



Change of Use (C2 to C3) of Care Home to 19 Residential Apartments

Walshaw Hall, Tottington, Bury

Supporting Planning Statement
Heritage & Green Belt

March 2023

Quality Control

Project No.	22.095			
Client	Capstone Care Limited			
Title	Conversion of Care Home to 19 Residential Apartments			
Location	Walshaw Hall, Tottington, Bury			
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1.0 Introduction

Purpose

- 1.1 The purpose of this Supporting Planning Statement is to support a full planning application for the change of use (C2 to C3) of the former care home, known as Walshaw Hall to 19 residential apartments with associated facilities. This application has been prepared on behalf of the applicant, Capstone Care Limited.
- 1.2 This Planning Statement outlines the context within which the application for full planning permission is made, describes the proposals and provides a detailed assessment of the main planning considerations, including heritage and conversion within the Green Belt, together with a reasoned justification of the merits of the scheme when assessed against relevant national and local planning policy and other material considerations.
- 1.3 Capstone Care have a clear intention to see Walshaw Hall positively re-purposed to deliver much needed housing within Tottington following the approval of 'The Beeches' (now known as 'Walshaw Hall Care Home') in 2013 which comprises a 56 ensuite bed purpose-built care home adjacent to Walshaw Hall. Since the Walshaw Hall Care Home opened in 2016, Walshaw Hall continued to operate, but the shortcomings of the older, converted care home soon became evident and occupancy rates fell to unsustainable levels. The decision was taken in 2019 to close Walshaw Hall. The subsequent covid pandemic further reinforced the appropriateness of closing the original home due to not meeting Capstone Care's operational requirements or standards. As such the care operator wishes to utilise the vacant space to contribute to identified housing growth needs, satisfying planning policy requirements through redevelopment of an existing building for residential use with minimal alterations to the internal and externals of Walshaw Hall. Please note that as part of the application 'pack' a letter is submitted which explains the reasons for the closure.

Report Summary

- 1.4 This Statement concludes that the proposal represents sustainable development. Consequently, there are no planning reasons why the proposed change of use and conversion of Walshaw Hall into apartments should not be permitted.

- 1.5 The proposal has been informed by technical evidence and is supported by architectural drawings, a Design and Access Statement and a Daytime Bat Survey. The application therefore includes a suite of information such that the proposal can be fully considered by the local planning authority.

Author

- 1.6 This Statement has been prepared by Planning and Design Group (UK) Limited ('P&DG'). P&DG is a planning, heritage and urban design consultancy with extensive experience in securing planning permission for student accommodation. Our contact details are as follows:

Planning and Design Group (UK) Limited
Pure Offices, Lake View Drive, Sherwood Park, Nottingham, NG15 0DT
T: 01623 726256
E: midlands@panddg.co.uk

2.0 The Site

- 2.1 This site is located on the edge of Tottington, approximately 3 miles North-West of Bury town centre. The extents of the grounds of Walshaw Hall includes open gardens and woodland over nearly 5.5 acres (2.2 hectares). The site is bounded by Bradshaw Road to the north and open countryside to the other 3 sides. It lies in the Green Belt and the development of the new care home was approved as an exception to development in the Green Belt in 2013.
- 2.2 As explained above, following approval of the Walshaw Hall Care Home in 2013 (a 56 ensuite bed purpose-built care home adjacent to Walshaw Hall), it has become apparent that the older Walshaw Hall is far less suited to a care home use. This is evidenced in the occupancy rates which have fallen to unsustainable levels. The covid pandemic further highlighted the need for it to close as it was not meeting Capstone Care's operational requirements or standards. Capstone Care have provided a letter confirming the operational constraints of Walshaw Hall meeting existing and future care needs.
- 2.3 Below is an extract from the Government's 'Flood Maps for Planning'. It shows that the site is entirely within Flood Zone 1 (lowest risk of flooding).



Flood Maps for Planning

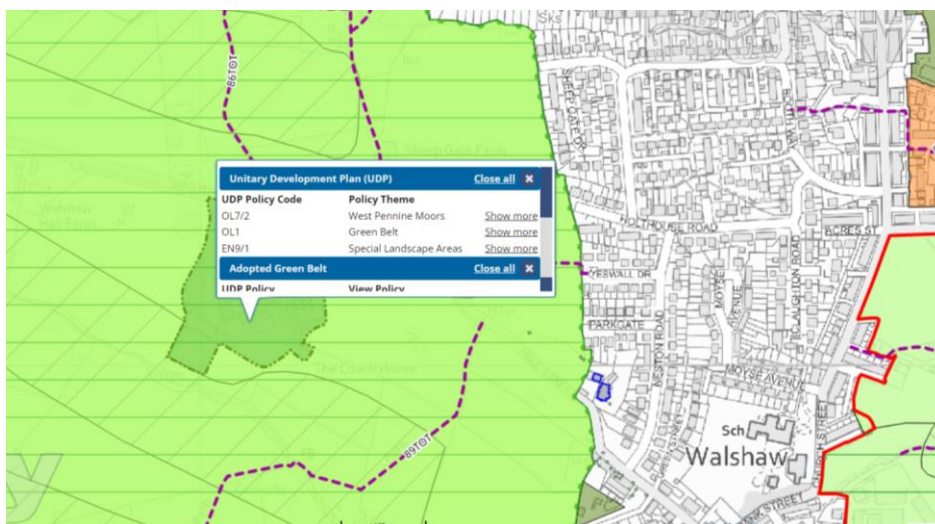
- 2.4 The map below is from the Historic England website. It shows there are no historic assets on or near the site (although it is noted on the Council's website that Walshaw Hall appears on a 'draft list' of 'locally listed buildings' - this is considered further below).



Historic England

2.5 Finally, the plan below is an extract from the 'Policies Map' for the Council's adopted Development Plan. It shows that the following constraints / designations are relevant to the site (which again are considered further below):

- West Pennine Moors (Policy OL7/2)
- Green Belt (Policy OL1)
- Special Landscape Areas (EN9/1)
- Tree Preservation Orders (the darker green shading)



Policies Map from Development Plan

Walshaw Hall

2.6 Walshaw Hall is a large late 19th Century house with 1980's extensions added when it was converted to a care home. The house and outbuildings are built in coursed dressed local stone with slate roofs in a Gothic style. Features include chimneys, bay windows, dressed ashlar window surrounds and quoins, castellated parapets,

bracketed eaves, bands of scalloped slates, decorative ridge tiles and a squat, castellated central tower with flagpole.

- 2.7 Internally, the hall has narrow corridors, typically around 1-1.2m wide but in some areas constricted to 0.75m. An area of the building's first floor, in the west wing, is at a higher level than the rest of the building and two of the proposed apartments in this area are accessible only via stairs. The majority of the upper floors do however have lift access.
- 2.8 The main formal entrance to the building, on the south elevation, is accessed via steps to a low raised terrace and further steps to the entrance doors. Level access is provided via the central courtyard, accessed from the north side of the building adjacent to the main access road and car park of the adjoining Walshaw Hall Care Home.

3.0 Planning History

3.1 Below is the recent and relevant planning history relating to the site as available on the Council's website:

60183 - Surfacing of existing car park to existing care home, including kerbs and edgings and replacement of existing external lighting: Permitted 31/08/2016.

60181 - Variation of condition 2 (approved plans) of planning permission ref. 55803 for proposed new 53 bed unit, 3 storeys high adjacent to existing residential home: Various amendments to the scheme including window and door position, number of bed spaces and the relocation of onsite refuse/recycling store and its construction detail: Permitted 31/08/2016.

55803 - Proposed new 53 bed unit, 3 storeys high adjacent to existing residential home: Permitted 23/01/2013.

51559 – Double garage at the Coach House: Permitted 14/08/2009.

48195 – First floor balcony at front: Permitted 20/07/2007.

99/35009 – 16 Bedroom Extension: Permitted 16/02/1999.

97/32996 - Two storey side extension and use of building as accommodation for the elderly: Permitted 25/04/1997.

4.0 Proposed Development

- 4.1 The proposal involves the change of use from Walshaw Hall's former use as a C2 use class care home into apartments, reverting the building to C3 use class. This is wholly appropriate for the size, construction and internal layouts of the building and requires a relatively small number of structural alterations to achieve. External alterations are minimal.

Amount – Apartments

The proposed conversion to apartments provides 19 apartments across all floors. The mix of apartments is as follows:

- 7x 1-bedroom apartments between 45m² and 71m².
- 2x 1-bedroom mezzanine apartments of 58m².
- 8x 2-bedroom apartments between 68m² and 98m².
- 1x 2-bedroom mezzanine apartment of 89m².
- 1x 2-bedroom 2-storey apartment of 97m².

9x 1 bedroom apartments total
10x 2-bedroom apartments total.

The total gross internal area of the apartments is 1287m².

All apartments meet national space standards and provide a good level of amenity and outlook.

Amount – Parking

Bury Borough Council SPD11 'Parking Standards in Bury' has the following requirements for C3 accommodation in low access areas:

- 1 bed – 2.0 spaces per unit x 9 = 18 spaces
- 2 bed – 2.5 spaces per unit x 10 = 25 spaces

Total parking 43 spaces.

Disabled parking for flats/apartments minimum 5% = 3 spaces. It is proposed to include that disabled provision within a total parking provision of 45 spaces.

Cycles – 4 spaces @ 1 per 5 dwellings

- 4.2 The submitted site plan illustrates the minor alterations to external works required to bring the apartment scheme to Council standards of parking, access, and refuse storage.
- 4.3 The access road was improved as part of the Care Home construction works in 2016 and no additional changes are required. Parking is accommodated in the existing car park in the east of the site and by minor changes and modest expansion of the car parking area in front of the main entrance to the building on the south side.
- 4.4 It should be noted that 3 new disabled parking spaces have been provided by the north-east corner of Walshaw Hall, close to an available level access through the north access into the central courtyard and secondary building entrances. Space is also identified for 6 additional future parking spaces for Walshaw Hall Care Home, should loss of use of the current vacant parking on the site present the need.
- 4.5 The external alterations include the demolition of a small upvc extension (8sqm) and an external metal fire escape, both of which are located within the central courtyard. The western elevation also involves the removal of the door into the care home garden to be reconfigured as a window.
- 4.6 A new recycle store is also provided at the north-east end of the building, built in reclaimed stone and timber fencing similar to the existing recycling store of the Care Home.
- 4.7 The ground floor is converted to 10 apartments in a mix of 1 and 2 bedrooms. Each apartment has been designed to make efficient use of existing spaces and services. Apartments facing south and east benefit from views over grounds and open country countryside beyond.
- 4.8 The 3 apartments in the west wing are in the former dining area, subdivided to provide mezzanine apartments. Apartment 6 also includes a smaller former lounge with a southern aspect. Apartment 10 at the north end of the building is reinstated as a self-contained 2 storey building, providing a 2-bedroom apartment with a separate external entrance from within the central courtyard. There is an existing lift which serves all 3 main floors.

- 4.9 The first floor is converted to 7 apartments, also a mix of 1 and 2 bedrooms. Each apartment has been designed to make efficient use of existing spaces and services. Apartments facing south and east benefit from views over grounds and open country countryside beyond.
- 4.10 Apartment 11, on the south side above the main building entrance, has a series of living spaces arranged along the south façade to maximise benefit of the spectacular views south over open countryside towards Manchester city centre.
- 4.11 Apartments 16 and 17, in the west wing located where former bedrooms were, are at a higher level than the remainder of this floor and accessed via an additional flight of stairs. The second floor was formerly staff and ancillary accommodation. This will be converted to two apartments. There is a limited number of windows and existing rooflights on this floor, with some in locations and of a size which is not ideal for the best use of available space. Some new Velux rooflights are proposed, in discrete locations to address this shortcoming.
- 4.12 As part of the overall scheme, 6 additional car parking spaces have been provided for the Walshaw Hall Care Home. To provide the necessary parking spaces for the development, the following modest level of additional hardstanding is proposed:
- Frontage – 54m²
Disabled Spaces – 62m²
Walshaw Hall Care Home additional parking spaces – 78m²
- Total – 194m²**
- 4.13 The accompanying plans illustrate how the internal and external alterations are kept to a minimum.

5.0 Planning Policy

- 5.1 This section considers the proposal against both local and national policy and guidance, in accordance with the relevant legislative framework. A description of their status and relevance to the application is provided.

Local Planning Policy

- 5.2 Section 70(2) of the Town and Country Planning Act 1990 states that in the determination of applications *'The Authority shall have regard to the provisions of a development plan, so far as material to the application, and to any other material consideration'*. Similarly, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 For the purpose of this application, the Development Plan comprises the adopted Bury Unitary Development Plan August 1997. A number of other documents including Supplementary Planning Documents are also material considerations.
- 5.4 The Local Plan Policies Map (see above) identifies that the site falls within:
- West Pennine Moors (Policy OL7/2)
 - Green Belt (Policy OL1)
 - Special Landscape Areas (EN9/1)

Bury Unitary Development Plan August 1997

The following policies from the Bury Unitary Development Plan August 1997 are relevant to this proposal:

- 5.5 Policy H1/2 – 'Further Housing Development' sets out a criteria-based approach to assess planning applications on sites that are not allocated. The policy generally allows for sites to come forward to help deliver housing growth provided the sites are in sustainable locations and are not protected for alternative uses. Criteria includes:
- The need to direct development towards the urban area;
 - the availability of infrastructure;
 - the need to avoid the release of peripheral open land, unless this can be shown to be consistent with urban regeneration;

- the suitability of the site in land use terms with regard to amenity, the nature of the local environment and surrounding land uses;
- other policies and proposals of the Plan.

5.6 Policy H2/1 – The Form of New Residential Development is a general design policy that requires good designs in new residential developments and that local character is not adversely affected by new developments. Criteria includes:

- The height and roof type of adjacent buildings;
- the impact of developments on residential amenity;
- the density and character of the surrounding area;
- the position and proximity of neighbouring properties;
- the materials to be used in proposed developments, especially their colour and texture.

5.7 Policy H2/2 – The Layout of New Residential Development is a general design policy that requires good designs in new residential developments and that local character is not adversely affected by new developments.

5.8 Policy H2/4 – Conversions supports the conversion of existing buildings to residential development subject to suitability and details.

5.9 Policy H4 - Housing Need specifies that the Council will encourage the provision of a range of housing types and tenures as appropriate to the housing needs of the Borough.

5.10 Policy H4/1 – Affordable Housing seeks to deliver affordable housing on large residential developments.

5.11 Policy EN1 – Environment seeks to protect, preserve and enhance the character, appearance and amenity of the Borough's built environment.

5.12 Policy EN1/1 – Visual Amenity seeks to ensure that new development does not adversely affect visual amenity in terms of views of prominent or important buildings and the visual amenity within or viewed from areas of environmental interest.

5.13 Policy EN1/2 – Townscape and Built Design states that the Council will give favourable consideration to proposals which do not have an unacceptable adverse effect on the particular character and townscape of the Borough's towns, villages and other

settlements and sets out a number of factors that will be considered with the aim of ensuring that development is acceptable.

- 5.14 Policy EN1/3 – Landscaping Provision relates to landscaping provision in new development and states that development proposals will be required to make provision for incidental open space and landscaping to the Council's satisfaction.
- 5.15 Policy EN4/2 – Energy Efficiency encourages energy efficiency in development proposals by guiding and controlling the location and form of development that takes place.
- 5.16 Policy EN8/1 – Tree Preservation Orders sets out the Council's intention to use TPOs to protect important trees.
- 5.17 Policy EN9/1 – Special Landscape Area states that in those areas identified on the Proposals Map as Special Landscape Areas, any development which is permitted will be strictly controlled and required to be sympathetic to its surroundings in terms of its visual impact. High standards of design, siting and landscaping will be expected. Unduly obtrusive development will not be permitted in such areas.
- 5.18 Policy EN10 – Environmental Improvement states that the Council will seek to improve the environmental quality of the Borough, within which priority will be given to an on-going environmental improvement programme.
- 5.19 Policy OL1 – Green Belt states that the Council will maintain a Green Belt, ensuring that it fulfils the five strategic purposes of Green Belt.
- 5.20 Policy OL1/1 – Designation of Green Belt states that the Council will operate development control policies over a Green Belt as delineated on the Proposals Map. Para 79 in particular reinforces the Government's aim of preventing urban sprawl by keeping land permanently open.
- 5.21 OL1/4 – Conversion and Re-use of Buildings in the Green Belt specifies that the conversion and re-use of buildings in the Green Belt is not inappropriate provided that it satisfies a series of criteria:
 - Criteria (a) and (b) of Policy OL1/4 are concerned with maintaining the openness of the Green Belt and not conflicting with the purposes of including land within the Green Belt.

- Criterion (c) requires the re-use of buildings to be limited to those of permanent and substantial construction.
- Criterion (d) considers the form, bulk and general design of buildings.
- Criteria (e) relates to access and traffic generation.
- Criterion (f) relates to the provision of necessary services without extensive works. Criterion (g) relates to the need to consider any impacts on protected species.

5.22 Policy HT2/4 – Car Parking and New Development requires development to make adequate provision for car parking and servicing in accordance with the Council’s car parking standards.

5.23 Policy HT4 – New Development seeks to locate new development in sustainable locations which support the principles of sustainable development; assist the implementation of a balanced transportation strategy; and minimise the environmental impact of traffic.

5.24 Policy HT6 – Pedestrians and Cyclists seeks to provide new and improved facilities for pedestrians and cyclists.

Other Material Considerations

5.25 The other material considerations that are relevant to the application include the Supplementary Planning Guidance (SPGs) and Supplementary Planning Documents (SPDs) listed below which will be taken into consideration whilst assessing the proposed development, these include:

- Affordable Housing SPG
- Conversion and Re-use of Buildings in the Green Belt SPD
- Residential Conversions SPD
- Design and Layout of New Development in Bury SPD

Affordable Housing SPG

5.26 This Guidance Note relates to the Council’s planning policy in respect of affordable housing provision in association with new residential development. It provides additional and updated information on Policy H4/1 of the Bury Unitary Development Plan which deals specifically with this issue and requires developers on suitable sites to make provision for affordable housing.

Conversion and Re-use of Buildings in the Green Belt SPD

5.27 In order to ensure that future conversions are sympathetic to the Green Belt objectives, this note provides additional guidance on:

- The types of buildings that may be suitable for conversion in the Green Belt;
- sustainability considerations, including access to public transport and other local services;
- design considerations;
- the need to ensure that any proposal would have no greater impact on the openness of the Green Belt than its current building or existing use;
- the need to prevent associated development and activities with a particular use from harming the openness of the Green Belt (e.g. 'suburban style gardens); and
- ensuring the environmental quality, amenity, wildlife interest and character of the Green Belt is maintained and where possible, enhanced.

Residential Conversion SPD

5.28 This Development Control Policy Guidance Note relates to the Council's planning policy with regard to the conversion of non-residential buildings to self contained dwellings and the subdivision of existing dwellings into two or more self contained dwellings. It should be treated as a significant material planning consideration as a Supplementary Planning Document (SPD) that provides additional information on the implementation of Policy H2/4 of the Bury Unitary Development Plan (UDP), which deals with this issue.

Design and Layout of New Development in Bury SPD

5.29 This SPD provides design guidance for all types of development across the Borough's urban and rural settlements. It should be taken into consideration when designing individual and groups of buildings as well as the extension and refurbishment of existing buildings. The SPD also provides advice on the design quality of soft and hard landscaped areas and all aspects of support infrastructure such as roads, footways, parking and amenity spaces.

National Planning Policy

- 5.30 National policy is defined by the relevant paragraphs of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (NPPG). It is a significant material consideration in the determination of planning applications.
- 5.31 The NPPF states in paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 expands on this stating that there are three overarching objectives to sustainable development – social, economic, and environmental – and that these objectives are interdependent and need to be pursued in mutually supportive ways. They are not criteria against which every decision can or should be judged (paragraph 9).
- 5.32 Paragraph 11 establishes a general presumption in favour of sustainable development, for both plan-making and decision-taking. Footnote 7 identifies that determining policies for housing applications will be out-of-date where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 5.33 Paragraph 11 also makes clear that:

“For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or
d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

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

- 5.34 The relevant application of Paragraph 11(d)(ii) has become known as ‘the tilted balance’.
- 5.35 Paragraph 38 sets out that Local planning authorities should approach decisions on proposed development in a positive and creative way. Further, that decision-makers at

every level should seek to approve applications for sustainable development where possible.

- 5.36 Paragraph 60 makes it clear that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed to address specific housing requirements. Paragraph 62 then substantiates this with a requirement to access the size, type and tenure of housing needed for different groups in the community and student accommodation is specifically mentioned as part of this principle.
- 5.37 Paragraph 92 stipulates that planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles.
- 5.38 Chapter 11 refers to ensuring developments make effective use of land. Under Paragraph 120, point C explicitly states planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict or contaminated unstable land.
- 5.39 Paragraph 126 refers to the creation of high-quality buildings and places being fundamental. Good design is a key aspect of sustainable places, creating better places in which to live and work and helps make development acceptable to communities.
- 5.40 Paragraph 130 states planning policies and decisions should ensure that developments:
- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;
 - d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and support local facilities and transport networks; and
- f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.41 Paragraph 137 states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

5.42 Paragraph 138 states that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.43 Paragraph 150 explains that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction.

5.44 Paragraph 203 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Places For Everyone - Joint Development Plan Document

5.45 This Plan is not yet adopted but due to its advanced stage (it is currently at Examination in Public) it should be seen as a material consideration (particularly considering the age of the current Development Plan document). Relevant policies include the following:

- 5.46 Policy JP-Strat 6 - Northern Areas states that a significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on prioritising the re-use of brownfield land through urban regeneration, enhancing the role of the town centres and increasing the mix, type, quality and range of residential offer.

- 5.47 Policy JP-S 1 - Sustainable Development states that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives. Preference will be given to using previously developed (brownfield) land and vacant buildings to meet development needs.

- 5.48 Policy JP-H 1 - Scale, Distribution and Phasing of New Housing Development states that a minimum of 164,880 net additional dwellings will be delivered over the period 2021-37, or an annual average of around 10,305.

- 5.49 Policy JP-H 2 - Affordability of New Housing Substantial improvements will be sought in the ability of people to access housing at a price they can afford, including through:
 - 1. Significantly increasing the supply of new housing, in accordance with Policy JP-H 1 'Scale, Distribution and Phasing of New Housing Development', thereby reducing the potential for a shortfall to lead to large house price and rent increases...

- 5.50 Policy JP-H 3 - Type, Size and Design of New Housing states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods.

- 5.51 Policy JP Allocation 7 - Elton Reservoir is a Bury allocation for 3,500 dwellings.

- 5.52 Policy JP Allocation 8 – Seedfield is a Bury allocation for 140 dwellings.

- 5.53 Policy JP-G 10 - The Green Belt will be afforded strong protection in accordance with the NPPF.

- 5.54 Policy JP Allocation 9 – Walshaw is another Bury housing allocation for 1,250 dwellings.

5 Year Housing Land Supply

- 5.55 The table below is an extract from the Council's 5-year Housing Land Supply Statement April 2022. It shows that the Council has a significant shortfall in its 5-year housing land supply.

Percentage buffer:	5%	10%	20%
LHN (614 per annum)	3,070	3,070	3,070
Buffer	154	307	614
Total Target	3,224 (645 per yr)	3,377 (675 per yr)	3,684 (737 per yr)
Supply	1,676	1,676	1,676
Percentage	52%	50%	45%
Years Supply	2.6	2.5	2.3

6.0 Planning Assessment

Principle of Development

- 6.1 This section identifies the key issues relevant to and the potential impacts of the proposals, assessing these against and considering their consistency with local and national planning policy and guidance.
- 6.2 The NPPF states (para.7) that the *'purpose of the planning system is to contribute to the achievement of sustainable development'*. Paragraph 11 sets out a presumption in favour of sustainable development. For decision-taking this includes *'approving development proposals that accord with an up-to-date development plan without delay'*.
- 6.3 As is demonstrated by this Planning Statement, it is clear that the proposals accord with policies of the Development Plan, to the extent that they are relevant. Furthermore, benefits of the application proposal outweigh any potential adverse impacts.
- 6.4 Before drawing up these proposals, the applicant considered three potential uses for the building. These were:
- Refurbishment as a care home – bringing facilities up to current day standards including bedrooms with ensuite shower facilities, can typically reduce the number of bedrooms by 1/3rd, from 46 bedrooms to around 31. This is below the threshold of viability for a care home where cost effective care provision staffing needs a minimum number of residents. Resolving accessibility issues would also require major internal alterations. Changes in demand for care post covid simply confirmed that this option was not viable.
 - Conversion to retirement apartments – retirement and care villages, often in rural locations, are a growing option for the elderly. However, such developments provide a much larger range of facilities and services than can be provided at Walshaw Hall without significant new building. The same issues of accessibility as the option above would apply. Such a development would not be feasible for many potential residents and considered not to be viable.
 - Conversion to open market apartments – this option provides wider scope for a range of apartment layouts and types within the constraints of an existing

building. Accessibility and operational issues are less constrained and would provide the opportunity to deliver much-needed housing.

- 6.5 The third option (conversion to open market apartments) was clearly the most viable and suitable for the building. The proposal represents an opportunity to deliver much needed new residential dwellings in an area that is currently struggling with its housing delivery. Both national and local planning policy supports the reuse of buildings for development purposes. The proposal will support the continued use and maintenance of this attractive and locally important building (whilst at the same time, provide essential new accommodation for local people). Great care has been taken to ensure each unit conforms to national space standards and will provide safe and enjoyable living conditions for residents.
- 6.6 As established above, the Council cannot currently demonstrate a 5 Year Housing Land Supply (based on the Council's Housing Land Monitoring report of April 2022 which states it only has between 2.3 and 2.6 years' housing land supply). The 'tilted balance' is therefore engaged, and the Council must decide whether any adverse impacts of allowing the proposal would significantly and demonstrably outweigh the benefits (delivery of much needed new housing), when assessed against the policies in the NPPF taken as a whole (bearing in mind the Government's objective of significantly boosting the supply of housing).
- 6.7 It is considered that based on the above, the Council can support the proposal 'in principle'. We now look to see whether there are any adverse impacts resulting from the proposal, which would significantly and demonstrably outweigh its benefits.

Green Belt

- 6.8 As explained previously, the site sits within the Green Belt. Paragraph 150 however states that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes the re-use of buildings as long as they are of permanent and substantial construction.
- 6.9 The proposal is for the change of use (C2 to C3) of an existing building (Walshaw Hall). As previously explained, following the opening of the Walshaw Hall Care Home it has become clear that the market cannot sustain both buildings in a C2 use. Due to its history and current condition, the building can quite clearly be described as permanent and substantial construction.

6.10 Furthermore, the proposal does not extend the building's current footprint or increase its massing or bulk (note there is a very small 18m² refuse store proposed as part of the scheme, but this is located near the main existing building and is required as part of the proposed C3 use). As such, the Green Belt's openness is preserved through the proposal.

6.11 Paragraph 138 states that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.12 With reference to these five purposes, we would make the following points in relation to the proposal:

- a) As the proposal reuses an existing building (without any extension or increase in size) the proposal will not result in urban sprawl,
- b) no neighbouring towns will merge into one another through the proposal,
- c) again, as the proposal uses an existing building, the proposal will not result in encroachment into the countryside,
- d) the proposal will not impact on the setting and special character of any historic town, and
- e) although the site is not in an urban location, the proposal does reuse an existing building. This means that no greenfield land is lost through the proposal (this purpose is to facilitate the use of brownfield before greenfield land).

6.13 Notwithstanding the above, Development Plan OL1/4 – 'Conversion and Re-use of Buildings in the Green Belt' specifies that the conversion and re-use of buildings in the Green Belt is not inappropriate if it satisfies a series of criteria:

- Criteria (a) and (b) of Policy OL1/4 are concerned with maintaining the openness of the Green Belt and not conflicting with the purposes of including land within the Green Belt.

- Criterion (c) requires the re-use of buildings to be limited to those of permanent and substantial construction.
- Criterion (d) considers the form, bulk and general design of buildings.
- Criteria (e) relates to access and traffic generation.
- Criterion (f) relates to the provision of necessary services without extensive works.
- Criterion (g) relates to the need to consider any impacts on protected species.

6.14 In reference to the criteria for Policy OL1/4, we would make the following points:

- Criterion (a) (b) and (c) are covered above under the five purposes of the Green Belt.
- With reference to Criterion (d), the proposal relates to the reuse of an existing building, the key changes to the building will be internal and external alterations do not increase the built form of the building.
- As regards traffic generation (Criterion e), please see 'Transport' section below.
- For Criterion (f), all necessary services are already in place (meaning extensive work is not required).
- For Criterion (g) we have included a bat survey due to the age and type of building (see below).

6.15 In summary, based on the findings above, we can conclude that the proposal is not inappropriate development in the Green Belt.

Transport and Access

6.16 The proposal accords with the Council's car and cycle parking standards, providing standard parking bays, disabled bays and cycle storage. The existing lawful use of a care home would itself generate significant vehicle journeys through staff, deliveries, and visitors. Therefore, further impacts on the local highway network through the proposal are expected to be negligible.

6.17 The existing access off Bradshaw Road is more than suitable on highway grounds through the change of use of Walshaw Hall and improvement works to parking formed part of the new care home in 2016, as identified in the planning history section.

- 6.18 Moreover, as set out in the submitted Design and Access Statement (DAS), the existing access will provide a safe and suitable access for the new development as well.

Design and Appearance

- 6.19 The concept behind the scheme is the re-use of the building and site, making the best and most efficient use of previously developed land, delivering high-quality residential accommodation which will go towards meeting an identified need, and other benefits. More details on the design can be found within the accompanying DAS and detailed elevation plans.

Amenity

- 6.20 As well as the Walshaw Hall Care Home there are two individual dwellings on the site. Since the care home use ceased at Walshaw Hall, residents will have noticed a decline in use of the site. It is of course unrealistic however for residents to expect this to continue and for the building to not be reused for other purposes. Notwithstanding, the overall design approach ensures there are good standards of residential amenity for future occupiers, whilst not prejudicing the amenity of existing local residents. Windows remain in the same location meaning there is no increased risk of overlooking.
- 6.21 Furthermore, as explained under 'Transport and Access' above, the proposed residential use is not expected to create additional traffic movements over that of the existing care home use.

Heritage

- 6.22 As stated above, the building is not listed nor is it in a conservation area. It is however on a draft locally listed building list. It can only be assumed that the Council wishes to adopt the list at some point. Planning policy seeks the protection of non-designated heritage assets and states that when considering planning applications, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.23 It is unclear what the Council sees as the particular significance of Walshaw Hall but Historic England in its 'Local Heritage Listing: Identifying and Conserving Local Heritage Historic England Advice Note 7 (Second Edition) 2021 refers to 'The intrinsic design and aesthetic value of an asset relating to local and/or national styles, materials,

construction and craft techniques, or any other distinctive characteristics' of buildings. It therefore, would appear appropriate to apply this to Walshaw Hall as its 'significance'.

6.24 In terms of impact on this significance, the DAS explains that:

"The appearance of the courtyard is improved by removal of (1) an external metal fire escape stair and canopy; (2) a flat-roofed upvc corridor extension with the main wall line continued and faced in reclaimed stone; (3) upvc glazed screen and door to apartment 10, replaced with clerestory windows for privacy and reclaimed stone infill walling; (4) kitchen extract ductwork.

No extensions are proposed, the only new construction being the recycle store. This has a similar design to the one provided for the adjacent Care Home, in reclaimed stone topped with a timber screen.

The proposed works will also include a full condition assessment and appropriate replacement and making-good to bring the building up to a good state of repair which meets current Building Regulations and other relevant standards.

Windows in the original building and later extensions are predominantly traditional timber sliding sash windows. Their condition and thermal performance will be assessed as part of this process. Any upgrade or replacement will seek to maintain the contribution fenestration makes to the overall character and appearance of the building and replace occasional anomalous later window types with more appropriate fenestration."

6.25 It can be concluded from this that the building will be treated sympathetically and with the utmost care. Visually, the building will change very little meaning the aspects which make the building 'significant' will remain.

Landscape

6.26 It is identified above that the site sits within a 'Special Landscape Area. Policy EN9/1 states that in these areas, any development which is permitted will be strictly controlled and required to be sympathetic to its surroundings in terms of its visual impact. High standards of design, siting and landscaping will be expected. Unduly obtrusive development will not be permitted in such areas.

- 6.27 As explained throughout this Planning Statement, the proposal is for the reuse of an existing building, the appearance of which will only change marginally. The site is already heavily wooded and again this will not change through the proposal. It can be concluded therefore that the proposal will not have any negative visual impact on the landscape.

Trees

- 6.28 It is noted that the site is blanketed by a Tree Preservation Order on site. To be clear, no trees will be impacted through the proposals and the existing character will remain.

Ecology

- 6.29 As the proposal is for the re-use of an existing building, it has not been considered necessary to have a full Preliminary Ecological Appraisal Report prepared for the site. Notwithstanding this, due to the nature of the building and the proposed works, it was considered appropriate to have a bat survey carried out on site (this submitted as part of the application 'pack').
- 6.30 The survey (prepared by Rachel Hacking Ecology) explains that the proposed conversion of the site into apartments is likely to include works to the roof and fabric of the building. This has the potential to result in impacts to bats and their roosts, should these be present. Impacts can include disturbance, killing or injuring of individual bats and damage, obstruction or destruction of roosts.
- 6.31 As such, a further detailed survey is required in order to determine the status of roosting bats at the site. A single bat activity survey is required at an optimal time of year (between May and September). The survey results will inform mitigation requirements. If a bat roost is present, a bat mitigation licence will be required prior to the commencement of works. The licence can be sought following the granting of planning permission. Survey work will take place at the appropriate time this year and the results will be fed back to the Council.
- 6.32 The survey also states that evidence of nesting birds was identified within one of the roof voids. Therefore, it recommends that any works take place outside of the bird nesting season (the nesting season is generally March to August), or a bird nest check be undertaken prior to work commencing.

- 6.33 Finally, the survey shows that the proposed development offers opportunities to enhance the site for wildlife, in accordance with the NPPF. This could include installation of bat boxes on the buildings and trees on site. Nest boxes suitable for species such as Swift *Apus apus* and House Sparrow *Passer domesticus* could also be installed. A suitably qualified ecologist should advise on the locations and specifications of boxes.

Sustainability

- 6.34 The submitted DAS explains that the conversion and refurbishment of Walshaw Hall into apartments brings an existing building back into use. This effective reuse of existing resources is wholly in accordance with the principles of sustainable development set out in the NPPF.
- 6.35 The proposed works offers an opportunity to bring an old building up to modern standards of energy use, including the requirements of Part L of the Building Regulations.
- 6.36 A 'fabric first' approach entails providing internal lining of thermal insulation to both the solid stone walls of the original building and the cavity walls of the 1980s extensions. Roof insulation will also be significantly improved. Single glazed sash windows will be replaced with double glazed units or provided with secondary glazing subject to detailed assessment of condition of window frames. This brings the thermal envelope of the building in line with present day insulation standards and significantly reduces heating loads.
- 6.37 There is scope to use renewable or low carbon sources including photovoltaic panels or air-source heat pumps. The latter provide an effective cost-efficient low-energy option for this type of refurbishment work. A potential location for an air source heat pump is identified on the submitted site plan.

Key Benefits

- 6.38 When the policies of the Development Plan and NPPF are taken as a whole, there is no doubt that the benefits of the proposed development must be given significant weight. The key benefits of the proposal would therefore include:
- Provision of high-quality residential development to help meet the Council's housing need.

- Making efficient use of an existing vacant building.
- Ensuring the continued life of a locally listed building.
- New employment opportunities during construction.
- Support for existing business and employment through increased GVA.
- Visual improvements to the local area.
- Creating a balance of new homes varying in sizes.
- Creating new homes within a scenic setting.

Assessment Summary

- 6.39 The supporting evidence submitted with this application has not identified any significant external impacts arising from the development that would preclude the grant of planning permission.
- 6.40 The proposal has been reviewed in the context of national and local planning policy and the respective weight that must be given to each policy and other material considerations. The proposal represents a sustainable form of development that generally accords with relevant provisions of the Development Plan.
- 6.41 As identified above, the Council cannot currently identify a 5-year housing land supply. There are no impacts identified above which would significantly and demonstrably outweigh the benefits of the proposal which will deliver residential accommodation.

7.0 Summary

- 7.1 This supporting Planning Statement has been prepared in support of a full planning application for the change of use (C2 to C3) of the former care home, known as Walshaw Hall to form 19 residential apartments with associated facilities.
- 7.1 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.
- 7.2 The proposal would strongly accord with the provisions of the Development Plan, so far as they are relevant. It has been demonstrated that the proposal would not be inappropriate development in the Green Belt and the significance of a non-designated heritage asset would not be detrimentally impacted through the development. The statement also identifies a number of key benefits which would result from the proposal.
- 7.3 The Council cannot currently identify a 5-year housing land supply. There are no impacts identified above which would significantly and demonstrably outweigh the benefits of the proposal which will deliver residential accommodation. Therefore, a presumption in favour of sustainable development should be applied (Paragraph 11 of the NPPF).
- 7.4 The planning balance weighs in favour of this proposal and it should be supported by the Council. On this basis, it is considered that full planning permission should be granted.

Planning and Design Group

Midlands Office: Pure Offices Lake View Drive Sherwood Park Nottingham NG15 0DT tel 01623 726256

London Office: 5 St John's Lane London EC1M 4BH tel 020 7549 2858

Oxford Office: Bee House 140 Eastern Avenue Milton Park Oxfordshire OX14 4SB tel 01235 854008

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