

FULL PLANNING APPLICATION

**OLD CLIFFORD RESERVOIR
CLIFFORD
HEREFORDSHIRE**

**PROPOSED CONVERSION OF AND EXTENSION TO THE EXISTING
RESERVOIR TO PROVIDE ONE RESIDENTIAL DWELLING WITH
ASSOCIATED ACCESS, PARKING, LANDSCAPING AND ANCILLARY WORKS**

PLANNING STATEMENT

JANUARY 2019



Geraint John Planning

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1.0 INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared in support of a full planning application submission, submitted on behalf of Miss R and Miss T Chester, in relation to the following development proposal at the former reservoir, in Clifford ('The Site'):

'Proposed conversion of and extension to the existing reservoir to provide one residential dwelling with associated access, parking, landscaping and ancillary works'

Information Submitted in Support of Application

- 1.2 The following information has been prepared in support of the planning application following comprehensive dialogue with the Local Planning Authority on the application's information requirements:

- Application Forms;
- Plans and Drawings, including:
 - Site Location Plan;
 - Existing Site Plan (Dwg Ref. 1732/E01);
 - Existing Extract Site Plan (Dwg Ref. 1732/E02);
 - Existing Roof Plan (Dwg Ref. 1732/E100);
 - Existing Ground Floor (Dwg Ref. 1732/E101);
 - Existing Basement Plan (Dwg Ref. 1732/E102);
 - Existing North Elevation (Dwg Ref. 1732/E200);
 - Existing East Elevation (Dwg Ref. 1732/E201);
 - Existing South Elevation (Dwg Ref. 1732/E202);
 - Existing West Elevation (Dwg Ref. 1732/E203);
 - Site Plan (Dwg Ref. 1732/S100);
 - Extract Site Plan (Dwg Ref. 1732/S101);
 - Proposed Roof Plan (Dwg Ref. 1732/S102);
 - Proposed Ground Floor (Dwg Ref. 1732/S103);
 - Proposed Lower Ground Floor (Dwg Ref. 1732/S104);
 - Proposed Northern Elevation (Dwg Ref. 1732/S200);
 - Proposed Northern Elevation – Colour (Dwg Ref. 1732/S201);
 - Proposed Eastern Elevation (Dwg Ref. 1732/S202);
 - Proposed Eastern Elevation – Colour (Dwg Ref. 1732/S203);
 - Proposed Southern Elevation (Dwg Ref. 1732/S204);
 - Proposed Southern Elevation – Colour (Dwg Ref. 1732/S205);
 - Proposed Western Elevation (Dwg Ref. 1732/S206);
 - Proposed Western Elevation – Colour (Dwg Ref. 1732/S207);
 - Proposed Site Sections AA (Dwg Ref. 1732/S300);
 - Proposed Site Sections BB (Dwg Ref. 1732/S301);
 - Proposed Site Sections CC (Dwg Ref. 1732/S302);
 - Proposed Site Sections DD (Dwg Ref. 1732/S303);
 - Proposed Site Sections EE (Dwg Ref. 1732/S304);
- Design and Access Statement (prepared by Loyn & Co) Parts 1 - 5;
- Planning Statement (prepared by GJP);
- Landscape and Visual Assessment (prepared by SEED);
- Site Investigation and Drainage Strategy (prepared by Mann Williams);
- Ecology Report (prepared by Wildwood Ecology); and
- Transport Statement (prepared by TTC Transport Planning).

Purpose and Structure of this Statement

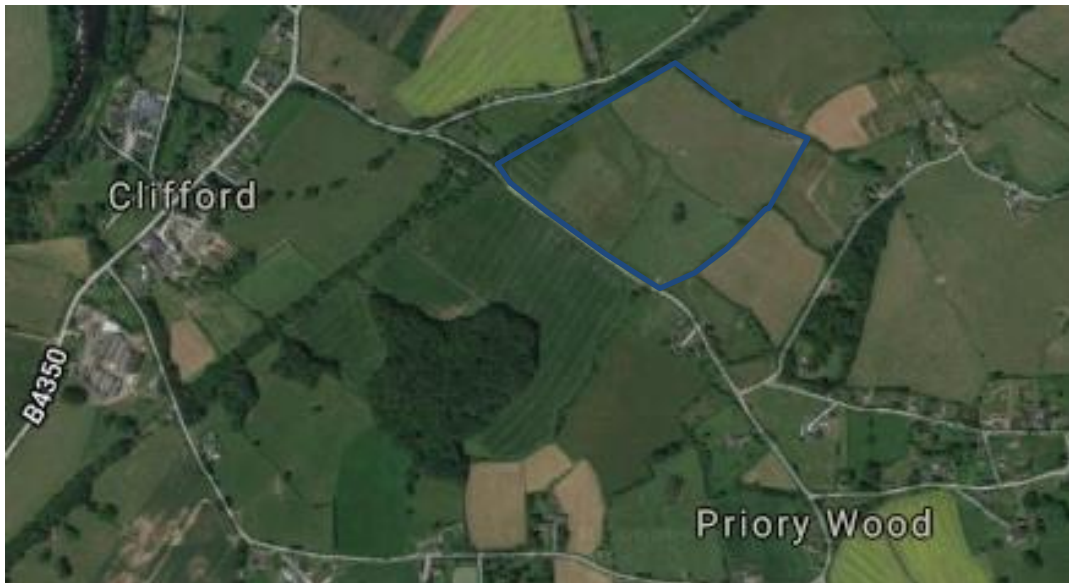
1.3 This Planning Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development. The statement is structured as follows:

- **Section 2** provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
- **Section 3** provides details of the development proposals;
- **Section 4** outlines the relevant planning policy framework in relation to the site and the development;
- **Section 5** details the pre-application enquiry submitted for this site and the Council's response;
- **Section 6** analyses the key planning considerations arising from the proposed development (in light of the planning policy context);
- **Section 7** sets out our conclusions.

2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The site comprises a vacant and disused reservoir building located on a parcel of land to the north-east of the village of Clifford, and around 3km North of Hay-on-Wye. The Applicant is in the ownership of three fields, all of which are bounded by hedgerows. The eastern field contains the reservoir building and stable buildings and so it's considered the boundary of the application is limited to these areas only.



Site Context (Applicant's Ownership in Blue)

- 2.2 A site aerial photograph of the site is included below. Please note that the red line has been limited to the proposals for the site as best possible:



Site Location (Approx. Boundary indicated in Red)

- 2.3 The site accommodates a vacant, former reservoir which is partially embedded into the topography of the land along the north-westerly border of the site, in the northern corner of the higher of the two parcels of land which make up the site. The former reservoir consists of several brick piers and a corrugated steel-clad roof. Later brickwork has been added to enclose the reservoir.



Site Photograph (Front and Side Elevations of Existing Building)

- 2.4 There is also an underground section of the building where there is some evidence of the old working of the reservoir where the water was stored. The Applicant has commissioned a Structural Feasibility Report (Mann Williams dated 24th January 2019) which assesses and reports the way in which the building used to work when it was active.



Site Photograph (underground of building)

- 2.5 Access to the land is from the southern boundary off Locksters Lane which forms the south-west curtilage of the plot and runs for the full extent of this side of the site.



Access to the site from the south – via Locksters Lane

The Site's Surroundings







- 2.6 The site is bounded by agricultural land on all sides, although an unnamed road runs along the boundary to the south-west. The site is situated just outside of the small settlement of Clifford, which lies to the west, although the closest dwelling to the site is that of a farmyard situated to the south-east.
- 2.7 As the site is situated in a rural area, public transport is relatively limited, with the nearest bus stop being approximately 1.5 miles and the closest train station around 20 miles away in Hereford. The town of Hay-on-Wye is only around 2.5 miles away and offers many amenities, providing the nearest supermarket and post office.

Planning History

- 2.8 A summary of planning decisions relating to residential development within the surrounding area is provided below, with a map and key provided for location reference:



Surrounding Planning History (Site Location Indicated in Red)

Key	Reference	Proposal	Application Type	Decision
	P172581/F	Proposed change of use and conversion of former chapel into residential accommodation	Full	Approved 6 th September 2017
	P171600/F	Proposed dwelling with garage, garden store and loft	Full	Approved 10 th July 2017
	P170575/F	Erection of log cabin for tourist accommodation with associated works and provision of new access	Full	Refused 7 th April 2017
	P152291/PA4	Proposed change of use from Agricultural store to dwelling house	Prior Approval	Approved 4 th November 2015
	DS044091/F	Change of use to form three bedroom private dwelling	Full	Approved 12 th January 2006
	DS040915/F	Conservatory extension to dwelling	Full	Approved 22 nd March 2004

- 2.9 On the basis of the decisions above, it is clear that small-scale residential developments and conversions in the area have previously been supported, providing they are in-keeping with the scale and character of the surrounding location.

3.0 DEVELOPMENT PROPOSALS

- 3.1 The design intention at the heart of the proposals is to retain the existing reservoir and sensitively bring it into beneficial, sustainable use. The proposals seek to redevelop the existing reservoir building, bringing this back into beneficial use through the retention of the existing building, and the use of glazing and internal works which would see both the lower ground and ground floors used as kitchen and living spaces.



Extract of Perspective Study 02

- 3.2 The above sketch illustrates the relationship of the proposed extension to the existing building in order to convey the subservient nature of the extension design proposal.
- 3.3 In addition to the re-use of the building, a single storey extension is also proposed. This is to be a partially buried structure mirroring the width of the existing building but at a lower subservient level. It is proposed to be constructed in both concrete and glazing, to allow residents to look out onto a courtyard where a water feature will be in place.



Extract of North Elevation (Ref. 1732/S201)

- 3.4 The approach to the dwelling would be via a new, rural entrance off the public highway. The entrance would retain the rural character of the area, with a five-bar gate and cattle grid. The gate would however be set a sufficient distance back from the public highway to allow vehicles to pull off the road safely.
- 3.5 Parking for up to 3 vehicles is proposed to be provided south of the existing building and will include adequate turning space to allow vehicles to enter and exit the site in forward gear. The track and parking area will comprise a gravel finish with a strip of grass central in line with typical rural tracks. The parking area will be cut into the hill to help conceal the parked cars.
- 3.6 The residential curtilage of the dwelling is to be limited and controlled to areas close to the existing building in the lowest lying, most discrete part of the site. Sheep on the site will be able to graze the land right up to the edges of the reservoir, retaining the existing character.

- 3.7 In order to uphold and respect the building's history, care is being taken in order to maintain the original structure, or to replace existing components with similar materials. The more recent, poor quality additions to the building that have been made post original construction are to be removed, while much of the original features of the structure will be preserved. A thorough study of the construction of the brick work is included within the Design and Access Statement (Loyn and Co).



4.0 PLANNING POLICY CONTEXT

- 4.1 A review of the planning policy context associated with the site and proposed development (at the national and local level) is provided within this section of this Statement.
- 4.2 The key planning policies of relevance to the determination of the application are outlined. A detailed assessment of the accordance of the proposed development with these policies is provided in Section 5 (Material Considerations) of this Statement.
- 4.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 states that applications for Planning Permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

National Planning Policy

National Planning Policy Framework (July 2018)

- 4.4 The revised National Planning Policy Framework (NPPF), published July 2018, must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 4.5 The NPPF is based upon a 'presumption in favour of sustainable development', which is defined at paragraph 11 of the NPPF. The presumption in favour of sustainable development means (for decision making) approving applications that accord with the plan without delay. Paragraph 11 of the NPPF also states that this means granting planning permission where the development plan is absent, silent or relevant policies are out-of-date, unless:
- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 4.6 It is set out within the NPPF that sustainable development falls into three overarching objectives as set out in Paragraph 8:
- an economic objective – to help build a strong, responsive, competitive economy;
 - a social objective - supporting vibrant and healthy communities providing a range of homes for present and future generations; and
 - an environmental objective - protecting and enhancing the natural, built and historic environment.
- 4.7 Paragraph 38 of the NPPF states that Local Authorities should approach decisions on proposed development in a 'positive and creative way', and work proactively with applicants to 'secure developments that will improve the economic, social and environmental conditions' of the area. It goes on to state that Authorities should seek to approve applications for sustainable development where possible.
- 4.8 Paragraph 79 of the NPPF states that isolated homes in the countryside should be permitted providing they meet special circumstances, including in cases where the re-use of a redundant or disused building for development, leads to the enhancement of the immediate setting; as well as if the design of the dwelling is of exceptional quality or innovative nature.
- 4.9 Expanding further on exceptional design quality, NPPF states that such a design should be 'truly outstanding or innovative', helping to raise standards of design more generally in rural

areas; reflect the highest standards in architecture; significantly enhance its immediate setting; and be sensitive to the defining characteristics of the local area.

- 4.10 The Government encourages the re-use of previously developed land in promoting sustainable development. The NPPF states at Paragraph 84:

'The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist'.

- 4.11 Paragraph 102 of the NPPF states that transport issues should be considered at an early stage so that impacts can be addressed, the scale of the proposals can be accommodated, sustainable transport can be promoted and environmental impacts can be addressed.
- 4.12 Paragraph 124 of the NPPF states that good design is a key aspect of sustainable development. Moreover, well-designed and safe built environment meet the social objective of sustainable development.
- 4.13 The following sections of the NPPF are of particular relevance:

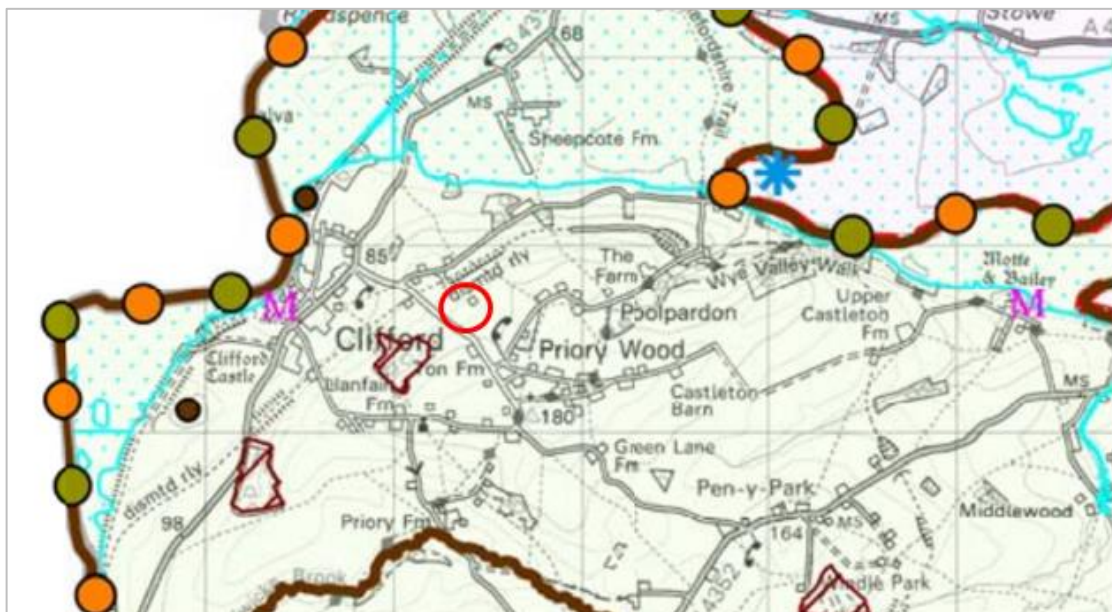
Section	Title
2	Achieving Sustainable Development
5	Delivering a Sufficient Supply of Homes
12	Achieving well-designed Places
8	Promoting Healthy and Safe Communities
15	Conserving and Enhancing the Natural Environment
16	Conserving and Enhancing the Historic Environment

Local Planning Policy








Herefordshire Local Plan – Core Strategy (2011 – 2031)

- 4.14 The Core Strategy was adopted by Full Council on 16th October 2015 and has replaced the Unitary Development Plan.

Local Plan Designations



Extract of Herefordshire Local Plan Core Strategy Policies Map (October 2015)

Herefordshire Local Plan Core Strategy Policies Map			
Key	Legend	Key	Legend
	The Site		Site of Special Scientific Interest (LD2, SD4)
	Land Liable to Flood (SD3)		Special Area for Conservation (LD3, SD3, SD4)
	Scheduled Ancient Monuments (LD4)	 	Local Wildlife Site (LWS), Site of Importance for Nature Conservation (LD2)

- 4.15 To summarise, the site is not subject to any specific Place Shaping Policies within the Local Plan Core Strategy Policies Map.

Relevant Policies

- 4.16 The key planning designations and policies within the Herefordshire Core Strategy of relevance to the site and proposals are as follows:

Policy	Title	Policy Summary
SS1	Presumption in Favour of Sustainable Development	Seeks to take a positive approach that reflects the presumption in favour of sustainable development contained within national policy. It seeks to work proactively to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the social, economic and environmental conditions in Herefordshire.
SS2	Delivering New Homes	Seeks to supply deliverable and developable land to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable housing need.
SS3	Releasing Land for Residential Development	Seeks to provide a sufficient supply of housing land to be maintained over the plan period.
SS4	Movement and Transportation	Seeks to promote new developments to be designed and located to minimise the impacts on the transport network; ensuring that journey times and the efficient and safe operation of the network are not detrimentally impacted, and a genuine choice of modes of travel including walking, cycling and public transport will be promoted.
SS6	Addressing Climate Change	Seeks to conserve and enhance those environmental assets that contribute towards the county's distinctiveness, in particular its settlement pattern, landscape, biodiversity and heritage assets and especially those with specific environmental designations.
RA1	Rural Housing Strategy	Seeks to ensure that development of rural housing will contribute towards the wider regeneration of the rural economy to assist with reaching the rural areas target of 5,300 new dwellings to be provided between 2011 and 2031 to contribute to the county's housing needs.
RA2	Herefordshire's Villages	Seeks to maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15 of the Core Strategy.
RA3	Herefordshire's Countryside	Seeks to limit residential development beyond settlement limits unless the proposal meets specified policy criteria i.e. is of exceptional quality and innovative design satisfying the design criteria set out in Paragraph 55 of the National Planning Policy Framework and achieves sustainable standards of design and construction.
RA5	Re-use of rural buildings	Seeks to promote the sustainable re-use of individual and groups of redundant or disused buildings, including farmsteads in rural areas, which will make a positive contribution to rural businesses and enterprise and support the local economy (including live work units) or which otherwise contributes to residential development, or is essential to the social well-being of the countryside.
MT1	Traffic Management, Highway Safety and Promoting Active Travel	Sets out traffic management and safety criteria which all proposed developments should seek to incorporate within the scheme.
LD1	Landscape and Townscape	Seeks to demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection,

Policy	Title	Policy Summary
		protection and enhancement of the setting of settlements and designated areas.
LD2	Biodiversity and Geodiversity	Development proposals should conserve, restore and enhance the biodiversity and geodiversity assets of Herefordshire through appropriate mitigation.
LD3	Green Infrastructure	Development proposals should protect, manage and plan for the preservation of existing and delivery of new green infrastructure.
SD1	Sustainable Design and Energy Efficiency	Seeks to ensure that high quality design and well-planned developments can enhance community cohesion through maintaining or creating a sense of place. New development should be designed to preserve and enhance locally distinctive characteristics and positively contribute to the appearance of the locality. To achieve this, it is important that new development is successfully integrated into the existing built, natural and historic environment; however, recognising that architectural styles change over time. Policy SD1 does not seek to stifle architectural innovation, contemporary design or reject advances in design and technology.
SD3	Sustainable Water Management and Water Resources	Measures for sustainable water management will be required to be an integral element of new development in order to reduce flood risk; to avoid an adverse impact on water quantity; to protect and enhance groundwater resources and to provide opportunities to enhance biodiversity, health and recreation.
SD4	Waste Water Treatment and River Water Quality	Development should not undermine the achievement of water quality targets for rivers within the county, in particular through the treatment of wastewater. In the first instance developments should seek to connect to the existing mains wastewater infrastructure network. Where this option would result in nutrient levels exceeding conservation objectives targets, in particular additional phosphate loading within a SAC designated river, then proposals will need to fully mitigate the adverse effects of wastewater discharges into rivers caused by the development.

Hereford's Housing Land Supply

- 4.17 A Position Statement regarding Hereford's housing land supply was published in April 2017 with an updated assessment note produced more recently and published in October 2018. The overall conclusion of both of the assessments regarding the authority's completions and commitments was that Hereford had a 4.45-year supply of housing, as such, the Local Planning Authority is not currently able to demonstrate a 5-year land supply of housing.

Clifford Neighbourhood Development Plan

- 4.18 Clifford Parish Council has designated a Neighbourhood Area under the Neighbourhood Planning (General) Regulations 2012, and was approved in March 2013. The Parish Council will prepare a Neighbourhood Development Plan for that area. The plan must be in general conformity with the strategic content of the emerging Core Strategy but is not sufficiently advanced to attract weight for the purpose of decision-taking at this time.
- 4.19 In July 2018, options for settlement boundaries in Clifford were presented for discussion at the public council meeting and a call for development sites was to be issued soon after. More recently, in October 2018 the Council have confirmed that the steering group is currently drafting the Neighbourhood Plan.

Supplementary Planning Guidance

- 4.20 The provisions of the following Supplementary Planning Guidance (SPG) have also been taken into consideration:
- Planning Obligations (2008).

5.0 PRE-APPLICATION ADVICE

- 5.1 The Applicant has engaged in pre-application discussions with the Council and key stakeholders in order to obtain feedback on the scheme before finalising the proposals.

Herefordshire Council

- 5.2 Pre-application discussions were undertaken with Herefordshire Council in March 2018 with a meeting taking place on 11th April 2018 in respect of the conversion and expansion of the site to support a single residential dwelling. Formal feedback was received on 24th May 2018. The key issues regarding the site were outlined as follows:

- Principle of Development;
- Design and Amenity;
- Impact on a Historic Building;
- Landscape Impact;
- Access and Parking;
- Drainage; and
- Ecology.

Principle of Development

- 5.3 After visiting the site and reviewing the accompanying feasibility study, the Council confirmed that the building is of fairly substantial construction. That said, there were still a number of works and extensions proposed in order to accommodate the proposals. Extensions to buildings can undermine the character of an asset and therefore lead to conflict with policy RA5 in this regard.
- 5.4 Whilst acknowledging that the level of works were arguably higher than normally supported under Policy RA5, given that the proposal would ensure the retention and re-use of the historic reservoir for a different purpose, the principle of conversion and extension was considered to be acceptable in this case.

Design and Amenity

- 5.5 It was confirmed that the proposals offered a '*modern approach to re-use the building for a new purpose*'. Providing that the materials to be used for the extension follow the general approach of the plans i.e. brick work and glazing, the design is considered to be appropriate.
- 5.6 The proposal should also safeguard the amenity of existing and proposed residents in terms of overlooking, overshadowing and overbearing.

Impact on a Historic Building

- 5.7 One of the main concerns the Council's Historic Buildings Officer highlighted was the level of glazing and the amount of intervention required on the reservoir building itself. However, on reviewing the updated Feasibility Report submitted after the initial pre-application meeting, the Officer stated that, '*...The removal of the later, upper brickwork, to incorporate recessed glazing into the east/west elevations, is acceptable; as is the retention of internal features that evidence the structures purpose as a railway related pumping station.*'

Landscape Impact

- 5.8 The Landscape Officer provided comments on the application due to its rural location. It was recommended that the hedgerow along the driveway access was omitted from the proposals due to the impact in formalising the track. Moreover, any views of the building when travelling

south west along the C1182 and further afield should be assessed within a landscape appraisal as part of any formal submission, taking into account the points from which the site can be viewed.

Access and Parking

5.9 It was suggested that a 7-day speed survey was carried out at the site in order to inform the necessary visibility splays for the site. If large sections of hedgerow removal are required to accommodate this, some form of mitigation should be provided. It was also requested that the materials used for the access track should be informal and conform to the rural surrounds of the site.

5.10 A scheme accommodating a four bedroom dwelling should provide a minimum of three car parking spaces in order to meet the standards contained within the design guide.

Drainage

5.11 With regards to wastewater drainage, the development should initially seek to connect to the existing mains wastewater infrastructure. If evidence is provided that this is not a practical option, package treatment works or the use of a septic tank are options to be considered, although details of drainage plans will need to be submitted alongside any formal submission.

Ecology

5.12 In support of a full application, an Extended Phase 1 ecological survey should be undertaken to determine the presence of and provide robust risk avoidance measures and working methods for general ecology and any species specific mitigation identified by survey. It was noted that dormice were known to utilise local hedgerows and copses for nesting and commuting/foraging.

Parish Council

5.13 The Applicant has also undertaken discussions with the local Parish Council in order to update them on the progress of the application and answer any queries. The scheme was presented to Councillors on 10th January 2019 at the Parish Council Meeting. A summary brochure was produced by Loyn & Co in order to provide Members with a brief overview of the proposed application and included some visual images of the proposals. A copy of the summary brochure is included at **Appendix A**.

5.14 A number of questions and queries were raised about some aspects of the proposals including access and drainage arrangements for the site, maintenance of boundaries, and the sustainability and heating of the proposed dwelling. All questions made by Members were responded to at the meeting.

5.15 As well as consultation with the Parish Council, the Applicant has also undertaken dialogue with surrounding neighbouring properties to inform them of the application and proposals.

6.0 MATERIAL CONSIDERATIONS

6.1 The key planning considerations arising from the proposed development (in light of the nature and form of the proposed development, the planning history, the planning policy context and the pre-application feedback obtained, outlined within the preceding section of the Statement) are considered to be as follows:

- The Principle of the Proposed Development;
- Design;
- Landscape and Visual Impacts;
- Ecology;
- Drainage; and
- Highways.

The Principle of the Proposed Development

National Policy

6.2 The NPPF is based upon a 'presumption in favour of sustainable development', which is defined at paragraph 11 of the NPPF. The presumption in favour of sustainable development means (for decision making) approving applications that accord with the plan without delay. Paragraph 11 of the NPPF also states that this means granting planning permission where the development plan is absent, silent or relevant policies are out-of-date, unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.3 The site comprises a former reservoir, which accords with the definition of 'Previously Developed Land', as set out in Annex 2 – Glossary of the NPPF and the definition of 'Brownfield land' as per the Core Strategy – Glossary of Terms. National policy encourages the re-use of previously developed land in promoting sustainable development. The NPPF states at Paragraph 84: *'The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist'*.

6.4 At Paragraph 79 of the NPPF, the guidance advises local planning authorities that they should avoid new isolated homes in the countryside unless one or more of the circumstances outlined in the policy apply. In this instance, there are considered to be two circumstances specifically listed in Paragraph 79 which are considered to be applicable to the proposed development, these being as follows:

(c) 'the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting'; or

(e) 'the design is of exceptional quality, in that it:

- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*
- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.'*

6.5 The proposed development would lead to the re-use of the existing former reservoir, which is capable of a genuine conversion. It should be noted that this building has lay vacant for a number of years and is not required to be used for a reservoir. In order to save this building a suitable alternative use is required to be considered. Due to the costs associated with the conversion, it is considered that a residential use is the only viable prospect for this building,

to be restored for future use. It is therefore considered that the proposals would satisfy Para 79 (c) of National Policy.

- 6.6 The circumstances set out in (e) requires outstanding or innovative design. In order to achieve this our clients have appointed Loyn & Co as the project architects, with the brief to create an outstanding design, whilst ensuring the character of the main building has been retained. Loyn & Co have significant experience in winning a number of architectural awards for good design. As such, they have a track record of delivering, bespoke, high quality developments, with challenging site constraints, such as this site.
- 6.7 It is considered that the design proposed satisfies the second part of (e) as the development to lead to an enhancement to the immediate setting and has been sensitively designed to interact with the characters of the local area. One of the main reasons for the existence of the policy, is to encourage, promote and support individual houses that far exceed the design and environmental quality associated with the majority of new houses built in England.
- 6.8 In this proposal, it is considered that the applicant is meeting two of the special circumstances listed in Paragraph 79 of the NPPF. The proposed development represents a genuine conversion of a brownfield building, bringing the vacant building back into use. The design of the proposal is also considered to be of the highest quality. It has allowed the building to be extended in a manner which will protect and enhance the visual amenities of the surrounding landscape, will restore the former reservoir and provide a contemporary extension to make this viable as a project. As such, it is considered that the proposed development complies with the special circumstances outlined in paragraph 79 by being a conversion of an existing redundant building, which would help to raise the standards of design in the surrounding rural area.

Local Policy

- 6.9 In terms of Local Planning Policy, it is considered that the proposals fulfil the criteria of Local Plan Policy RA5 as follows.
- The design proposals are considered to respect the character of the former reservoir building, with only minimal openings provided to make the building habitable. The retention of the building, and conversion of this element into the lounge / kitchen diner of the proposed dwelling, illustrates that this particular element of the scheme is to be re-used as a focal part of the dwelling. The design concept of the dwelling has also considered the heritage of the former reservoir and attempted to maintain reference to this, through the design process;
 - The design proposals make adequate provision for protected and priority species and associated habitats – as detailed within the Ecology Report. Moreover, it is proposed that the new-build element of the proposal will be a grass roof allowing for the immediate habitats and species commuter routes to be maintained;
 - The proposal is compatible with neighbouring uses, given that the immediate surrounds of the site are agricultural farmland, as such any operations on these lands will not be materially impacted upon, with the vast majority of the adjoining fields still being viable for agricultural purposes;
 - The existing reservoir building is a permanent and substantial construction capable of conversion without major or complete reconstruction. As set out above, and illustrated upon in the proposed floor plans and sketches, the reservoir building will form an integral part of the proposal i.e. will accommodate the living / dining area of the new dwelling. Whilst a new roof structure might be required, any new roof design will be

derived from the existing roof style currently present at the site. This will allow the character of the building to be maintained in accordance with point 1 above; and

- The existing building is capable of accommodating the proposed new use without the need for substantial alteration, subject to the roof as outlined above. Whilst there is to be a proposed new-build element, this will sunken with the roof level being the same height as the surrounding ground levels with a grassed roof, hiding the building from wider views, as illustrated on the proposed floor plans. This element would not adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting. In terms of hardstanding, an informal driveway is to be proposed which retains the rural character i.e. gravel tyre pathways with a green central section.

- 6.10 As confirmed in the pre-application enquiry response (detailed above), although the level of works were arguably higher than normally supported under Policy RA5, given that the proposal would ensure the retention and re-use of the historic reservoir for a different purpose, the principle of conversion and extension was considered to be acceptable in this case.

Design

- 6.11 The design of the scheme has been informed by the pre-application dialogue that took place with Officers. The proposed change the use of the building has been carefully considered through incorporating a high-quality design. This has included retaining the old features of the building as far as possible (i.e. brick work) whilst making the necessary changes to enable to the building to be suitably converted. The result has been a sensitive retention of the existing reservoir building which enhances it's existing character.
- 6.12 The proposed extension to the building has also been carefully designed to ensure that it remains subservient to the reservoir building, being built into the existing land given the levels and whilst ensuring that the surrounding landscape is protected and that any visual impact is controlled. The result is a modern and contemporary extension which can only be seen from within the curtilage of the site.
- 6.13 The access track and site entrance will remain rural in character to protect the rural nature and character of the site when viewed from the road. The parking will also be cut into the site in order to prevent any visual impact.
- 6.14 The Design and Access Statement submitted with the application provides further detail regarding the site, scheme and proposals.

Landscape and Visual Impacts

- 6.15 Due to the rural and relatively isolated nature of the existing building, the impacts of any landscape and visual impacts that the proposed development may have. The Applicant has appointed SEED, an experienced, award winning Landscape Architect to develop the Landscape Strategy and design. SEED have been instrumental in designing the access and overall progression of the scheme from the pre-application enquiry design to the full developed design and this is evidenced in the submission documents.
- 6.16 In addition to the Landscape Strategy, in order to fully assess the scheme, an Appraisal has been carried out by SEED Architects to assess the visual impact of the proposed development from 4 viewpoints. This includes
1. The access point
 2. The road
 3. Views of the site from higher ground level from PROWs.

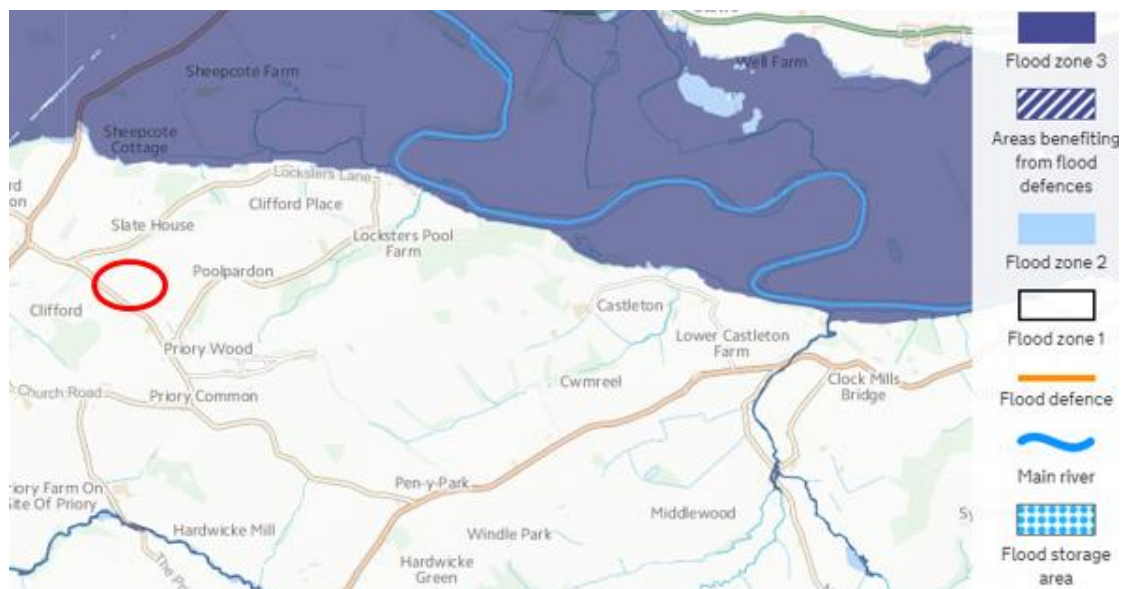
- 6.17 The Report confirms that the both the extension element to the proposals and the car parking area would not be visible from any of the viewpoints assessed. It is therefore considered that the proposals are acceptable in terms of visual impact.

Ecology

- 6.18 Wildwood Ecology Limited was contracted to undertake a Preliminary Ecological Appraisal (Aug 2018) of the site and a copy of the accompanying report is submitted with this planning application.
- 6.19 The key issues highlighted within the report are that the development may result in impacts on wildlife and habitats affecting the following protected species namely nesting birds (swallows and robins were found nesting within the existing building) and lesser horseshoe (the existing building being an occasional night and day roost for 2 bats). As a result, bat surveys were also undertaken to inform the extent of the use of the site for protected species.
- 6.20 It is proposed to incorporate a compensation roost on the site in order to mitigate for the loss of the roost within the existing building. This will be located within the attic area of the stables, to the south-east of the building proposed for renovation. A cool tower will also be constructed adjacent to the stables which lie within the Applicants ownership – works which will be able to be undertaken in advance of any works to the reservoir building to minimise disruption. There will be no lighting of any hedgerows or trees, or roost features. Destructive works will be timed to avoid the sensitive hibernation period, but may be carried out at any other time of year.

Drainage

- 6.21 The Environment Agency's Flood Risk Map for Planning indicates that the site is not located within an area considered to be at risk of flooding. An extract of the Environment Agency's Flood Risk Map is provided below.



- 6.22 As outlined within the Mann Williams 'Structural Feasibility' Report (dated 24th Jan 2019), there is no mains drainage in the area, storm water will need to be drained to a soakaway. The reservoir previously drained to a soakaway in the orchard to the north and there may be potential to re-use this as drainage for the house.

- 6.23 As there is no mains drainage in the area foul water will need to be treated prior to being discharged to ground water locally via a soakaway. A 'Klargester Biodisc' or similar 'Packaged Treatment Plant' is proposed as a suitable solution, potentially with a secondary 'polishing' system such as reed beds. Procurement of a license to discharge treated foul water would be required.

Highways

- 6.24 The proposed development will not result in a significant traffic generation as part of the development. However, in order to assess the appropriate visibility slays for the site, a speed survey of the existing road was undertaken over a 7 day period to assess traffic volume and speed. The findings confirm that traffic flows were extremally light and that the average speed of vehicles was approx. 25 – 33mph. The design of the access has therefore taken these findings into account and the site accommodates a 53 meter visibility splay to the north west and 41 meter visibility splay to the south east and it is considered that these are sufficient levels of visibility for any cars leaving the site.
- 6.25 There are 3 parking spaces proposed on the site and it is considered that this level is acceptable in line with the levels of parking to accord with the Council's adopted parking standards which was confirmed within the pre-application advice given by the Council.

7.0 SUMMARY AND CONCLUSIONS

Purpose of this Statement

- 7.1 The proposed development seeks the proposed conversion of and extension to the existing reservoir to provide one residential dwelling with associated access, parking, landscaping and ancillary works.
- 7.2 This Statement outlines the context within which the application is made, and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development with the final design of the proposals being informed by pre-application discussions with the council.

Summary of Key Considerations

- 7.3 It is considered that there are a number of material considerations in support of the application, which include the following:
- The site is suitable and available for development;
 - The proposal seeks the effective reuse of brownfield site and conversion of an existing building, ensuring that it is preserved and brought back into beneficial use;
 - It is considered that the proposals meet the requirements of NPPF Paragraph 79 (c) and (e) and Local Plan Policy RA5 and is therefore considered to be policy compliant;
 - The design of the proposals is of a high quality and reflects an appropriate scale and appearance, utilising existing building on the site as far as possible and ensuring that the extension remains subservient and low-lying;
 - The landscape and visual impacts have been assessed as a key matter within the application and it is considered the proposals are acceptable in this respect;
 - The proposed access arrangements and parking are considered to be acceptable in line with standards and have been informed by the necessary technical work;
 - It is considered that there will be limited ecological impacts as a result of the conversion of the building and the Ecology Report highlights the appropriate mitigation necessary for bats;
 - A thorough Site Investigation has been undertaken which confirms that there are no issues as well as assessing the proposals for both foul and surface water drainage; and
 - There are no trees located which would be adversely impacts due to the proposals.

Conclusion

- 7.4 At the time of submission, it is noted that a 5-year supply of housing land cannot be demonstrated by Herefordshire Council. Therefore, it is considered that the acceptability of the proposals should be considered under Paragraph 11 of the NPPF, that planning permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 7.5 It is noted that for the purposes of this application, there are no policies of the framework which indicate that development should be restricted and the scheme comprises an acceptable re-use and conversion of the existing building in line with Paragraph 84 of the NPPF. The scheme also satisfies two of the special circumstances listed in Paragraph 79 of the NPPF.
- 7.6 Accordingly, it is respectfully requested that the application should be approved.