

**Environment Policy Development Group - 18 March 2004****SUPPLEMENTARY PLANNING GUIDANCE: THE ADAPTATION AND RE-USE OF TRADITIONAL FARM BUILDINGS****Report of Chief Environment and Development Officer**

**Statutory Powers:** Town and Country Planning Act 1990. PPG12, Paras 3.15 to 3.18

**Financial Implications:** Within existing budgets

**Purpose**

1. This report seeks Members' consideration of the re-drafted version of the Guide on the Adaptation and Re-use of Traditional Farm Buildings for adoption as Supplementary Planning guidance (SPG) following the conclusion of the consultation exercise undertaken in April/May 2003. The Guide itself addresses the Council's core objective "to maintain the District's distinctive environment whilst enabling access and sensitive development."
2. Government guidance states that SPG should be prepared in consultation with the public and those whose work it may affect. When considering the adoption of SPG the Local Planning Authority should prepare a report on the consultations and include in it the responses it has made to the representations received.

**Recommendation**

**That the Executive RECOMMEND that Council APPROVES the:**

- (i) **Guide on the Adaptation and Re-use of Traditional Farm Buildings, as amended following public consultation, be adopted as Supplementary Planning Guidance;**
- (ii) **document be published and made available to a wide range of customers.**

**Background**

3. Members may recall the Group's consideration of the draft version of this guide and resolving to endorse it as a basis for consultation prior to adoption as SPG (28 November 2002 - Minute EPDG.07/02). The value of SPG as a planning tool is recognised for bringing clarity to policies, efficiency and consistency to the development control system, and increasing the effectiveness of both. To give maximum weight to SPG, consultation with key stakeholders is essential.
4. When endorsing the draft Guide for consultation purposes Members expressed three particular concerns which are repeated, and responded to, here.

- (1) The Guide made no mention of the potential for conflict where new occupants of converted buildings would co-exist in close proximity to working farms. This omission has been remedied by the inclusion of a paragraph which draws attention to such potential conflicts and the ways to address them at the initial design stage;
- (2) The Guide should not simply target developers and officers but should be accessible more widely. The intention is to make the document widely available through appropriate outlets;
- (3) The Guide should be much more user-friendly in its presentation. The draft was a draft in every sense, including its presentation. That Members highlighted the importance of making the Guide 'user-friendly' has been reflected in the appearance of the 'final' version. The Guide's audience is indeed wide, from Appeal Inspectors to the occupiers (and potential occupiers) of the buildings themselves. In fine-tuning the document, the aim has been to produce an appearance that matches its 'authoritative but plain English' text so that it suits all needs.

### **The Consultations**

5. A questionnaire similar to those used for other SPG consultations was sent with the draft to all Parish/Town Councils and Amenity Societies (73), local agents/architects (113), neighbouring planning authorities (6) and a number of National Bodies with a particular interest (7). Responses totalled 32, which at 16% was a little below that of other SPG consultations. Nevertheless, the very positive nature of all but one of the responses suggests a high level of support, and need, for the guidance. The single 'negative' response was from a local agent who chose not to complete the questionnaire but wrote to the effect that the guidance was not disputed but the need to publish it was. The fact is, however, even in its draft form there has been public demand for the Guide and it has already proved its value at appeal. A full description of the consultation responses is included in the Appendix attached to the report.

### **Risk Assessment**

6. None in so far as producing the document is concerned as it relates to Development Plan Policy. The risk associated with not having the guidance is that decisions may be less consistent without it.

### **Human Rights Act**

7. Whilst the guidance will have some effect on an individual's use and development of their property, this impact has been balanced against the wider community interest. In addition, the guidance accords with current Government Planning Policy and the new policies in the emerging Local Plan.

### **Conclusion**

8. The high standards of design embodied in the Guide are already being achieved in the district and being supported at appeal. They therefore reflect national and local policies and current 'best practice'. Achieving the standards in individual cases demands a considerable commitment of officer time. Publication of the Guide would relieve officers from much of the

repetitive work involved, confirm the Council's commitment to the standards being achieved and, furthermore, enable their achievement consistently throughout the district.

Alan Cheetham  
Conservation Officer

Environment PDG  
18 March 2004

Steve Munday  
Development Control & Conservation Manager

Alan Robinson  
Chief Environment & Development Officer

**Background Documents:**

PPG7 The Countryside – Environmental Quality an Economic & Social Development  
PPG12 Development Plans  
PPG15 Planning and the Historic Environment

### Analysis of Questionnaire Responses (31)

- 6 **Question 1.** How well do you think the Guide covers the things to consider when proposing changes to Traditional Farm Buildings?

**Answers:** Poorly - **Nil**, Not so well - **Nil**, Fairly Well – **5**, Very Well – **26**

**Officer Response:** This question sought to gain an overall impression of how well the Guide was thought to serve its purpose. Question 2 below was therefore intended to pick up on any significant omissions.

- 7 **Question 2.** Are there any aspects about making changes that haven't been covered but you feel should be?

**Answers:** No –**26**, Yes – **5** as follows:

- (1) The detailed treatment of Interiors. **Officer Response:** The treatment of interiors is referred to throughout the Guide in relation to the impact upon exterior character and appearance e.g. the desirability for not introducing additional door or window openings means internal arrangements will need to respond to the pattern of existing openings. The Guide also refers to the important features and characteristics of interiors and the desirability for respecting them (which is obviously greater in the case of a listed building). This level of guidance is believed to properly reflect the level of control a planning authority normally has over the detailed treatment of interiors and its suitability, therefore, for inclusion in an SPG document.
- (2) Temporary protection is better than approving an unsuitable use. **Officer Response:** This observation infers the existence of a policy that accepts any use as being better than no use, but this is not the case in the South Hams. If a use is unsuitable on policy grounds (including the adverse impact of its 'accommodation' in a building) it would not normally be approved.
- (3) Include Drawings of Design Details. **Officer Response:** The inclusion of detailed design drawings showing the construction of window openings, eaves treatments and the like was indeed considered, but was rejected on account of the diverse and individual nature of constructions found in the field and the undesirability of offering 'standard' solutions. A guide that included such details would need to be long indeed to cover all 'eventualities', and would be more a technical guide rather than one dealing essentially with planning issues.
- (4) Provide more information about appropriate materials and where to obtain them (e.g. roofing slates) **Officer Response:** Information of this kind becomes out-of-date fairly quickly and is better provided 'on request' at the time an application is made – which is normally the case.
- (5) Access and Highway Considerations **Officer Response:** Achieving adequate standards is a necessity for all kinds of development. What is important in the context of this SPG is not their precise nature but whether they can be achieved without adverse impact, and this aspect has been covered in the Guide.

8 **Question 3.** Do you feel any of the contents are unnecessary?

**Answers:** Yes – Nil, No – 31

**Officer Response:** Although adding to the documents length, the inclusion of the 'information only' section on what the buildings are and why they are important seems to have been accepted as an essential element of the guide that enhances its value.

9 **Question 4.** Do you think any parts of the guide are factually incorrect, ambiguous or unclear in their meaning?

**Answers:** No – 30, Yes – 1, as follows: Although admirably clear and well illustrated, not all the 'technical' terms were clarified so these might not be understood. **Officer Response** Although it seems from the other 30 replies they probably were, the re-drafting has been mindful of the need to explain any out-of-the-ordinary terms that might not be understood.

10 **Question 5.** Although the Draft version of the Guide is as yet in a standard format, how easy was it to follow and refer to?

**Answers:** Very Difficult – Nil, Difficult – Nil, Easy – 18, Very Easy - 13

**Officer Response:** The idea of adding a 'Contents Page' was mentioned more than once. This seems sensible, so one has been added. The colour-coding of the various sections should also help reference the various sections

11 **Question 6.** This was the last question requesting "Any Further Comments."  
(The sources of the comments are shown in brackets; AS = Amenity Society, LA = Local Agent, NA Neighbouring Authority, NB = National Conservation Body, PC= Parish Council, SHDC = from within Council )

#### **Suggestions for Improving Presentation / Ease of Use**

- (1) Use colour illustrations to add to users' enjoyment, particularly where material selection is concerned. (PC x2, LA) **Agreed + Implemented**
- (2) Add Bibliography, including reference to relevant sources of further information including web sites. (NB, PC) **Agreed + Implemented**
- (3) The Draft looks as if it is targeted at professionals. Needs to be made more attractive to general public as many don't employ architects (LA) **Agreed + Implemented**
- (4) Don't be too informal in the use of colloquialisms as this tends to undermine the essential professionalism and authority of the Guide (PC) **Agreed + Implemented** by significantly reducing their number.

#### **Suggestions for Improving Content / Value**

- (1) Include a statement explaining what the significance of the Guide is as a piece of SPG (SHDC) **Agreed + Implemented** in the form of a Preface.
- (2) In the Checklist of Application Requirements, stress the importance of providing the landscape proposals at the outset, so these form part of an approval and are not dealt with as an afterthought (SHDC). **Agreed + Implemented**
- (3) In the Wildlife section, stress that if 'protected species' are found during the initial structural survey, this should be investigated before continuing with it (NB). **Accepted + Implemented**

(4) Notwithstanding the Guide's purpose, mention that the preferred use of farm buildings is continued farm use, and that grants for this purpose are available from DEFRA (NB). **Accepted + Implemented** as a final footnote.

### **Other Comments**

12. Although not requiring action of any kind, Members may wish to be aware of the flavour of the supportive comments received:
- "An excellent no fuss information book" (PC)
  - "Attractive and logical presentation" (PC)
  - "Congratulations. The guidance is outstanding. I would like to plug it in our (national) newsletter" (NB)
  - "The photos are very helpful and make for easy reference" (PC)
  - "It sets out some wonderful examples of sympathetic conversions. Ensure the guidance is adhered to" (PC)
  - "The inclusion of a wildlife section is most welcomed" (NB)
  - "Very informative guide. I hope builders will use it" (PC)
  - "Provides a very useful reference for when we are considering planing applications (PC)
  - "Very useful guide for owners, occupiers and architects" (PC)
  - "It's such an important guide, every developer should be made to read it before planning any action" (PC)
  - "Our congratulations – this is a high quality contribution to a difficult subject, helpful and unfailingly constructive. It should be sold in bookshops throughout the South Hams – or perhaps Devon" (AS)
  - "All in all, a very useful guide and much needed" (LA)
  - "The illustrations were most helpful with the accompanying illustrations"(PC)
  - "I would be interested to have a copy of the final version....and talk to you about cribbing from it for our purposes" (NA)
  - "There is so much to commend the analysis of the existing character and details of the various types of farm buildings. Also the illustrations of new work should be helpful" (LA)

The non-supportive comment was as follows:

"We, the professionals, either know, or can research, all the information in your guide. We don't need to be preached to – our clients will either take or ignore our advice, and they won't read the guide" (LA)