the drying kiln is primarily required on safety grounds as the engineers have condemned its current state due to possibility of imminent collapse but, instead of committing to a wholesale re-construction at this stage, the Applicants have suggested an approach to proceed with dismantling but only until a point of solid construction which can then allow the structure to be stabilised.
63. It was advised that the limewash on the side of the building contributes evidential value to its significance and that its removal would be harmful and unnecessary. To this end,

the Applicants have advised that the limewash is a 20th century addition to the building from the time of the modern roof and before the current one that used to cut across the first floor milling room window. A historic, early 20th century photograph, with a gabled roof against the south gable, illustrates no limewash. The Applicants therefore consider that it has very limited historic value. The internal limewash is generally modern and its removal is required on internal walls that are to be insulated/lime plastered as it reduces vapour permeability too much.

64. With regard to the roof and wall insulation, it was considered that the loss of the interior wall finish would harm the building's special interest and it was asked whether analysis of the thermal performance of the walls had been undertaken; it was queried whether the improved thermal performance would be significant and enough to outweigh the harm. To this end, the Applicants have advised that the external walls to be insulated have been carefully chosen to impact as little as possible on the significance of the building. As such, the full ground to second floor internal gable, adjacent to the hurst frame, is proposed to be uninsulated to retain the character of that space. The Applicants advise that insulation will improve thermal elements, by more than halving the heat loss, and it is considered that, in this respect, the benefits outweigh the heritage impact.
65. The Applicants advise that the proposed roof insulation is the most important, as most heat is lost upwards through the roof and the details propose a u-value which is still significantly lower than the minimum required for Building Regulations. However, the levels chosen will allow for the purlins to remain of uncovered, breathable construction and the character of the space would be maintained.
66. Concern was raised with proposals to remove timbers damaged by insects. To this end, the Applicants have submitted a specialist timber report and the removal of insect damaged timber is to be avoided where possible. This advises that any removal and treatment should be accurately specified and justified and that the general strategy for treating of timbers is to be limited to joist ends only where projecting into stonework and treatment would be from Natural England's bat safe list. It is advised that other timbers are only to be replaced if the existing cannot be braced or repaired in situ and any live infestation/rot will be initially treated having regard to SPAB/English heritage guidance of changing atmospheric conditions to un-desirable living conditions which the conversion will address.
67. The Conservation Officer advises that the responses to the concerns raised, and as detailed in the amended plans, have addressed much of the initial concern. To this end it is advised that, whilst there is a degree of harm proposed in facilitating for the conversion, it is considered that this is outweighed by the public benefits of securing the long term conservation of the building. Given the above, it has been advised that the proposals are considered acceptable subject to any planning permission being subject to appropriate conditions, as listed in the recommendations above.
68. Therefore, subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP3, L1 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7, DMC8 and DMC10 of the Development Management Plan.

Archaeology

69. Sough Mill, and its associated water management system, is a site of archaeological interest and the site is considerably older than the current buildings. A mill is documented at the site since at least 1528 and the mill site could well have medieval origins. Although no fabric or features predating the 17th century are currently visible with the present building and structures on site, there is potential for evidence of earlier structure and

milling use of the site from the medieval period onwards both within the fabric and the building, below ground internally and within the wider site.

70. The standing mill building and structures, including associated water management features and sluice gate has archaeological interest because of its potential to contain currently concealed evidence related to its construction, development and use. Any remains would be considered heritage assets of archaeological interest. Although features that fell beyond the structure of the listed building and structures would be considered non-designated heritage assets, and likely of no more than regional significance in their own right, they would directly contribute to the understanding and significance of the listed building.
71. Within the footprint of such ground works and ground disturbance, any surviving archaeological remains, features and deposits relating the earlier use and development of the mill site will be destroyed. Given how well preserved and relatively untouched the mill currently is, and extent of groundworks that would be required across the building and site to achieve a residential conversion, this represents a significant and permanent loss of the belowground archaeological interest and its contribution to the mill's significance as a heritage asset.
72. To this end, the Archaeologist advises that, notwithstanding the information submitted with the application documents, a full analytical building recording is required, at level 3-4 with interpretation of the development of the Mill and its fabric. It is advised that the Melbourne Estate archives should be consulted for the documentary research and the Written Scheme of Investigation (WSI) should provide for a dendrochronological assessment to inform the dating of its fabric.
73. However, it is advised that this harm should be weighed against the considerable benefits of securing the future of this important heritage asset as a balanced planning decision is reached. Therefore, it is advised that, should the proposals be deemed acceptable with respect to the advice of the Conservation Officer, and with respect to planning balance, then a conditioned scheme of archaeological work is required to mitigate the impacts detailed above. On this basis, it is considered that the proposals will accord with Policies GSP3 and L3 of the Core Strategy and Policies DM1, DMC3 and DMC5 of the Development Management Plan.

Landscaping

74. The proposed landscaping is considered appropriate in principle to the setting of the mill. A boundary treatment is required between the footpath and first floor bedroom door for privacy, security and safety from falling. Instead of erecting a stone wall, which could be seen to alter the permeability of that part of the site historically, it is proposed to install a native plant hedge, managed to a height of 1.2m. The hedge will have a post and wire fence inner core and be carried along the back side of the parking area to form the necessary fall protection for footpath users. That will then also allow the stone walls to reduce in height around the parking area.
75. In terms of the proposed retaining walls, the initial proposal for gabions has been amended to a gritstone, drystone wall construction to the south of the building. To this end, and subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP3, L1 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7, DMC8 and DMC10 of the Development Management Plan.

Amenity

76. Given the relative distance and interrelationship between the application building and the neighbouring dwellinghouse at Lathkill Lodge, it is considered that the proposed conversion of the mill will not have a significant impact on the amenity of the neighbouring residents. To this end, the proposals are considered to be compliant with Policy GSP3 of the Core Strategy and Policy DMC3 of the Development Management Plan.

Highway and rights of way matters

77. The Local Highway Authority has advised of no objection to the proposals with respect to highway safety but they have requested an informative be attached to any grant of planning permission with respect to Over Haddon Public Bridleway No. 24 and Over Haddon Footpath 6 (FP 6). To this end, it is considered that with appropriate conditions that the proposals will comply with Policy GSP3 of the Core Strategy and Policies DMT3, and DMT8 of the Development Management Plan.
78. There is currently a caravan on the site for the purposes of providing the Applicants with accommodation while they undertake the conversion works. Whilst this is accepted as permitted development for such purposes, it is considered reasonable to attach a condition that the caravan be removed from the site within two months of first occupying the proposed dwellinghouse, and that no other caravan be provided thereafter, to ensure the adequacy of parking and manoeuvring space to serve the property and to protect the setting of the listed building.

Sustainability and climate change

79. Policy CC1 requires development to make the most efficient and sustainable use of land, buildings and natural resources in order to build in resilience to and mitigate the causes of climate change. However, this has to be balanced with the impact that such mitigating proposals may have on the listed building and its setting.
80. The Conservation Officer has requested that the initially proposed, detached outbuilding be removed from the plans due to the impact on the setting of the listed building and the Applicant duly agreed to this. The Applicant has removed the proposed outbuilding from the latest plans and has decided to now opt for an oil boiler that will be housed within the utility/ground floor wc, and an oil tank provided under the parking area.
81. It is advised that, given that wood pellets are increasingly difficult to source locally, ground source heating not being possible due to bedrock and an air-source heat pump being inadequate due to the building requiring too much energy to be viable, that the use of oil is the only viable option in this instance. It is considered that the installation of a solar panel array would be intrusive on the building, or within its setting, and would again be unlikely to facilitate for all the heating requirements of the building.
82. On this basis, it is considered that, having regard to the balance of the sustainable re-use and preservation of the historic building balanced with the aims of mitigating the climate footprint of the development, the proposals are acceptable having regard to Policy CC1 of the Core Strategy.

Flood risk and drainage

83. The Environment Agency has assessed the proposals and advises that the site is located within Flood Zone 1 and, therefore, have no fluvial flood risk concerns regarding the proposals.
84. With regard to foul drainage, as the proposed package treatment plant will be discharging in, or near, to a Special Area of Conservation (SAC) (in this instance the Peak District

Dales Special Area of Conservation), it is advised that the proposed method of disposal of foul drainage will not meet the requirements of the general binding rules (specifically Rule 17). It is advised that private sewage treatment facilities should only be used where it is not reasonable for a development to be connected to a public sewer, because of the greater risk of failures leading to pollution of the water environment posed by private sewerage systems compared to public sewerage systems.

85. Therefore, a Permit application will need to be submitted to the Environment Agency; this can be advised as an informative on any grant of planning permission. However, if a Permit is granted, the package treatment plant must be monitored and maintained appropriately and this can be a condition on any grant of planning permission. In addition, any granting of planning permission must include a condition that a scheme to treat and remove suspended solids from surface water run-off during construction works has been approved by the Local Planning Authority and implemented.
86. The Environment Agency has advised that the construction of the development should adhere to the submitted CEMP; this can be attached as a condition on any grant of planning permission.

Ecology and biodiversity

87. An Ecology Assessment (December 2024) by Dunelm Ecology has been submitted in support of the application. Natural England considers that, without appropriate mitigation, the application would have an adverse effect on the integrity of Peak District Dales Special Area of Conservation and damage or destroy the interest features for which Lathkill Dale Site of Special Scientific Interest has been notified.
88. Upon reviewing the CEMP, it is confirmed that the mitigation outlined is suitable for avoiding impacts to the designated sites during the construction phase. It is also noted that, due to the constraints of the development, SuDs are not feasible. However, this, coupled with the fact that the building is already partially existing, leads to acceptance that the risk from surface water has been addressed sufficiently. It is noted that rainwater harvesting could be a welcome addition to the development, but not compulsory.
89. It is advised that, in order to provide sufficient mitigation for the designated sites, package treatment plants should be installed alongside an ongoing monitoring and maintenance plan to ensure they are operating at the required treatment level; this will need to be conditioned to ensure that there are no impacts to the protected sites during the residential phase of the development.
90. Natural England advises that, despite the proximity of the application to European Sites, the documents submitted by the Authority for consultation did not include information to demonstrate that the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) had been considered by the National Park Authority, i.e. the consultation did not include a Habitats Regulations Assessment; the Applicants have since made such a submission.
91. The Ecologist has assessed the proposals and concurs with Natural England's advice with respect to the submission. It is concluded that there is unlikely to be a significant impact on the SAC (i.e. impact on the habitats and species that are qualifying and primary reasons for selection of the designated site) because:
 - the proposal is for a single dwelling with a package treatment plant, the foul water and discharge will be minimal;

- the surface water from the roof is already existing, there will be little change with the hardstanding; and
 - a CEMP is in place to mitigate impacts during the construction phase.
92. Therefore, the development can be screened out for the purposes of the Habitat Regulations and as such an Appropriate Assessment is not required. However, in order to mitigate the adverse effects, and make the development acceptable, the above mitigation measures and CEMP will need to be implemented as conditions on any grant of planning permission and, on this basis, it is considered that the proposal will not have an adverse effect on the integrity of the SAC.
93. It is noted, with respect to bats, that one day time inspection (May 2024) and three dusk emergence surveys (June, July and August 2024) were conducted on the Mill. Low numbers of brown long-eared droppings and feeding remains were found and numerous roosting opportunities in the form of external wall crevices and gaps around gable verges and roof slates were identified during the day time inspection. Low numbers of bats were recorded emerging from the building and several species were recorded foraging in the surrounding area during all nocturnal surveys. Based on the field survey results, the mill was assessed as supporting common pipistrelle and brown long-eared day roost sites.
94. Whilst no evidence of nesting birds was found within the mill, the external wall crevices have potential to be used by crevice dwelling species. There was no evidence of otter or water vole was recorded during the survey, although suitable habitat and evidence of water voles has been recorded within the wider area. The site provided sub-optimal burrowing habitat for water voles, therefore they are unlikely to be impacted. Otters may occasional forage/commute along the river when it holds water but no resting places would be impacted by the proposals.
95. Given the above, it is considered that all surveys have been undertaken in line with the relevant guidelines. An appropriate impact assessment has been undertaken along with details for appropriate mitigation/compensatory methods for all surveyed species/habitats and the mitigation measures for bats are welcomed. Conditions are requested with respect to all mitigation and enhancement measures identified in Section 4.3 of the Ecology Survey (2024) being adhered to and with regard to works not being undertaken during the bird breeding and nesting period. On this basis, the proposals are considered to comply with Policies GSP3 and L2 of the Core Strategy and Policies DMC11 and DMC12 of the Development Management Plan.
96. The development is exempt from statutory Biodiversity Net Gain.

Conclusion

97. The principle of the use of the building as a market dwelling is considered acceptable in that it accords with policy principle set out in Policy HC1 of the Core Strategy and Policies DMC10 and DMH6 of the Development Management Plan.
98. The proposals, in their amended form and subject to appropriate conditions, will preserve the special historic and architectural character and appearance of the building, its immediate setting and the setting of the Over Haddon Conservation Area. The proposals will also serve to preserve archaeological interests. To this end, the proposals are considered to comply with the aims of Policies GSP3, L1 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7, DMC8 and DMC10 of the Development Management Plan.
99. The Applicants have submitted sufficient information to address other matters, which include ecology, climate change, drainage and access/parking. It is also considered that

the proposals will not significantly impact on the amenity of neighbouring residents. To this end, and subject to appropriate conditions, the proposals are considered to be compliant with Policies GSP1, GSP2, GSP3, CC1, CC5, L1, L2 and L3 of the Core Strategy and Policies DM1, DMC3, DMC5, DMC7, DMC8, DMC10 DMC11, DMC12, DMC13, DMC14, DMT3, DMT8 and DMU1 of the Development Management Plan.

Human Rights

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

List of Background Papers (not previously published)

Nil

Report Author and Job Title

Gareth Griffiths, Planner, South Area