



Supplementary Planning Guidance Note

No. 5 Conversion of Rural Buildings

Adopted by Flintshire
County Council on 17th
January 2017



Purpose

It is Flintshire County Council's intention to prepare and keep up to date a series of Supplementary Planning Guidance (SPG) Notes which will provide detailed guidance on a range of development issues and topics. The purposes of these Notes are:

- To assist the public and their agents in preparing planning proposals and to guide them in discussions with officers prior to the submission of planning applications,
- To guide officers in handling, and officers and councillors in deciding, planning applications, and
- To assist Inspectors in the determination of appeals

The overall aim is to improve the quality of new development and facilitate a consistent and transparent approach to decision making.

Planning policies: the Flintshire context

The Development Plan

Under planning legislation, the planning policies for each area should be set out formally in the Development Plan. Flintshire County Council, as the Local Planning Authority (LPA), has a legal duty to prepare and keep up to date a development plan for the County, and the Flintshire Unitary Development Plan was adopted in 2011. The UDP provides broad policies together with allocations of land for all the main uses such as housing, employment and retailing, and will help to shape the future of Flintshire in a physical and environmental sense as well as influencing it in economic and social terms. The Plan therefore seeks:

- To help the Council make rational and consistent decisions on planning applications by providing a policy framework consistent with national policy and
- To guide development to appropriate locations over the period up to 2015.

The need for Supplementary Planning Guidance

Despite the Plan containing policies with which the Council can make consistent and transparent decisions on development proposals, it cannot in itself give all the detailed advice needed by officers and prospective applicants to guide proposals at the local level, such as house extensions or conversions of agricultural buildings. The Council's intention is to prepare a range of Supplementary Planning Guidance notes (SPG) to support the UDP by providing more detailed guidance on a range of topics and issues to help the interpretation and implementation of the policies and proposals in the UDP. The review of the Local Planning Guidance Notes will be undertaken on a phased basis and details of the available SPG's can be found on the Council's website. Where there is a need to refer to another SPG this will be clearly referenced. These SPG Notes are freely available from Planning Services, Directorate of Environment, County Hall, Mold, Flintshire CH7 6NF (telephone 01352 703228), at the Planning Services reception at County Hall and can be downloaded from the Planning Web pages www.flintshire.gov.uk/planning

The status of Supplementary Planning Guidance

Supplementary planning guidance can be taken into account as a material consideration in the decision making process. The National Assembly will give substantial weight to SPG which derives out of and is consistent with the development plan. In accordance with National Assembly advice the Council's suite of SPG's has been the subject of public consultation and Council resolution. The draft of this SPG was approved for public consultation on 13.06.13 (Council Minute no.6). The SPG was the subject of a public consultation exercise between 18.12.15 and 12.02.16. The 5 comments submitted to the Council have been taken into account and where appropriate amendments have been incorporated into this final draft which was approved by the Council on 07.01.17 (Council Minute no.8) for use as a material consideration in determining planning applications and appeals. A summary of the representations and the Council's response is set out in Appendix 3.

This document should therefore be afforded considerable weight as a material planning consideration.

No. 5 Conversion of Rural Buildings

This guidance note explains the approach that the Council will take when dealing with proposals for the change the use of and conversion of rural buildings. It offers additional guidance on the interpretation and application of policy HSG7 Change of Use to Residential in the Open Countryside, but will also be applicable to policies including EM4 Location of Other Employment Development, RE4 Small Scale Rural Enterprises, RE5 Small Scale Farm Diversification, SR1 Sports, Recreation or Cultural Facilities, T1 Tourist Attractions, T2 Serviced Tourist Accommodation, and T3 Self Catering Tourist Accommodation.

1 - Background

1.1 - Many of the buildings in Flintshire's countryside form an important part of the County's rural heritage, but changing economic and social circumstances mean that some are no longer required for their original purposes. Amongst these are barns, outbuildings, schools, churches and chapels. In principle it is reasonable that new uses should be found for them, thus utilising an existing resource and reducing pressure for new greenfield developments, whilst simultaneously assisting the rural economy. But such schemes of renovation and conversion must be of an acceptable standard, respecting the character and qualities of the original building. The emphasis should be about saving something of value, rather than rebuilding or extensive alterations.

1.2 - For many years the commonest form of rural conversion was the conversion of barns and other redundant rural buildings into residential use, which allowed many people to find homes in a quiet rural setting where they would not be allowed to build a new dwelling. However, from a sustainability and building conservation point of view, residential conversion is the least desirable. The Government currently favours the conversion of buildings for employment purposes, and thus making it more difficult to gain permission for a residential conversion. Examples of business re-use which will be acceptable in principle include agriculture and forestry related activities, light industry, offices, storage and distribution, tourism, sport and recreation. Only where conversion for employment purposes is proven to be not feasible will conversion to residential use be considered.

2 - Policy

2.1 - The issue of the conversion of rural buildings features in several chapters of the Plan including Housing, Employment, Rural Enterprise and Agriculture, Sport and Recreation, Tourism and Community Facilities. However the key policy is HSG7 'Change of Use to Residential in Open Countryside' and the wording is set out in Appendix 1. The wording of the other relevant policies referred to above can be viewed in the UDP written statement on the Council's website. Rather than looking at each policy in detail, this Note attempts to look at underlining principles and guidelines.

2.2 - The Welsh Government's "Planning Policy Wales" establishes the national policy context. A key objective is the re-use of suitable previously developed land and buildings to minimise land take on greenfield sites. WG's advice on the conversion of rural buildings is set out in para 3.2.1 of Technical Advice Note (TAN) 23: Economic Development.

2.3 - The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation. In recognising this local planning authorities are expected to adopt a positive approach to the conversion of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes, on this basis that:

- they are suitable for the specific re-use;
- conversion does not lead to dispersal of activity on such a scale as to prejudice town and village vitality;
- their form, bulk and general design are in keeping with their surroundings;
- imposing conditions on a planning permission overcomes any planning objections, for example on environmental or traffic grounds, which would otherwise outweigh the advantages of re-use;
- if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction;
- conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and/or architectural interest.

3 - Preferences for the Re-use of Rural Buildings



Business re-use

3.1 - The Government now favours the re-use of rural buildings for schemes bringing local economic benefits and the Welsh Government advises in para 3.2.2 of TAN 23 'Residential conversion of rural buildings which have ceased to be used for industrial or commercial purposes, including agriculture, need to be assessed on their impact including their impact on the fabric and character

of historic buildings. In areas where the creation of local employment is a priority, local planning authorities may include policies within the Development Plan which prohibit residential re-use unless:

- The applicant has made every reasonable attempt to secure suitable business re-use and the application is supported by a statement of the efforts which have been made; or
- Residential conversion is a subordinate part of a scheme for business re-use; or
- The resulting housing will contribute to an identified need for affordable housing for local need (see 9.2.14 of PPW 2016)'.

3.2 - In Flintshire the Council supports new rural commercial development taking place through the re-use of existing buildings, given the vital role of small rural enterprises in promoting a more diverse rural economy.

3.3 - Acceptable uses in principle include offices, high technology, light industry (including food- and timber-related business uses), storage and distribution, and tourism. In all cases it is important that:

- The conversion must be achieved without causing problems such as unacceptable disturbance, visual intrusion, noise, smell, excessive traffic generation or by detracting from highway safety;
- The buildings must be suitable for the uses proposed, with prefabricated or temporary buildings unlikely to be considered suitable.

3.4 - Farm diversification is needed to supplement diminishing farm incomes. In addition to the above uses, it can include retailing clearly related to the farm, such as the sale of farm produce or value-added food products. All such uses should remain ancillary to the main farm use. The inclusion of a “farm plan” showing how the proposals fit into the operation of the farm may be requested, and should help speed up the decision process.

4 - Issues to be addressed by applicants

4.1 - The LPA will require all applicants to submit a statement setting out the steps taken to determine the suitability or feasibility of using a property for business purposes, to include the points set out below.

Physical suitability of the building, site and surroundings

- » The building should be structurally sound and of substantial traditional construction and materials, and capable of re-use without substantial reconstruction (in this context even the need to rebuild 10-15% of the building could be considered substantial by the Council);
- » Extensions or modifications will not normally be acceptable but may be considered where they are essential to a scheme proceeding and are of a scale and nature which do not detract from the character and appearance of the original building;
- » Any features of architectural or historic interest are retained;
- » The business re-use would not be harmful to the amenity of nearby residents through noise and emissions or excessive traffic generation;
- » The access to the building and the local highway network are adequate to cater for the nature and volume of traffic likely to be generated;
- » Sufficient parking and manoeuvring space is available within the site.

4.2 - It will also be necessary to have regard to whether a business re-use can be satisfactorily operated in terms of the amenity of residents and other users of land (noise, light, etc) and any environmental pollution.

Economic feasibility for re-use

4.3 - Where the building is physically suitable for business re-use the applicants should establish whether or not the use is financially feasible, allowing for the purchase and conversion costs and the likely sale or lease price. They should demonstrate that all possible sources of grant aid for the particular business re-use have been explored. In this respect, the Council’s Economic Development Unit may be able to assist. Financial and personal information will be treated in confidence by the LPA.

Combined business and residential use

4.4 - In some cases a building may be capable of supporting a combined usage, and - given the increasing trend for home working and family-based business - this would be acceptable in principle provided that the residential element is subordinate to the business use.

Local Needs Housing

4.5 - In other instances the re-use of a rural building for affordable housing to meet local needs may be appropriate. In order to be suitable, a building would need to be accessible to local public transport as well as local facilities and services in order to bring about sustainable development. Further advice on local needs housing is set out in SPG Note No. 9 Local Needs and Affordable Housing and contact should be made at the earliest opportunity with the Council's Housing Officers.

Residential re-use

4.6 - In those cases where existing rural buildings are considered to be suitable for business re-use, applicants will need to demonstrate that every reasonable attempt has been made (and has been demonstrated) to find a business re-use, or the residential use is subordinate to business re-use, or alternatively the housing will contribute to an identified need for affordable housing in the locality. The Council will require that the property is marketed for sale or for lease at a reasonable price for a period of at least one year and a statement prepared of the genuine efforts taken to secure a business re-use. Further guidance on this aspect is set out in Appendix 2. Only then will the Council consider sympathetic residential conversions of buildings having architectural and historic merit, rather than allow them to deteriorate. Put simply, a converted barn should look like a barn, not a new house. Many traditional buildings are inherently attractive with materials which blend in with their surroundings. Unlikely to be acceptable in this context are those buildings which:

- have undergone radical alteration;
- are too small to adapt without significant extension;
- are structurally unsound, and would require works tantamount to rebuilding (a structural survey will be required to verify the building's condition and its ability to accommodate the physical alterations); and
- are incapable of conversion to the new use without significant extensions or enlargements of window and door openings which would damage their character or lead to overdevelopment: and
- are utilitarian, either in construction or appearance, and make little visual contribution to their surroundings.

4.7 - It is in the applicant's interest to ensure the building's stability is protected during conversion as even its partial collapse, whatever the cause, will render the planning permission null and void.

Conversion of community facilities

4.8 - Planning Policy Wales highlights that the economic and social role of local shops and public houses should be taken into account when assessing proposals to change their use to residential, whereas a positive approach should be taken towards schemes for conversion to village shops and their extensions, and to pubs in villages which have lost such provision. Policy CF1 Retention of Local Facilities seeks to retain such uses and further guidance on the requirements of this policy is set out in a separate guidance note.

Redundancy of the building

4.9 - Where the conversion of an agricultural building is proposed, any replacement building should be carefully sited and designed.

Quality and condition of the building

4.10 - It is important that buildings in the open countryside where conversion is desired should be of permanent and substantial construction, and in a reasonably sound condition. If they require substantial rebuilding, tantamount to the erection of a new dwelling, they will be seen by the LPA as such, and permission is most unlikely to be granted.

4.11 - The planning application must be accompanied by a report by an independent structural engineer or surveyor, demonstrating the building's capability to accommodate the scheme proposed. This is in the applicant's interest because if the building collapses, even partly, whilst conversion works are ongoing, the permission could otherwise be lapsed.

Design considerations

4.12 - In essence, it is worth stressing that national planning policies seek to minimise new development in the open countryside, and therefore the re-use of old buildings should retain the character which justifies their preservation in the first place and not give the appearance of a new intrusion into the countryside. Generally the scheme should be capable of conversion without the need for extensions and alterations. Much of the detailed guidance below will be most applicable to the conversion of former agricultural buildings although there are general principles that can be applied to other buildings.

4.13 - Successful conversions can be difficult to achieve and require considerable design skills and experience. It is advisable to use the services of a qualified architect or surveyor. The RIBA and the RICS can supply details of practices:



- Royal Institute of British Architects, 66Portland Place, London. W1B 1AD (Telephone 020 7307 3700)
- Royal Institution of Chartered Surveyors, 12 Great George Street, Parliament Square, London SW1P 3AD (Telephone 020 7334 3781 or 020 7695 1618)

4.14 - In addition, advice can be found in a guide to good practice on design matters, "Converting Historic Farm Buildings in Wales", which was produced jointly by Cadw, Welsh Government and Monmouthshire County Council in 2004. The following diagram from that guidance note illustrates many of the key messages:

**Agweddau gwahanol tuag at addasu
ysgubor nodweddiadol**

**Alternative approaches to converting
a typical barn**

Top: Ysgubor nodweddiadol, heb ei haddasu, gyda'r drysau uchel i'r ardal ddyrnu, ychydig iawn o agoriadau ar gyfer golau a dim simne.

Top: A typical unconverted barn, with tall doors to the threshing area, few openings for light, and no chimney.



Canol: Mae'n bosibl creu tŷ modern safonol o adeilad o'r fath ond nid yw nodweddion yr ysgubor wedi cyfrannu o gwbl at y cynnyrch terfynol.

Middle: It is quite possible to create a standard modern house from such a building, but the features of the barn have made no contribution to the final product.



Gwaelod: Mae cynllun amgen ar gyfer addasu'r ysgubor yn cadw'r agoriadau gwreiddiol a llinell y to. Cadwyd drysau estyll a cheir cyn lleied o wydr â phosibl. Mae anghenion domestig fel gwaith plymio wedi'u cuddio.

Bottom: An alternative design for conversion preserves the original openings and roofline. Plank doors have been retained and glazing kept to a minimum. Domestic requirements such as plumbing are hidden.



The scheme should aim to comply with the general advice which follows.

5 - External alterations

Roof

- Avoid raising the roof, altering the pitch or installing windows in the roof.
- Dormers will almost always be inappropriate, particularly where the existing building has no dormers, unless there is a clear precedent for their use on buildings in the locality.
- Vent pipes and flues protruding from the roof should be avoided.
- Roof slates/tiles should be repaired and re-used where possible.
- The number of roof lights should be kept to a minimum and should be flush with the roof surface and not overly large in proportion in relation to the roof.
- The position, number and size of solar or photo-voltaic cells should not adversely affect the appearance of the building.

Walls

- Retain existing openings and – if further openings are required – old blocked up openings should be utilised.
- Minimise the use of new window and door openings – where they are necessary, ensure they are sympathetic in terms of the overall proportions of the building as well as design, proportions and materials.
- Where openings need to be blocked up, sympathetic materials should be used to show where the original opening was located.
- Existing features such as arches, lintels, ventilation slits and fixed machinery should be retained and incorporated.
- Large barn doors should be kept, either by glazing or by using them for garaging.
- Avoid fussy, over-elaborate details.

- Where necessary, repointing of stone/brickwork should use traditional lime based mortars and methods.

Windows and Doors



- Traditional or vernacular windows and doors should be retained and repaired wherever possible.
 - New or replacement windows and doors should match originals or reflect the character of the building or those used in buildings in the locality.
 - New window and door frames should be recessed at least 10cm to give depth to a facade.
 - Avoid the use of UPVC.
 - Timber should be painted rather than stained although sustainably sourced local hardwoods may be left untreated.
- Modern up and over garage doors will not be acceptable.



Internal Features

- Internal character features such as exposed beams, roof timbers, original fittings and tiled, wooden or stone floors, should be retained and incorporated in the conversion.
- The subdivision of internal space where it forms an integral part of the building's character, will not be appropriate.

Extensions

- The emphasis in any conversion scheme is that the building in its present form is suitable for the intended use. At the time of considering a conversion scheme, minor extensions will only be allowed in exceptional circumstances, where they are genuinely required to facilitate a residential conversion (rather than merely adding extra bedrooms) may be acceptable provided that it is ancillary in scale and in keeping with the character and appearance of the building.
- Large extensions will not be acceptable.
- Conservatories, porches, dormers, sheds, pools and other extensions that are inherently domestic in design will be resisted. (Porches, if required, should be provided internally.)
- To avoid later extensions which are out of character the Council will remove permitted development rights for alterations to the building.

- In the case of residential conversions, garaging and storage requirements should be met through existing buildings or other structures on site.

Drainage and Waste

- Rainwater gutters and downpipes should be kept to a minimum, in black finished cast iron or aluminium.
- External pipework such as soil and vent pipes should be positioned internally and kept to a minimum.
- Sustainable methods of treatment and disposal of waste water should be incorporated in the conversion wherever possible.
- Refuse storage and recycling facilities should be as unobtrusive as possible.

Heating and Ventilation

- Chimney stacks are unlikely to be acceptable.
- Heating system flues should have a minimal visual impact and be of appropriate material and colour.
- Consideration should be given to sustainable sources of heat such as ground / air source heat pumps, provided that the necessary equipment and machinery can be incorporated sensitively within the scheme of conversion.
- Underfloor heating can help avoid the clutter often associated with radiators.

External areas



- Curtilages should be kept to the minimum area required for the intended occupation and use of the building, and should ideally follow existing boundary features.
- Boundaries are best hedged with species native to the locality, or constructed using local stone/brick, or simple post and rail fences. Wherever possible existing boundaries should be retained and repaired or supplemented with new planting.
- The curtilage should be kept as uncluttered as possible, particularly in terms of residential

paraphernalia such as sheds, gazebos, etc. In granting planning permission for residential conversions, the Council may remove permitted development rights for structures that would normally be permitted development.

- Use brick or stone setts or cobbles, retaining as much of these features where existing as possible
- In the conversion of farm buildings, hard landscaping is appropriate to courtyards and soft landscaping elsewhere, retaining existing features where possible. Hard surfacing outside the original farmyard area should be minimised, and manicured lawns and gardens should also be avoided.
- External features of interest associated with the original use of the building should be retained and incorporated into the layout and design of the curtilage
- Parking should be sensitively sited and designed, and meet the Council's LPG Note 11 Parking Standards.
- Vehicular access should be gained from an existing access onto the public highway and should avoid either the creation of new access points or driveways across open land.
- Services such as LP gas and oil tanks and septic tanks should be sited unobtrusively and screened.
- Storage areas which may be required for employment projects should be sensitively and unobtrusively sited, or screened effectively.
- Disabled people should have satisfactory access to all buildings used by the public –see LPG Note 12 Access For All.

Sustainability



- Local materials, such as sustainably harvested timber, that require less transportation should be used where possible in order to reduce the carbon footprint of development
- Efforts should be made to ensure that the carbon footprint of the building be reduced through the highest standards of insulation, energy and water efficiency and renewable energy. Regard should be had to the Code for Sustainable Homes, details of which can be found in SPG Note 20 -Sustainable Buildings - Energy Conservation and Renewable Energy.

Relationship to other buildings and uses

5.1 - Consideration should be given to privacy and overlooking issues where dwellings are located nearby SPG Note 2 Space Around Dwellings provides advice on reasonable minimum separation distances as well as private garden space. Schemes of conversion should also have regard to nearby land uses and operations in terms of ensuring that occupants enjoy satisfactory levels of amenity.

Protected species

5.2 - Many old buildings may contain species such as barn owls and bats which are protected under the Wildlife and Countryside Act 1981. The applicant will need to undertake a survey before the application can

be considered, and the LPA will consult the Natural Resource Wales (NRW) on its results and the mitigation measures required. To damage or destroy a bat site is an offence even if committed unknowingly. The County Ecologist (telephone 01352 703268) in the Environment and Conservation Section of Planning Services will be happy to give advice.

Listed buildings and conservation areas

5.3 - Some rural buildings being considered for conversion will be listed as being of architectural or historic interest. A separate application for listed building consent must be made for any alterations which would affect the special character of such buildings. Further advice on listed buildings is contained in SPG No.6, Buildings may also be in a conservation area, and further advice is contained in SPG No. 7 Conservation Areas. Reference can usefully be made to a good practice guide 'Converting Historic Farm Buildings' which was produced jointly by Cadw, Welsh Government and Monmouthshire CC.

Area of Outstanding Natural Beauty

5.4 - The Clwydian Range is designated as an Area of Outstanding Natural Beauty on account of its landscape quality and scenic beauty. Proposals for conversions either in or close by the AONB will be judged against the conservation and enhancement of its natural beauty. Particularly high standards of design and materials will be required in schemes.

Removal of permitted development rights

5.5 - Permitted development (PD) rights are certain minor changes which can be made without needing to apply for planning permission. In order to avoid loss of the building's character, the Council will remove PD rights when granting permission for residential conversions through the imposition of a planning condition. This means that any subsequent additions or alterations, such as garages, sheds, extensions, conservatories and roof alterations, will require planning permission.

Making a planning application for a conversion

5.6 - It is advisable to consult a Planning officer from the Development Management Section of Planning Services (in the Directorate of Planning and Environment, County Hall, Mold) for pre-app discussions before applying. All applications should be made using the 1App standard planning application form or submitted on-line. Before submitting an application, reference should be made to the 'Planning Application Requirements' document, available on line or from the Planning Services Offices. Conversions will require an application for full planning permission and will specifically require:

- A design and access statement.
- Elevations and plan drawings, existing and proposed.
- Cross sections where relevant.
- Landscaping details showing existing and proposed, hard and soft landscaping.
- Report by a structural engineer/surveyor.
- Marketing report (for residential projects only) and a statement of the efforts made to secure a business re-use for the building.
- Wildlife survey report.

Appendix 1: Key UDP policy

HSG7 Change of Use to Residential Outside Settlement Boundaries

The change of use to a dwelling of an existing non-residential building outside settlement boundaries will only be permitted where:

- a. if suitable for employment use, the building has been advertised at a reasonable price for sale or lease for an employment generating use, for a period of at least one year without success; or
- b. residential conversion is a subordinate part of a scheme for business re-use; or
- c. the resultant housing would contribute to an identified need for affordable housing to meet local needs.

provided that:

- i. the building is structurally sound and capable of conversion without significant extension, extensive rebuilding, or external alteration. A detailed independent structural survey will be required as evidence in support of the application;
- ii. the building has traditional architectural and historic features which merit retention and are retained as part of the scheme;
- iii. the residential use of the building and curtilage provides adequate privacy and space around dwellings, and does not have an unacceptable effect on the character and appearance of the surrounding area, by virtue of its siting, scale, design, form, use of materials and landscaping;
- iv. reasonable standards of residential amenity are provided by the proposal.

The Council will give sympathetic consideration to the change of use of existing buildings of architectural or historic merit to residential uses rather than allow their deterioration. Due to the need to exercise strict control on new housing development outside settlement boundaries only buildings with worthy architectural or historic interest will be considered for conversion under this policy. If other buildings of no architectural or historic interest were considered it would lead to the proliferation of new dwellings in the open countryside which the Plan and National Planning Guidance seek to avoid. Many older traditional buildings are inherently attractive and because of the use of natural materials such as stone and slate they blend in with their natural surroundings.

National Planning Guidance gives preference to the conversion of rural buildings to employment related rather than residential uses except where residential conversion is a subordinate part of a scheme for business re-use, or is contributing to an identified need for affordable housing. This policy seeks to distinguish between rural buildings which have an existing economic use whose conversion to residential may have a detrimental effect on the local economy, and those buildings which have ceased to have an economic use. However, due to the need to diversify the rural economy, proposals must be supported by a statement from the applicant of the genuine efforts made to advertise the property for sale or lease as an employment related use, with recognised estate agents and/or in appropriate property journals, at a reasonable price, for a minimum period of one year. This will only be required when the building is considered suitable for employment generating uses having regard to the characteristics of the building, the site and surroundings, and the vehicular access and local highway network.

Not all buildings will be suitable for a change of use. Those radically altered since their original construction or of insufficient architectural merit may not be worthy of retention or too small to adapt without significant extension. The original building must be structurally sound, or capable of being made so, by works that are not tantamount to rebuilding. A structural survey will be required with all proposals to verify the condition of a building. It must also be capable of accommodating the new use without significant extensions which

might destroy its character or lead to overdevelopment. The emphasis should be on retaining existing openings with only minor extensions which complement the scheme of conversion and do not detract from it. Division to more than one residential unit will depend on the size and available space around the building and its suitability for multiple adaptation. All schemes should conform to the Council's 'Space About Dwellings' standards to ensure adequate space between existing and proposed new dwellings.

In all cases, every effort must be made to ensure the stability of the building during conversion works. The full or partial collapse of the building, whatever the cause, will render the planning permission null and void.

Appendix 2: The marketing assessment

In cases where a building is considered to have potential for a business re-use it will be necessary for the applicant to demonstrate that all reasonable efforts have been made to secure a business re-use. Conversions to residential use will not be allowed unless there is clear evidence that there is no demand for a business use. This must explain the attempts made to market the building for business use over a period of at least one year in North Wales, Cheshire and Merseyside at a reasonable price for sale or lease. A planning application will need to be accompanied by a statement addressing the following points:

The marketing exercise must include:

- » Marketing through a recognised and independent property agent.
- » Continuous advertisement on the agents own website and publications.
- » Regular advertising for at least a year in a local / regional newspaper / specialist publications / websites (for the first month this should be intensive advertisement and marketing).
- » A 'for sale' and / or 'to let' board on the site frontage throughout the period (any decision to not have a display board must be sufficiently justified).
- » Notification to Flintshire County Council's Economic Development Unit.

Proof must include:

- » Copies of the sales particulars.
- » Copies of all advertisements with dates.
- » Details of when and where the advertisement was displayed by the agent, and the latter's particulars.
- » Details of the number of enquiries / viewings.
- » Details of any offers received and an explanation of why they were not accepted.
- » A short statement by the agent of the building's viability for business use in the light of the marketing exercise.

APPENDIX 3

Supplementary Planning Guidance Note (SPGN) Public Consultation, (Dec 18th 2015 and Feb 12th 2016) comments and responses to SPGN No 5 Conversion of Rural Buildings.

Commenting Body / Individual	Comment	Response	Recommendation
No. 5 Conversion of Rural Buildings			
Clwydian Range and Dee Valley AONB JAC	The committee supports the general thrust of the SPG to save buildings of value rather than rebuilding or extensive alterations, and the emphasis on respecting the character and qualities of the original building. The specific reference to the AONB in para 5.4 is particularly welcome, but it is suggested that the importance of sensitive areas such as the AONB, Conservation Areas and Listed Buildings where traditional buildings make a special contribution to the character and appearance of the area should also be referenced in the introductory background section (para 1.1) to add emphasis.	It is not considered necessary for the AONB to be specifically mentioned in the introductory sections of the Note as there would be calls for other important resources to be mentioned as well. In the detail of the Note listed buildings and conservation areas are addressed in para 5.3 and the AONB in para 5.4.	No change
Huw Evans Planning	Whilst the principle of the preferred use of rural buildings for employment purposes is generally accepted the reality is that many such buildings are quite clearly not suited to commercial use or there is no demand. This is particularly pertinent in Flintshire which has an excess of existing and allocated. In these instances the requirement to advertise for a 12 month period is unnecessary and excessive resulting in undue delay in bringing buildings into beneficial use. It would be better to take account of the advice from commercial agents.	The preference for economic and business of rural buildings is enshrined in both PPW and the UDP. Nevertheless, para 4.2 of the SPG explains that it will be 'necessary to have regard to whether a business can be satisfactorily operated in terms of amenity of residents and other users of land (noise, light etc) and any environmental pollution. The Note then goes on in para 4.3 to look at whether a business re-use is financially feasible, allowing for conversion costs and the likely sale or lease costs. Only in those	No change

	<p>They are much better placed to advise on not only the suitability of premises for employment use but the prospect of them being let or disposed of within a reasonable timescale. Conversion of redundant buildings to residential use in the countryside can contribute to the need for a range of new housing in the rural area. It should also be noted that the cost of conversion in most cases precludes them from being able to meet affordable local needs housing.</p>	<p>instances where i) the site and its surroundings is considered suitable for business re-use and ii) the business re-use is considered to be commercially feasible, will the requirement for marketing for a business re-use be required. This approach is considered to reflect the concerns of the objector.</p>	
CPRW	<p>The final sentence of para 3.4 should be amended to specify that in terms of farm diversification schemes a farm plan 'will' be required. This would make the decision making process even speedier and pre-application advice should be made mandatory for such proposals and the requirement for a farm plan to be resolved at that time.</p>	<p>It is not considered necessary for a 'farm plan' to be submitted in all farm diversification proposals especially when the diversification activity is small scale and ancillary to the farm operations. However, in cases where diversification proposals require a fuller understanding as to how they fit in with the farm operations, then the SPG provides the basis for a farm plan to be requested.</p>	No change
CPRW	<p>The second bullet point in para 4.1 in respect of extensions or modifications should be amended to read '...will not normally be acceptable 'especially to listed buildings', but...'. This would ensure the protection of listed buildings and their settings.</p>	<p>It is not considered necessary for extensions / modifications to be specifically excluded from listed buildings. The wording of the bullet point '... will not normally be acceptable' is sufficient to demonstrate that any proposals to alter or extend a rural building will need to be justified and demonstrated to not harm the character and appearance of the building.</p>	No change
CPRW	<p>The paragraphs at the bottom of p7 both have the same references '4.7'.</p>	Noted	Amend paragraph referencing from 4.7 onwards