

Planning Statement including Heritage Appraisal

**CONVERSION OF STONE BUILDINGS TO THREE DWELLINGS,
DEMOLITION OF MODERN STABLE BUILDING AND
REPLACEMENT WITH TWO NEW BUILD DETACHED DWELLINGS,
AND ASSOCIATED WORKS.**

BLACKER FARM, PARK LANE, EMLEY, HUDDERSFIELD HD8 9QS

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1.0 INTRODUCTION

This statement has been prepared to support a full planning application for the demolition of the conversion of traditional barns to three dwellings and for the demolition of a modern stable block and replacement with two new build dwellings at Blacker Farm, Emley.

The proposal comprises the conversion of non-designated heritage assets, which is wholly compliant with adopted policy. The scheme also involves the redevelopment of previously developed land in the Green Belt that would not cause substantial harm to openness. As such, the proposal is a type of development that is not inappropriate within the Green Belt and accords with both the NPPF and Local Plan policy.

This statement should be read in conjunction with the supporting plans supplied by Hinchcliffe Architecture and Design, and the suite of extensive supporting technical documents, which demonstrate the credentials of the scheme in more detail. It is anticipated that the Local Planning Authority (LPA) will adopt a progressive approach to this sustainable scheme.

This statement now proceeds to give details of the site. The details of the proposal are then set out. The planning merits of the scheme are then discussed in relation to relevant planning policies contained in the statutory development plan, together with Government guidance principally set out in the NPPF. In particular, it will be demonstrated that the proposal demonstrates high quality and sensitive design, would not harm highway safety or efficiency, and would sufficiently protect living conditions. Furthermore, the proposal would not result in an unacceptable impact on ecology interests and would deliver biodiversity net gain. The Heritage Assessment demonstrates that any low-level harm to heritage assets is outweighed by public benefits. Finally, the conclusion is reached that planning permission should be granted for the proposed development.

2.0 THE SITE

The application site is a collection of buildings known as Blacker Farm. Its located approximately 0.75km to the north east of the village of Skelmanthorpe and 0.8km to the north west of Scisset/Clayton West. The village of Emley lies 1.5km to the north. The site is accessed via a 550m long unsurfaced access track off the east side of Park Lane. To the south is an area of woodland known as Blacker Wood and beyond that the Whistlestop Valley Heritage Railway line runs west to east.

A Bridleway (route code DEN/27/10) runs along the access track from Park Lane before branching off north eastwards before it reaches the building group. A further Public Footpath (route code DEN/26/10) joins the access track at right angles from the south.

The site is not a working farm. It has historically been used as a hunt yard and also contains 17 DIY livery stables. Up to 30 dogs have been kept on site in association with the hunt yard.

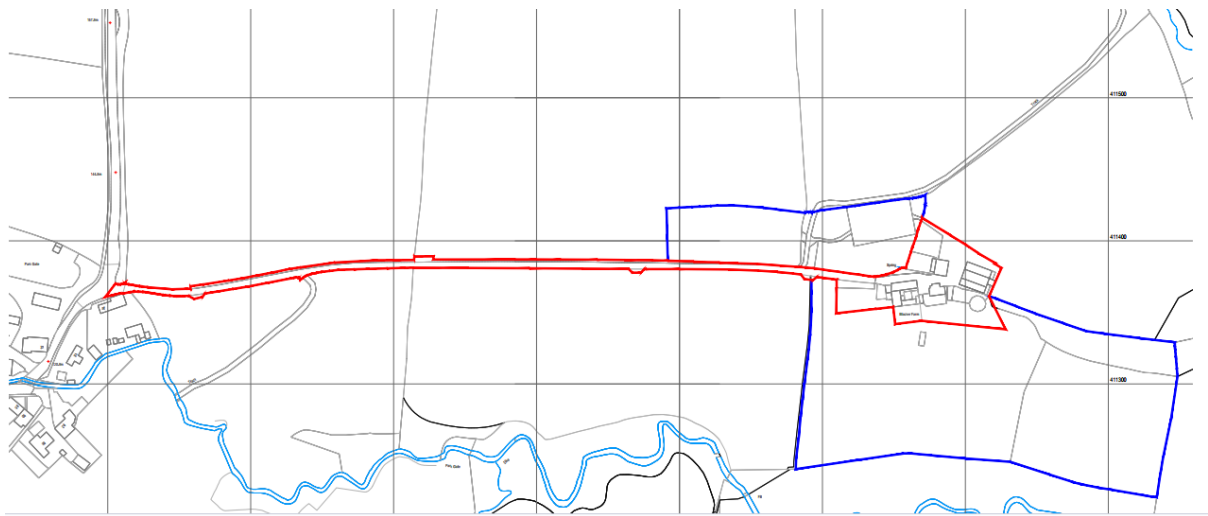


Figure 1: Location of Blacker Farm

The application site consists of a farmhouse, with a U-shaped range of traditional barns to the west (last used as dog kennels). This range has a mixture of single storey and two storey bays and is arranged around a central courtyard. It is constructed in coursed natural gritstone under a roof that is a mixture of traditional natural stone and metal sheeting.

To the north, and perpendicular to the farmhouse is a further smaller single storey outbuilding, previously used as stables. There is currently a static caravan sited to the west of this building. The building is constructed in natural gritstone under a stone roof.

To the east of the farmhouse is a substantial but rudimentary modern building range, also used for livery stables. The northern and southern ranges in particular are purpose built and designed as stables. The buildings are constructed in a mix of metal sheeting, concrete blocks and timber boarding.

There is a large horse manege to the north west of the building group and a further enclosed dog exercise area directly to the west of the U-shaped barn range. A circular horse walker is located to the south of the modern stable range. The southern part of the site slopes down from north to south such that ground level abutting the north side of the U-shaped range is approximately 2m higher than that to the south.

The application site is within the Greenbelt.



Figure 2: Aerial Image of application site.

3.0 THE PROPOSAL

Full planning permission is sought for the proposed development as shown on Figure 3 below. The proposals are in two main parts. The key elements are as follows:

1. Conversion and alteration of the U-shaped range of barns to form two dwellinghouses (Plots 1 and 2), and conversion and extension of the smaller single storey traditional building to one dwelling (Plot 3).
 - The northern wing of the U-shaped range will be converted within its shell. Modest alterations to the height of the western and southern wings will be made in order to make the buildings habitable.
 - The dwelling in the northernmost range (Plot 1) will have four bedrooms and the (Plot 3) other will have 3.
 - Existing openings are re-used where possible with some new openings to maximise natural light and solar gain.
 - Gardens are located within an existing enclosed dog exercise area to the west and also in a modest new enclosed area to the south.
 - The height of the smaller single storey building (Plot 3) is very slightly increased. The dwelling will have three bedrooms. A modest gabled extension is provided off the north east facing gable, over part of a surfaced yard currently used for outdoor storage.
 - The garden for this dwelling is contained within an existing partly enclosed paddock that abuts its west elevation. The static caravan will be removed.
2. Demolition of modern stable range and replacement with two new build open market dwellings (Plots 4 and 5).
 - Full demolition of existing stable range. Hardstandings and paraphernalia to the north and east, and the horse walker will be removed.
 - The two new four-bed dwellings will be sited on the footprint of the modern stable building. Both dwellings would be orientated with their principal elevations facing south, (the same as the existing farmhouse).

- The dwelling on plot 4 (westernmost) has a symmetrical front elevation similar to the existing farmhouse. The dwelling on plot 5 will have a more contemporary treatment to the front elevation.
- Both properties will have modest curtilages with gardens sited to the north and contained within the areas of existing hardstanding.
- Both properties have been designed to a high standard, and the external finishes of stone walls and stone slate roofs will reflect the prevailing material palette on the site.



Figure 3: Proposed Site Plan

Ample parking provision will be provided adjacent to each of the five proposed dwellings.

The access track will be re-surfaced in a suitable material and four passing places constructed at intervals to ensure there is safe and suitable vehicular, equestrian and pedestrian access.

4.0 PLANNING HISTORY

There is no planning history listed on the Council's public record for this site.

5.0 ALLOCATION AND POLICIES

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory development plan for Kirklees comprises the Kirklees Local Plan adopted on 27 February 2019.

The Local Plan establishes the overarching vision, spatial strategy, and development principles for the district, setting out detailed policies to guide and manage growth and change across Kirklees up to 2031. The Local Plan is set out in two parts; Part 1 'Strategy and Policies' which contains the spatial strategy and development management policies and Part 2 'Allocations and Designations' which sets out the allocations and designations included in the Local Plan.

The site is located within the Green Belt.

National

Material considerations exist in the form of national policy and guidance contained within the National Planning Policy Framework (NPPF) as updated in December 2024 and the suite of documents comprising National Planning Practice Guidance (NPPG).

The NPPF is reflective of the guidance contained within the NPPG. The following sections of the revised NPPF are considered of direct relevance to the current proposal:

- Section 2 - Achieving sustainable development
- Section 4 - Decision-making
- Section 5 - Delivering a sufficient supply of homes
- Section 12 - Achieving well-designed places
- Section 13 – Green Belt Land

The overarching message of the NPPF is that LPAs should adopt a positive and pro-active approach to planning proposals, particularly those that result in sustainable development. LPAs should not place unnecessary burdens on developers and should look to support appropriate schemes such as this.

Kirklees Local Plan

The following local plan policies are considered relevant to this development:

Policy LP1 Presumption in favour of sustainable development

Policy LP2 Place shaping

Policy LP3 Location of new development

Policy LP7 Efficient and effective use of land and buildings

Policy LP20 Sustainable travel

Policy LP21 Highways and access

Policy LP22 Parking

Policy LP24 Design

Policy LP33 Trees

Policy LP35 Historic environment

Policy LP59 Brownfield sites in the Green Belt

Policy LP60 The re-use and conversion of buildings

Supplementary Planning Guidance

The Kirklees Housebuilders Design Guide SPD adopted on 29 June 2021 seeks to ensure future housing development is high quality, socially inclusive and built to high environmental standards. The Kirklees Highway Design Guides established the Council's requirements for parking, servicing and design standards.

6.0 ASSESSMENT

Loss of existing use

The site at present has a sui generis use as a livery stables and kennels/hunt yard. This is not classed as an employment generating use within the Local Plan and so is not safeguarded under policy LP8.

Principle of Development in the Green Belt

The revised NPPF is a crucial part of the Government's overarching agenda of delivering 1.5m new homes during this parliament. This is a central pillar of the 2024 election pledge and is a response to the well-publicised UK housing crisis. The NPPF places great importance on housing delivery across the UK and is accompanied by recent press releases ("back the builder's, not the blocker's") and written ministerial statements. All of these place heavy emphasis on the need to reform the planning system so that developments, most notably housing developments, can be delivered as quickly as possible.

The proposed level of housing that is expected to be delivered is extremely ambitious. To put it into context, the UK has not got close to delivering the amount of housing now proposed for over 45 years.

Applications for housing developments need to be viewed in this context and supported wherever possible.

Proposed Conversions

Paragraph 154 (h) iv states that the re-use of buildings which are of permanent and substantial construction is an exceptional form of development that is not inappropriate in the Green Belt, provided that the development would preserve its openness and does not conflict with the purposes of including land within it. Local Plan policy LP60 states that the conversion or re-use of permanent and substantial buildings in the Green Belt will be acceptable provided that the scheme does not introduce incongruous domestic characteristics and the design and materials are to a high standard.

The two buildings in question are both permanent buildings, constructed in stone and dating from the 19th century and early 20th centuries.

Greenbelt openness would be preserved in that the garden to plot one would be in a discreet enclosed paddock bounded by mature trees along its northern and western boundaries and the barn buildings to the east. The area is already in use as a dog exercise area and for storage in association with the kennels. The presence of the trees means that the area is not visible when viewed from the bridleway and nearby public footpath. The modest garden to the south of unit two would also be screened from public vantage points by the site buildings and by vegetation growing along the length of the field boundary to the west.

The proposed conversion would not conflict in any way with the five purposes of the green belt (i.e. checking unrestricted urban sprawl, preventing towns from merging; safeguarding the countryside from encroachment; preserving the setting and character of historic town and assisting in urban generation). Consequently, this part of the proposals is fully compliant with paragraph 154 (h) of the NPPF and Local Plan policy LP60.

Paragraph 154 (c) allows for the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. The conversions include modest extensions to the existing buildings in order to deliver a good standard of housing amenity for future occupiers. The extensions are clearly not disproportionate to the original buildings, and the scheme is fully compliant with paragraph 154 (c) of the NPPF and Local Plan policy LP60.

New Build Houses

One of the most significant changes in the revised NPPF in respect of Green Belt policy is the clear and deliberate loosening of restrictions on the redevelopment of previously developed land.

Under the last iteration of the NPPF, the redevelopment of previously developed land was not inappropriate providing that it would not have any greater impact on openness. This like-for-like requirement has now been abolished. Instead, paragraph 154 part (g) now allows for the redevelopment of previously developed land which would not cause **substantial harm** to the openness of the Green Belt.

Furthermore, Local Plan policy LP59 (b) allows for the partial or complete redevelopment of existing brownfield sites provided that the extent of the existing footprint is not exceeded.

The definition of previously development land is *'Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed.'*

The site of the modern stable buildings and its surrounds is clearly previously developed land. The buildings have been used for the keeping of horses for many years. The area of the stables, hard surfaced external area and the access track all comprise developed areas of land. A study of aerial photographs shows that the use and physical building/engineering operations have all been in situ for well over 10 years. They are therefore clearly lawful.

The shift from “no greater impact” to “no substantial harm” has been explained in the attached Legal Opinion of Freddie Humphreys, Kings Chambers (13 May 2025), which confirms:

“...the exemption under 154(g) is now much broader... Development on previously developed land in the Green Belt can now only be considered inappropriate if it causes substantial harm to openness... substantial harm is a very high policy threshold – there is no higher threshold in the NPPF.”

Substantial harm is a deliberately high threshold. There can be no doubt that the change in this respect has been made in order to allow for more housing development on previously developed sites in the Green Belt. There is no longer any policy requirement for arbitrary volumetric calculations between the existing and proposed developments.

The existing site already affects the openness of the Green Belt through the presence of the stable buildings, associated hardstanding, horse walker and the storage of horseboxes, trailers and related equipment. The buildings are large and visually dominant. Their design and materials of construction lack coherence and are unsympathetic to the local vernacular. These features, together with the general activity associated with the equestrian and hunt meet use, result in a level of visual and physical encroachment. The massing of the new

dwelling would be substantially smaller than the existing sprawling buildings and they would occupy a smaller footprint. As a result, there is considerable enhancement to the appearance of the site when compared to the existing haphazard and incongruous nature of the existing structures.

The site benefits from an established access track that runs discreetly along a field boundary. This will be retained and reused, ensuring there is no additional impact on openness or local character. Vehicle movements associated with two dwellings is likely to be less than those currently generated by 17 livery stables.

The proposed dwellings have been carefully designed to integrate with their surroundings and to ensure they would not substantially affect the openness of the Green Belt. Their modest scale; location set back from the building line of the original farmhouse; simple massing and use of natural, appropriate materials ensure that they will be discreet and well related to the established group of buildings.

The site and its surrounding field system also benefits from a sense of containment in the wider landscape provided by mature woodland areas to the south (Blacker Wood) to the north (trees along Nineclogs Dike) and also to the east, which all serve to limit wider views. The presence of the intervening farmhouse and traditional barns to the west along with trees along the roadside verge mean that there would be no views of the dwellings from Park Lane.

In conclusion, when compared to the existing situation, the proposals would most certainly not breach the substantial harm threshold. In fact, by virtue of their smaller footprint, appropriate local materials and the creation of green garden space in an area currently given over to hardstanding and storage, the proposals would improve the overall sense of openness.

Recent appeal decisions issued since December 2024 confirm that even where proposals increase built form, they have not been found to cause substantial harm where effects are moderate, localised, or visually contained and the high threshold that substantial harm entails.

For example, appeal reference APP/J1535/W/24/3345568 considered the issue of whether substantial harm to Green Belt openness would be caused by the introduction of a dwelling

house on a site that does not contain any existing buildings, and is directly relevant to the current proposals. The Inspector noted:

“The site is largely devoid of any buildings or structures, but includes an area of hardstanding comprising the foundations of the former building and is enclosed by timber fences. Consequently, any new buildings would have a significantly greater impact on the spatial openness of the Green Belt than the existing development. Nevertheless, the single storey dwelling would have a modest footprint and would have a low ridge height. Whilst the dwelling be more visible than the existing development at the site, the presence of the neighbouring properties and the established hedgerow to the rear of the site would limit the visual effect on the openness of the Green Belt.

The dwelling would be located within the context of the surrounding development, which is enclosed from the surrounding open fields by a hedgerow and mature trees. While the development would be visible from outside the site, the proposal would be largely visually contained and would not unacceptably impact the function and purpose of the Green Belt.

Accordingly, although the proposal would harm the openness of the Green Belt, the adverse effects would be moderate. The proposal would therefore accord with Paragraph 154 g) of the Framework.”

On this basis, applying the revised policy test in paragraph 154(g) and the interpretation set out in the Kings Chambers Opinion, any impacts would be low at the most, and so the development will not give rise to substantial harm to openness. It therefore constitutes appropriate development in the Green Belt and is acceptable in principle.

Sustainability

The application site is not within a settlement. However, once the end of the approach drive is reached, it is around 800m (10-12 minute walk) to the centre of Skelmanthorpe and its range of facilities including supermarkets, shops, pharmacy, post office, library and pubs. There are frequent bus services from Skelmanthorpe to Huddersfield and surrounding villages as towns. Consequently, despite its countryside location, the site cannot be considered to be remote.

Crucially the development will result in fewer private vehicle trips to and from the site overall. Use of the site for 17 livery stables and a hunt yard including the keeping of around 30 dogs generates significant numbers of vehicle trips by horse owners, vets, farriers, feed deliveries etc. Typically, a horse owner visits twice per day per horse. Hunt meets are also held at the site which means large groups of people converge on the site by car. Overall, the number of trips generated by the proposed five dwellings is highly likely to be less than the current use, if it were operating at full capacity (which it could at any time). Consequently, the development will result in a reduction in the need to travel by car overall.

Heritage Assessment

This section of the report provides an assessment of the significance of the heritage assets that could be affected by the proposed development, and of the impacts that development could have upon them.

This assessment satisfies the requirements of policy LP63, and the requirements set out in paragraph 200 of the NPPF.

In compiling the Heritage Statement, the Historic Environment Record (HER) has been consulted via the Heritage Gateway platform . Relevant information has been used to inform the assessment of significance and the impact the development would have upon the heritage assets.

The assessment of significance follows the guidance and principles contained in Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets.

The HER returned no records within 250m of the site.

The site is a historic farmstead complex. The 1854 Edition OS map shows an L-shaped building on the site, but this is to the north east of the existing U-shaped barn and farmhouse and so appears to be a building that is no longer standing.



Figure 4: 1854 Edition OS map

By 1907, the northerly and westerly wings of the U-shaped range were in situ (see Figure 5 below) as well as a detached building later to become incorporated into a return structure on the southerly wing. The farmhouse is also present.



Figure 5: 1907 OS Map

The single storey outbuilding to the north appears by 1959 so dates from the early 20th century. The southern wing of the U-shaped building is also completed during this time.

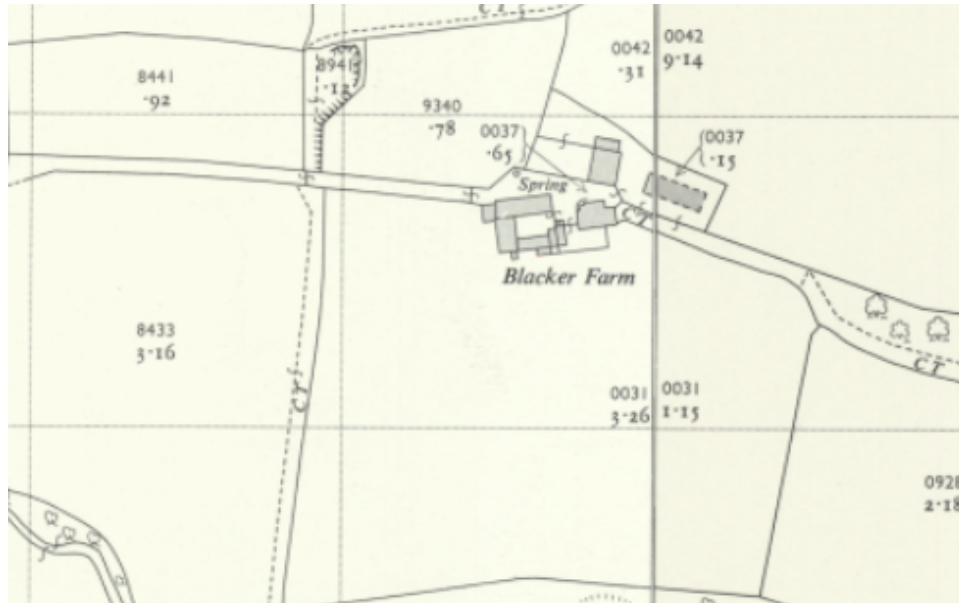


Figure 6: 1959 OS map

It is clear therefore that the U-shaped range developed incrementally from the late 19th century through to the mid-20th century.

The significance of the building derives primarily from its historic interest as an example of a U shaped or 'regular courtyard' farm layout, that were often marks of higher status of estate-managed farming in this area. This is borne out by the finely tooled stone seen in particular on the northern wing. They evolved to provide a sheltered, secure central yard for the protection of livestock from harsh weather and the layout optimised functional efficiency. Its incremental development in response to changing demands adds to its significance. The building group holds value due to its connection to past lives and periods. **Historic Interest: Low.**

It also displays architectural interest as an example of a vernacular building constructed to suit local farming needs. There have been unsympathetic alterations to the buildings including the infilling of large cart openings, and what appear to be alterations to the southern section of the roof of the westernmost wing to create a mono-pitched element. **Architectural Interest: Low.**

Overall, the U-shaped barns as a group are considered to be non-designated heritage assets of low significance, based on its local historic and architectural interest.

The single storey building to the north was constructed in the early 20th century. It has a wider gable and a shallower roofpitch than the older buildings and the stonework is not as fine. A substantial part of the front (east) elevation has been altered and re-built.

Consequently, although it is built in a vernacular style with local materials, this building does not contain enough heritage significance to warrant consideration as a non-designated heritage asset. It is nonetheless as highlighted above, a substantial and permanent structure and its conversion is wholly compliant with Local Plan policy and the NPPF.

In terms of the impacts of the proposed conversion scheme, the northerly wing of the U-shaped range, which is the oldest section will be converted within its shell. The large, infilled cart opening of the north elevation would be re-opened and glazed to more accurately reflect its former function. Some new window openings would be inserted but they would reflect traditional picking hole windows in terms of their size and proportion.

The southerly wing would see the most change, with a second storey added. As outlined above this element of the building is much later, dating from the early 20th century and so is less sensitive to change. The proposed raising of the roof and insertion of windows, particularly on the south elevation would however cause some 'less than substantial harm' to the building group.

The westerly wing was present by 1907 but has been subject to alteration. Consequently, in this context the proposed modest raising of the roof and the glazing of the west elevation would cause 'less than substantial harm,' but at a relatively low level.

The two new build dwellings are spaced well away from the U-shaped barns (approximately 30m) and are on the opposite side of the farm house. Consequently, their presence will not cause harm to the setting of the barns.

Overall, the scheme would cause less than substantial harm to the heritage significance of the building group, but this harm is outweighed by public benefits, which involve providing a

long-term viable use for the buildings that will secure their longevity and delivering much needed new housing.

Design and Amenity

National policy attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Local Plan policy LP24 reiterates the importance of good design, as does the Council's Housebuilders Design Guide SPD.

The conversion of the single storey barn to the north will be a sensitive scheme that conserves the vernacular style of the building. A modest extension off the north gable will follow the roof line and form of the host building. The modest raising of the roof height to provide accommodation within the roof space will not detract from the overall character of the building and materials of construction will be matching. The garden will be in a visually enclosed existing paddock which will ensure that the setting of the building is not overtly domesticated.

Account has been taken of the Council's Housebuilders Design Guide in drawing up the scheme for the two new build dwellings. They will have a simple gabled design with traditional dual pitched roofs that will complement the surrounding built form. They will be set back and away from the principal elevation of the historic farmhouse so that they do not compete with it visually. A simple palette of materials will maintain a coherent identity across the site.

The dwellings will have sufficient internal floor space to meet basic lifestyle needs and provide high standards of amenity for future occupiers.

The more contemporary fenestration details on the dwelling on plot 5 aligns with the SPD which states that contemporary designs are welcomed where they are appropriate in the site context. The glazing will maximise solar gain, and will not be visible from public vantage points.

The development therefore accords with the NPPF and with Policy LP24, delivering high-quality dwellings that respond positively to their setting.

Policy LP24 of the Local Plan goes on to state that developments should provide a high standard of amenity for future and neighbouring occupiers. Principle 6 of the Design Guide SPD advises that residential layouts must ensure adequate privacy and maintain high standards of residential amenity, to avoid negative impacts on light, outlook and to avoid overlooking.

There are no neighbouring residential properties in proximity of the site. The siting and orientation of the new build dwellings has been carefully considered to avoid overlooking, overshadowing, or loss of privacy between each other, the main farmhouse and the barns to be converted. The properties would have garden space that is proportionate to the size of each dwelling.

Three and four-bedroom family homes with generous amenity provision are a valued part of the local housing mix, particularly in rural areas of the district, and this proposal would make a positive contribution in meeting that need.

In summary, the development would deliver a high-quality living environment for future occupiers and would have no adverse impact on the amenity of neighbouring land or buildings. The proposal is therefore considered to be fully compliant with relevant Local Plan policies in respect of residential amenity.

Highways

Policy LP21 of the Local Plan seeks to ensure new developments can be safely accommodated on the surrounding highway network. The Kirklees Highway Design SPD provides further guidance. The application is supported by a highway statement from Paragon Highways. This sets out that safe and suitable means of access is to be provided, and that the development would result in no harm to highways safety and efficiency. The proposal is fully policy compliant in this regard.

Ecology and Biodiversity Net Gain

Policy LP30 Local Plan requires that development result in no significant loss or harm to biodiversity through avoidance, adequate mitigation or, as a last resort, compensatory measures and should minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist.

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) have to deliver at least 10% biodiversity net gain.

A comprehensive Ecological Impact Assessment has been undertaken by Middleton Bell Ecology, and is submitted separately. A BNG metric and an enhancement plan have also been prepared.

The EIA sets out the potential ecological impacts and concludes that the proposed development will result in an increase in the amount of green space within the red line boundary and the quality of the habitat available for the wildlife present within the local area. The mitigation and enhancement measures proposed have the potential to result in a slight net gain for bats with a neutral effect for other protected and notable species and no tangible impact on other ecological receptors.

The BNG on site enhancement that forms part of the development proposals will deliver a 13% gain in Habitat Units and a 64% gain in Hedgerow Units. This is comfortably above the statutory 10% net gain.

The development is fully policy compliant in respect of Ecology and BNG considerations.

Flood Risk

The application site is within flood zone 1 as identified by the Environment Agency so is not at undue risk of flooding. The site is below the size at which a flood risk assessment would be required for development not in zone 2 or 3. The applicant would be happy to accept a condition to agree details of surface water outfall to a soakaway.

Affordable Housing

Policy LP11 requires that all developments of over 10 new homes should contribute to affordable housing provision. Given the scale of development the threshold is not exceeded. The proposal therefore complies with policy LP11.

Contamination and Coal Mining

Local Plan policy LP53 states that development on land that is unstable or is suspected of being contaminated due to its previous history or geology will require the submission an appropriate contamination assessment.

As a result of its previous use, and issues such as the potential for asbestos within the stable building and the proximity of coal seams, a Phase 1 Geo-Environmental Report (including a coal mining report) carried out by JNP Group is submitted with the application. It concludes that the potential site conditions provide a MEDIUM to LOW environmental risk and hence further investigation, and assessment is required in the form of intrusive testing works, and a building survey to determine asbestos containing materials. These requirements can be dealt with by planning conditions

The report also provides a Coal Mining Risk Assessment which sets out appropriate investigation and remediation measures to ensure the site can be developed safely in respect of coal mining legacy. The report sufficiently outlines the potential risks and mitigation measures. The further investigation and any necessary mitigation can be secured by condition.

7.0 CONCLUSION

The site is previously developed land within the Green Belt. In light of the revised policy test in paragraph 154(g) of the NPPF, the proposed new build dwellings would not cause substantial harm to openness and therefore constitute appropriate development in the Green Belt. In fact, the scheme would result in an improvement to openness by the removal of the industrial scale stable building and replacement with buildings of a smaller scale and massing and on a reduced footprint.

The proposed conversions are wholly in accordance with paragraph 154(h) of the NPPF. Any 'less than substantial harm' to non-designated heritage assets is offset and outweighed by the public benefits of providing a viable use that will secure the long-term conservation of the buildings and delivering much needed new housing.

Residential amenity is safeguarded. The supporting highway statement demonstrates that the proposal can be safely accommodated on the local network. Contamination and coal mining legacies can be dealt with by condition and trees would be protected.

Taken as a whole, the proposal accords with the relevant provisions of the NPPF and the policies of the Local Plan, delivering high-quality dwellings without giving rise to adverse impacts. Planning permission should therefore be granted.

The Applicant is willing to discuss any issues that may arise during the consideration of the proposal with the LPA.