

JR PLANNING
VELOCITY POINT
WREAKES LANE
DRONFIELD
S18 1PN

BRADLEY SARGESON
SENT BY EMAIL

**LETTER TO ACCOMPANY AMENDED PLANS FOR APPLICATION 2025/0153 AT HIRST
COTTAGE, BILLINGLEY**

Dear Bradley

Following recent discussions and a review of the consultation responses, I am pleased to submit amended drawing numbers reference 2025/114 01 Rev A and 2025/114 02 Rev A and. The amended plans address the issues that have arisen during the application to date, and should allow the application to proceed to a positive outcome. The key Green Belt and Heritage issues are addressed below.

Green Belt

The revised NPPF is a crucial part of the Government's overarching agenda of delivering 1.5m new homes during this parliament. This is a central pillar of the 2024 election pledge and is a response to the well-publicised UK housing crisis. The NPPF places great importance on housing delivery across the UK and is accompanied by recent press releases ("back the builder's, not the blocker's") and written ministerial statements. All of these place heavy emphasis on the need to reform the planning system so that developments, most notably housing developments, can be delivered as quickly as possible.

The proposed level of housing that is expected to be delivered is extremely ambitious. To put it into context, the UK has not got close to delivering the amount of housing now proposed for over 45 years.

Applications for housing developments need to be viewed in this context and supported wherever possible.

One of the most significant changes in the revised NPPF in respect of Green Belt policy is the clear and deliberate loosening of restrictions on the redevelopment of previously developed land.

The site comprises the redevelopment of previously developed land in the Green Belt.

Under the last iteration of the NPPF, the redevelopment of previously developed land was not inappropriate providing that it would not have any greater impact on openness. This like-for-like requirement has now been abolished. Instead, Paragraph 154 part (g) now allows for the redevelopment of previously developed land which would not cause substantial harm to the openness of the Green Belt.

Substantial harm is a deliberately high threshold. There can be no doubt that the change in this respect has been made in order to allow for more housing development on previously developed sites in the Green Belt. There is no longer any policy requirement for arbitrary volumetric calculations between the existing and proposed developments. A new development that is larger than the existing development is policy compliant up until the point where the substantial harm threshold is crossed.

In this instance, the proposed dwelling occupies a very similar position to the previous dwelling, and is similar in scale to the previously dwelling with approved extensions. Whilst in the Green Belt, the site is surrounded to all sides by neighbouring buildings. As such, it is a very well contained site that offers no contribution to openness of the wider Green Belt area.

Taking account of the containment of the site by neighbouring buildings, and similarities in the scale, orientation and position between the proposed and former dwellings, there is no doubt that the impact on openness falls well below the 'substantial harm' threshold. Even if the starting point is now taken as a site with no existing building, the containment of the site and it being surrounded by other buildings means that the introduction of a new house would only cause moderate harm to openness, and not substantial harm.

As such, the proposal is not inappropriate development in the Green Belt as defined by paragraph 154 (g) of the NPPF.

Design and Heritage Matters

The consultation response from the LPA's Conservation Officer to the original scheme includes the following helpful summary:

The demotion noted in January 2025 was harmful to the conservation area setting as the historic building is now lost. However, I accept the previous building was fragmentary and had been significantly altered, both externally and internally. Beyond this, and on balance, a properly detailed and sympathetic scheme for the site could be acceptable. However, as detailed above, the current scheme is not yet adequately sympathetic in appearance and design and has been increased in size as the LPA recommended against. If this could be amended to accommodate the comments above, I feel I may be able to support the proposal, but a redesign and negotiation over the details will be required.

The amended scheme fully takes on board the concerns raised in respect of the initial scale and design. The redesign aligns the scale and appearance of the proposed dwelling more closely with the previously approved extension scheme. The following key amendments have been made:

- Front gable omitted, restoring the vernacular appearance, form and scale of the front elevation.
- The garage projection reduced back to a double garage, with the room above and dormer windows omitted.
- Appropriate detailing added to the fenestration (quoins, windows surrounds etc.).
- Position and footprint very similar to the approved extension scheme.

The scale, position and appearance of the proposed dwelling as amended now fully reflect and respect the grain and appearance of the conservation area. The historic relationship between the building and Chapel Lane is maintained, with the generous set back and large front garden space retained. No trees are impacted by the proposal.

Overall, the amended scheme proposes a building that preserves the significance and historic character of the Billingley Conservation Area, and is fully policy compliant in this regard.

Conclusions

The previous concerns have been fully taken on board and addressed. The amended scheme represents the redevelopment of previously developed land that does not cause substantial harm to openness. Furthermore, the amended proposal would preserve the Conservation Area.

Should you have any queries please do not hesitate to contact me.

Kind regards,

Tom Shiels
JR Planning
04/09/2025