

Date of Meeting	7 th April 2016
Application Number	15/10727/FUL
Site Address	Emmotts Farm Grimstead Road West Grimstead SP5 3RQ
Proposal	Alterations, extensions, and conversion of existing Staddle Stone barn and attached stable to form three bedroom dwelling with creation of associated garden. Alterations and extension of Victorian barn to create stables, garaging and workshop. Associated works including removal of lean-to structures within yard area
Applicant	Miss Hayley Clark
Town/Parish Council	GRIMSTEAD
Electoral Division	ALDERBURY AND WHITEPARISH – Cllr. Richard Britton
Grid Ref	420803 126698
Type of application	Full Planning
Case Officer	Becky Jones

Reason for the application being considered by Committee:

Officers do not have delegated powers to determine the application which has been made by a member of planning staff and where an objection has been received.

1. Purpose of Report

To consider the above application and the recommendation of the Area Development Manager that planning permission be **APPROVED** subject to conditions.

2. Report Summary

The main planning issues to consider are:

- Principle of development
- Scale, design and impact on the character of the Grade II listed Staddle Stone Barn and other designated heritage assets
- Impact on the Special Landscape Area
- Ecology, archaeology and drainage
- Impact on highway safety and public right of way

- Impact on neighbouring amenities and public protection
- Community Infrastructure Levy

The application has generated 1 letter of no objection from Grimstead Parish Council and 2 letters of support. One letter of objection was received under the accompanying listed building application which raises issues to be considered as part of this planning application regarding the impact on the Staddle Stone barn. There are no proposed alterations to the existing means of access through an existing gateway into the farmyard.

3. Site Description

The site comprises three barns at Emmotts Farm, West Grimstead which are centred around a main farmyard and the farmhouse known as Emmotts Farm. Two of the barns are Grade II listed (Hay Barn and Staddle Stone Barn) and the other barn (Victorian Barn) is curtilage listed as part of the Grade II listed Emmotts Farm. The site is not located within a Conservation Area. The farm is currently used for the keeping and riding of horses and other small scale farming activities.

The Staddle Stone barn is currently used for general storage and a chicken house. To the east and north of the barn are unstable lean to structures and an attached, modern structure used as stables and a workshop.

The Hay Barn is used for this purpose and is not affected by the proposals.

The Victorian Barn comprises storage and workshop areas and was originally the dairy. It has an attached lean to structure adjacent to the Hay Barn. To the south is a garage which would continue to serve the farmhouse.

The farm is accessed at the end of a short length of track which is a public footpath known as Macks Lane (GRIM21) heading north from Grimstead Road. It passes the site to the east and links Grimstead Road with Crockford Road to the north.

4. Planning History

15/10868/LBC	Alterations, extensions and conversion of existing staddle stone barn and attached stable to form three bedroom dwelling with creation of associated garden. Alterations and extension of Victorian barn to create stables, garaging and workshop. Associated works including removal of lean-to structures within yard area
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5. The Proposal

The applicant is proposing to alter, extend and convert the existing Staddle Stone barn and attached stable to form a three bedroom dwelling with a garden area. The Victorian barn would also be altered and extended to create stables, garaging and a workshop, as part of the new residential curtilage. Associated works include removal of modern lean to structures in the yard. Access to the dwelling would be from the existing farm access, which has been used to access the farm for more than 20 years. Foul drainage would be to a package treatment plant, as the levels on the site require pumps and a pump chamber.

Materials include:

- Salvaged plain clay tiles for the Staddle Stone barn roof.
- Natural slate for lean to extension and stable conversion, proposed garage, stables and workshop
- Timber feather edge boarding for wall cladding.
- Handmade bricks to blend with yard wall for plinth walls.

- Painted hardwood timber windows. Unfinished green oak to breakfast room frames.
- Repairs to Victorian barn roof. Timber feather edge boarding to walls. Handmade bricks for plinth and panels. Retain east elevation cladding.

The following documents have been submitted:

- Planning, Design and Access Statements
- Heritage Statement
- Structural Viability Report
- Bat Survey with evening emergence and dawn return surveys.
- Additional ecological response.

6. Local Planning Policy

National Planning Policy Framework (NPPF) and NPPG

Conserving and enhancing the natural environment

Wiltshire Core Strategy (WCS):

Core Policy 1: Settlement Strategy

Core Policy 2: Delivery Strategy

Core Policy 48: Supporting Rural Life

Core Policy 50: Biodiversity and Geodiversity

Core policy 51: Landscape

Core Policy 57: Ensuring high quality design and place shaping

Core Policy 58: Ensuring the conservation of the historic environment

Salisbury District Local Plan (SDLP)

C6 Special Landscape Areas

This SDLP policies is a saved policy of the adopted Wiltshire Core Strategy (Appendix D)

Planning (Listed Building and Conservation Areas) Act 1990

Section 66: Special considerations affecting planning functions

**The Conservation of Habitats and Species Regulations 2010,
EC Habitats Directive when as prescribed by Regulation 3(4) of the Conservation
(Natural Habitats, &c.) Regulations 1994 (as amended).
Circular 06/2005**

7. Summary of consultation responses

Drainage – No objection subject to conditions

Rights of Way – Informatives required.

Contamination – no objection

Public Protection – no objection subject to occupancy condition

Archaeology – no objection subject to conditions

Conservation – no objection subject to conditions

Ecology – no objection subject to conditions

Highways – no objection

8. Publicity

The application was advertised by site notice, press advert and neighbour consultation.

2 letters of support were received:

- Support for using disused building and help fill a need for village housing.
- Satisfied with the proposed design and materials which will blend well with their surroundings and do much to enhance the village.

1 letter of objection was received (representing Wiltshire Archaeological & Natural History Society – WANHS and Agent for the Council of British Archaeology (CBA) under the accompanying listed building application which raises issues to be considered as part of this planning application. These issues are considered by the Conservation Officer under impact on the Grade II listed building.

9. Planning Considerations

Planning permission is required for the development. The applications must be determined in accordance with the development plan unless material considerations indicate otherwise. (Section 70(2) of the Town and Country planning Act and Section 38(6) of the Planning and Compensation Act 2004). The NPPF is also a significant material consideration and due weight should be given to the relevant policies in existing plans according to their degree of consistency of the framework. (Paragraph 215 at Annex 1).

Principle of development

The proposal seeks to convert a Grade II listed barn to a 3 bed dwelling. The site lies in the countryside of the Special Landscape Area, in an Area of Special Archaeological Significance, in the north of West Grimstead.

The *principle* for this development can be considered under *three* relevant strands of policy:

- Core Policy 2 and development within small villages
- Core Policy 48 conversion and reuse of redundant rural buildings, and
- NPPF policies in relation to designated heritage assets

i) Core Policy 2 and development within small villages:

The Settlement Strategy (Core Policy 1) identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire. Core Policy 24 identifies West Grimstead as a small village where the settlement boundary has been removed. The settlement boundary (or defined limit of development) for West Grimstead has been removed and the Delivery Strategy set out in Policy CP2 specifically states:

Outside the defined limits of development: Other than in circumstances as permitted by other policies within this Plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.

However, West Grimstead is also defined as a small village and Core Policy 2 provides further detail in this respect:

At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:

- i) Respects the existing character and form of the settlement*
- ii) Does not elongate the village or impose development in sensitive landscape areas, and*
- iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement.*

Whilst West Grimstead does not have a settlement boundary, the site does comprise an existing group of agricultural barns which are part of an existing farm. Whilst it could be debated whether or not Emmotts Farm itself lies within the “built area” of West Grimstead, officers consider that the proposed conversion of the *existing* barns would not result in a new building in the countryside and so would not be in conflict with the criteria of CP2, as the resultant conversion would respect the existing character and form of the existing settlement and would not elongate the village or impose development in a sensitive landscape area. For this reason, the proposal is not considered to be in conflict with CP2.

ii) Core Policy 48 conversion and reuse of redundant rural buildings:

Core Policy 48 seeks to support rural life and states:

Conversion and re-use of redundant rural buildings

Proposals to convert and re-use redundant rural buildings for employment, tourism, cultural and community uses will be supported where it satisfies the following criteria:

- i. the building(s), is/are structurally sound and capable of conversion without major rebuilding, and only modest extension or modification which preserves the character of the original building; and*
- ii. the use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas; and*
- iii. the building can be served by adequate access and infrastructure; and*
- iv. the site has reasonable access to local services;*
- v. the conversion or re-use of a heritage asset would lead to its viable long-term safeguarding*

Where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria. In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances, in line with national policy.

CP48 would therefore be applicable to the application as the proposed residential conversion affects two Grade II listed barns and a curtilage listed Victorian barn. A structural report has been submitted in respect of criteria (i) and confirms that, “*The buildings can be converted to their proposed future usage with very little loss of historic fabric, and that there is considerable long term benefit to the fabric as it will be repaired and protected from further gradual deterioration that the current use inevitably allows.*”

In considering the residential use of the Staddle Stone barn, alternative employment, tourism or cultural uses on this site would need to be considered to be acceptable. There are a number of reasons why such uses would not be considered suitable for the site:

- Proximity to other residential dwellings, particularly Emmotts Farmhouse itself, neighbouring dwellings and potential for disturbance from noise and activity, contrary to criteria (ii).
- Other uses resulting in an increase in vehicles negotiating the highways junction would be likely to attract an adverse highway recommendation, contrary to criteria (iii).
- The farm is currently used for the keeping and riding of horses and other small scale farming activities. Any uses for the barns sited in such close proximity to the farm use would normally generate public protection issues under Core Policy 57. Provided the resultant residential use is tied to the existing farm and equestrian uses, public protection are satisfied with the proposed use (see amenity section). It would be unreasonable for a tourism, cultural or employment use could be tied in this way.

In conclusion, a residential use that is tied to the equestrian/farm use is considered to be the most suitable use for the listed barns under the terms of CP48.

iii) NPPF policies in relation to designated heritage assets

In considering designated heritage assets, the NPPF states:

129. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage assets

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

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness, conservation and any aspect of the proposal.*

132. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

134. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

In conclusion, the principle of the development is subject to the detailed considerations required by the above policies. However, subject to the details being satisfied, the proposed residential conversion of the Grade II listed barn subject to its occupancy being tied to the existing farm/equestrian use, being would be considered to be sustainable development in terms of the Wiltshire Core Strategy Policy CP2, CP48 and the NPPF policies for the conservation of heritage assets.

Scale, design and impact on the character of the Grade II listed barn and other designated heritage assets

Core Policy 57 sets out the design criteria for new development and states:

A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire...

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The Conservation policies of the Core Strategy and the NPPF seek to ensure that the existing character of the listed building and the settings of nearby listed buildings would not be harmed and the existing character of the Conservation Area would be preserved or enhanced. The NPPF states:

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include Listed Buildings and Conservation Areas.

The Conservation Officer has responded and suggested some conditions. In summary:

We have reports including a heritage impact assessment table and an engineer's report. I

welcome the retention of the larger barn as storage, the conversion of this building would be problematic.

Conversion of staddle barn: I welcome the removal of the lean-to structure abutting the east elevation of the staddle barn and south elevation of the stables (see photo fig 5 of historic report). I concur with the assessment that it is of no significance.

Issue of repairs necessary to facilitate conversion: As is typical with such applications, we don't know the precise extent of repairs (or which timbers) until the building is gently picked apart (although Andrew Waring's report does say that the structural timbers are generally in good condition but joists are in poor condition). As with the barn next door, I recommend that we have a condition requiring a detailed examination of the timbers once there has been some limited opening up, with a schedule submitted to us for approval highlighting where timbers are to be replaced (and with what); where there are to be repairs (ie scarfed on resin or what?). Also I note that the section drawing talks about replacing the timber floor and floor joists. Mr Waring's report says that the grillage You might want to look at the condition attached to the application at Rowden's Farm 15/00153/FUL.

At the moment there is a combination of a brick plinth and staddle stones. The staddle stones will be reset on new concrete pads. I have no objection to this, as this is standard practice in relation to staddle barns undergoing a change of use. There is no impact on character or historic fabric (the staddle stones being retained and reset).

Conditions relating to the staddle barn are suggested, relating to a repairs schedule for timber framing, samples for timber cladding and clay roof tiles, further details of glazed balustrades (south and west elevation), clarification regarding rooflights and eaves detail (including guttering).

Garage/stable building: This is referred to as the Victorian barn in the historic report. It is of some interest as part of the group but little in its own right. I have no objection to the proposed changes although I would want a condition to cover any new timber cladding and new roofing materials.

One letter of objection was received to the accompanying listed building application as follows:

- The changes to all the buildings cannot be considered as there is no detailed historical context of the property as a whole by which to make an assessment.
- The proposed changes to the staddle stone barn are deceptive as it actually destroys the total concept a structure mounted on staddle stones.
- The proposal entails removing the staddle stones and re-positioning them so that they no longer support the barn but a positioned to be but a "visual memory" of the original.
- Previous work is evident where the staddle stones have been built into a wall to support the original timbers and it is unclear how this "modification" is to be treated.
- The installation of an under-croft further destroys the original concept of the staddle stone barn, few of which survive in Wiltshire of this size.
- With the potential loss of such a key listed structure, a detailed historic record of all the buildings and their relationship should be made.

- This application concerning the destruction of the staddle stone barn should not be approved.

In response, the Conservation officer noted:

1. Has the objector not seen the historic report and heritage impact assessment?
This is a very thorough document and more than sufficient to establish the historic interest and significance of the complex.
2. The proposals retain the staddle barn on staddle stones. The staddle stones are reset and the partial brick plinth, which already exists, rebuilt but not extended. The building will read as a staddle barn thereby retaining character and preserving its significance.
3. The staddle stones will be repositioned in appropriate locations following underpinning. This is standard when staddle barns are upgraded.
4. The drawings show that the brick plinth later modifications (surrounding the staddle stones) will be rebuilt to replace existing.
5. We have a great number of staddle stone barns. That is not to say they are not important – this is a grade II listed building.
6. The staddle stone barn is not being destroyed. It is being repaired and re-used and the quality of supporting information suggests in a sensitive way.

In conclusion, subject to conditions, it is considered that the development would lead to less than substantial harm to the significance of the Grade II listed buildings, the curtilage listed barn, their curtilages and their settings, including the setting of Emmotts Farmhouse. The proposal would comply with Policy CP58 and the NPPF.

Impact on the character of the Special Landscape Area

The site lies within the Special Landscape Area and the development affects two listed barns and a curtilage listed barn. When considering the impact of the development on the landscape and the character of the area, Policy C6 has been saved:

Within the Special Landscape Area, proposals for development in the countryside will be considered having particular regard to the high quality of the landscape. Where proposals which would not have an adverse effect on the quality on the landscape are acceptable, they will be subject to the following criteria;

- (i) the siting and scale of development to be sympathetic with the landscape; and*
- (ii) high standards of landscaping and design, using materials which are appropriate to the locality and reflect the character of the area.*

Core Policy 51 states that Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures.

The site plan below shows the extent of the works within the landscape. The site is well screened and there is a belt of existing trees and vegetation to the west of the site that would be retained. The removal of the lean to extension to the north of the Hay Barn is likely to improve the visual impact of the site from the north. Views from the west would be limited by the existing trees and planting on this boundary. Views from the south would be against the context of Emmotts Farmhouse and a significant belt of trees and planting on the south boundary of Crossways House.



Landscape setting



View from Grimstead Road looking north

In conclusion, the development is considered to comply with Policy C6 and CP51 as the siting and scale of development would be sympathetic with the landscape and the proposals demonstrate high standards of design, using materials which are appropriate to the locality and reflect the character of the area. There is unlikely to be any significant visual impact arising from the conversions on the character of the landscape or the immediate locality.

Ecology

Although protected species are not specifically mentioned in the NPPF, the NPPG sets out guidance and the ODPM circular 06/2005 still applies and is listed under current policy and guidance on the planning portal. Paragraph 99 states “It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances.

Core policy 50 states: Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

The ecologist initially objected on the grounds that the bat survey appeared to be insufficient for several reasons. Either a full justification for the methodology used or further surveys would need to be provided before determination. A full response to this objection and the reasons cited by the ecologist was received from Chalkhill Environmental Consultants, addressing each point and is attached at Appendix 1.

The ecologist responded: *I can confirm that the additional information from the applicant's ecologist is acceptable and overcomes my objections to the application with regard to roosting bats. However, I am still concerned about the lack of mitigation for the loss of a large number of swallow nests and I recommend that mitigation should be provided for approval **before determination** of this application (see birds section below).*

Bats: Details of lighting should be submitted for approval as a condition of planning consent to ensure that the Natterer's bats and Common pipistrelle bats using the hay barn can continue to use the site. Natterer's bats are particularly light sensitive.

I recommend that provision for roosting bats be provided within the converted buildings as a biodiversity enhancement (retention of existing potential for roosting bats) and conditioned as part of planning consent. This provision could be allowing access into the loft space or roof space of the converted buildings, by incorporating battens to allow bats access beneath the timber cladding or by incorporating integral bat tubes/bricks/boxes into the walls (retrofitting is possible). Details of bat roost provision can be provided as a condition of planning consent in this instance, as it would be an enhancement.

*Birds: In summary, the information on swallows from Gunnell, Murphy and Williams (2013) *Designing for Biodiversity – a technical guide for new and existing buildings* 2nd edition, RIBA Publishing is: Swallows require access to the interior of a building with a gap of at least 70mm (width) by 50mm (height) and a nesting platform of at least 260mm (width) by 100mm (depth). Precast nests are available or nesting platforms can be made. These should be placed on a ledge inside a building at least 2 metres above the ground where droppings will not be a nuisance. Swallow nests should not be placed close together. Nesting areas could be provided in garages, outbuildings or possibly under very deep eaves such as the Richard Green Ecology 'eaves/ridge overhang swallow nest box' example (see more details on <http://www.richardgreenecology.co.uk/news?blogEntry=35>).*

I recommend that in this instance, due to the high number of nests likely to be affected by the proposed development, that the mitigation for swallows be provided before determination of this application to ensure that an adequate level of mitigation (no. of nesting sites) can be achieved.

The applicant then submitted a further plan of elevations for the Victorian barn to show a proposed access for the Swallows via a louvered opening which replaces the clerestory window. This would be in addition to the open eaves which are currently used by Swallows when the barn doors are not open. The opening sizes accorded with the suggested dimensions from the ecologist. The ecologist concluded:

I am satisfied with the proposed provision for swallows in terms of access into the converted barn as shown on the plan submitted. I am also satisfied that swallows would be able to continue to access the roof space of the converted barn, as depicted in the plan submitted with photographs on 11th February 2016 by the agent, Simon Lock. Development must be carried out in accordance with these designs for swallows as a condition of planning consent.

No conservation objection was raised to the proposed mitigation for the Victorian barn.

In conclusion, there is a possibility of some impact on protected species arising from the development. However, the proposed mitigation measures would make any potential impact insignificant as a material consideration for refusal of the scheme. Conditions requiring provision for roosting bats within the converted buildings would be a biodiversity *enhancement*, with the retention of existing potential for roosting bats. Swallows would be able to continue to access the roof space of the converted barn, as depicted in the submitted details. No objection is raised to the proposed ecological mitigation, in accordance with Core Policies 48 and 50, the guidance in the NPPG and the ODPM circular 06/2005 and the EC Habitats Directive.

Archaeology

Core Policy 58 aims to ensure that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life. Heritage assets include Listed Buildings and Conservation Areas.

The Archaeologist stated:

This site is of archaeological interest. The Historic Environment Record (HER) describes the farmstead itself as of at least 17th century date and the field to the east is recorded as part of the historic core of West Grimstead, which dates back to at least the medieval period.

The National Planning and Policy Framework (NPPF) contains the following Policy: "128. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

The heritage assessment which accompanies the application does not appear to specifically address the potential for below ground remains. However, the likely new footprint of impact appears to be small and so I consider its focus on the above ground heritage assets to be proportionate. I do not consider a field evaluation to be necessary.

The NPPF also says: 141. Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

It is therefore recommended that a programme of archaeological works in the form of an archaeological watching brief is carried out as part of any development. The applicant should be aware that, if archaeological remains are encountered, this may have an effect on their programme of works. If human remains are encountered during the works, they cannot be removed without the appropriate permissions.

Drainage

The NPPG states: *If there are concerns arising from a planning application about the capacity of wastewater infrastructure, applicants will be asked to provide information about how the proposed development will be drained and wastewater dealt with. Applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment.*

The site is in Flood Zone 1 and according to Environment Agency maps, is not at risk of surface water flooding. The applicant has stated that although Emmotts Farmhouse is connected to the mains sewer, a treatment plant has been proposed due to the site levels requiring pumps and a pump chamber. The drainage officer has considered the proposals and raised no objection to the principle of the development.

Impact on highway safety and public right of way

The highways officer stated:

The access road serving Emmotts Farm is of restricted width, although it only appears to serve two other properties. The farm would have generated a level of vehicle movements which will be replaced by those associated with the proposed residential dwelling. I note from the comments made by Rights of Way that it is not certain whether vehicular rights exist for Emmotts Farm and this must be clarified by the applicant.

I do have some concern regarding the junction of the access road with Grimstead Road. Visibility from the right hand arm of the junction is poor. However, there is an alternative and the sight line is far better from the left hand arm. Any users of the junction would be likely to emerge using the safest route. On balance I would not wish to object on highway safety grounds.

The site is located outside of the village policy limits and is remote from facilities to meet the everyday needs of any future residents. The proposed development could therefore be considered as contrary to local and national sustainable transport policy guidance, in particular Core Policy 60 and Core Policy 61.

The proposed parking and turning arrangement is acceptable and if you are minded to approve the proposal, I would have no highway conditions to add.

The rights of way officer advised that the property would be accessed by a public footpath known as Macks Lane (GRIM21). This is not recorded as a public vehicular highway. The only recorded public rights along it are on foot. In order to drive a vehicle along Macks Lane, the new householder would need to have a demonstrable private right of vehicular access and it is an offence to drive along a public footpath without lawful authority.

The Wiltshire Council Rights of Way Team have received an application to upgrade the path to a byway which, when determined, could lead to the route being recorded as a restricted byway and accordingly the establishment of a private vehicular right.

The applicant has stated that Emmotts Farm has evidence of using the track for access to the farm in excess of 20 years. The Farm has been within the same family since 1901 and throughout this period, the track has been used for vehicular access to the farm, highlighting a long standing use of the right of way.

There are at least three existing vehicular accesses that can be seen along the length of the footpath, indicating use by cars. In some cases users may have a private vehicular right and in some not. Therefore an informative should be added to any permission to warn vehicular users that they do so at their own risk and to make them aware that if they do not have a vehicular right there is no guarantee that they will be able to continually access the property with vehicles. It should be added that the full width of the lane should be available at all times.

Officers have also discussed the sustainability of the site in highway policy terms and CP48. Consideration was given to the effect of the residential use being tied to the farm/equestrian business on the site and also possible alternative uses for the listed building (eg employment, community, tourism). Given the access restrictions to the site, officers concluded that that a dwelling tied to the farm business would be the preferred use of the building in highway policy terms and that any other use resulting in an increase in vehicles negotiating the junction would be likely to attract an adverse highway recommendation. In conclusion, having fully considered the issues relating to the sustainability of the site and the barn conversion in relation to policy, officers would recommend that no highway objection is raised to the proposal.

Impact on neighbouring amenities and public protection

Core Policy 57 states: A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through:

vii. Having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing; vibration; and pollution (such as light intrusion, noise, smoke, fumes, effluent, waste or litter)

Given the separation of the development from neighbouring properties, the use of rooflights, and levels of screening around the site, the proposal is not considered to cause harm to neighbouring occupiers in terms of overlooking, overshadowing, dominance or loss of light.

The public protection officer considered:

I write with reference to the above planning application which proposes to extend and convert existing stables and barn at Emmotts Farm, West Grimstead.

Ordinarily we would have significant concerns that noise and odour from the farming/stable activities on site would have an adverse impact on future occupants of the proposed property. However, as stated in the planning statement the proposed property is to be occupied by the applicant (owner of the farm/stables). Therefore, we would recommend that the proposed property is tied to the farm/stable business to prevent occupants not associated with the business moving in.

We would also recommend that conditions relating to construction times and burning of waste are attached to any planning permission granted to minimise disturbance to nearby residents.

With reference to contamination, the building being replaced is a raised barn so had no contact with the ground. For this reason the risk of contamination low and its use is also low risk.

Therefore, subject to the conditions described above being attached to the proposed development, appropriate levels of amenity are achievable within the development itself and no objection is raised under Policy CP57.

Community Infrastructure Levy

The Community Infrastructure Levy (CIL) is a charge that local authorities in England and Wales can put on new development in their area to raise funds to help deliver the infrastructure necessary to support this development. All development containing at least 100 square metres of new build is chargeable, although residential extensions which are built by 'self builders' are exempt from CIL.

An informative would be placed on any permission to advise the developer regarding CIL.

RECOMMENDATION: APPROVE subject to conditions:

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

The equestrian and agricultural farm yard and buildings as shown on plan 784-20-21 (and hatched in red) shall not be occupied at any time other than for purposes ancillary to the residential use of the main dwelling hereby approved, known as the Staddle Stone Barn, Emmotts Farm, Grimstead Road, West Grimstead SP5 3RQ. There shall be no subdivision of the planning unit.

Reason: To ensure that the residential property known as the Staddle Stone Barn is not occupied by anyone who is not associated with the existing farm and equestrian use at Emmotts Farm, in the interests of future amenities.

The development hereby permitted shall be carried out in accordance with the following approved plans listed in schedule:

Planning Statement October 2015, Pegasus Group, received 28/10/15
Design and Access Statement, Favonius Architects, received 28/10/15
Heritage Statement August 2015, Elaine Milton, received 28/10/15
Structural Viability Report 7463:01 14/4/15 received 28/10/15
Chalkhill Environmental Consultants, Bat Survey 578-15 15/16 July 2015, received 28/10/15
Response from Jan Freeborn, Project Ecologist, Chalkhill Environmental Consultants, received 11/1/16
Photos of Victorian Barn (stables) roof received 11/2/16 from Mr. S Lock
Site Plan, 784-20-05 Jul 2015, received 28/10/15
Block Plan, 784-20-07 Jul 2015, received 28/10/15
Location Plan, 784-20-06A Jul 2015, received 3/11/15
Drainage Plan, 784-20-19 Aug 2015, received 28/10/15
Ground Floor Plan, 784-20-01A July 2015, received 9/2/16
First Floor Plan and Roof Plan, 784-20-02 Jul 2015, received 28/10/15
Sketch Sections, 784-20-08 July 2015, received 28/10/15
Sketch Section C-C, 784-20-22 Feb 16, received 2/2/16
Typical Window Detail and Rooflight Detail, 784-20-11A, received 2/2/16
Stable Elevations, 784-20-04B Jul 15, received 14/3/16
Proposed Elevations, 784-20-03 Jul 2015, received 28/10/15
Door Details Utility Door D04, 784-20-09 Jul 2015, received 28/10/15
Door Details D05, D06, 784-20-14 Jul 2015, received 28/10/15
Door Details Breakfast Room French Door D03, 784-20-10 Jul 15, received 28/10/15
Door Details D01, 784-20-13 Jul 15, received 28/10/15
Door Details D02, 784-20-12 Jul 15, received 28/10/15
Stable Doors, 784-20-15 Jul 2015, received 28/10/15
Staddle Stone Barn and Extent of Associated Equestrian/Farm Yard, Buildings and Garden Area, 784-20-21 Dec 2015, received 3/12/15

REASON: For the avoidance of doubt and in the interests of proper planning.

No construction or demolition work shall take place on Sundays or Public Holidays or outside the hours of 07:30 to 18:00 Monday to Friday and 08:00 to 13:00 on Saturdays

Reason: In the interests of neighbouring amenities

No development shall commence within the area indicated (proposed development site) until:

- A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and
- The approved programme of archaeological work has been carried out in accordance with the approved details.

REASON: To enable the recording of any matters of archaeological interest.

The development hereby approved shall be carried out in accordance with the recommendations made in section 7 of the Bat Survey report dated 15/16 July 2015

prepared by Chalkhill Environmental Consultants, as already submitted with the planning application and agreed in principle with the local planning authority before determination.

REASON: To ensure adequate protection and mitigation for protected species.

Only low-height, downward directional and passive infrared sensor lights shall be used on the east elevation of the barn conversion (Staddle Stone Barn) and the western elevation of the converted stables/garages/workshop building (Victorian Barn) and no external lighting shall be installed to the southern elevation of the adjacent Hay Barn, unless otherwise agreed in writing with the local planning authority. No other external lighting shall be installed on these elevations without the prior approval of the Council's Ecologist.

REASON: To maintain the farmyard as a dark corridor for foraging/commuting Natterer's and Common pipistrelle bats using the Hay Barn, and to limit the amount of light spillage into the site that may affect other foraging/commuting bats using the site, including Brown long-eared bats.

Before development takes place, details of the provision of bat roosting features into the converted buildings shall be submitted to the local planning authority for approval, including a plan showing the locations and types of features. The approved details shall be implemented before the dwelling hereby approved is first occupied.

REASON: To provide additional roosting for bats as a biodiversity enhancement, in accordance with paragraph 118 of the National Planning Policy Framework.

The development hereby approved shall be carried out in accordance with the designs for swallows depicted in the drawing 784-20-04B Stable Elevations and the photograph submitted on 11th February 2016 by Mr. S Lock showing that swallows would continue to be able to access the roof space in the converted barn.

REASON: To ensure adequate protection and mitigation for protected species.

INFORMATIVES:

Archaeological work should be conducted by a professionally recognised archaeological contractor in accordance with a written scheme of investigation approved by this office and there will be a financial implication for the applicant.

The applicant is advised that the development hereby approved may represent chargeable development under the Community Infrastructure Levy Regulations 2010 (as amended) and Wiltshire Council's CIL Charging Schedule. If the development is determined to be liable for CIL, a Liability Notice will be issued notifying you of the amount of CIL payment due. If an Additional Information Form has not already been submitted, please submit it now so that we can determine the CIL liability. In addition, you may be able to claim exemption or relief, in which case, please submit the relevant form so that we can determine your eligibility. The CIL Commencement Notice and Assumption of Liability must be submitted to Wiltshire Council prior to commencement of development. Should development commence prior to the CIL Liability Notice being issued by the local planning authority, any CIL exemption or relief will not apply and full payment will be required in full and with immediate effect. Should you require further information or to download the CIL forms please refer to the Council's Website

www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/communityinfrastructurelevy.

Please note that this consent does not override the statutory protection afforded to any protected species. All British bat species are protected under The Conservation of Habitats and Species Regulations 2010 (as amended), which implements the EC Directive 92/43/EEC in the United Kingdom, and the Wildlife and Countryside Act 1981 (as amended). This protection extends to individuals of the species and their roost features, whether occupied or not. If bats are discovered, all works should stop immediately and a licensed bat worker should be contacted for advice on any special precautions before continuing (including the need for a derogation licence from Natural England). Please also be advised that works should not take place that will harm nesting birds from March to August inclusive. All British birds (while nesting, building nests and sitting on eggs), their nests and eggs (with certain limited exceptions) are protected by law under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000. If birds are nesting on/in or within the vicinity of the proposed development, work should be undertaken outside the breeding season for birds to ensure their protection, i.e. works should only be undertaken between August and February. Further advice on the above can be sought from the Council Ecologists.

The applicant's attention is drawn to the comments on the website made by the drainage officer regarding foul and surface water drainage and the use of the treatment plant.

Please be advised that nothing in this permission shall authorise the diversion, obstruction, or stopping up of any right of way in the vicinity of the site Macks Lane (GRIM21) forms the east boundary to the site.

The property would be accessed by a public footpath known as Macks Lane (GRIM21). This is not recorded as a public vehicular highway. The only recorded public rights along it are on foot. In order to drive a vehicle along Macks Lane, the new householder would need to have a demonstrable private right of vehicular access and it is an offence to drive along a public footpath without lawful authority. Vehicular users are warned that they do so at their own risk and should be aware that if they do not have a vehicular right there is no guarantee that they will be able to continually access the property with vehicles.

The developer would be strongly encouraged to ensure that the converted buildings meet either the "very good" BREEAM standard or any such equivalent national measure of sustainable building which replaces that scheme. Please refer to Core Policy 41.

Appendix 1: Additional Report
Jan Freeborn, Project Ecologist, CHALKHILL ENVIRONMENTAL CONSULTANTS,
received 11/1/16

Point 1

No desk top study was carried out as part of the 2015 bat survey report by Chalkhill Environmental Consultants, but reference is made within the report of a Brown long-eared bat roost at the farmhouse of Emmotts Farm, West Grimstead. There are also other records for long-eared bats and Common pipistrelle bat roosts in the village.

Information about the roost of Brown Long-eared bats was provided by a family member who occupies the farmhouse. The loft space of this property which is outside the application area was surveyed by the ecologist for completeness and in order to take the opportunity of collecting more information about the status of bats within the immediate survey area. This daytime survey confirmed that what appeared to be a medium sized summer roost of Brown Long-eared bats (as judged by the appearance and quantity droppings) was present but no bats were seen during survey. The farmhouse may therefore be one of a number of roosts in the village familiar to the local population of Brown Long-eared bats. Since the farmhouse is in separate ownership and outside of the application area, it was not considered appropriate to include more detail about the survey of this roost in the report of July 2015.

Point 2

The buildings affected by the proposed development were assessed as having high potential for roosting bats in the report by Ahern Ecology dated 14th August 2014 (in the form of a letter to the applicant), which is provided as a separate appendix to the Chalkhill report (Appendix 5). For buildings assessed as having high potential for roosting bats, a combination of at least 3 separate surveys should be carried out, with at least two during the peak season between May and August, which were recommended in the 2014 report. No justification for only carrying out a single survey visit (a combined dusk emergence and dawn re-entry survey within 24 hours is considered to be one survey in the BCT guidelines, 2012) is provided in section 3 (limitations) of the report. No new assessment of the level of potential of the buildings was presented in the 2015 report, so it is not clear why only a single visit was deemed appropriate.

It is accepted that these buildings, unchanged since the previous survey, had features with a high potential for bats. However, it was considered that the finding of three bat droppings in this range of buildings during previous survey in August, a time of year when bats might be expected to be present in a summer roost, and the absence of any significant accumulations of bat droppings in these buildings on subsequent survey in July 2014 at a time of year when bats associated with buildings were likely to be present in summer roosts lessened this potential. However, it was because of these features that the July evening emergence/dawn return survey was carried out in order to make a preliminary assessment of the status of bats on the site which had not previously been carried out. This did reveal the presence of very low numbers of Natterer's and Pipistrelle bats, perhaps a few individuals only, in the hay barn on which no work is planned. The presence of these bats within the dark interior of this building was very obvious before dusk when exterior light levels were still very high. These bats were first heard on a bat detector by the surveying ecologist located within the yard and clearly seen flying within the building high up beneath the roof on a brief inspection while exterior light levels were still high. No similar activity was heard or seen within the other buildings assessed as having a high potential for bats on evening emergence survey and no bat echolocation calls were recorded on two Anabat bat detectors left running within the buildings 2 and 4 assessed as having a high potential for bats. No bats were seen returning to building 4 on dawn return survey. Very low levels of bat activity were observed in and around the yard on evening emergence survey and on dawn return survey. No bats were observed flying

at dusk or before dawn in numbers or in a way to suggest that these had recently emerged from or were returning to roosts in these buildings.

The July survey was carried out at a time of year and in conditions when bats were likely to have been active. Bats were observed flying and echolocating in the hay barn during this survey but there was no similar bat activity in the other buildings. No bats were seen emerging from these buildings, no significant accumulations of bat droppings were found, no overnight bat activity was recorded and no bats were seen returning at dawn. It was therefore considered that further survey effort would add little to the assessment of the status of bats on the site which had confirmed the presence of roosting bats in the hay barn.

Point 3

Any deviation from the BCT survey guidelines (Hundt, 2012) must be explained and fully justified in the report.

The preceding paragraphs explain and justify the deviation from the BCT survey guidelines.

Point 4

There is evidence of a Brown long-eared bat roost within the farmhouse at Emmotts Farm, which increases the likelihood of this species using other buildings within the farm complex and therefore the application site. Is one survey visit enough to ensure that roosts are not present in other buildings?

It is accepted that the presence of a Brown Long-eared bat roost within the farmhouse increases the likelihood of this species using other buildings within the application site. The presence of this roost during July survey was very evident from the accumulation of bat droppings on the loft floor, although no bats were observed during survey. The presence of Brown Long-eared bats which prefer to roost in voids is often initially detected because of the accumulations of bat droppings beneath their roosting location (as was the case within the loft space of the farmhouse). No such accumulation of bat droppings was found within the buildings surveyed. As a predominantly void roosting species when undisturbed Brown Long-eared bats, if present, can frequently be observed in their roosts.

Point 5

One surveyor carried out all the surveys, including the internal and external inspections of the buildings for evidence of bats and the emergence and re-entry activity surveys. A single surveyor would not have a sufficient view of all the buildings at any one time to ensure that emerging/returning bats were not missed, especially those that are difficult to hear using bat detectors, including Brown long-eared bats (which call very quietly or not at all). The surveyor was located in the centre of the courtyard surrounded by the buildings, so the rear elevations were not covered during the emergence survey (high potential for bats on the western elevation of building 4 would not have been seen) and bats could have been missed by the Anabat left in the roof space.

The dawn and dusk surveys of July 2014 were carried out as part of an initial assessment of the status of bats on the site. Further survey, if considered necessary, would have addressed these issues of methodology. The western elevation of building 4 was covered by the dawn return survey. The Anabats were tested at the beginning of deployment in the evening and before being switched off at dawn and the only activity recorded was these test recordings. These bat detectors were therefore working correctly and likely to have recorded any bats flying with the loft spaces of these buildings. Natterer's bats and Brown Long-eared bats (confirmed to be present within or near the application area) are known to fly within the buildings where these species roost before emerging. Quietly echolocating Brown Long-eared bats can usually be detected when flying in enclosed spaces within buildings. No bat echolocation calls were recorded on the Anabat bat detectors.

Point 6

Due to the fragility of the floors in buildings 2 and 4, these could not be fully assessed physically for signs of bats, so a thorough search for droppings and other evidence of roosting bats was not conducted. This should have meant that a more thorough activity survey was carried out to compensate, i.e. a higher number of dusk emergence and/or dawn re-entry activity surveys. This was not achieved.

Although the floors were fragile, survey with a powerful torch of these areas was possible from the top of the access stairs. No bats were seen flying or heard echolocating within buildings 2 and 4 on evening emergence survey during the times when Natterer's bats and Pipistrelle bats were very obviously active within the hay barn. No overnight activity was detected on the Anabat bat detectors in these buildings. No bats were seen emerging from these buildings. It was therefore considered that further survey would add little to information about the status of bats in these buildings.

Point 7

Natterer's bats and Common pipistrelle bats were found to be using buildings 2 and 3 within the complex of farm buildings.

This is an error. A few individuals only of Natterer's bats and Common pipistrelle bats were seen flying and heard echolocating within the hay barn which will not be affected by the proposed work. No bat activity was detected in buildings 2 and 3.

Point 8

The use of sites by bats, particularly brown long-eared bats, with several suitable buildings can be complex, with different buildings used for varying purposes at different times of year, and this has not been discussed.

Individual Brown Long-eared bats have been known to remain through part of the winter within the roosts occupied during the summer and this may be occurring within the farmhouse. No evidence of a summer roost of Brown Long-eared bats was found within the buildings surveyed and it is not considered that their structure would provide the cold and unfluctuating temperature gradients which hibernating bats require. The unlined corrugated metal sheet roof of the hay barn, the only building where the presence of roosting bats was confirmed, is likely to create a wide range of temperature gradients in winter. No remains of insect prey in the form of wings was found to suggest that bats, particularly Brown Long-eared bats, were using the buildings surveyed as feeding perches. No small accumulations of bat droppings were found to suggest that individual bats were using the buildings surveyed at night roosts.

Point 9

The site is approximately 5km west of the Mottisford Bats SAC and the potential for use by horseshoe bats has not been discussed.

*The Mottisfont woodland supports an important population of the rare barbastelle *Barbastella barbastellus*, an Annex II bat species, and this is the primary reason for the selection of this site as a SAC. Mottisfont contains a mix of woodland types including hazel coppice with standards, broadleaved plantation and coniferous plantation which the bats use for breeding, roosting, commuting and feeding. Although *Barbastella* bats will roost in barns, the habitat surrounding the application site is mainly pasture with poor connectivity to nearby small areas of woodland.*

It is accepted that horseshoe bats move long distances between roosts, often within a very short period of time and even during the same night. However, horseshoe bats, a void roosting species, are usually very apparent in summer as these species roost suspended from roof beams and deposits of bat droppings usually accumulate beneath these roost sites. No such accumulations of bat droppings were found during two summer surveys when horseshoe bats roosting in buildings are likely to be or to have recently been present and no accumulations of bat droppings consistent in appearance to those of horseshoe bats of either species were found. Horseshoe bats require flying access to buildings and it is accepted that flying access would be possible to several of the open fronted outbuildings, although these buildings would not provide the dark and sheltered conditions required by horseshoe bats in summer day roosts. Horseshoe bats will use unsheltered open fronted buildings at night roosts where deposits of droppings accumulate below the roost site. No droppings to suggest use by bats of any species of any of the buildings surveyed as a night roost were found. No horseshoe bats or accumulations of droppings consistent in appearances to those of horseshoe bats was found in any of the other buildings to which there was night time flying access. No echolocation calls of horseshoe bats were heard on survey or recorded on the Anabat bat detectors. None of the buildings surveyed were

assessed as being likely to provide the cold, undisturbed and fluctuating temperature conditions required by hibernating horseshoe bats in winter. In terms of buildings, these conditions are likely to be found in cellars and large and small stone buildings, none of which are present within the application area.

Point 10

The previous 2014 report by Ahern Ecology also found evidence of swifts and swallows nesting in the majority of the buildings, including those proposed for conversion (buildings 2, 4 and 5), but the Chalkhill Environmental report only recommends mitigation for swallows. Mitigation should be provided for both these species. An estimate of the number of nests would be useful in designing effective mitigation for these species, so that there is no net loss of nesting sites.

It is considered that the identification of nesting Swifts on the site during survey of August 2014 is an error. The photograph show in the August 2014 report as evidence that Swallows and Swifts were nesting on the site shows only Swallows. Swift nests are usually located in cavities in building walls or within enclosed voids at a height of at least 5 metres and usually much higher (eg church towers or multi-storey buildings). Swifts are a very aerial species and require height from which to drop from their nest sites in order to gather sufficient speed in order to fly to gain height. It is not considered that the buildings surveyed would provide sufficient height to be attractive to nesting Swifts. Swifts are a migrant species arriving relatively late in May and usually departing by early August. At the time of the August 2014 survey, any breeding Swifts on the site are likely to have already departed on their southern migration and any Swifts observed flying over the site during this time of year were likely to have been moving south during migration to their wintering areas. At the time of the mid-July survey, family groups of Swifts, including fledged young of the year which may have bred on the site were likely to have still been present and active at the time of the early evening survey. No such activity was observed. Swallows were seen entering the hay barn and a single roosting Swallow was encountered in the loft of building 2 when this building was inspected before emergence survey ended. Each pair of Swallows requires flying access through their own individual entrance which they will defend to the building where their nest is located. There is only a single entrance providing flying access to the hay barn and therefore it is likely that a single pair of Swallows only is nesting in this building. No alterations to this building are planned as part of the proposed development.

Point 11

No mitigation for nesting birds is currently shown on any of the elevations plans submitted with the application. The proposed wood store area on the eastern elevation and the porch on the northern elevation of the barn conversion would seem to offer opportunities for nesting swallows, depending on the number of nests that could be accommodated.

It is agreed that these structures may offer opportunities for nesting Swallows and, given the presence of at least one pair of breeding Swallows on the site, may be adopted as breeding locations by this species.

Point 12

Although it was observed that Natterer's and Common pipistrelle bats emerged from Building 3 during the emergence survey on 15th July 2015, it is not clear where these bats are roosting within the building (apart from a plan showing the location of bat droppings on page 25 of the 2014 Ahern Ecology report). Buildings 2 and 4 share walls with building 3, so works must take account of the likely presence of roosting bats, including the demolition of part of buildings 4 (northern end, 4B) and 6.

Buildings 2 and 4 are constructed against the wall of the hay barn (building 3) to which no alterations are planned. The precautionary recommendations outlined in the report of the July 2015 are aimed at avoiding disturbance and harm to the bats roosting in the hay barn. No concentrated accumulations of bat droppings were found within the hay barn during the surveys of August 2014 and July 2015, making it impossible to locate with any accuracy potential roost sites within this building. However, both Natterer's bats and Common pipistrelles are crevice roosting species, although Natterer's bats when roosting in buildings prefer to have dark undisturbed conditions in which to fly before emerging from the building

in which their roost is present. Common pipistrelles roosting within buildings will fly and feed in dark sheltered conditions within these buildings, particularly in adverse weather conditions. The roof frame of the hay barn, which supports an unlined corrugated metal roof, is constructed from combination of modern repair/replacement beams and substantial traditional timber beams with complex joints and junctions. This construction would provide the crevice roosting opportunities required by both Natterer's bats and Pipistrelle bats. At the start of evening emergence survey, these bats were observed flying and heard echolocating in the hay barn in the dark conditions high up beneath the roof while exterior light levels were still very high. These echolocation calls were detected by the surveying ecologists located in the centre of the adjacent yard and on a brief inspection of the interior the bats were seen flying. After feeding for a few minutes within the hay barn, a single Pipistrelle bat emerged from the entrance to the hay barn and flew swiftly away from the site. The dusk emergence of Pipistrelles from crevice roosts in buildings but not within their interiors can be spread over up to forty-five minutes in roosts where high numbers of bats are present with some individuals emerging at or shortly before dusk and some individuals emerging not until complete darkness. There is therefore some individual variability in times of emergence in this species.

The Natterer's bats continued to be heard echolocating within the barn whilst exterior light levels were still high. Because of the ongoing bat activity within the dark conditions of the hay barn, the surveying ecologist briefly inspected the interiors of buildings 2 and 4 for similar activity but none was heard or observed. During these inspections, exterior light levels remained high. Because of this behaviour which was consistent with that of Natterer's bats, it was concluded that these bats were roosting within the hay barn, likely in roosts located within complex junctions and joints of the substantial traditional timber roof frame, and had not entered the hay barn to fly within this building from roosts elsewhere within the building complex.

The surveying ecologist then returned to the survey point in the yard. The echolocation calls of Natterer's bats flying within the hay barn continued to be heard until exterior light levels fell although these bats were not observed emerging from the open front of the hay barn. Having confirmed that bats were likely to be roosting within the hay barn which will not be affected by the proposed work, the efforts of the surveying ecologists were concentrated on the other buildings with a high potential for the presence of bats within the application area.

Point 13

The submitted survey report by Chalkhill Environmental Consultants dated July 2015 is therefore considered to be insufficient and an amended report, including a justification for the methodology used that deviates from the BCT survey guidelines and the issues listed above, must be submitted before determination. If the justification cannot be provided or is considered to be insufficient, then further activity surveys for bats would be required during the next optimal season between May and August 2016.

The foregoing comments are designed to provide a sufficient justification for the deviation from the survey methodology suggested in the BCT survey guidelines.

Point 14

Provision for roosting bats should also be made within the barn conversion (Staddlestone barn or building 4) and the stables (Victorian Barn or building 2). This would retain the potential for roosting bats on site and would not result in a net loss of biodiversity. It could also be viewed as an enhancement of the site in accordance with paragraph 118 of the National Planning Policy Framework. For example, provision for roosting bats could be made within the roof space of the stables and above the first floor bedroom's ensuite in the barn conversion.

Consideration could be given to making provision for roosting bats in the building 4 and building 2.

Point 15

Provision for nesting birds and roosting bats must be designed to be in-keeping with the listed status of the buildings.

The listed status of the building makes this essential.

Point 16

The retention and protection of the hay barn used by Natterer's and Common pipistrelle bats must be secured as a planning condition.

Comment is not possible regarding securing the bat roost in this building through a planning condition. No alterations to the hay barn are planned as part of the proposed development or any change of use. The building will continue as now as an actively used working building within the yard complex. The bats and their roost within this building are already subject to and will continue to be subject to the legislation which protects all British bats and their roosts.

The precautionary recommendations included in the report of the survey of July 2015 take account of the presence of the bats in the hay barn and include measures to be taken through the use of methods and timings of work to avoid harm and disturbance to these bats during the proposed work and following its completion.

The report of the survey of July 2015 makes it clear that if a planning application regarding any change of use of this building is made in the future, further surveys will be necessary and a mitigation licence from Natural England is likely to be required.

Jan Freeborn

Project Ecologist

CHALKHILL ENVIRONMENTAL CONSULTANTS