

SOUTH HOLLAND DISTRICT COUNCIL

Report of: Lead Development Management Planner (Interim) - BBC & SHDC

To: Planning Committee - 07 January 2026

(Author: Oscar Patman - Planning Officer)

Purpose: To consider Planning Application H13-0848-25

Application Number: H13-0848-25

Date Received: 04 September 2025

Application Type: FULL

Description: Conversion of existing steel framed building to self build dwelling

Location: Land off High Road Moulton Spalding

Applicant: Mr & Mrs Greenaway

Agent: Seven22 Architecture Ltd

Ward: Cowbit, Weston and Moulton

Ward Councillors: Cllr T E Sneath
Cllr A Casson
Cllr A R Woolf

You can view this application on the Council's web site at

<http://planning.sholland.gov.uk/OcellaWeb/planningDetails?reference=H13-0848-25>

1.0 REASON FOR COMMITTEE CONSIDERATION

1.1 The application has been referred to Committee by Chairman's Panel, following a request by Cllr A Casson.

2.0 PROPOSAL

2.1 This is a full planning application, seeking the conversion of an existing steel framed building to a three-bedroom, self-build dwelling.

2.2 It is proposed that the existing building would be extended for its entire width by approximately 6m, resulting in an approximate 36% increase in floor area. The barn would be entirely re-clad, with black standing seam insulated cladding, accentuated with vertical western red cedar cladding. The fenestration would be grey aluminium. A Stamford stone chimney stack is proposed relatively centrally within the roof, above the living room.

3.0 SITE DESCRIPTION

3.1 The site is outside any of the settlement boundary outlined within the South East Lincolnshire Local Plan, 2019, and can therefore be considered to be within the Countryside.

3.2 The site is located along the main road (High Road) between Moulton and Weston, sitting 160m and 650m respectively from each settlement. The building is set back from the road (approximately 100m) and well screened, giving a more remote and rural character.

3.3 The wider site features a fishing and wildlife site, which is well vegetated and landscaped. The

existing building is a utilitarian, green steel framed structure, erected approximately eleven years ago. Under application reference H13-0683-20, this building was intended to be used for site maintenance in association with the holiday lodges; however, it has since been found to be surplus to this requirement.

4.0 RELEVANT PLANNING POLICIES

4.1 The Development Plan

4.2 South East Lincolnshire Local Plan, March 2019

4.3 If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, states that the determination must be made in accordance with the plan unless material considerations indicate otherwise.

4.4 Policy 01 - Spatial Strategy
Policy 02 - Development Management
Policy 03 - Design of New Development
Policy 04 - Approach to Flood Risk
Policy 09 - Promoting a Stronger Visitor Economy
Policy 23 - Reuse of Buildings in the Countryside for Residential Use
Policy 28 - The Natural Environment
Policy 30 - Pollution
Policy 31 - Climate Change and Renewable and Low Carbon Energy
Policy 33 - Delivering a More Sustainable Transport Network
Policy 36 - Vehicle and Cycle Parking
Appendix 6 - Parking Standards

4.5 National Planning Policy Framework (NPPF), 2024

4.6 Section 2 - Achieving sustainable development
Section 5 - Delivering a sufficient supply of homes
Section 9 - Promoting sustainable transport
Section 12 - Achieving well-designed places
Section 14 - Meeting the challenge of climate change, flooding and coastal change
Section 15 - Conserving and enhancing the natural environment

4.7 Planning Practice Guidance (PPG)

5.0 RELEVANT PLANNING HISTORY

5.1 H13-0495-06 - Full - Creation of wildlife area and excavation of pond - Refused 19 June 2006.

5.2 H13-0935-06 - Full - Creation of wildlife area and excavation of pond - Approved 25 August 2006.

5.3 H13-0475-11 - Full - Use of site for touring caravans - Refused 12 September 2011.

5.4 H13-0320-12 - Full - Proposed touring caravan site - Approved 1 August 2012.

5.5 H13-0683-20 - Full - Change of Use to fishing and wildlife holiday lodges, erection of 5 modular holiday lodges with associated landscaping, planting and parking - Approved 15 October 2020.

5.6 H13-0849-25 - S73 - Change of Use to fishing and wildlife holiday lodges, erection of 5 modular holiday lodges with associated landscaping, planting and parking - Approved under H13-0683-20. Modification to Condition 2 to allow amendments to previously approved plans - Ongoing.

6.0 REPRESENTATIONS

6.1 The responses received from consultees during the initial consultation exercises, which can be viewed in their entirety through the South Holland website, can be summarised as follows:

6.2 Cllr Casson

"Can I please request this application to go to chairman's panel, please."

6.3 Highway and Lead Local Flood Authority

"No Objections - The proposal is for conversion of existing steel framed building to self build dwelling. The access has been approved under H13-0683-20. The dwelling will include three bedrooms, and sufficient parking has been demonstrated. The proposal will not have an adverse impact on the public highway.

As Lead Local Flood Authority, Lincolnshire County Council is required to provide a statutory planning consultation response with regard to drainage and surface water flood risk on all Major applications. This application is classified as a Minor Application and it is therefore the duty of the Local Planning Authority to consider the surface water flood risk and drainage proposals for this planning application."

Proceeds to recommend the following informative condition:

"Please contact the Lincolnshire County Council Streetworks and Permitting Team on 01522 782070 to discuss any proposed statutory utility connections, Section 50 licences and any other works which will be required within the public highway in association with the development permitted under this Consent. This will enable Lincolnshire County Council to assist in the coordination and timings of these works. For further guidance please visit the Highway Authority's website via the following link: Traffic Management - <https://www.lincolnshire.gov.uk/traffic-management>."

6.4 Environmental Proteciton

Initial Comments, dated 23/09/25

"As the project is self build we would advise restricting the use of heavy machinery and external power tools beyond the hours of 7:30-18:00 Monday to Friday, and Saturday 8:00- 13:00."

6.5 *Additional Comments, dated 02/10/25*

"I request a screening assessment form be completed for this location."

6.6 *Revised Comments, dated 15/10/25*

"I have reviewed the submitted screening assessment form along with photographs supplied in the planning statement and structural appraisal. I request a precautionary land contamination condition be applied at this location as follows: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported immediately to the Local Planning Authority (LPA). An investigation and risk assessment must be undertaken in accordance with details to be agreed with the LPA. Where remediation is necessary, a remediation scheme must be submitted to and approved in writing by the LPA. Following completion of measures identified in the approved remediation scheme a verification report shall be submitted to and approved by the LPA. No deviation shall be made from this scheme without the express written agreement of the LPA. If during redevelopment contamination not previously considered is identified, then the LPA shall be notified immediately and no further work shall be carried out until a method statement detailing a scheme for dealing with the suspected contamination has been submitted to and agreed in writing by the LPA. Reason: To assess whether the site is polluted and to address any pollution to ensure a satisfactory development. This issue is integral to the development and therefore full details need to be finalised prior to the commencement of works. This Condition is imposed in accordance with Policy 30 of the South East Lincolnshire Local Plan, 2019."

6.7 Public Representations

This application has been advertised in accordance with the Development Procedure Order and the Council's Statement of Community Involvement. In this instance, no letters of representation have been received.

7.0 **CONSIDERATIONS**

7.1 Evaluation

7.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

7.3 The adopted South East Lincolnshire Local Plan 2011-2036, adopted March 2019 (SELLP), is the development plan for the district, and is the basis for decision making in South Holland. The relevant development plan policies are detailed within the report above.

7.4 The policies and provisions set out in the National Planning Policy Framework, December 2024 (NPPF) are also a material consideration in the determination of planning applications, alongside adopted Supplementary Planning Documents.

7.5 Principle of Development

7.6 Policy Context - Spatial Strategy

7.7 Policy 1 of the South East Lincolnshire Local Plan (2019) sets out the settlement hierarchy in respect of delivering sustainable development, which meets the social and economic needs of the area whilst protecting and enhancing the environment; in order to provide enough choice of land for housing to satisfy local need, whilst making more sustainable use of land, and to minimise the loss of high-quality agricultural plots by developing in sustainable locations and at appropriate densities.

7.8 Policy 1 expresses this sustainable hierarchy of settlements, ranking the settlements deemed to be most sustainable in descending order. The most sustainable locations for development are situated within the 'Sub-Regional Centres', followed by 'Main Service Centres'. Lower down the hierarchy are areas of limited development opportunity including 'Minor Service Centres', with areas of development constraint comprising 'Other Service Centres and Settlements'. The countryside is at the bottom of the settlement hierarchy and represents the least sustainable location.

7.9 The site is located outside any defined settlement boundary. Policy 1 states that "the rest of the Local Plan area outside the defined settlement boundaries of the Sub-Regional Centres, Main Service Centres, Minor Service Centre and Other Service Centres and Settlements is designated as Countryside".

7.10 As such, the site should be considered to be within the Countryside from a planning policy context.

7.11 Policy 1 states that within "the Countryside development will be permitted that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community or environmental benefits."

7.12 Within the explanatory text of Policy 1 and throughout the South East Lincolnshire Local Plan (2019), further discussion of what can be considered to necessitate a Countryside location can be found. Policy 23 outlines that the reuse of a building in the Countryside for residential use can be considered as development which necessitates a Countryside location.

7.13 Policy Context - The Reuse of Buildings in the Countryside for Residential Use

- 7.14 Paragraph 84 of the National Planning Policy Framework (December 2024) outlines that "Planning policies and decisions should avoid the development of isolated homes in the countryside unless the development would re-use redundant or disused buildings and enhance its immediate setting".
- 7.15 Within the context of South Holland, the suitability of a proposal for the re-use of a building in the Countryside is contained in Policy 23. In this context, Policy 23 states:
- "Proposals for the conversion of existing buildings which are located outside defined settlement boundaries to residential use will be permitted provided that:
1. the building is structurally sound and capable of conversion without the need for significant extension, alteration or rebuilding;
 2. the building is of architectural or historic merit or makes a positive contribution to the character of the landscape, to justify conversion to ensure retention;
 3. the proposal is in keeping with its surroundings;
 4. the design is sympathetic to the character and appearance of the building in terms of architectural detailing and materials of construction; and
 5. development leads to an enhancement of the immediate setting of the building".
- 7.16 The Reasoned Justification associated with this policy explains the rationale and aims of Policy 23. Paragraph 5.15.3 states:
- "Rural buildings, such as brick-built barns, can make a significant contribution to the character of an area and so there is a concern that they should not remain vacant, under-used or become derelict, detracting from the visual character and quality of the designated Countryside. Policy 23 therefore makes provision for the conversion and reuse of rural buildings as dwellings. South East Lincolnshire's stock of traditional and historic buildings is a finite resource and so conversions provide the opportunity to retain and enhance the architectural quality and character of the building and its setting."
- 7.17 This is expanded upon by Paragraphs 5.15.4 and 5.15.5, which are copied below for context:
- "5.15.4: However, not all buildings in the Countryside are suitable for conversion as they may be of insubstantial construction, of poor design or not in keeping with their surroundings. Buildings to be converted should be structurally sound and proposals which require significant extension, alteration or rebuilding will be not acceptable. Structural surveys may be required in order to demonstrate that a building is structurally sound. Proposals which would involve rebuilding, rather than conversion, will be regarded as new dwellings in the Countryside and will not be permitted."
- 7.18 "5.15.5: Proposals will be required to be sympathetic to the character and appearance of the building in terms of architectural detailing and materials of construction in order to conserve its interest. They should also seek to optimise the potential to enhance the character and quality of the site. In terms of vehicular access, proposals should meet the requirements of the Highways Authority."
- 7.19 The aims of Policy 23 can therefore be broadly outlined as the retention and enhancement of buildings of architectural, or historical merit, in the Countryside.
- 7.20 *Policy Context - Need for Housing*
- 7.21 The National Planning Policy Framework (December 2024) outlines, within Paragraph 61, that "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."
- 7.22 Paragraph 73 of the National Planning Policy Framework (December 2024) also emphasises the importance that the contribution of small to medium sized sites can make in meeting the housing requirements. ("Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise

housebuilders to deliver new homes, and are often built-out relatively quickly"). This paragraph seeks to ensure that there is a sufficient supply of homes and advises that sites of all sizes make a contribution to the housing requirement of an area.

7.23 Need for Housing

7.24 The proposal is for a self-build dwelling. This matter is discussed in greater detail in the following section; however, pertinent to housing need here, is Section 2 of the Self and Custom Housebuilding Act, 2015, which states that: "an authority to which this section applies must give development permission for the carrying out of self-build and custom housebuilding on enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority's area in respect of each base period." To this end, and as reaffirmed within Footnote 28 of the National Planning Policy Framework (December 2024), the Planning Authority are obliged to give enough suitable development permissions to meet identified demand.

7.25 Self and Custom Building Housing - Policy Context

7.26 The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom housebuilding. The Act does not distinguish between self-build and custom housebuilding and provides that both are where an individual, an association of individuals, or persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals. The definition contained within the Act is as follows:

"In this Act "self-build and custom housebuilding" means the building or completion by -
(a) individuals,
(b) associations of individuals, or
(c) persons working with or for individuals or associations of individuals, of houses to be occupied as homes by those individuals."

7.27 It is noted that the applicants statement details that "a 2024 appeal decision within the District reinforces this position, with the Inspector explicitly noting that the self-build nature of the proposal was a material consideration that weighed in favour of the single dwelling".

7.28 The South East Lincolnshire Local Plan (2019) has a number of allocated sites, a number of which are yet to be delivered. Likewise, the district has plentiful opportunity for windfall sites within settlement boundaries; both means to which self-build projects could come forward, within sustainable locations.

7.29 Whilst the South East Lincolnshire Local Plan (2019) does not have a policy dedicated to self-build proposals, Policies 10, 11 and 17 provide a strategy for the provision of these dwellings. Paragraph 5.3.5 of the South East Lincolnshire Local Plan (2019) states:

"Within the defined settlement boundaries there will be numerous opportunities for infill and larger-scale housing development that will be available to the local builder, self-builder, custom-builder and larger house-building companies. It is not practical to identify or anticipate all such opportunities; however, the positive tone of the Local Plan encourages such development provided that the material considerations of the Local Plan and particular sites can be met."

7.30 Policy 17 expands upon this briefly, outlining that the "Local Plan will also seek to meet the housing needs of custom and self-builders as they may come forward." Paragraph 5.9.4 of the reasoned justification for this policy reiterates that "opportunities for infill development within Settlement Boundaries can also meet the known interest registered by self and custom house builders".

7.31 In this regard, it is clear that proposals for self-build dwellings should be consistent with the Development Plan as a whole and appropriately located within settlement boundaries. This approach has been confirmed within Appeals APP/A2525/W/23/3319481, APP/A2525/W/24/3343297 and APP/A2525/W/25/3359058 amongst others. Within these previous appeals, it was outlined that proposals which break from the spatial strategy of the South East Lincolnshire Local Plan (2019) would require significant justification, including evidence that a search for alternative sites within settlements has been conducted. No such

justification or search for sites has been presented to the Council at this time.

- 7.32 In this vein, whilst weight is given in favour of proposals for self and custom builds, these proposals must be consistent with the provisions of the South East Lincolnshire Local Plan (2019) as a whole, and cannot be used as the sole justification for divergence from policy. The weight given in favour of the proposal in respect of its self-build nature is tempered accordingly.
- 7.33 Principle of Development - Assessment
- 7.34 As outlined above, the proposal relates to the conversion of an existing building in the Countryside, and so, in order to be acceptable in principle, would have to conform to the five criteria outlined in Policy 23. Assessing the proposal against these criteria, the following is considered:
1. Proposed here is a significant level of alteration, through the entire recladding of the building and a sizeable extension. The level of extension and alteration goes beyond what would typically be expected of a conventional conversion.
- 7.35 However, Policy 23 and Paragraph 5.15.4 of the Reasoned Justification are explicit in the use of the words "need" and "require". The building itself is considered to be structurally sound, as demonstrated within the submitted structural survey, and would meet space standards without the proposed extensions. On this basis, the proposed conversion does not actually necessitate all of the alterations proposed, and could reasonably occur at a reduced scale. The alterations could therefore be considered superfluous and used to aid with the conversion rather than facilitate it. To this end, it could be argued that the proposal would technically be in accordance with criterion 1, in that the building is structurally sound and capable of conversion without significant alteration.
- 7.36 2. The existing building is of no architectural merit. It is well screened and well set back from the road, and therefore its contribution to the landscape is minimal. Whilst it is not argued, as outlined in the Design and Access Statement, that the building is indicative of a point in time of agricultural architecture, it is not an exemplary model of that era, and nor is there a special need to preserve pieces from that design philosophy at this time.
- 7.37 The building is only approximately eleven years old and so is of no historic merit. As such, the existing building is not considered to be of significant merit as to justify its conversion. The proposal is in direct conflict with criterion 2 of Policy 23.
- 7.38 3. The proposed design is in keeping with its surroundings. The design relates well to those of the lodges approved under H13-0683-20, and would act as a design focal point for the site as a result. The materials selected and overall design is well selected for the rural area and is a well designed modern interpretation of this character.
- 7.39 4. The existing building, as outlined above, is a rudimentary, agrarian building, of no merit. The proposed design would wholly change its appearance. The resultant building would bear no resemblance to its predecessor. As outlined above, Paragraph 5.15.5 requires proposals to be sympathetic to the original appearance of the building in terms of materials and detailing to preserve its interest. This is not considered to have occurred here. As such, such a significant redesign cannot be said to be sympathetic to the original building.
- 7.40 5. The proposal is of a high quality, which would lead to an immediate enhancement of the building's setting. The materials, detailing and overall design are well adapted to the area, portraying a consistent and strong design philosophy, which would enhance the area. The proposed materials appear to be of a suitably high quality also, enhancing the building in this regard.
- 7.41 For the reasons outlined above, the proposal is considered to be in accordance with points 1, 3, and 5 of Policy 23, but contrary to points 2 and 4 of this policy. Whilst the proposed design is of a good quality, the existing building is of no merit historically or architecturally. As such, the proposal is considered to be contrary to the aims of Policy 23 as a whole, in that the intention to retain existing buildings of architectural merit has not been achieved.

- 7.42 As discussed above, the weight attributed to the self-build nature of the dwelling is proportionate. The provisions of Policies 10, 11 and 17 of the South East Lincolnshire Local Plan (2019) are such that the development should still be directed to within settlement boundaries in the first instance, a matter that has been regularly reinforced through recent Appeal decisions. Accordingly, the weight attributed to the self-build nature of the proposal would not be sufficient on its own to justify the principle of a residential development on this site, or warrant a departure from the aims of the spatial strategy.
- 7.43 It should be noted that the Council's 5 Year Housing Land Supply Assessment and the inset maps supporting the South East Lincolnshire Local Plan (2019), identify a number of single plot and small sites, not identified for a particular dwelling type or sector. It would be unlikely that at least some of those sites could not be considered as being suitable for self-build housing particularly given the straightforward requirements for such sites to be considered as a serviced plot of land as defined in the Self-build and Custom Housebuilding Act 2015 and explained in the PPG. No such evidence of a search for sites within such allocations or within the broader settlement boundaries has been provided.
- 7.44 To this end, whilst weight is given in favour of the proposal as a result of its self-build nature, said weight is not substantial enough to overcome the conflict in principle with Policy 23 of the South East Lincolnshire Local Plan (2019), which by extension results in the proposal being contrary to Policy 1 of the South East Lincolnshire Local Plan (2019).
- 7.45 For these reasons, the principle of development is not considered acceptable and is at conflict with Policies 1 and 23 of the South East Lincolnshire Local Plan (2019).
- 7.46 Layout, Design, Scale and Consideration of the Character of the Area
- 7.47 Section 12 of the National Planning Policy Framework (December 2024), "Achieving well-designed places", states that the "creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve" and as such, it is generally accepted that good design plays a key role towards sustainable development.
- 7.48 Paragraph 135, contained within Section 12 of the National Planning Policy Framework (December 2024), states that new development should function well and add to the overall quality of the area (including beyond the short term) and should be visually attractive as a result of good architecture and appropriate landscaping. This goes on to establish that it is important that new development should be of the highest quality, to enhance and reinforce good design characteristics, and that decisions must have regard towards the impact that the proposed development would have on local character and history, including the surrounding built environment and landscape setting such as topography, street patterns, building lines, boundary treatment and through scale and massing. Developments should create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, among other considerations.
- 7.49 Paragraph 139 of the National Planning Policy Framework (December 2024) states the following:
- "Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design⁵⁴, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings".
- 7.50 South Holland do not have a local design guide, meaning that supplementary guidance on design matters is principally driven by national documents, including the National Design Guide (NDG). The NDG outlines broad principles for well designed places. The entire document is of note to this application; however, Paragraphs 41, 43, 44, 50, 51, 52, 53, 56, 57 and 75 of the

NDG are highlighted here as being particularly relevant to the case at hand.

Likewise, Policy 2 of the South East Lincolnshire Local Plan (2019) outlines sustainable development considerations for proposals; providing a framework for an operational policy to be used in assessing the sustainable development attributes of all development proposals. Furthermore, Policy 3 of the South East Lincolnshire Local Plan (2019) requires development to comprise good design; identifying issues that should be considered when preparing schemes so that development sits comfortably with, and adds positively to, its historically designated or undesignated townscape or landscape surroundings.

- 7.51 These policies accord with the provisions of the National Planning Policy Framework (December 2024) and require that design which is inappropriate to the local area, or which fails to maximise opportunities for improving the character and quality of an area, will not be acceptable. Proposals for new development would therefore require the aforementioned considerations to be adequately assessed and designed, including the siting, design, and scale to be respectful of surrounding development and ensure that the character of the area is not compromised.
- 7.52 The proposed design is considered to be high quality. A clear approach has been taken in designing the proposed dwelling, to produce a coherent design, which is well-tailored for its needs and location. The submitted scheme is evidently rooted in its rural location, and whilst not necessarily representative of traditional vernacular design in South Holland, is reflective of more modern design practices emerging throughout the area.
- 7.53 The proposal clearly embodies the principles of good design outlined within the NDG, in that it is adapted to the area where it is proposed and has sustainability at its core. The result is a dwelling which clearly enhances the existing character of the building.
- 7.54 The materials proposed are well chosen for the setting. They compliment the rural character of the area well, invoking the previously agricultural nature of the plot in a coherent and logical manner. The use of black cladding is typical of the wider South Holland area, paying homage to a certain degree to local vernacular. It is considered Paragraph 57 of the NDG has been met as a result.
- 7.55 However, whilst it is accepted that the proposal reflects government guidance on design, it is not considered that the proposal would be outstanding or innovative, and would not necessarily raise the standard of design in the area more generally. Many of the features proposed would only function within a Countryside setting, and so their reproducibility is limited. Likewise, whilst sustainability measures such as heat pumps have been mentioned (although not detailed), these would not be used in an innovative way. The design is of a good quality, but cannot be said to be truly outstanding.
- 7.56 As such, whilst weight is transferred in favour of the proposal, due to its good design, this would not necessarily be tantamount to the full weight transferred by Paragraph 139 as the design is not outstanding or innovative.
- 7.57 Taking account of the design, scale, and nature of the development, as detailed above, the proposal is considered to be acceptable in this regard. The proposal would not cause an adverse impact to the character or appearance of the area and would therefore be in accordance with Policies 2 and 3 of the South East Lincolnshire Local Plan (2019) and Section 12 of the National Planning Policy Framework (December 2024).
- 7.58 Impacts Upon Residential Amenity
- 7.59 Paragraph 135 of the National Planning Policy Framework (December 2024) states that development should create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 7.60 Policies 2 and 3 of South East Lincolnshire Local Plan (2019) sets out that residential amenity and the relationship to existing development and land uses is a main consideration when making planning decisions. Policy 30 relates to pollution in all forms, including noise pollution

and contaminated land.

- 7.61 Due to the relative isolation of the plot, there would be no amenity impact. The Environmental Protection department has recommended restrictions on hours of construction; however, this is considered excessive given the isolation of the plot.
- 7.62 A screening assessment has been requested by the Environmental Protection department. This has been duly provided by the applicant, and following this a standard contaminated land condition has been requested by the department.
- 7.63 As detailed above, the scale and design of the proposal is considered to have no significant or unacceptable impact on the residential amenities of the occupiers of adjacent properties or land users, when also taking account of the conditions recommended. As such, the proposal is considered to accord with Section 12 of the National Planning Policy Framework (December 2024) and Policies 2 and 3 of the Local Plan in terms of impact upon residential amenity.
- 7.64 Highway Safety and Parking
- 7.65 Section 9 of the National Planning Policy Framework (December 2024) is titled 'Promoting sustainable transport'. Within this, Paragraph 116 advises that "development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios".
- 7.66 In respect of highway matters, Policy 2 details that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to access and vehicle generation. Policy 3 details that development proposals will demonstrate how accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways will be secured, where they are relevant to the proposal. Policy 33 further reinforces the need for developments to be accessible via sustainable modes of transport.
- 7.67 Policy 36 of the South East Lincolnshire Local Plan (2019), in conjunction with Appendix 6, sets out minimum vehicle parking standards and requires at least two spaces for dwellings of up to three bedrooms and three spaces for dwellings with four or more bedrooms.
- 7.68 Ample parking has been provided on site. Access would be via an existing and established access road to the fishing lakes. The creation of a dwelling would not significantly increase the traffic using this access, and certainly not to such an extent as to cause severe harm as outlined in Paragraph 116.
- 7.69 The proposal would therefore be acceptable and would not have an unacceptable adverse impact on highway safety in accordance with Policies 2, 3, 33 and 36 of the South East Lincolnshire Local Plan (2019), as well as Section 9 of the National Planning Policy Framework (December 2024).
- 7.70 Flooding Considerations
- 7.71 Section 14 of the National Planning Policy Framework (December 2024) requires development plans to "apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: applying the sequential test and then, if necessary, the exception test as set out below".
- 7.72 Paragraph 174 of the National Planning Policy Framework (December 2024) states "the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding". The strategic flood risk assessment provides the basis for applying this test.

- 7.73 Paragraph 175 of the National Planning Policy Framework (December 2024) states that "the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."
- 7.74 If, following the application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exceptions Test can be applied if appropriate. The process for applying the Exception Test is outlined within Paragraphs 177, 178 and 179 of the National Planning Policy Framework (December 2024). Paragraph 178 states "to pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."
- 7.75 The site lies within Flood Zones 1, 2 and 3 of the Environment Agency's Flood Maps. These have been created as a tool to raise awareness of flood risk with the public and partner organisations, such as Local Authorities, Emergency Services and Drainage Authorities. The Maps do not take into account any flood defences.
- 7.76 The South-East Lincolnshire Strategic Flood Risk Assessment (SFRA) provides an overview of how flood risk has been considered in shaping the proposals of the Local Plan, including the spatial strategy and the assessment of housing and employment sites. Policy 4 of the South East Lincolnshire Local Plan (2019) is clear in that "Development proposed within an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's flood map or at risk during a breach or overtopping scenario as shown on the flood hazard and depths maps in the Strategic Flood Risk Assessment) will be permitted" in instances where specific criteria is met.
- 7.77 It is worth noting that large parts of the district of South Holland lie within Flood Zone 3. It is therefore necessary to use the refined flood risk information (Hazard and Depth maps) within the SFRA as a basis to apply the sequential test.
- 7.78 Within the SFRA the majority of the wider site is outside of an identified hazard zone; however, the western section of the site, where the dwelling would be located, is within the "danger for some" hazard zone. Hazard depths within the "danger for some" area are expected to reach up to 1m. It is important to note that the depths given in the hazard depths are based on a broad data set rather than site specific topographically surveys. As such, individual site topography means that flood depths can actually be lower or higher than those outlined in the hazard depth maps.
- 7.79 Paragraph 176 of the National Planning Policy Framework (December 2024) states: "Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test set out below". Footnote 62 offers further discussion as to what may be considered to be a minor development. Despite increasing the vulnerability of the use to the impacts of flooding, inline with Annex 3 of the National Planning Policy Framework (December 2024), there is no requirement to apply the sequential or exceptions tests here.
- 7.80 However, as clarified within Paragraph 14 of the PPG on Flood Risk and Coastal Change (ID 7-014-20220825):
"As changes of use are not normally subject to the Sequential or Exception tests, when formulating policy, the local planning authority will need to consider what changes of use will be acceptable, taking into account the Strategic Flood Risk Assessment. This is likely to depend on whether developments can be designed to be safe and that there is adequate emergency planning provision".
- 7.81 As such, despite there being no obligation to apply the Sequential or Exceptions tests, the proposal should still be considered safe from flooding in order to be considered acceptable. In this regard, Policy 4 of the South East Lincolnshire Local Plan (2019) states:

"Change of use of existing buildings will be supported providing they do not pose an increase in

risk to people. Change of use that would result in self-contained ground floor residential accommodation in areas of hazard rating 'danger for some', 'danger for most' and 'danger for all' will not be supported. In these areas unrestricted access to a habitable room above the flood level and an emergency evacuation plan will be required."

- 7.82 A site specific topographic survey has not been provided to demonstrate if there would be variance from the hazard depths maps of the SFRA. To this end, it can be assumed that at least part of the dwelling would be subject to flood depths of up to 1m. Seeing as there are no fluctuations in finished floor levels throughout the building, the whole dwelling would be in effect subject to the same flood depths.
- 7.83 It is proposed that the finished floor level of the dwelling would be raised by 1m, with flood resilient construction up to 300mm above finished floor level. The wording of Policy 4 is explicit that unrestricted access to rooms above flood depth, which has been provided. Therefore, despite being single storey accommodation, in "danger for some" the proposal would still be in accordance with the aims of Policy 4, in that the development would be safe for its lifetime.
- 7.84 On this basis, the proposal is considered to be in accordance with Policy 4 of the Local Plan and Section 14 of the Framework with regards to flood risk.
- 7.85 Impacts of Climate Change
- 7.86 In respect of the climate emergency, Section 14 of the National Planning Policy Framework (December 2024) states that new development should be planned for in ways that: "avoid increased vulnerability to the range of impacts arising from climate change" with care taken to ensure that, where development is brought forward in areas which are vulnerable, "risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and help to reduce greenhouse gas emissions, such as through its location, orientation and design".
- 7.87 Paragraph 166 of the National Planning Policy Framework (December 2024) details that when determining planning applications, Local Planning Authorities should "expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption", with 'significant weight' given to "the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights)".
- 7.88 Paragraph 161 states: "The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."
- 7.89 In line with the above paragraphs, some weight is given in favour of the proposal, as it would involve the conversion of an existing building in a sustainable manner. However, the Marks and Spencer PLC v Secretary of State for Levelling Up, Housing and Communities ruling is clear that there is some encouragement for the reuse of buildings, there is nothing close to a presumption in favour of repurposing buildings. To this end, the weight in favour of the conversion is proportionate, and should not be so significant as to outweigh all other matters.
- 7.90 It is outlined, within Page 14 of the Design and Access Statement, that various environmental sustainability measures would be installed, which include air source heat pumps, solar panels and insulation. However, no specific details of these features have been provided; and therefore, their efficacy and extent cannot be examined here. On this basis, only minimal weight is attached to this point.

7.91 As such, some weight is attached in favour of the proposal under Section 14 of the National Planning Policy Framework (December 2024); however, said weight is tempered due to the lack of information provided.

7.92 Biodiversity Net Gain

7.93 Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) requires developers to deliver a minimum of 10% Biodiversity Net Gain using standardized biodiversity units measured by statutory biodiversity metrics. This is often referred to as the mandatory requirements for Biodiversity Net Gain.

7.94 "Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits".

7.95 As a self/custom build dwelling, subject to the appropriate legal agreement confirming this to be the case, the proposal is considered to meet the requirements of this provision and is therefore exempt from the need for the statutory biodiversity gain condition.

7.96 The submitted Biodiversity Net Gain Statement outlines several measures such as bird and bat boxes and landscaping to be installed. However, no details of these measures have been provided. As such, an assessment of their effectiveness cannot be undertaken, and only minimal weight is attached to this point.

7.97 **Planning Balance**

7.98 As detailed above, Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

7.99 Proposed here is a well-designed barn conversion. There would be a clear visual betterment in the immediate area, which transfers relevant weight under Section 12 of the National Planning Policy Framework (December 2024) and Policies 2 and 3 of the South East Lincolnshire Local Plan (2019). Weight is also given in favour of the proposal due to its nature as a conversion (see Section 14 of the National Planning Policy Framework (December 2024)) and due to its self-build nature.

7.100 However, Policy 23 of the South East Lincolnshire Local Plan (2019) is explicit that conversions would only be permissible where the existing building is of architectural or historic merit. Neither is the case here. The existing building is not of significant enough merit as to justify its retention. Likewise, the proposed alterations, whilst improving the building, would be so extensive as to fail to respect the existing character of the building, however poor this may be, as required under criterion 4. On this basis, the proposal is not in accordance with the aims of Policies 1 and 23 of the South East Lincolnshire Local Plan (2019). As such, the proposal is considered to be unacceptable in principle.

7.101 **Additional Considerations**

Public Sector Equality Duty

In making this decision the Authority must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging

participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).

C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149. It is only one factor that needs to be considered, and may be balanced against other relevant factors.

It is not considered that the recommendation in this case will have a disproportionately adverse impact on a protected characteristic.

7.102 Human Rights

In making a decision, the Authority should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as South Holland District Council to act in a manner that is incompatible with the European Convention on Human Rights. The Authority is referred specifically to Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property).

It is not considered that the recommendation in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general public interest and the recommendation is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

7.103 **Conclusion**

7.104 Taking these factors into consideration, the proposal is considered to conflict with Policies 1 and 23 of the South East Lincolnshire Local Plan (2019). There are no significant factors in this case that would outweigh the harm identified as part of the proposal; therefore, the planning balance is against the proposal.

8.0 **RECOMMENDATIONS**

8.1 Based on the assessment detailed above, it is recommended that the proposal should be refused.

9.0 **REASONS FOR REFUSAL**

1. Policy 23 of the South East Lincolnshire Local Plan (2019) is concerned with proposals for the conversion of existing buildings, which are located outside defined settlement boundaries, to residential use. Policy 23 sets out that proposals of this nature will be permitted provided that they meet a set of five criteria.

The existing building is of no architectural or historic merit to justify its retention. It is a rudimentary and typical example of industrial agricultural buildings found throughout the English countryside. On this basis, the proposal fails to meet criterion 2.

Moreover, whilst the proposed design is of architectural merit, it fails to be sympathetic to the existing building, due to the extent of changes proposed. The resultant building is visually distinct from the existing building, with changes to the scale and external materials of the building proposed. The proposal would therefore be contrary to criterion 4.

Therefore, the Local Planning Authority is of the view that the proposals would be contrary to Policies 1 and 23 of the South East Lincolnshire Local Plan (2019).

2. The Local Planning Authority has acted positively and proactively in determining this application by assessing it against all material considerations, including national guidance, planning policies and representations that have been received during the public consultation exercise. Furthermore, matters of concern with the application have been identified and discussed with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory solution and due to the harm, which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

This decision notice, the relevant accompanying report and the determined plans can be viewed online at <http://planning.sholland.gov.uk/OcellaWeb/planningSearch>

3. The determined plans are:

- 005a S01 - Site Location Plan
- 005a P01 - Proposed Site Layout & Block Plan
- 005a P02 - Proposed Plans - Roof & Floor Plans
- 005a P03 Rev A - Proposed Elevations - Amendment 1
- Sketch Views - Sheet 1
- Sketch Views - Sheet 2
- Planning Statement, ref 005a Rev C, prepared by Seven22 Architecture, dated November 2025
- Flood Risk Assessment, rev A, prepared by Seven22 Architecture, dated August 2025
- Structural Appraisal, ref JC/25/07/8174, prepared by JC Consultancy Ltd, dated August 2025
- Biodiversity Net Gain Statement, prepared by Seven22 Architecture, dated August 2025

Background papers:- Planning Application Working File

Lead Contact Officer

Name and Post: Nick Atkinson , Lead Development Management Planner (Interim) - BBC & SHDC

Telephone Number:

Email: nick.atkinson@sholland.gov.uk

Appendices attached to this report:

Appendix A Plan A

MapThat Scale Print Title

