



# **Barn and Farm Conversions Supplementary Planning Document**

## **Consultation Statement**

**Prepared in accordance with Regulation 12 of the  
Town and Country Planning (Local Development)  
(England) Regulations 2012**

**April 2020**

**Reigate & Banstead**  
**BOROUGH COUNCIL**  
Banstead | Horley | Redhill | Reigate



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# Contents

1. Introduction .....	1
2. Preparing the SPD .....	3
Appendix 1: Consultation responses from Specific and General Consultees with resultant changes made to the SPD where relevant .....	8
Appendix 2: Any other matters.....	17
Appendix 3: Individuals and organisations consulted on the draft Barn and Farm Conversions SPD under Regulations 12 and 13 .....	18

# 1. Introduction

- 1.1. Within the borough there are number of barns and farms which contribute to the character and history of the area. Changes in the patterns and methods of farming have resulted in many barns and farm buildings becoming economically redundant or fundamentally ill-suited to modern agricultural practices. As a result, owners have looked for new economic uses which in many cases have involved conversion to non-agricultural purposes. National and local planning policy have changed over the years to reflect and support this.
  
- 1.2. The Council's previous "Appropriate Uses for Historic Barns" Supplementary Planning Guidance (SPG) (adopted in 1994) is no longer consistent with national or local policy. As Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Local Plan Regulations) requires there to be no conflict between an SPD and the adopted development plan, the Appropriate Uses for Historic Barns SPG has been updated to reflect the adopted Core Strategy and DMP policy. It has also been updated to reflect changing national policy and include principles for the conversion of other farmyard buildings.
  
- 1.3. The amended Barn and Farm Conversion SPD provides guidance on the conversion of barns and other farm buildings. The principles (both design and change of use) of conversion of barns and other farm buildings are established in:
  - Core Strategy Policy CS4 'Valued Townscapes and The Historic Environment'
  - Core Strategy Policy CS10 'Sustainable Development';
  - DMP Policy DES1 'Design of New Development';
  - DMP Policy NHE9 'Heritage Assets';
  - DMP Policy NHE6 'Reuse and Adaptation of Buildings in the Green Belt and in the Rural Surrounds of Horley'; and
  - DMP Policy EMP4 'Safeguarding Employment Land and Premises'.

- 1.4. Having clear, up to date guidance adopted will provide additional clarity and certainty for developers and the Council to ensure that the conversion of barns and other farm buildings in both rural and urban areas is undertaken in a manner which would benefit and help to enhance the character and local distinctiveness of the surrounding natural and built environment.

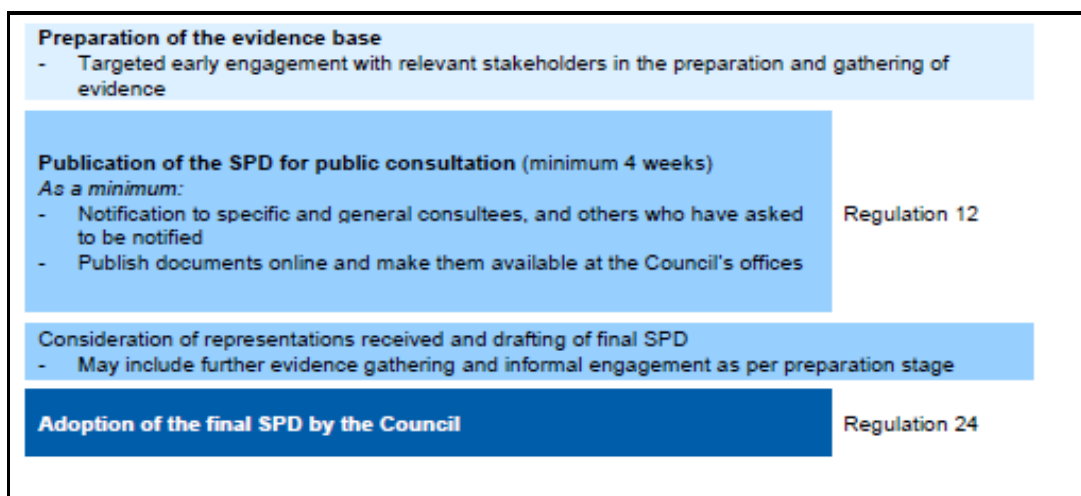
## **Purpose of the Consultation Statement**

- 1.5. This Consultation Statement has been prepared in accordance with Regulation 12(a) of the Town and Country Planning (Local Development) (England) Regulations 2012 (SI No 767, 2012). All references to “regulation(s)” in this document are to these Regulations unless otherwise stated.
- 1.6. Regulation 12 (a) requires that before we adopt a Supplementary Planning Document (SPD) we must prepare a Consultation Statement setting out:
  - (i) the persons the local planning authority consulted when preparing the supplementary planning document;
  - (ii) a summary of the main issues raised by those persons; and
  - (iii) how those issues have been addressed in the supplementary planning document

## 2. Preparing the SPD

2.1. This SPD has been prepared in accordance with the legal requirements of the Town and County Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations) and the requirements set out in the Council's Statement of Community Involvement in Planning (SCI) (April 2019)<sup>12</sup>. The process is summarised in **Figure 1 and 2** below.

**Figure 1: Process of preparing an SPD**



Source: RBBC (2019) *Statement of Community Involvement*

<sup>1</sup> Available at: [http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement\\_of\\_community\\_involvement\\_in\\_planning.pdf](http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement_of_community_involvement_in_planning.pdf)

<sup>2</sup> The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs.

**Figure 2: Timeline for preparation of the SPD**

<b>Stage</b>	<b>Date</b>
<b>Early scoping and information gathering</b>	July - August 2019
<b>Preparation of draft SPD with relevant key individuals and organisations</b>	August – October 2019
<b>Executive approval for public consultation of the draft SPD and supporting documents</b>	5 <sup>th</sup> December 2019
<b>Consultation on draft SPD with supporting initial Consultation Statement, SEA/HRA/EqIA screening (minimum of 4 weeks)</b>	January 2020
<b>Representations received considered and draft SPD updated as relevant</b>	February 2020
<b>Adoption of the SPD (and revocation of the 1994 Appropriate Uses for Historic Barns SPG) by Council’s Executive</b>	April 2020
<b>Publish SPD with final Consultation Statement and Adoption Statement</b>	April 2020

## **Preparation of the Draft Barn and Farm Conversions SPD**

- 2.2. In preparing the draft Barn and Farm Conversions SPD for consultation, we involved and sought the views of the individuals and organisations listed in **Table 1** below. Their suggestions were incorporated into the draft SPD for consultation.

**Table 1: Individuals and organisations involved in preparing the draft SPD**

Person/ Organisation	Issues/ Comments Raised
<b>RBBC Senior Conservation Officer</b>	<ul style="list-style-type: none"> <li>• Discussed the need to update the original 1994 SPG to reflect changing policy and to expand its remit from “Appropriate Uses for Historic Barns” to include other farm buildings, and non-heritage farm buildings</li> <li>• Reviewed and updated the original “Appropriate Uses for Historic Barns” SPG 1994</li> <li>• Provided text in relation to converting farm buildings</li> </ul>
<b>Natural England</b>	<ul style="list-style-type: none"> <li>• In response to the consultation on the Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement, Natural England has provided comments on additional guidance that they consider should be included in the SPD.</li> <li>• On Natural England’s suggestion, additional advice has been included in the draft SPD on the importance of biodiversity and landscape enhancement, and advice on protected species.</li> </ul>



## Consultation on the Draft SPD

- 2.3. Following executive approval on 5<sup>th</sup> December for public consultation on the draft Barn and Farm Conversions SPD, in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council undertook a statutory public consultation on the draft Barn and Farm Conversions SPD between 6<sup>th</sup> January and 8<sup>th</sup> February 2020.
- 2.4. During this consultation we wrote to all interested parties<sup>3</sup> and we made the documents available on our website and in paper format at the main Town Hall and at the six libraries in the borough.
- 2.5. In accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 we accepted all representations received during the consultation period.

## Representations Received

- 2.6. Following the formal consultation stage, the Council has reviewed the responses received and made amendments where necessary. A summary of the representations received and how they have been taken into consideration in finalising the SPD is detailed in Appendix 1.
- 2.7. The main issues raised during the consultation include:
- Including references to promotion of local distinctiveness and landscape enhancement
  - Including details on renewable energy provision
- 2.8. Prior to finalising the necessary amendments, the Local Development Framework (LDF) Scrutiny Review Panel reviewed a summary of the responses and the Council's proposed approach/ amendments to the draft SPD. They recommended the following amendments which have been taken into consideration in finalising the SPD:

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<sup>3</sup> Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose

**Table 1 LDF Scrutiny Panel**

<b>Proposed Amendment</b>	<b>Proposed Approach</b>
<b>Include fire protection measures for external cladding.</b>	Paragraph 3.47. has been added to the SPD, detailing fire protection measures recommended for barn and farm conversions.

### **Adoption of the SPD**

- 2.9. Following adoption, the Barn and Farm Conversions SPD will become a material consideration in the determination of planning applications and appeals and will therefore need to be taken into consideration in the preparation of planning proposals within the borough.
  
- 2.10. Upon adoption in accordance with Section 25 of the Planning Act 2008 and Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) the Council's current Appropriate Uses for Historic Barns SPG (1994) will be revoked. We will bring this to the attention of people living or working in the borough.

## Appendix 1: Consultation responses from Specific and General Consultees with resultant changes made to the SPD where relevant

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD where they need to be addressed)	Amendments made to the SPD?
Surrey Hills AONB RBBC\Representor\0003	Advice could include reference to underlying national and local AONB planning policy.	Noted. DMP Policy NHE1 "Landscape Protection" details guidance for proposals within AONB.	N
Surrey Hills AONB RBBC\Representor\0003	One of the greatest problems with the conversion of farm buildings in the Surrey Hills is that they can result in a farm holding becoming unviable and the land then being used for the growth of horsiculture. The latest Surrey Hills AONB Management Plan 2020-2025 Policy P5 states that proposals to redevelop or convert farm buildings that would render	Noted. It is not considered that this level of detail is needed in the SPD. DMP Policy NHE1 "Landscape Protection" advises that proposals	N

	<p>the associated farmed landscape unviable will be resisted. Perhaps this could be worked into the SPD.</p>	<p>should have regard to the current Surrey Hills AONB Management Plan.</p> <p>The DMP also recognises the potential impact of horsiculture. DMP Policy NHE8 “Horse Keeping and Equestrian Development” balances the competing demands of equestrian development with protection of the openness of the countryside and quality of the landscape and defines what is considered to be appropriate in a local context.</p>	
<p>General Consultee RBBC\Representor\0004</p>	<p>Paragraph 3.44: There is no attempt to encourage insulation standards in excess of current building regulations. The addition of exterior insulation to a property is a once in a lifetime opportunity to upgrade</p>	<p>Noted.</p> <p>Energy requirements are dealt with via Core Strategy Policy CS10 “Sustainable</p>	<p>Y</p>

	<p>the environmental standards of the structure, as is the installation of active air circulation systems / the achievement of Passivehaus or equivalent standards. This should be emphasised.</p>	<p>Development”, DMP Objective SC8 “encourage new development to incorporate passive and active energy efficiency measures and climate change resilience measures and where appropriate incorporate renewable energy technologies” and DMP Policy CCF1 “Climate Change Mitigation”. These require residential (and non-residential) properties to aim for high standards of energy efficiency and the inclusion of renewable energy technologies.</p> <p>Following discussion with the borough’s Senior</p>	
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		<p>Conservation Officer, comments have been added under newly named section 'Heating and Energy Efficiency' Paragraph 3.45. to reflect the fact that the Council would normally prefer freestanding photovoltaic ranges in the grounds rather than on the roofs of converted rural buildings.</p>	
<p>General Consultee RBBC\Representor\0006</p>	<p>Provide NPPF/ NPPG paragraph numbers in text rather than in footnote. Provide hyperlinks to various documents throughout the SPD.</p>	<p>Noted. NPPF/ NPPG paragraph numbers have been added to the text paragraphs and links to documents (where missing) have been added in footnote. For non-digital readers of the document full website</p>	<p>Y</p>

		addresses have not been replaced by hyperlinks.	
General Consultee RBBC\Representor\0006	There is no mention in the 'External Cladding' section of timber species the Council prefers/ permits to use as external cladding.	Noted. It is considered that the detail provided is sufficient. The type of wood required will be dealt with on case-by-case basis.	N
General Consultee RBBC\Representor\0006	All drawings should be labelled as Figures and referenced within the text.	Noted. Amended accordingly. As a result of this, some drawings had to be moved around.	Y
General Consultee RBBC\Representor\0006	Delete the insulation drawing and accompanying text on page 20 as it is obsolete and no longer serves a useful purpose.	Noted. It is considered the diagram and accompanying text provide useful guidance.	N
General Consultee RBBC\Representor\0006	Suggest it would be helpful to the reader if RBBC Conservation considered including in Paragraph 3.44	Noted. The Council's Senior Conservation Officer has advised that it would not be	N

	<p>'Insulation' a hyperlink to the 'Historic England' 2017 re-issued publication:</p> <p><a href="#"><u>'Energy Efficiency and Historic Buildings Application of Part L of the Building Regulations to Historic and Traditionally Constructed Buildings'</u></a></p>	<p>appropriate to refer to the Historic England Guidance on Energy Efficiency as the majority of the barns and farm buildings in the borough are timber frame with weatherboard and the guidance is not relevant to this.</p>	
<p>General Consultee RBBC\Representor\0006</p>	<p>Paragraph 3.58: Suggest amend 'black painted cast metal' to read 'black (RAL 9005) painted cast iron'. See typical commercial trade literature at: <a href="https://www.alumascwms.co.uk/media/3883/alumasc-cast-iron-rainwater_oct-15.pdf"><u>https://www.alumascwms.co.uk/media/3883/alumasc-cast-iron-rainwater_oct-15.pdf</u></a></p>	<p>Noted. The Council does not consider this level of detail is necessary.</p>	<p>N</p>
<p>Natural England RBBC\Representor\0017</p>	<p>The SPD could consider incorporating features which are beneficial to wildlife within development.</p>	<p>Noted. Section 5 of the SPD provides guidance on how to enhance biodiversity within barn and farm conversions, including provision of wildlife habitats such as provision of</p>	<p>N</p>



		bird boxes, bat boxes and providing safe routes for hedgehogs between different areas of the development.	
Natural England RBBC\Representor\0017	The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature.	Noted Council's Green Infrastructure strategy recognises that private gardens provide important part of the borough's green infrastructure provision.  The Council has a Local Distinctive Design Guide SPG which is used by developers and planners to consider how new development might make a positive contribution to the	Y

		<p>character and functions of the landscape.</p> <p>Both documents have now been referenced within the SPD and section 5 has been renamed to 'Landscape and Biodiversity Enhancement' to reflect these additions.</p>	
<p>Natural England RBBC\Representor\0017</p>	<p>Natural England has produced Standing Advice to help local planning authorities assess the impact of particular development on protected or priority species.</p>	<p>Noted.</p> <p>This is already referenced in the SPD paragraph 5.6.</p>	N
<p>Environment Agency RBBC\Representor\0015</p>	<p>We encourage growth that can be supported by the necessary environmental infrastructure, for instance water resources and flood risk management provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities.</p>	<p>Noted.</p> <p>The Barn and Farm Conversions SPD provides guidance for the conversion in terms of building materials etc.</p> <p>Flooding is dealt with through the DMP policy CCF2.</p>	N

Gatwick Airport Safeguarding RBBC\Representor\0008	No specific comments.	Noted.	N
General Consultee (Infrastructure provider) RBBC\Representor\0022	No specific comments.	Noted.	N
Transport for London RBBC\Representor\0001	No specific comments.	Noted.	N
National Grid RBBC\Representor\0009	No specific comments.	Noted.	N
Horley Town Council RBBC\Representor\0010	No specific comments.	Noted.	N
Highways England RBBC\Representor\0011	No specific comments.	Noted.	N
Tandridge District Council RBBC\Representor\0012	No specific comments.	Noted.	N
Historic England RBBC\Representor\0014	No specific comments.	Noted.	N

## Appendix 2: Any other matters

A number of other minor amendments were proposed, including grammatical and typographical suggestions. Where considered appropriate these amendments have been made.

## Appendix 3: Individuals and organisations consulted on the draft Barn and Farm Conversions SPD under Regulations 12 and 13

Specific Consultees	
Homes England	Eircom UK Ltd
Sutton and East Surrey Water	Energis Communications Ltd
Scotia Gas Network	EU Networks Fiber UK Limited
National Grid	FibreSpeed Limited
CLH Pipeline System Ltd	Fibrewave Networks
Surrey Downs CCG	FLAG Atlantic UK Limited
Southern Gas Network	Fujitsu Services Limited
British Gas	Full Fibre Limited
Southern Electric	G. Network Communications Limited
Thames Water Utilities Ltd	Gamma Telecom Holdings Ltd
Vodafone	Gigaclear Plc
O2	Glide Business Limited (formerly WarwickNet Limited)
UK Power Network	Hutchison 3G UK Limited
Government Pipeline & Storage System	Hyperoptic Ltd
euNetworks Fiber UK Ltd	In Focus Public Networks Ltd
Gas Transportation Company	InTechnology Smart Cities Limited (formerly InTechnology WiFi Limited)
Three	Integrated Digital Services Limited

Southern Water	Internet Central Ltd
Thames Water	Internet Connections Limited
Crawley CCG	GTT Communications
British Telecom	ITS Technology Group Limited
Thames Water	IX Wireless Limited
Network Rail	KCOM Group Plc
Environment Agency	Lancaster University Network Services Limited
Crawley Borough Council	Lightning Fibre Limited
London Borough of Croydon	Lothian Broadband Networks Limited
Epsom & Ewell Borough Council	Communications Infrastructure Networks Limited
Mole Valley District Council	MLL Telecom Ltd
London Borough of Sutton	MS3 Networks Ltd
Tandridge District Council	My Fibre Limited
Surrey County Council Minerals & Waste Planning	NATS (En Route) PLC
Surrey County Council Planning Consultation	Neos Networks Ltd
Greater London Authority	NextGenAccess Ltd.
Coast 2 Capital	NWP Street Ltd
Historic England	Ontix Limited
Marine Management Organisation	Orange Personal Communication Services Ltd
Natural England	Open Fibre Networks Limited (formerly Independent Next Generation Networks Limited)
Highways England	Open Network Systems Limited

Natural England Sussex & Surrey Team	Quickline Communications Limited
Historic England South East	PCCW Global Networks (UK) Plc
Mayor of London	Ranston Farm Partnership
Local Plans South - NHS Property Services Ltd	Aqua Comms
Sussex and Surrey Police	Severn Trent Retail Services Limited
Transport for London	Solway Communications Limited
The Coal Authority	Sky Telecommunications Services Limited
Nutfield Parish Council	Sky UK Limited
Burstow Parish Council	Sprintlink UK Ltd
Salfords & Sidlow Parish Council	Spyder Facilities Limited
Betchworth Parish Council	SSE Telecommunications Limited
Chaldon Parish Council	Subtopia Limited
Charlwood Parish Council	TalkTalk Communications Limited
Headley Parish Council	Tata Communications (UK) Limited
Newdigate Parish Council	Telewest Limited
Bletchingley Parish Council	Telefonica UK Limited
Horley Town Council	TeliaSonera International Carrier UK Limited
Leigh Parish Council	The Wireless Infrastructure Company Limited
Outwood Parish Council	The Wireless Asset Company Limited
Buckland Parish Council	Telecommunications Wireless and Infrastructure Services Limited
National Grid (Avison Young)	Telensa Ltd.
Airband Community Internet Limited	Telent Technology Services Limited

Airwave Solutions Limited	Thus plc
Affiniti Integrated Solutions Limited	TIBUS (trading as The Internet Business Limited)
Arqiva Communications Ltd	Timico Partner Services Limited
Arqiva Services Limited	Tiscali UK Limited
Arqiva Limited	toob Limited
AT&T Global Network Services (UK) B.V.	Truespeed Communications Ltd.
Atlas Communications NI Limited	UK Broadband Limited
(aq) Limited	Ulstercom Ltd
Atlas Tower Group Limited	Urban Innovation Company (UIC) Limited, (formerly Euro Payphone Ltd)
B4B Networks Ltd	Verizon UK Ltd
Bolt Pro Tem Limited	Virgin Media Limited
Boundless Networks Ltd	Vodafone Limited
Box Broadband Limited	Voneus Limited
Britannia Towers II Ltd	Interoute Communications Limited
British Telecommunications plc	WHP Telecoms Limited
Broadband for the Rural North Limited	Wifinity Limited
Broadway Partners Limited	Wightfibre Limited
Call Flow Solutions Limited	Wildcard UK Limited
Cambridge Fibre Networks Limited	WPD Telecoms Limited (formerly Surf Telecoms Limited)
Central North Sea Fibre Telecommunications Company Limited	Zayo Group UK Limited
CenturyLink Communications UK Limited	Zzoomm PLC



CityLink Telecommunications Limited	A.P.T.
CityFibre Metro Networks Limited	AERIAL SITES PLC
Cogent Communications UK Ltd	Cellular Design Services
COLT Technology Services	Harlequin Group Ltd
Community Fibre Limited	IPM Communications PLC
Concept Solutions People Ltd	Mobile Broadband Network Limited
Cornerstone Telecommunications Infrastructure Limited	Mono Consultants
County Broadband Limited	Waldon Telecom Ltd.
EE Limited	Sitec Infrastructure Services Ltd
<b>General Consultees</b>	
Residents, businesses, registered providers and developers on the Council's Planning Policy Consultation Contacts database	