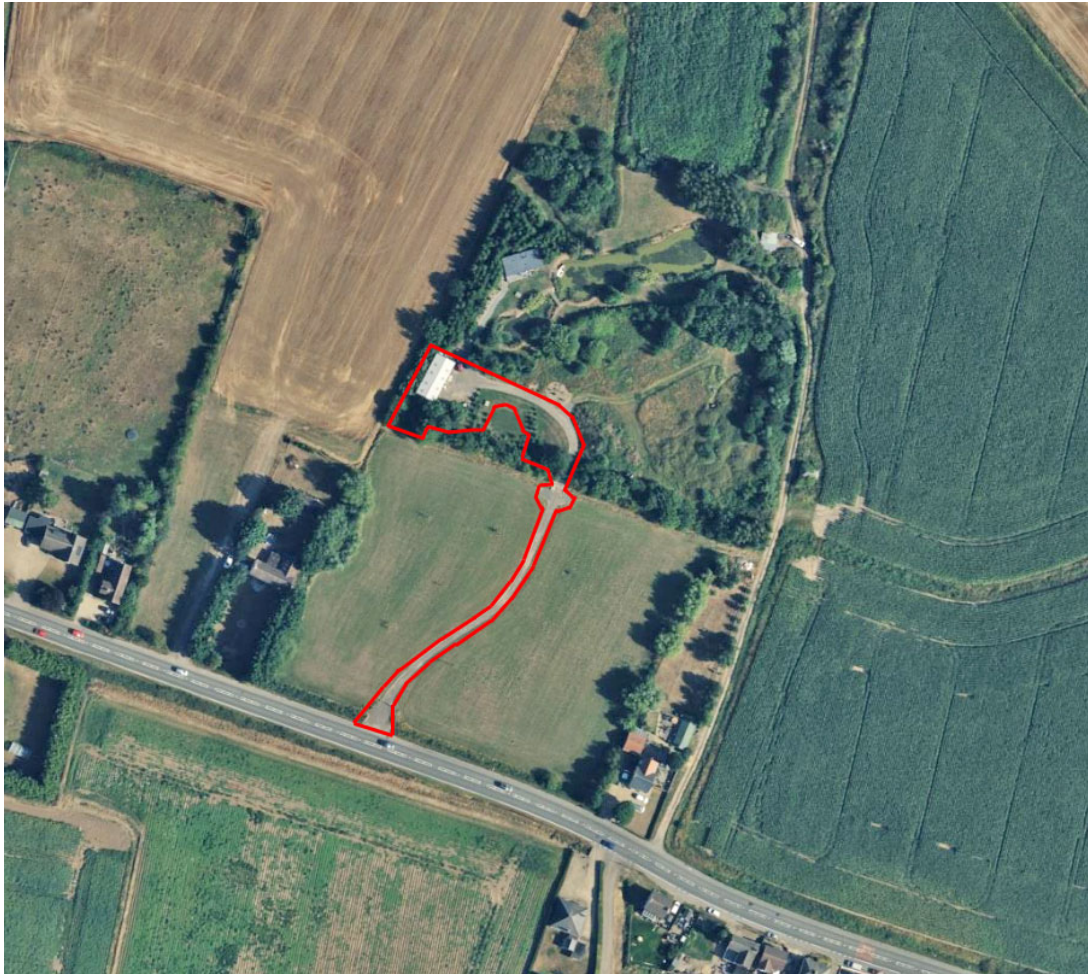


PLANNING, DESIGN & ACCESS STATEMENT



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Project: Proposed conversion of existing steel framed building to three bedroom dwelling. High Road, Moulton

Client: Mr & Mrs Greenaway
Job No. 005a
Date: September 2026
Rev: D

Prepared by: Peter Flavill BA(Hons) Architecture, PgDip Architecture

Introduction

1. The application site, measuring approximately 0.198ha, is situated north west of Moulton, outside the main settlement area, on the northern side of the A151, High Road. The site comprises of generally level ground, with extensive planting both within and surrounding it.
2. The site is set within a larger area of trees, planting and ponds created by the applicant over many years and through various applications. The setting is a wildlife haven and includes a large fishing pond.
3. The proposal seeks the conversion of an existing steel-framed storage building into a single residential dwelling. The building has been present on the site for well over 10 years, is of permanent and substantial construction, and is structurally capable of conversion without significant external enlargement. The proposal seeks to make effective use of an existing structure, delivering a high-quality, energy-efficient home that enhances the site's appearance and contributes positively to local housing supply.
4. The existing building, as seen below, has a footprint measuring 15.3m long x 7.1m deep. The eaves line is approximately 4m high and the ridge 5.2m high.



South east facing elevation



North east facing elevation of barn



Existing access track from High Road

5. An access track leads from the A151 High Road to the existing storage barn and gravel parking/turning area. The access, positioned roughly centrally along the frontage, has excellent visibility onto High Road.



View of access from A151

6. The application site and the land associated have previously benefitted from planning permission for:
- Planning Approval H13-0935-06 granted in 2006, for creation of a wildlife area and excavation of a pond.
 - Planning Approval H13-0320-12 granted in 2012, for up to 15 touring caravans.
 - Planning Approval H13-0683-20 granted in 2020, for change of use to fishing and wildlife holiday lodges, erection of 5 modular holiday lodges with associated landscaping, planting and parking.
 - Planning Approval H13-0849-25 a S73 variation of H13-0683-20, modification to condition 2 to allow amendments to previously approved plans.



Views of surrounding pond and landscape areas. The barn proposed for conversion is seen in the background of the photo on the right.



Fishing pond, existing barn roof seen background left.

7. The storage building was previously used in conjunction with farming and the creation of the wildlife and pond areas, following the 2020 planning approval for holiday lodges the building was used to store equipment, materials and waste associated with the lodges. The most recent planning approval, H13-0849-25, modified the holiday lodge consent parking and landscaping layouts and noted the historic use of this building for storage. However, this building is greatly underused and surplus to the requirements for the holiday lodges.

Planning Policy

National Planning Policy Framework (NPPF) 2026

8. Policy S5: Principle of development outside settlements

The NPPF 2026 introduces a dedicated national policy for development outside settlements. Policy S5 confirms that development outside settlement boundaries is not automatically unacceptable, and identifies circumstances where proposals should be supported.

S5/1.

Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

S5/1/c.

The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the

existing building. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces;

S5/1/d.

The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);

Policy HO11: Isolated homes in the countryside

HO11/1

Development proposals for isolated homes in the countryside should only be supported where one or more of the following circumstances apply:

HO11/1/c

The development would reuse a redundant or disused building and enhance its immediate setting, including proposals which would secure the long-term reuse of a vacant or underused listed building (subject to taking into account any harm to its significance, as set out in policy HE6 designated heritage assets);

9. The existing building is long-established, structurally permanent, and forms part of an existing developed site. Its reuse aligns directly with the aforementioned NPPF support for redevelopment of previously developed land.
10. The NPPF 2026 gives substantial weight to making effective use of land and buildings, including bringing underused or redundant structures back into productive use.
11. The NPPF places strong emphasis on improving the energy performance and resilience of existing buildings. Conversions typically deliver:
 - Modern insulation
 - Improved building fabric
 - Efficient heating systems
 - Reduced embodied carbon compared with demolition/rebuild

Local Planning Policy

12. A review of the South East Lincolnshire Local Plan - Adopted: March 2019 indicates at least the following policies are of interest to this application;
 01. Spatial Strategy
 02. Development Management
 03. Design of New Development
 04. Approach to Flood Risk
 17. Providing a mix of housing - Custom and Self-Builders
 23. The Reuse of Buildings in the Countryside for Residential Use
 28. The Natural Environment
 29. The Historic Environment
 30. Pollution
 31. Climate Change and Renewable and Low Carbon Energy
 36. Vehicle and Cycle Parking - Appendix 6 Parking Standards

13. Policy 23 of the SELLP relating to 'The Reuse of Buildings in the Countryside for Residential Use', this policy states that "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".*

Previous Planning Submission

Towards the end of 2025, long prior to the revised NPPF (August 2026), a full planning application of the same designs for conversion to residential use was submitted to South Holland District Council. The previous application was refused at Planning Committee for the reasons set out below.

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

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).

Structural Appraisal

14. Please refer to the report carried out by JC Consultancy structural engineers. The level of work required to enable the conversion of the building does not go beyond what would be reasonably expected. The structural slab, portal frame and secondary sheeting rails supporting cladding are all in very good condition, replacing the skin of the building

with an insulated cladding is readily achievable and common. The form of the existing structure and bracing makes it very easy to extend, an additional structural bay/frame is proposed, this can be achieved very quickly with simple connections.

15. The following is an extract from the JC Consultancy report which accompanies the application;

'The proposed conversion will likely involve retaining all existing structural elements of the building and complementing them with the introduction of further independent walls, of either blockwork or timber frame type systems, located internally, to form the partitions and internal layout. As such additional load placed upon the existing steel frame will be minimal, and of no concern from a structural perspective. Furthermore, all elements that provide overall lateral stability including diagonal steel bracing members present between rafters and columns, are being retained, and as such overall stability will not be compromised as a result of the conversion. Due to their relatively small spans, the existing purlins and sheeting rails have considerable capacity to support additional loadings from an insulated cladding.'

16. Practically all conversion projects require a new insulated 'leaf' of construction to be added to the external walls and roofs. With typical brick built barns the insulation is often added with the formation of a new inner leaf of studwork, this also has a structural role in shoring up the existing masonry walls. The existing steel framed barn of this proposal needs no such structural improvement and indeed the cladding could be retained as is, with an insulated inner leaf being added, however removal of the external skin of cladding is a very easy task and offers an opportunity for a more aesthetically pleasing replacement finish, in this case 'standing seam' cladding such as from Cladco or Catnic and areas of vertical timber boarding are proposed.



Examples of standing seam cladding & vertical timber boarding

Public Consultation

17. Draft proposals were presented to The Moultons Parish Council meeting of 1st July 2025, held at Moulton Seas End village hall. Following a brief presentation by the agent, both the applicant and agent answered questions from the council. The proposals were warmly received and the parish council indicated their approval for the scheme.

Pre-Application Planning Enquiry

18. A request for pre-application advice, enclosing the proposal as submitted, was presented to South Holland District Council in September 2026, key points from the response are given below whilst a complete copy of the response can be found in the appendix.

Whilst the design would result in a fundamental alteration in the appearance of the building, it is considered that the design is of a high quality. The extension, which may under other circumstances be considered overly large, is well proportioned to the plot, and the design has sensitively integrated the increase in floor space as to prevent an immediate appearance of overdevelopment. The materials and overall appearance reflect the holiday lodges within the wider site, and a clear parallel between the two designs has been drawn. They relate well to the rural setting and are typical of materials seen throughout the District.

Conclusion

In summary, the proposed conversion would broadly align with the Policies of the NPPF and SELLP. Whilst there is conflict with Policies 1 and 23 of the SELLP, with regards to the conversion, recent appeal decisions are clear that these policies should be ascribed minimal weight.

Therefore, on balance, the scheme is considered acceptable, subject to the appropriate details being provided as a part of the full application process.

19. The planner responding identified that the application should provide further information/evidence to satisfy flooding considerations; *'The submitted flood risk assessment states that finished floor levels would be 1m above ground levels, with flood resilient construction used 0.3m above that. This would place the dwelling above flood depths; however, it should be evidenced that in doing so, the conversion itself is not compromised through unacceptable floor to ceiling heights.*

- Please refer to drawing 005a P04 Typical Existing & Proposed Sections, demonstrating that the raised floor level can be integrated without compromising a functional and attractive floor layout.

Likewise, an emergency plan, as outlined in part C, would be required.

- Please refer to the updated Flood Risk Assessment which indicates occupants will be required to register for the Environment Agency's Floodline Warnings Direct service, amongst other arrangements.

Evaluation

20. The structural engineer's assessment indicates the building is structurally sound and capable of conversion. The proposed works are practically and viably achievable, they would ensure the sustainable retention and longevity of an existing building.
21. The existing building erected approximately eleven years ago, is no longer required in connection with maintaining the holiday lodges, wildlife/fish pond site area or in the storing of waste.
22. The proposal to convert the existing building and occupy the site aspires to make the most of, and share in the benefits of the very attractive and tranquil setting, which has been established by the applicant over many years.
23. Conversion brings about an opportunity to turn a very drab looking building into something of much more quality and which will relate to its setting in a far more positive way.
24. The existing building is located sufficiently far enough away from neighbouring properties so as not to give rise to overlooking, overbearing or cause disturbance from vehicle movement. The site is already visually well screened off.
25. Since approval of application H13-0683-20, one of the holiday lodges has been partially completed, the applicant would like to erect the other structures and living in the converted building will mean they can be on hand to meet, greet and help visitors as well as being able to keep an eye on the security of the wider site area.
26. Since the previous consultations and application submissions the National Planning Policy Framework has been revised such that *'the reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building.'*



Design



Use

27. C3 Residential – As a self-build 3 bedroom conversion to become the permanent home of the applicant.

Layout/Design

28. The layout follows the existing line of the building, retaining all of the existing primary and secondary structure of floor, walls and roof. An extension to the southern end of the building is proposed so as to enhance a contemporary way of living whilst achieving three bedrooms to accommodate the owners and their son.
29. The proposals seeks to take a drab industrial looking building and turn it into something more interesting, whilst being sympathetic to the local area. The steel frame, cladding rails and floor slab are all in excellent condition and will be retained. Replacing the outer cladding of the walls and roof with an insulated cladding system is a relatively quick and easy operation. A standing seam metal cladding is proposed with a black or anthracite finish. In contrast to the metal cladding, Western Red Cedar vertical timber boarding is proposed. Metal and timber cladding can be found on various agricultural buildings in the area, whilst barns are often seen with black boarding or natural coloured timber that has silvered down over time.
30. The introduction of doors and windows is very straightforward when considering recladding a building of this nature. The door and window openings offer an opportunity to include contrasting materials that reflect the local setting, to this end the window and door reveals will have a timber box lining that projects slightly from the main wall surfaces. The doors and windows would be aluminium, colour matched to the external cladding.
31. The entrance is signified by a recessed area to the side elevation, this being clad in contrasting timber boarding to match the door and window reveals.

32. A three bedroom property is required by the applicant and this is considered an efficient level of accommodation, to achieve this and create attractively sized living spaces, a modest extension of the frame of the building is proposed. The extra bay of framing would match the existing form, profile and height of the current building. The space provided means the conversion can also respond better to its setting, a semi enclosed terrace is proposed at the southern end of the building, this enables large contemporary glazing to be included without giving rise to overheating, the architectural form can then be more contemporary and relevant to the nature of a steel framed building.
33. The internal layout of the conversion seeks to be as efficient as possible whilst providing a variety of spaces and volumes within the profile of the building. The high ceiling of the entrance porch welcomes you into a more domestic hallway, the spatial volume then opens up again to high vaulted ceilings in the kitchen, dining and livings spaces. The inner hallway and bedrooms would have a more domestic ceiling height and form to add to a sense of enclosure and intimacy.
34. The living spaces open out onto the garden to the east and have an outlook across the fields to the south. The bedrooms all face west across open countryside.
35. The approach to the entrance takes a curving path alongside the main garden area on the east side of the building, currently gravelled and used for parking. The curving path, bounded by a stone filled gabion wall, brings people up to the entrance. To define differing spaces within the wider setting, the garden area adjacent to the dwelling is to be raised by 750mm, to nearly the finish floor level, a sunken patio is suggested within the middle of the space and this coupled with a bund or mound along the southern edge of the garden will enable the users to feel even more immersed and at peace within the landscaping.







Sustainability

36. The existing building has been built in a very solid and sound way, it lends itself to reuse. Adding insulated cladding is easily achieved, the type of insulation used in this construction is of a high performance and makes it simple to achieve contiguously around the entire envelope of the building.
37. Heating and hot water is to be provided by air source heat pump, with the building being so well insulated this will be a very efficient system. The linear roof area and contemporary nature of the proposal will enable a very effective array of solar panels to integrate with the design easily. A very high scoring Energy Performance Certificate will be achieved, the majority of the materials to be used will be recyclable.

Conclusion



38. The circumstances of this site and the existing building are unique to this applicant. The setting has been lovingly made first hand by the applicant and other family members over many years. It is an impressively ecologically diverse setting that the applicant is striving to improve and maintain, it is, and always will be very close to their hearts.
39. Converting the existing building, which is now surplus to requirements, chimes with the National Planning Policy Framework in the aims of transitioning to a low carbon future through the reuse of existing buildings.
40. The proposed design and material changes will lead to a visual enhancement of the setting and will therefore also make a positive contribution to the character of the landscape.
41. The design and materials proposed are sympathetic to the character and appearance of the original building, which through its low pitch form and construction nature prescribes a more contemporary response in terms of architectural detailing and materials of construction.
42. We believe the proposed development leads to an opportunity for improving the character and quality of the area and the existing building.

APPENDIX



Council Offices
Priory Road
Spalding
Lincolnshire PE11 2XE

Date 24/09/26

Dear Sir/Madam,

PLANNING: PRE-APPLICATION ADVICE

Reference: HPE-0871-26 **Case Officer:** Oscar Patman
Location: Land off High Road, Moulton, PE12 6PE
Proposal: Conversion of existing steel framed storage building to residential use

Preliminary matters

This is a pre-application response letter concerning the proposed conversion of the storage building at the land off High Road, Moulton, to a residential use. This proposal includes an extension to the barn and its recladding.

Stage 2 advice was requested.

Relevant Planning Policies

South East Lincolnshire Local Plan – Adopted: March 2019

01: Spatial Strategy
02: Development Management
03: Design of New Development
04: Approach to Flood Risk
11: Distribution of New Housing
17: Providing a Mix of Housing
23: The Reuse of Buildings in the Countryside for Residential Use
28: The Natural Environment
33: Delivering a More Sustainable Transport Network
36: Vehicle and Cycle Parking
Appendix 6: Parking Standards

National Guidance

National Planning Policy Framework, 2026

Section 4 - Achieving sustainable development

Section 5 - Meeting the challenge of climate change

Section 6 - Delivering a sufficient supply of homes

Section 12 - Making effective use of land

Section 14 - Achieving well-designed places

Section 15 - Promoting sustainable transport

Section 17 - Pollution, public protection and security

Section 18 - Managing flood risk and coastal change

Section 19 - Conserving and enhancing the natural environment

Section 20 - Conserving and enhancing the historic environment

Evaluation

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.

In this case, the adopted South East Lincolnshire Local Plan 2011-2036 (SELLP), adopted March 2019, forms 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.

The policies and provisions set out in the National Planning Policy Framework, updated 2026, (NPPF) are also a material consideration in the determination of planning applications, alongside adopted Supplementary Planning Documents.

Furthermore, where a Neighbourhood Plan has been adopted, this alongside the adopted Local Plan, forms part of the Development Plan for the District, and must be considered when assessing development proposals. In this instance, no relevant neighbourhood plans have been adopted.

Planning Considerations

Principle of Development

Policy Context – Spatial Strategy and the Re-use of buildings in the Countryside

Policy 1 of the SELLP sets out a spatial strategy for delivering sustainable development across South East Lincolnshire to 2036. Policy 1 (Spatial Strategy) expresses this sustainable framework 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 in respect of sustainable development 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.

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

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.

The suitability of a proposal for the re-use of a building in the Countryside for residential purposes is contained in Policy 23. 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".

Policy Context – Achieving Sustainable Development

Policy S3(1) of the NPPF states:

“Decisions on development proposals should apply a presumption in favour of sustainable development. This means:

- a. Policy S4 in this Framework should be applied when considering development proposals within settlements;
- b. Outside settlements, policy S5 should be applied”

The site is located outside of any of the settlements defined in the SELLP. As such Policy S5 of the NPPF is relevant here. This states:

S5 “Only certain forms of development should be approved outside settlements (...) These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework”.

Policy S5(1) proceeds to outline circumstances where a proposal for development outside of a settlement would be permissible.

The application has been explicitly put forward as a conversion. On that basis, S5(1)(c) is considered the most relevant paragraph. This states:

“The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces”

In the interest of brevity, the remaining circumstances outlined Policy S5(1) have not been assessed in detail within this report. That being said, as the proposal explicitly relates to a conversion, it is not considered that any of the other paragraphs are relevant here.

Isolated Homes in the Countryside

The submitted statement has referred to Policy H011 of the NPPF and isolated homes in the countryside.

Policy S5(3) of the NPPF states: “Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11”

Within 200m of the site, there are approximately eight dwellings. The site itself is within a site approved for holiday lodges, with one of these lodges already present. On that basis, whilst the proposal would not infill a gap within a group of houses as per Policy S5, it is not considered that the site would be isolated for the purposes of HO11.

Therefore, whilst the reference in the Supporting Statement to HO11 is acknowledged, it is not considered to be pertinent to this application. In any event, the provisions of Policy HO11 which would be relevant, relating to conversions, broadly align with Policy S5 of the NPPF and so the underpinning considerations would be largely consistent regardless of if the stance on isolation was changed following further review.

Material Inconsistency

Policy 23 of the SELLP and Policy S5 of the NPPF both concern conversions of existing buildings to dwellinghouses. Appeal decision 6009598 states:

“Policy 23 of the LP supports the re-use of buildings in the countryside, subject to a number of criteria, including a requirement that 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. However, these aspects of the policies are not consistent with the revised Framework, which contains no equivalent requirement for a building proposed for re-use to possess architectural or historic significance. [...] I therefore afford only limited weight to the conflict with Policy 23 in this respect”

In short, it is the view of the Inspector that only limited weight should be attached to Policy 23, due to its more stringent requirements than those under Policy S5 of the NPPF. Accordingly, in light of Appeal Decision 6009598, it is considered that the primary tool of assessment should be Policy S5 of the NPPF, with only limited weight attached to Policy 23. Nevertheless, in the interest of completeness, and in light of the fact that the Inspector did not conclude that no weight should be given to Policy 23, an assessment against the relevant provisions has still been made here.

Assessment of Principle

The proposal would represent the reuse of an existing building. It has been evidenced that the building is structurally sound and capable of conversion.

An extension is proposed, which would increase the floor area by approximately 36%. Whilst this is large, it is not considered to be disproportionate in this instance, largely due to the high quality design which has integrated the extension sensitively into the overall design. In any event, it has been evidenced that that the building is capable of conversion without this extension; and therefore, there would be some fallback position offered as a result which must be considered.

As previously outlined, Appeal decision 6009598 attributed only limited weight to Policy 23 of the SELLP. The proposal remains largely unchanged from that previously refused under H13-0848-25. On that basis, the conflicts with Policy 23 previously identified are considered relevant here again. I would draw your attention to the report for H13-0848-25 in the first instance for commentary on this point.

Nevertheless, despite the identified conflict with Policy 23, it is considered that the proposal is acceptable in principle and would conform to Policy S5 of the NPPF, in light of the Inspectors comments relating to 6009598.

Layout, Design, Scale and Consideration of the Character of the Area

Section 14 of the NPPF, “Achieving well-designed places”, outlines that planning decisions and policies should “promote high quality, healthy, inclusive and sustainable places”.

Paragraph 1 of DP3 outlines that “development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets”.

In order to create well-designed places, Paragraph 2 outlines that proposals should reflect seven key principles, as appropriate to the nature of the development and its location. These are: liveability, climate, nature, movement, built form, public space, and identity.

Likewise, Policy 2 of the SELLP 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 SELLP 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.

The design remains largely unchanged from that previously submitted under H13-0848-25. On that basis, whilst the updates to the NPPF are acknowledged, the previous comments under H13-0848-25 are considered to be largely applicable here.

Whilst the design would result in a fundamental alteration in the appearance of the building, it is considered that the design is of a high quality. The extension, which may under other circumstances be considered overly large, is well proportioned to the plot, and the design has sensitively integrated the increase in floor space as to prevent an immediate appearance of overdevelopment. The materials and overall appearance reflect the holiday lodges within the wider site, and a clear parallel between the two designs has been drawn. They relate well to the rural setting and are typical of materials seen throughout the District.

The proposal clearly embodies the principles of good design outlined in the National Design Guide and NPPF, in that it clearly reflects its surroundings, and produces a coherent appearance. The proposal represents a clear betterment over the existing design, and enhances the immediate area as a result.

Policy DP3(3) of the NPPF states:

“Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.”

It has been identified that the proposal would conform to Policies 2 and 3 of the SELLP, and Policy DP3 of the NPPF. On that basis, substantial weight is given in favour of the proposal.

Residential Amenity

DP3 of the NPPF outlines that development should create places that are safe, inclusive, and accessible and which promote health and well-being, with a focus on promoting liveability.

Likewise, Policy P3(1) outlines that development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site. This point is expanded upon in P3(2) which states all

development proposals should “provide healthy living conditions for occupiers and users in terms of adequate access to light and avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and the quality of life “.

Policies 2 and 3 of SELLP sets out that residential amenity and the relationship to existing development and land uses is a main consideration when making planning decisions.

At this stage in the application, it is difficult to concretely state the amenity impacts. That being said, the distance to neighbouring plots should prevent a significant amenity impact. There should be no significant overlooking or overshadowing. Suitable space has been provided internally to provide a good standard of residential accommodation.

Highway Safety and Parking

Section 15 of the NPPF is titled ‘Promoting sustainable transport’. Within this, Policy TR6(4) advises that “development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.”

In respect of highway matters, Policy 2 of the SELLP 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. The provisions of Policy 33 of the SELLP align with Policy TR3 of the NPPF, which outlines that sustainable patterns of movement should be prioritised.

In respect of highway safety, the LPA would gain consultation responses from Lincolnshire County Council as Local Highway Authority, which has not occurred in this

instance. Consideration of highway safety would be taken in conjunction with LCC Highways, as Local Highway Authority.

That being said, the movements expected to arise from a single dwellinghouse would not be so substantial as to have a significant adverse impact upon highway safety or the proper function of the highway.

Policy 36 of the SELLP, 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. Ample parking has been provided on site.

Flooding Considerations

Section 18 of the NPPF relates to “Managing flood risk and coastal change”. It requires a sequential approach to flood risk, in accordance with the decision making policies contained within this section. Policy F7 is clear that “development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere.”

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 Policy F6.

The site lies within Flood Zones 1, 2 and 3 of the Environment Agency's Flood Maps. Within the Strategic Flood Risk Assessment (SFRA) the site is classed 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.

Policies F5 and F6 of the NPPF outline that changes of use would not be subject to the sequential or exceptions tests. As such, there is no requirement to apply either test here.

Nevertheless, Policy F7 of the NPPF states:

“Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:

a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;

b. The development will be safe throughout its lifetime taking account of the vulnerability of its users;

c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;

d. The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and

e. It can be demonstrated that flood risk will not be increased elsewhere”

Any submission would have to address these criteria in full. The submitted flood risk assessment states that finished floor levels would be 1m above ground levels, with flood resilient construction used 0.3m above that. This would place the dwelling above flood depths; however, it should be evidenced that in doing so, the conversion itself is not compromised through unacceptable floor to ceiling heights. Likewise, an emergency plan, as outlined in part C, would be required.

Biodiversity Net Gain

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.

The site area would appear to be less than 0.2 hectare. If this is the case, then it may be exempt under The Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026.

If the development is beyond this scale, then standard biodiversity gain requirements may be applicable here.

Climate Change

Policy CC2 of the NPPF states

“In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal [...]

d. Take advantage of opportunities to reuse existing structures and materials, including by reusing non-contaminated excavated soil and hardcore within the site”

The proposal would naturally conform to these requirements. It should be noted that the wording of this policy implies it these features are an expectation, rather than a discretionary point which would garner weight in favour. On that basis, whilst conformity with the policy is noted, it would not necessarily grant weight in favour of the proposal.

Making Effective Use of Land

Policy L2 of the NPP states:

“Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following [...]

Making better use of vacant and underutilised land and buildings”

It has been stated that the building is underutilised. However, this has not been fully evidenced. If this could be evidenced, then Policy L2 of the NPPF would confer weight in favour.

Conclusion

In summary, the proposed conversion would broadly align with the Policies of the NPPF and SELLP. Whilst there is conflict with Policies 1 and 23 of the SELLP, with regards to the conversion, recent appeal decisions are clear that these policies should be ascribed minimal weight.

Therefore, on balance, the scheme is considered acceptable, subject to the appropriate details being provided as a part of the full application process.

Other Matters

The point of previously developed land and the redevelopment of the site was raised briefly within the submitted statement. A conversation between the Applicant’s Agent and the Planning Officer also took place where the point was raised. Therefore, in the

interest of completeness, I have provided a brief comment on this matter below; however, as the enquiry was made explicitly on the grounds of a conversion, this discussion is intentionally brief.

Policy S5(1)(d) states:

“The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential)” should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects.

Within the NPPF, previously developed land is defined within Annex B as:

“Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed but where provision for restoration has been made through development management procedures (including development related to minerals extraction, waste disposal by landfill and renewable and low carbon energy development, where provision for restoration exists); land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape”

The existing building is permanent, as outlined within the submitted information. The lawful use of the building, on the balance of probabilities and on the strength of the information provided, is not agricultural. It would appear that the building has been used for the maintenance of the surrounding non-agricultural land, including the holiday accommodation, since the implementation of H13-0683-20.

Therefore, on the balance of probabilities, and on the strength of the information provided, the land could be seen as previously development land. The proposal therefore may broadly align with the provisions of Policy S5(1)(d) (although this would only be the case if the proposal was not for a conversion which is not the case here).

Documents

For convenience, I have included a list of documents which would typically be required for a Full submission.

Along with the submission of a Full Planning Application form, the Local Planning Authority will also require:

- One copy of an up to date 1:2500 / 1:1250 site location plan with the application site edged in red and any other land owned outlined in blue;
- One copy of 1:500 / 1:200 block plan with the application site edged in red and any other land owned outlined in blue. The north arrow must be shown and the plan should indicate all relevant details including all buildings, hard surface areas, walls and fences, as well as distances to adjacent boundaries from the proposed development;
- One copy of 1:100 / 1:50 existing and proposed elevation / floor plans / roof plans;
- A flood risk assessment;
- The relevant biodiversity net gain requirements, including;
 - o A statement as to whether the applicant believes that planning permission would be subject to the biodiversity gain condition (This needs to be a separate independent document rather than in a letter/email format), or;
 - o The pre-development biodiversity value of the onsite habitat on the date of application (or an earlier date) including the completed metric calculation;
 - o Where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for proposing that date;
 - o A statement confirming whether the value of the onsite habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation'), as the value will be taken from before degradation;
 - o A description of any irreplaceable habitat (as set out in the Regulations) on the land to which the application relates;
 - o A Statutory Biodiversity Metric;
 - o A plan showing onsite habitat existing on the date of application (or and earlier date), including any irreplaceable habitat;
- The necessary fee.

This planning advice is given in good faith but is an officer opinion only and therefore is not binding on any formal decision the Council may make following the receipt of a planning application.

BUILDING REGULATIONS

The works that you are proposing may also require Building Regulations and this informal advice or any subsequent planning permission does not give authority under Building Regulations to commence work. Please contact the Building Control section for further information on 01775 764557.

Yours Faithfully
 Oscar Patman
 Planning Officer

