



YORKSHIRE DALES
National Park Authority

Mark Corner
Chairman
Friends of The Dales

Via email: mark.r.corner@hotmail.com

16 November 2017

Dear Mark

Concerns regarding YDNPA policies on barn conversion

Thank you for your letter dated 3rd November regarding the above. I will deal with each of your points in turn.

Definition of roadside

You are quite right; the definition of roadside could permit development along minor roads and tracks. You are also quite right that this could, in some circumstances, lead to adverse effects on the landscape. But the policy reference to “roadside” is not a blank cheque – it is a proxy measure of potential acceptability and needs to be viewed in the context of other policy protections contained in the Plan, which are designed to ensure that the more harmful proposals do not succeed.

Fundamentally, the policy refers to “...suitable roadside locations”, while policies elsewhere in the Plan provide protection against harmful impacts on the landscape and historic environment. The Authority has also published a Traditional Farm Buildings Toolkit and Design Guide to operate alongside these policies and further guide proposals.

With so many traditional farm buildings in the National Park, it is simply impossible to prescribe the acceptability of any given location for conversion. There has to be discretion for the decision maker to take account of the circumstances of individual cases. Ever increasing prescription only runs the risk of unintended consequences.

The roadside definition was specifically addressed by the Local Plan Planning Inspector as part of his independent examination of the Local Plan’s soundness. He found it to represent a suitable approach.

You only have to read the reports prepared by Planning Officers in consideration of proposals under Policy L2 to see how carefully considered and rigorous the assessment of landscape and heritage impacts is. The Authority has refused or negotiated withdrawal of a number of inappropriate proposals and will continue to do so.



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Cumulative impact of barn conversion

I have appended the latest figures for approvals of barn conversions since Policy L2 was first given weight in decision making (September 2015).

I will deal firstly with your concern relating to the impact of roadside conversions in “open country”, which you refer to as a “spate” of applications. You’ll see from the appended figures that only 10 approvals have been issued for roadside conversions. Even if you add the further 7 that are the subject of a current application, not all of which will succeed, the total of 17 over more than 2 years can hardly be described as a ‘spate’, especially when spread across more than 1700 square kilometres.

Indeed, when the Authority attempted to predict the impact the policy would have, it predicted around 8 roadside conversions per annum. That figure was for completions rather than permissions, and we would normally expect some wastage where permissions are not implemented for one reason or another. If anything, we are perhaps seeing less roadside proposals than expected, simply because we anticipated that the bottlenecking of conversion demand caused by the previous more restrictive policy would see greater than average take up in the early years of the Plan.

Instead, the figures seem to suggest what we always suspected would be the case, namely that the roadside element of the policy would self regulate. As you have rightly pointed out, conversion of traditional buildings is not cheap in any circumstance, but especially so where entirely new utility connections and vehicular accesses need to be created, as will usually be the case in roadside locations. The focus of take up is instead upon settlements and building groups where visual impacts are more contained and where infrastructure is generally already in place.

While the Authority would certainly accept localised visual impacts will arise from conversions, it is difficult to envisage how, with the current trajectory and distribution of roadside conversion take up, harmful cumulative landscape impacts could arise. We feel that the Yorkshire Dales landscape does have capacity for change and that whatever change results from cumulative conversion should be viewed in the context of the overall numbers of buildings (6000) and what might happen in the alternative scenario, which is so often decline and ruination.

To turn to your concerns about cumulative impact on the ‘attractiveness of villages’, conversion of farm buildings within settlements is a centuries old tradition and has been permitted under successive planning policies in the Yorkshire Dales for decades. The Authority has clear expectations for the quality of conversions that will see them retain as much of their original character as possible. Many of our settlements are designated as conservation areas, not to mention two landscape-scale barns and walls conservation areas, where special regard is had to preserving and enhancing the architectural and historic character.

You use the example of Thorpe, which I would agree is a fine example of a Dales hamlet characterised as much by its traditional farm buildings as by its domestic ones. As such, the Authority has taken great care in negotiating acceptable schemes for the conversion of the 4 buildings approved to date, and will do likewise with the fifth that is currently being considered. It is worth pointing out that three of these buildings are in poor condition and

the other two could only be described as being in fair condition. Furthermore, two are listed buildings, both of which are classed as 'vulnerable' on the Authority's listed buildings at risk register. Given this context, I'm sure you will appreciate the potential conservation gain, as opposed solely to conservation risk, associated with conversion. In any event, the thought of imposing an artificial 'first come first served system' to manage cumulative impacts is one that we feel is both unnecessary and unfair.

Local housing needs

The Local Plan does not regard traditional buildings as an opportunity to provide affordable housing. The size of any given traditional farm building is obviously fixed. Many, especially in the northern Dales, are actually very modest in size. For the bigger buildings, in purely practical terms, it would be somewhat perverse to restrict the convertible floor area to a size commensurate with meeting local housing needs. The Local Plan policies will only permit modest extensions to traditional farm buildings so floor areas cannot be increased significantly.

There is of course a housing angle to the policy. The local occupancy restriction ensures that conversions accord with the Authority's housing strategy and has the effect of reducing valuation making barn conversions cheaper than they would otherwise be upon resale.

It is relatively rare for a permission to be obtained for conversion, only for it to be immediately placed on the market as a development prospect. Viability evidence assembled during the Local Plan's preparation showed that barn conversions subject to a local occupancy restriction were unlikely to be attractive as commercial development opportunities where a profit needed to be derived and a transfer value paid for acquisition of the building/land. For local families who already have the benefit of owning the building, it is a viable proposition, all the more so if they are able to undertake some of the work themselves. This is common experience in the Dales, and is reflected in many of the applications approved under the new policy

It should also be appreciated that the sustainability agenda in the National Park is moving on and that additional housing is required to secure viable communities. Barn conversions will inevitably play a role in this agenda and so we welcome the enthusiastic take up of the policy from this point of view. That is not to say that the Authority will allow a housing imperative to drive the acceptability of conversion proposals, but clearly, in small settlements like Thorpe, they could be hugely beneficial to community and economy alike.

Potential for removal of local occupancy restrictions

The Authority has a strong track record of resisting the removal of local occupancy restrictions where there is a clear policy basis for defending them. As long as the Authority has a local occupancy based policy, and as long as the National Park faces such pressures on its housing stock, it is difficult to envisage how anyone could conclude that such a legal agreement no longer serves a useful planning purpose.

Either local occupancy or holiday letting

The choice between local occupancy and holiday letting offers flexibility to applicants. A third of the permissions issued since the policy began to be used have taken up this option. This option has been offered, albeit in more restricted circumstances, since the previous Local Plan was adopted in 2005, so is nothing new. The nature of local occupancy criteria cover a broad range of household circumstances and as such aren't specifically targeted, either at the point of first occupation, or subsequently. But they are all linked to the socio-economic wellbeing of communities, which the Authority has a statutory duty to foster.

As pointed out above, commercially-motivated models for barn conversion often don't stack up financially. Instead, many conversions tend to be driven by local families who have the benefit of already owning the building. It is understandable that such families may wish to maintain flexibility to adapt to changing circumstances, especially on farm holdings where there may be generational transitions to consider and where there is clear potential to supplement farm incomes with holiday letting accommodation.

Monitoring & policy review

The Authority publishes an Annual Monitoring Report that assesses how our policies are performing. The 2016/17 report can be found on our website and contains a section dedicated to Policy L2. The policy will remain a focal point of monitoring activity in subsequent reports.

As regards specifically monitoring impact on affordability, the Local Plan has a monitoring indicator relating to the effectiveness of local occupancy restrictions in terms of mortgage availability, occupying households, sold prices and vacancy periods. This would apply to occupancy restricted housing created through new build and conversion and the Authority is putting measures in place to gather this intelligence.

To conclude, we welcome the scrutiny of Policy L2 by your organisation. We have always recognised that this was a significant area of policy change, that it wouldn't be without its problems, and that it needed to be monitored to ensure that it remained fit for purpose. That will happen as a matter of course, but it is simply too soon to commence any review of the policy. The Local Plan developed over a period of 5 years and barn conversion featured very prominently in the debates that took place over that period. You may therefore appreciate why the Authority is reluctant to commence a review before the policy has been given chance to 'bed in'.

Yours sincerely



CARL LIS OBE
CHAIRMAN

Barn conversion application statistics

Includes:

- all traditional buildings with the character of an unconverted barn, even if not technically in agricultural use;
- approvals where Section 106 agreement is still to be concluded;
- approvals since emerging Local Plan first given weight (29/2/15);
- applications currently undetermined (some of which will be refused or withdrawn).

Doesn't include:

- reoccupations of former dwellings – different policy context for these;
- retrospective applications;
- former barns that have had intervening use that has changed character (office/domestic annexe/workshops).

		Approved*		Current application		Total	
		Units	%	Units	%	Units	%
Towns and villages	Those listed in Policy SP3 where the principle of conversion has always been accepted under pre-L2 policy	7	13	4	17	11	14
Hamlets	Coherent groups of multiple (c10-20) dwellings	12	22	6	25	18	23
Building groups with residential content	e.g. farm steadings or small groups of up to 3 dwellings	23	42	7	29	30	38
Building groups other	e.g. situated among/alongside other modern farm buildings)	3	5	0	0	3	4
Roadside adjoins metalled road	Classified or unclassified fully sealed metalled road	6	11	1	4	7	9
Roadside adjoins private/green	Adjoins sealed or unsealed private road or unsealed 'green lane' maintainable at public expense	3	5	2	8	5	6
Roadside not adjoining subject to landscape impact	Doesn't physically adjoin routeway, but close proximity, so considered on merits	1	2	4	17	5	6
Total		55		24		79	