
**HIGHOVER FARM, HIGHOVER WAY, HITCHIN
HERTFORDSHIRE SG4 0QR**

"Change of use of former agricultural buildings comprising statutorily listed threshing barn and non-listed (non-designated heritage asset) courtyard buildings, former farmhouse together with the addition of 2 new build dwellings and the adaption of pre-existing courtyard buildings to provide cycle and refuse storage, partial demolition of non-listed structure to facilitate access, provision of private and communal space and BNG area"

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T 07825 633575
E ian.coward@collinscoward.co.uk
W www.collinscoward.co.uk

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1.0 INTRODUCTION

- 1.1. We are instructed by our clients, **Gill-Hudson Homes**, to submit an application for the development described as below:

Change of use of former agricultural buildings comprising statutorily listed threshing barn and non-listed (non-designated heritage asset) courtyard buildings, former farmhouse together with the addition of 2 new build dwellings and the adaption of pre-existing courtyard buildings to provide cycle and refuse storage, partial demolition of non-listed structure to facilitate access, provision of private and communal space and BNG areas"

- 1.2. The site lies to the north-east of Hitchin and in close proximity to the shops and services as provided by that settlement to include a mainline train station.
- 1.3. It is accessed via Woolgrove Road into Highover Way and is a complex of now redundant former farm buildings.
- 1.4. The site is currently unoccupied and we understand that all family activity ceased in 2022.
- 1.5. The main farmhouse (now redundant) lies on the southern side of the site facing in a broadly north-westerly direction. This is a substantial two-storey property with a single rear extension and ad hoc later additions to its frontage.
- 1.6. The associated agricultural buildings create a courtyard arrangement and include, in addition to the principal farmhouse, the listed threshing barn, detached cart shed, a piggery, hay barn, store and a series of 20th century structures.
- 1.7. The threshing barn which is located on the north-western boundary of the site was added to the statutory list of special and architectural interest as Grade II on 2nd May 2018.

- 1.8. A separate heritage statement accompanies this planning application and in essence the building was listed as a well-preserved example of a late 16th century or early 17th century timber-framed threshing barn which exhibits clear legibility of its original plan form.
- 1.9. This is to be created, with the addition of the small single-storey structure on its north-western side, to create two separate self-contained dwellings. This part of the site is also the subject of a separate and contemporaneous application for listed building consent and it has been agreed with officers of the local planning authority (and the detailed nature of the pre-application discussions held to date are covered in section 2 of this statement) that this is the only listed building on the site and that there are no issues of any other structure being listed by virtue of either attachment or having an established curtilage status.
- 1.10. The scheme is wholly residential and totals 14 units as follows:
- Part demolition of the pre 19th century hay barn on the western side in order to facilitate both vehicular (and service vehicles) and pedestrian access. This is the only route into the site and there are protected trees which are the subject of a Tree Preservation Order to the south of these buildings;
 - Part demolition and adaption of 2 ancillary structures within the courtyard which are more recent, dating to the 20th century, to provide enclosed car, cycle and refuse provision as part of the overall provision to serve all the properties across the site;
 - Creation of 14 separate units as follows, all of which are at dual aspect:
 - **Unit 1:** conversion and adaptation of the former hay barn to create a two-bedroom four-person unit with a net internal area of 86.24 square metres (NDSS requires 79 square metres). This is a dual aspect property which is part single-storey and part two-storey with at ground floor level a kitchen, 2 double bedrooms (one of which is en-suite) and a centrally located family bathroom. Stairs within the two-storey element provide access

to a family room/ lounge. A private garden area is to the rear and 2 car parking spaces are alongside. In respect of the shortfall from the NDSS standards we make three points: one of the bedrooms could be reduced to a single and that would only require 70 square meters and whilst still a shortfall from NDSS standards it would be less, yet, that would reduce the value of the property and seems an unnecessary contrivance; the re-use of heritage assets is more constrained and places more obstacles to meeting development standards than the volume housebuilders scheme to the north on open land; and the scheme as a whole has a large over provision of space as we now outline on a unit by unit basis;

- **Unit 2:** a four-bedroom six-person dual aspect property with a net internal area of 181.57 square metres (NDSS requires 106 square metres) and providing 3 bedrooms at ground floor and a kitchen/ dining room to the rear; stairs either side of the main entrance hall provide access up to a further bedroom and main lounge with a void and rooflight over part of the ground floor accommodation. Private amenity space is provided to the rear and 2 car parking spaces are allocated to the front;
- **Unit 3:** a four-bedroom six-person property with a net internal area of 230.97 square metres (NDSS requires 106 square metres). This utilises part of the non-listed corner building (a former store dating from the mid to late 19th century) and with a ground floor link into the listed threshing barn provides bedrooms at ground floor level with an entrance on the inner side of the courtyard.
- Within the main body of the threshing barn at ground floor level, 2 double bedrooms are provided, both of which are en-suite, a study as well as stairs up to a mezzanine level created by a new internal structure. This provides an open plan lounge and kitchen with rooflights to the north-western side due to the restricted headroom at this point and a staircase/ void. Private amenity space is to the rear and to the side and 2 car parking spaces are allocated to the frontage.

- **Unit 4:** the second unit within the listed structure and this is wholly within the listed structure with no need to utilise any non-listed buildings to facilitate its provision. This is a four-bedroom eight-person property with a net internal area of 222.54 square metres (NDSS requires 124 square metres). This utilises the main threshing barn entrance with the pre-existing doors to be preserved and fixed in an open position and a new glazed entrance added. Access is exclusively from within the courtyard and the threshing component is fully open with a staircase running across the position running across this feature. The position of the dividing wall between units 3 and 4 reflects the position of the historical bays and at ground floor level the 4 bedrooms and family bathroom are provided with an open plan lounge/ kitchen within the newly created mezzanine level with again, as with unit 3, rooflights on the north-western side to accommodate the restricted headroom.
- Private amenity space is provided to the rear and 2 car parking spaces are allocated to the frontage;
- **Units 5 to 8** are within the mid to late 19th century cart shed which lies alongside the threshing barn and are as follows:
 - **Unit 5:** a three-bedroom six-person property with a net internal area of 140.36 square metres (NDSS requires 102 square metres) with an entrance hall, 2 bedrooms at ground floor level and an open plan kitchen/ living area to the rear; centrally located stairs provide access to 2 double bedrooms both front and back and a centrally located family bathroom. Amenity space is to the rear and parking is provided within the part of the refuse store within the courtyard;
 - **Units 6, 7 and 8:** are all two-bedroom four-person properties which broadly have the same arrangement and with floorspaces varying between 93.40 to 95.84 square metres (NDSS requires 79 square metres). All have an entrance on the inner side of

the courtyard and a double bedroom alongside with a joint living/ kitchen area to the rear. Centrally located stairs provide access to a further double bedroom together with en-suite facilitated by the addition of a mezzanine level and again accommodating the roofslope either side. Amenity space is to the rear

- 2 car parking spaces for units 6 are provided in front of the threshing barn and for,
- for units 7 and 8 in a row of 4 spaces alongside the refuse store/ space for unit 5;
- **Units 9 and 10** are within the mid to late 19th century cattle sheds (subsequently re-purposed as piggeries) on the northern side. Unit 9 utilises the pre-existing rear extension and a new extension is proposed to unit 10 to reflect that to be used for unit 9.

Both units are three-bedroom six-person properties with a family bathroom and a family room to the rear. Unit 9 has a net internal area of 123.43 square metres and unit 10 a net internal are of 144.85 square metre.

Amenity space is to rear and 2 car parking spaces to the frontage.

- **Units 11 and 12** are provided within the former farmhouse facilitated by a rear extension for unit 12 to reflect that pre-existing for unit 11.

The change of use of this structure involves the demolition of the poor quality later additions to the front of the farmhouse.

- **Unit 11:** provides a lounge/ study/ toilet/ utility either side of the main entrance and there is a joint kitchen/ living area within the pre-existing rear wing. Stairs within the hallway provide access up to 4 rooms, 3 of which are doubles and 1 of which is a

single, making this a four-bedroom seven-person property with a net internal area of 188.53 square metres.

- **Unit 12:** provides a lounge, separate family area and kitchen at ground floor level with a small basement accessed via a newly introduced spiral staircase. At first floor level there are 4 bedrooms of which 3 are doubles and one is a single as with no. 11 and so again this is a four-bedroom seven-person property with a net internal area of 190.64 square metres.

Amenity space for both units 11 and 12 is to the rear and 2 car parking spaces are provided to the front for unit 11 and 2 to the side for unit 12.

- **Units 13 and 14** are both new-builds.
- **Unit 13:** is single-storey and unit 14, two-storey. Unit 13 is a two-bedroom four-person property with a net internal area of 80.83 square metres (NDSS requires 70 square metres) with bedrooms both front and back and an open plan living/ dining area.
- **Unit 14:** provides a lounge at ground floor and a separate kitchen/ dining area and stairs up to 3 bedrooms of which 2 are doubles and 1 is a single making this a 3-bedroom 5-person property with a net internal area of 108.93 square metres (NDSS requires 93 square metres).

Amenity space is to the rear and 2 car parking spaces are provided for each unit to the frontage with those for 13 sitting alongside and those for 14 the other side of the protected and retained tree.

1.11. In respect of other matters we note as follows.

- 1.12. Cycle storage is provided for units 2, 3, 4, 5, 6, 7 and 8 within the adapted courtyard building and for the remaining units this is shown individually on the proposed site plan.
- 1.13. Within the central cycle store 30 conventional spaces are provided, namely 3 spaces for each of units 2, 3, 4 and 5 to total 12 spaces; 2 spaces for units 6, 7 and 8 to total 6 spaces plus visitor spaces to cover the residual, namely 12 spaces as well as 2 cargo bay-like spaces (these are in addition to the 30 conventional spaces as cited).
- 1.14. Refuse is within the second adapted building within the courtyard and this provides for units 2, 3, 4, 5, 6 and 7.
- 1.15. Otherwise refuse is to be provided as shown on the proposed site plan which also shows bin collection points.
- 1.16. Electric vehicle charging points are also shown as 1 per unit.

2.0 PRE-APPLICATION ADVICE & PLANNING HISTORY

2.1 The scheme has been the subject of a detailed pre-application process, principally with Sarah Kasparian of the Major Projects team who has consistently been involved throughout the process.

2.2 In addition, we have met with Mr Mark Simmons, the local planning authority's conservation officer as well as other officers.

2.3 A compendium of the advice and discussions to date is as follows:

- Letter dated 18th November 2024, pursuant to ref. 24/02201/PRE;
- Site meeting of 02/12/2024;
- Round table meeting with the officers of the local planning authority on 03/02/2025 which was attended by Mark Simmons as well as officers advising in respect of ecology, highways and sustainability;
- Further site meeting, also attended by Mr Mark Simmons on 11/03/2025;
- Our further detail letter post this later meeting as well as amended plans as sent to the local planning authority in March 2025;
- Various emails and calls.

Statutory planning history

2.4 There is little in terms of statutory planning history that relates to the site itself and we cite for the sake of completeness ref. 87/01628/TPO in respect of works to a protected ash tree at that point.

- 2.5 However the key application of relevance is that in relation to the larger site to the north and on 19th June, 2018 and pursuant to **18/01154/OP** an application was submitted for development described as follows:

Outline application with all matters reserved other than access, comprising residential led development of up to 700 dwellings of use class C3 (dwellings), approximately 500 sqm of neighbourhood-level facilities, a new 2FE primary school, open space, play space, green infrastructure, and associated accesses (vehicular, pedestrian and cycle), including a new primary access off Stotfold Road with limited access off High Dane (as amended)

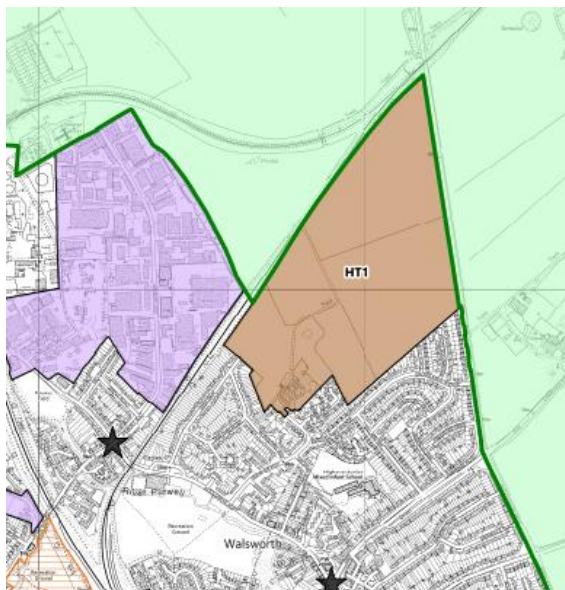
- 2.6 This approved on 29th November 2024 and the local planning authority statutory planning register records conditions being submitted for discharge. This is relevant in respect of the site's specific policy context to which we now turn.

3.0 POLICY

- 3.1 The statutory Development Plan comprises the North Hertfordshire Local Plan 2011-2031 which was adopted in November 2022. We will set out the policy context in full but first start with the proposals map designation and the related policy.

Site specific policy context

- 3.2 An extract from the proposals map as it relates to the site is below with the top larger-scale extract showing the full extent of the policy designation and the second more detailed the precise form of the application site with the outline of the pre-existing buildings being legible.





- 3.3 The designation confirms that the site is the subject of policy **SP17: Site HT1** and this reads as follows:

Policy SP17: Site HT1 – Highover Farm, Hitchin

Land to the east of Hitchin, as shown on the Policies Map, is allocated as a Strategic Housing Site for a new neighbourhood of approximately 700 homes.

A comprehensive and deliverable Strategic Masterplan for the entire allocation is to be prepared and agreed between the landowner/developer and the Council.

Where applications have already been submitted to the Council a Strategic Masterplan should be agreed prior to the or as part of the grant of planning permission.

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole.

Development proposals should provide the following planning and masterplanning requirements:

- a) Neighbourhood-level retail facilities providing approximately 500m² (net) of retail and food and beverage floorspace;**
- b) Principal access from Stotfold Road with provision for sustainable modes of transport and comprehensive integration into the existing pedestrian and cycle, public transport and road networks;**
- c) At least 7 serviced plots for self-build development;**
- d) Approximately two hectares of land reserved for provision of a new primary school;**
- e) Appropriate separation distances from the adjoining railway embankment to safeguard residential amenity;**
- f) Lower density development and / or green infrastructure provision as informed by detailed landscape assessments at the north of the site to:**
 - i. maintain appropriate visual and physical separation between Hitchin and Letchworth Garden City;**
 - ii. address surface water flood risk; and**
 - iii. respect the setting of the scheduled burrows to the northeast;**
- g) Sensitive consideration of other designated and non-designated heritage assets at Highover Farm including the Grade II listed Threshing Barn;**

- h) Undertake Contaminated Land Preliminary Risk Assessment, particularly relating to current and historic agricultural use; and**
- i) Undertake ecological appraisal in relation to Stotfold Road Verges and Hitchin Railway Banks Wildlife Sites**

3.4. And, in addition, the associated explanatory text as follows:

4.229 The land at Highover Farm provides opportunity for a strategic-scale site on the edge of Hitchin to address locally arising needs.

4.230 Although this site will not generate a requirement for a local centre which forms part of the formal retail hierarchy, it will be necessary to provide neighbourhood-level shops and facilities to ensure that the new development is sustainable.

4.231 This development will necessitate a new principal access from Stotfold Road. However, it is important to ensure that this does not result in new development 'turning its back' on the remainder of Hitchin.

4.232 A site at this scale will generate sufficient demand to support a new primary school on site. This will need to be at least 1FE in size. Further information on likely pupil yields, along with an understanding of any extent to which the nearby Highover JMI School may be able to meet future demands, will determine if it is necessary to deliver a 2FE school on-site.

4.233 A number of existing roads run to the edge of the allocated land, including Highover Way and High Dane. These provide opportunities to integrate development with the surrounding area whilst ensuring that any such routes do not create an alternate

access from Stotfold Road to the industrial areas located between the railway lines

4.234 The most appropriate solutions will be determined through the Development Management process having regard to the detailed policies of this Plan.

4.235 Although the gap between Hitchin and Letchworth Garden City is relatively narrow in this location, it is considered that Stotfold Road and the Cambridge railway provide definitive, defensible boundaries. Notwithstanding this point, it will be necessary to demonstrate an appropriate design solution as the site tapers to its northern end to respect this separation and nearby heritage assets.

4.236 The Highover Farm complex, at the south-west of the allocation site, is an important and long-evolved complex of agricultural buildings recognised on the Council's register of locally important heritage assets. In 2018, the Threshing Barn, which lies within this complex, was Grade II listed

General policy context

3.5. In respect of the more general policy context we submit that the full policy compendium relevant to the assessment of the application is as follows.

3.6. In respect of the stated vision, the following references apply:

The vitality and viability of the towns of Hitchin, Letchworth Garden City, Royston and Baldock are safeguarded in a way that takes account of their distinctive role. This will have been achieved through carefully planned development which meets the needs of these centres, retaining their market share in terms of their retail offer, whilst recognising the importance of preserving and enhancing their historic character. In local and village centres shopping facilities that meet local needs will be supported.

The District's important natural and historic areas and buildings that help to create the distinctive identity of the District in both urban and rural areas will have been protected and enhanced where possible. The quality and attractiveness of the landscape of North Hertfordshire, which contributes to its distinctive character, will have been conserved and enhanced where possible. New green infrastructure will have enhanced the network of green corridors linking settlements to the open countryside, providing greater opportunities for healthy lifestyles.

- 3.7. Policy SP1 sets a presumption in favour of sustainable development and reiterates the importance of delivering a mix of houses that contribute towards the target set and aspiration of the Plan (SP1 (C) (i)).
- 3.8. Policy SP2 is entitled **"Settlement Hierarchy and Spatial Distribution"** and confirms that by 2031 (starting from 2011) the Plan makes provision for 13,000 new homes. Of this figure approximately 80% will be in the stated towns with 1,842 new homes allocated to Hitchin which is defined as a town throughout the Local Plan.
- 3.9. Policy SP6 is entitled **"Sustainable Transport"** and criterion (b) confirms that Councils will encourage development in locations which enable sustainable journeys to be made to key services and facilities.
- 3.10. Policy SP8 is entitled **"Housing"** and so repeats the previously stated figure with the first part of that policy reading as follows:

Over the period 2011-2031, housing growth will be supported across the District. We will:

- a) Release sufficient land to deliver at least 11,600 net new homes for North Hertfordshire's own needs. Of these:**

- i. around 11,500 net new homes will be provided within that part of the District falling within the Stevenage Housing Market Area (HMA); while**
- ii. around 100 net new homes will be provided within that part of the District falling within the Luton HMA;**

3.11. And, in addition, criterion (c) **with our highlighting**, so referencing back to policy HT1:

c) Deliver these homes through the sites and allowances identified in this Plan that will support approximately:

- i. 5,100 homes from completions and permissions achieved since 2011 and other allowances;**
- ii. 7,700 homes from six Strategic Housing Sites delivering approximately 5,560 of these by 2031:**
 - BA1 - North of Baldock for 2,800 homes (approximately 1,400 to be delivered by 2031);**
 - LG1 - North of Letchworth for 900 homes (approximately 600 by 2031);**
 - NS1 - North of Stevenage in Graveley parish for 900 homes (approximately 775 by 2031);**
 - HT1 - East of Hitchin for 700 homes;**
 - GA2 - North-east of Great Ashby in Weston parish for 600 homes; and**
 - EL1 / EL2 / EL3 - East of Luton for 2,100 homes (approximately 1,500 by 2031)**

3.12. And criterion (f) in respect of affordable housing and viability:

f) Support a range of housing tenures, types and sizes measured against targets to provide:

- i. 33% of all homes over the plan period as Affordable Housing for local needs with targets to deliver up to 40% Affordable Housing where viable;**
- ii. a broadly even split between smaller (1- and 2-bed) and larger (3+ bed) properties subject to up-to-date-assessments of housing needs; and**
- iii. 56 plots on specified Strategic Housing Sites to help proactively address demand for self-build development over the plan period; and**

3.13. Policy SP9 is entitled "**Design and Sustainability**" and criterion (a) of this policy reads as follows:

(a) Support new development where it is well designed and located and responds positively to its local context

3.14. Policy SP12 is entitled "**Green Infrastructure, Landscape and Biodiversity**".

3.15. Policy SP13 is entitled "**Historic Environment**" and this policy reads in totality as follows:

Policy SP13: Historic environment

The Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be

given to the asset's conservation and the management of its setting. We will pursue a positive strategy for the conservation and enjoyment of the historic environment through:

- a) Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting according to their significance;**
- b) Identifying sites on the national register of Heritage at Risk or on the Council's 'At Risk' register;**
- c) Periodic reviews of Conservation Areas and other locally designated assets; and**
- d) Publication of detailed guidance**

3.16. This then introduces all the strategic housing site policies to include SP17: HT1 as previously cited.

3.17. Section 3 of the Local Plan introduces Development Management policies and the following have a bearing on the proposed development.

3.18. Policy T2 is entitled **"Parking"** where (a) confirms that parking for residential development should be provided in accordance with the minimum standards as set out at Appendix 4 of the Plan; where:

- 1 space is required for a one-bedroom property and 2 spaces for two to three-bedroom.
- For cycling 1 secure cycle space is required per dwelling or none if a garage or secure area is provided within the curtilage of the dwelling.

3.19. Policy SH2 is entitled **"Affordable Housing"** and this sets varying thresholds as follows:

Size of site (gross to be affordable dwellings)	Target percentage of dwellings
11 – 14 dwellings	25%
15 – 24 dwellings	35%
25 or more dwellings	40%

3.20. In respect of policy HS3, “**Housing Mix**”, we note that criterion (b) seeks that the scheme should provide a density, scale and character of development which is appropriate to its location and surroundings.

3.21. Policy D1 is entitled “**Sustainable Design**” and reads in totality as follows:

Planning permission will be granted provided that development proposals:

- a) Respond positively to the site’s local context;**
- b) Take all reasonable opportunities, consistent with the nature and scale of the scheme, to:**
 - i. create or enhance public realm;**
 - ii. optimise the potential of the site by incorporating Sustainable Drainage Systems (SuDS);**
 - iii. reduce energy consumption and waste;**
 - iv. retain existing vegetation and propose appropriate new planting;**
 - v. maximise accessibility, legibility and physical and social connectivity both internally and with neighbouring areas;**

- vi. future proof for changes in technology and lifestyle;**
- vii. design-out opportunities for crime and anti-social behaviour; and**
- viii. minimise the visual impact of street furniture and parking provision;**
- c) Have regard to the Design SPD, and any other relevant guidance;**
- d) Within Letchworth Garden City have regard to the Letchworth Garden City Design Principles contained in Appendix 5; and**
- e) For residential schemes, meet or exceed the nationally described space standards and optional water efficiency standards.**

3.22. Policy EN4 is entitled “**Biodiversity and Geological Sites**” and reads in part as follows:

Planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.

All development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible. Applicants should, having regard to the status of any affected site(s) or feature(s):

- a) Submit an ecological survey that is commensurate to the scale and location of the development and the likely impact on biodiversity, the legal protection or other status of the site;**

- b) Demonstrate that adverse effects can be avoided and / or satisfactorily minimised having regard to the hierarchy of protection below:**
 - i. locating on an alternative site with a less harmful impact;**
 - ii. providing adequate mitigation measures; or**
 - iii. as a last resort compensated for.**

The acceptability of approach(es) to avoidance, mitigation and compensation will be commensurate with the status of the asset(s) likely to be affected by the application; Compensation is unlikely to be an appropriate solution for proposals affecting nationally or internationally designated sites other than in the most exceptional circumstances.

- c) Include appropriate measures to manage construction impacts by demonstrating how existing wildlife habitats supporting protected or priority species will be retained, safeguarded and managed during construction;**
- d) Integrate appropriate buffers of complimentary habitat for designated sites and other connective features, wildlife habitats, priority habitats and species into the ecological mitigation and design. The appropriateness of any buffers will be considered having regard to the status of the relevant habitat. 12 metres of complimentary habitat should be provided around wildlife sites**

3.23. Section 4 of the Local Plan is entitled “**Communities**” and confirms that defined communities are generally based on the established network of town and parish boundaries.

3.24. Hitchin has its own narrative which starts on page 208 of the Local Plan and paragraph 13.128 confirms that 7 sites are allocated in and around Hitchin for an

estimated 971 new homes with "a significant majority of these to be built at the strategic housing site at Highover Farm".

3.25. Finally, paragraph 13.131 states as follows:

13.131 Hitchin town centre is the District's largest town centre. It has a good range of shops, with the primary shopping area being largely around Market Place and North Hertfordshire Local Plan 2011-2031 along High Street and Bancroft, with secondary shopping areas along Hermitage Road, Bucklersbury and Sun Street

4.0 ASSESSMENT

- 4.1. We start with the principle of development.

Principle of development

- 4.2. As a general introduction to the issue of the principle of development we note that the site reuses existing heritage assets (both designated and non-designated assets) and provides 14 new homes (of which 13 are nett additional) in a sustainable location close to Hitchin (which is the District's largest town centre).
- 4.3. We now turn to site's specific policy SP17: Site HT1 and we note that a comprehensive and deliverable masterplan was required to have been prepared for the entire allocation and that this is to be agreed between the landowner/developer and the Council. The third paragraph of the policy reads as follows:

Any application on part of the site will be assessed against its contribution to the Strategic Masterplan and must not prejudice the implementation of the site as a whole

- 4.4. We note that the adopted masterplan does not include the current site and the local planning authority's pre-application letter of 18th November, 2024 read as follows under the heading **"Principle of Development"** acknowledging this point:

"The site is part of the Local Plan allocation for residential-led mixed-use development. A key site-specific requirement is for a comprehensive and deliverable strategic masterplan for the entire allocation to be prepared and agreed between the landowner/developer and the Council. The current masterplan, under consideration in application referenced 18/01154/OP does include the site subject to this pre-application advice. Whilst this is contrary to the key site specific policy requirement, in principle this approach has been agreed by the Council via the resolution to grant outline planning permission on the basis that the threshing barn was newly listed".

- 4.5. We note that this letter was written in November, 2024 and now the relevant outline planning permission has been issued. We also note that the threshing barn was listed in May 2018 and that the outline had been submitted in April 2018 and no doubt with a long history of negotiation and discussion.
- 4.6. Policy HT1 was therefore related to the main housing site (the newly granted planning permission for up to 700 dwellings as well as community infrastructure) and only has a passing reference to the farm site of Highover Farm.
- 4.7. That point made, the only real consequence is in respect of affordable housing and the pre-application advice letter stated that 40% affordable housing “might” be appropriate.
- 4.8. In respect of the site’s specific merits, the site is vacant and in a state of disrepair.
- 4.9. It is currently the subject of security arrangements and the former farmhouse is boarded up following a recent series of trespass incidents.
- 4.10. The threshing barn is in a state of disrepair and the slates are in need of taking down and storing, pre their re-use at the appropriate stage.
- 4.11. The reuse of the heritage assets, both designated and non-designated, accord with paragraph 210 of the NPPF and in particular criterion (a) which reads as follows:

210. In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- 4.12. The farm use has long since ceased; the land associated with the farm has been sold and is now the subject of the 700-unit urban expansion. The residential reuse of the farm buildings is the most appropriate use and we support this conclusion with regard to the following points:

- The policy HT1 allocation;
- The close proximity to the town as a sustainable location for new residential development;
- The location of the pre-existing residential development to both the south and the east and the newly consented development to the north and the west;
- Residential is the highest value land use and provides the ability to invest in the preservation of the historic fabric.

Affordable housing

- 4.13. We now turn to affordable housing and the threshold set out in policy HS2 entitled **“Affordable Housing”**.
- 4.14. The lowest threshold is 11 units and within the range 11-14, 25% affordable housing should be provided. This figure rises to 30% for schemes within the range of 15-24 dwellings and for 25 or more dwellings a 40% affordable housing contribution is set.
- 4.15. In this case the scheme is for 14 units (13 nett additional) and so within the 25% threshold. It is our view that it would be inconsistent to apply a 40% contribution and this would only apply if it was included within the overall 700-unit scheme however we have previously confirmed it was not and it was not even included within the masterplan.
- 4.16. The local planning has accepted that this decision was in conflict with the policy as per the quote from the pre-application letter.
- 4.17. A further point is that whilst a 14-unit scheme is submitted we submit that all but 6 of the units could be the subject of a Class Q prior approval (the 6 excluded are the two in the listed building (units 3 and 4) and the two in the former farmhouse (units 11 and 12) as well as the two new builds (units 13 and 14). The 6 units

are well below the HS2 threshold and at national planning policy level the NPPF at paragraph 65 reads as follows:

65. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount³⁰

- 4.18. In addition the NPPG sets the same threshold.
- 4.19. We have chosen via negotiation to submit a full application as it enables the site to be presented as a totality and it is a far clearer strategy to follow this approach than a part planning application and a part Class Q. Either way and as agreed at pre-application stage we have instructed the preparation of a viability report which we understand will be open to third party scrutiny. It acknowledges the significant build cost of converting the listed asset in terms of presenting its optimum viable use. However, the policy background and the HT1 requirement need some consideration when assessing the proportionality of the negotiations.

Design

- 4.20. We now turn to design.
- 4.21. Design has been the subject of a great deal of discussion at pre-application stage.
- 4.22. Policy HT1 (g) requires sensitive consideration of other designated and non-designated assets including the Grade II listed threshing barn.
- 4.23. Policy SP13 states that when considering the impact of a proposed development on a significant designated heritage asset, greater weight should be given to the asset's conservation and the management of its setting and also policy SP9 states that planning permission will be granted provided development proposals "respond positively to the site's local context" (criterion (a)).

- 4.24. In summary great weight can be attributed to the change of use and conservation of the threshing barn and the setting and reuse of the remaining elements of the site have followed a farmyard agrarian aesthetic to respect the setting.
- 4.25. We confirm that all matters in respect of the listed threshing barn will be covered in a separate heritage statement and the contemporaneous application for listed building consent.
- 4.26. In respect of the conversion the mainstay of the approach has been to use the existing built form.
- 4.27. Units 6, 7 and 8 are currently open on the north-western side and the scheme proposes new vertical cladding to the existing open areas and facing brickwork at lower level.
- 4.28. Units 9 and 10 are also open on the inner courtyard side and will be completed by facing brickwork at lower level as well as the vertical boarding above. New windows are added as appropriate with patio doors to the inner side. The extension to unit 10 will reflect that to no. 9 in both scale and form and again will have a lower level brick base and timber cladding.
- 4.29. Slate roofs unify the entire complex.
- 4.30. The extension to the farmhouse to facilitate the additional unit will brick-built and reflect the pre-existing rear extension, so introducing a degree of symmetry to the composition.
- 4.31. The 2 new builds were the subject of significant discussion and various iterations were tabled throughout the pre-application process.
- 4.32. Again the agrarian style lead the approach with slate roofs and timber boarding which are a consistent and unifying theme across the former farm complex. The design of the two new builds is simple and uncomplicated and the single and two-storey elements sitting alongside each other reduce bulk and provide diversity and interest.

- 4.33. The central courtyard is also a key design challenge.
- 4.34. One can assume that when the farm was operational it was busy and accommodated a range of vehicles and farm machinery. The monobloc area is envisaged without kerb stones and pockets of landscaping to soften the overall feel of the courtyard.
- 4.35. The two 20th century dwellings within the courtyard are of low pre-existing value but will be adapted to accommodate some of the cycle storage and refuse provision in the interest of reducing clutter and catering for the practicalities of the residential scheme.
- 4.36. Otherwise car parking, as per the standards previously introduced, is broken up and allocated appropriately to each unit in the manner shown on the proposed site plan and described earlier in this statement.
- 4.37. The final issue in respect of design is the boundary treatment and whilst this is likely to be covered by means of condition this is envisaged to be ranch-style fencing with hedge planting on the inner side in order to protect privacy and provide a soft hedge.
- 4.38. This will be particularly important for the units on the south-western to north-western parts of the site and so unit 2 all the way through to unit 8.
- 4.39. The units on the opposite side of the site will follow the same approach albeit there is more flexibility here and there can be a reliance on some of the pre-existing boundary treatment on the eastern side of the site.

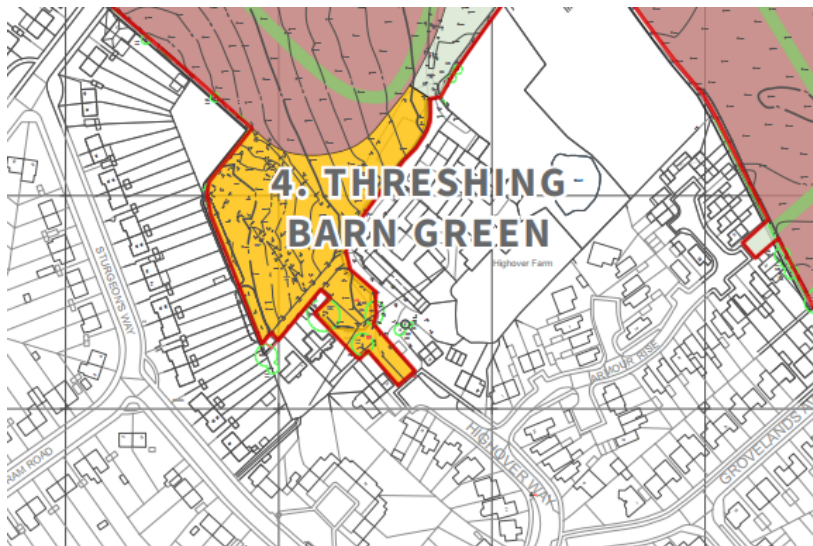
Biodiversity net gain, ecology and trees

- 4.40. These matters are covered by separate technical reports.
- 4.41. A full remit of ecological studies has been undertaken and the application is supported by a BNG metric with a discrete and separate BNG area allocated in the southern part of the site and as shown on the masterplan.

- 4.42. This will be demarcated and managed by the same management company which will deal with the overall management of the communal areas within the site.
- 4.43. All protected and good quality trees are retained and new planting is proposed.
- 4.44. Poor quality trees are to be lost and their loss justified in the submitted arboricultural report.
- 4.45. We would also add that as this is largely a reuse of pre-existing built form (and in making this point we acknowledge the limited new build elements) and so as a starting point BNG issues are not a particular challenge in the circumstances of this case.

Compliance with the masterplan

- 4.46. We now deal with compliance with the masterplan and the recent planning permission for up to 700 new dwellings and related infrastructure.
- 4.47. The two sites, namely the farm site and the former farmland beyond, should be developed in a complementary fashion.
- 4.48. We have made the point that as the masterplan has not included the farm then this aspect of the policy has not been complied with to date. An extract from the masterplan and the green infrastructure plan pursuant to the approved outline permission is below:



- 4.49. The area of land is open to respect the setting of the listed barn and the farm complex and in response and as previously described there will be a soft transition from the rear gardens with the ranch style fencing and hedging. The land owned by the current applicant is in fact quite limited as reflected on the application plans and so it is the housing development that has the key control over the areas of land that successfully confirm the transition between the two sites in a complimentary fashion.
- 4.50. The access road to the site is pre-existing and a pedestrian access is proposed alongside the pre-existing road to provide pedestrian permeability through the larger residential estate. This land is not owned by the current applicants and so

they are unable to undertake any works in respect of it and the vehicular access is established.

- 4.51. We assume that details of this will be submitted shortly. The current application will simply have no effect on this and will not prejudice any of this permeability.

5.0 CONCLUSION

- 5.1. The scheme for the 700 units was pursued in isolation from the farm which was not the intention of policy HT1. That said, the site is now within the ownership of the applicant and recent discussions have confirmed a clear willingness to negotiate and bring forward a complementary scheme and to do so in the short term.
- 5.2. It is also likely that any consent will started pre the more involved urban expansion proposal. Timing is of a particular concern in view of the current state of the site given its now 3 year period of vacancy and its heritage status.
- 5.3. There is no conflict with the masterplan.
- 5.4. The farm site is limited and discrete and in any event raises very different issues to the new build urban expansion on open former farmland. The assessment and approval of the 700 unit outline scheme has protected the setting of the listed heritage asset and the current scheme provides a soft transition to the open land associated with the residential scheme namely that termed "threshing barn green" on the green infrastructure plan as approved.
- 5.5. The use of the pre-existing access to the current site will in no way prejudice the pedestrian permeability to be sought via the residential scheme.
- 5.6. In terms of affordable housing obligation we have made the point that we consider it to be incorrect to seek a 40% contribution based on policy HT1 for the reasons outlined but in short the fact that the policy requirement for the 2 to come forward together was not met back in 2018 and this position has not changed since.
- 5.7. Reliance upon a Class Q change of use which raises no affordable housing obligations and which is now a very common method of pursuing the change of use of former agricultural buildings, would have left 6 units to be sought via a planning application which is a figure well below any local or national threshold level for the provision of affordable housing. Either way a complete and single

planning application was advised and has been discussed since the Autumn of 2024. This is a fair approach and a sensible one but also one which should be at the detriment of the applicant in particular where there are other appropriate options. All these factors are material considerations when one assesses the affordable housing viability submission which will follow.

- 5.8. The scheme places the heritage asset front and centre and creates an agrarian farmyard style setting with an emphasis upon a simple and complementary palette of materials. The approach unifies and recreates the farmyard pursuant to the optimum viable use and now also the only appropriate use having regard to the established residential development alongside and the soon to be extended residential urban expansion.
- 5.9. The focus is on the courtyard with shared spaces and landscaping and the use and adaption of the two 20th century structures to reduce clutter and proliferation enables the setting to be as open as is possible whilst providing for the practicalities of modern day living and other policy requirements not least in respect of refuse and cycle and parking provision. A great deal of discussion to date has been held in respect of design, the use of materials and the pattern and type of fenestration.
- 5.10. The listed threshing barn is the subject of a separate application for listed building consent and a concomitant heritage statement.
- 5.11. The quality of accommodation is still of a high standard given the constraints of the site and private amenity space is provided for each and every dwelling. In planning policy terms the proposal complies with policy HT1 insofar as it is able to do so at this stage and compliance is principally with regard to criterion (g) and the sensitive consideration given to the threshing barn and its setting in all respects and for the reasons outlined.
- 5.12. It provides the optimum viable use for the site and so compliance with policy SP13 which at criterion (a) sets a strong presumption in favour of the retention, preservation and enhancement of the heritage assets and their setting according to their significance.

- 5.13. It meets all relevant technical standards and all these matters confirm compliance with the Development Plan.