

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 10: Employment,
Economic Development and
Infrastructure (Policies STR5,
ED1, ED2, ED3, ED4, ED5,
ED6, ED7, ED8 and ED12)
Issue 6: Rural Development and
Diversification**

Document Reference: TWLP/058



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Matter 10 – Employment, Economic Development and Infrastructure (Policies STR5, ED1, ED2, ED3, ED4, ED5, ED6, ED7, ED8, and ED12)

Issue 6 – Rural Development and Diversification

Inspector’s Question 1: [consistency of Plan with paragraph 84 of the NPPF]

Does the Plan enable the development and diversification of agricultural and other land-based rural businesses, as required by paragraph 84 of the Framework?

TWBC response to Question 1

Introduction

1. Paragraph 84 (b) of the NPPF states:

“Planning policies and decisions should enable:

b) the development and diversification of agricultural and other land-based rural businesses;”

2. In terms of how the Plan enables the development and diversification of agricultural and other land-based rural businesses as required by the NPPF, the following sections/policies of the Submission Local Plan (SLP) [[CD 3.128](#)] are considered to be of relevance:

Section 2 of the SLP – Setting the Scene

3. Firstly, Section 2 on page 28 of the SLP sets out the borough context and the key issues, challenges and opportunities for the borough. This includes the local economy so that it can continue to be competitive and create a range of local job opportunities. Of particular note:

- It is recognised that current significant structural changes in retailing and town centres at the national level, as well as the 2020/2021 Covid-19 pandemic, give rise to uncertainty across the retail, business, and tourism sectors of the local economy and that a flexible approach may be needed in respect of uses within the town and other designated centres, to ensure their long-term adaptability to changes in the economic climate, and retail and town centre trends over the plan period.
- It is recognised that economic uncertainty may also put pressure on, and result in the loss of, rural shops and services in village and other local centres, which provide an important supporting role at the heart of communities
- In addition, it is recognised that while the area remains an attractive business location with good prospects for growth, opportunities need to be provided in both the urban and rural areas across the borough to actively facilitate future business growth and expansion, which in turn will create local job opportunities.

Section 3 – Strategic Objectives

4. In Section 3 of the SLP (pages 31 and 32), the Strategic Objectives provide a framework for assessing the overall coherence of the Local Plan and set out key principles to inform the development strategy and policy choices.
5. Strategic Objective 6, seeks:

“To ensure good, safe access to jobs and services, with priority to active travel and public transport, as well as embracing new technology;”

6. While Strategic Objective 7 seeks:

“To ensure that the borough is vibrant, culturally rich, and economically buoyant;”

Section 4 – Strategic Policies

7. Strategic Policy STR1: The Development Strategy (pages 35 to 44 of the SLP), sets out the development needs for the borough, including employment needs and how this is sought to be achieved through the Local Plan. With regard to the section on Economic Needs, the following paragraphs are of particular note in terms of enabling the development and diversification of agricultural and other land based businesses:

- Paragraph 4.56 (see page 43 of SLP) identifies proposed site allocations in relation to employment land needs, this includes the expansion of the Key Employment Area at Gill's Green known as the Hawkhurst Station Business Centre as listed in Table 5 on page 43.
- Paragraph 4.57 (also on page 43) recognises:

“that there will be additional floorspace, likely in the form of smaller offices and possibly workshops, as part of the new settlement at Tudeley Village, the locations of which will be identified through the proposed Supplementary Planning Document (SPD).”

Section 5 – Place Shaping Policies

8. The SLP [CD 3.128] also makes provision for the development and diversification of agricultural and other rural based businesses through proposed strategic policies and site allocations in the Place Shaping Chapter, Section 5. Examples include:
 - Policy STR/CRS1 The Strategy for Cranbrook and Sissinghurst parish (pages 178 and 179 of the SLP) - seeks to retain land and buildings currently used for non-residential uses within the centres of Cranbrook and Sissinghurst for employment-generating and community uses.
 - Policy STR/HA1 The Strategy for Hawkhurst parish (see pages 201 and 202 of the SLP) – seeks to safeguard the Hawkhurst Station Business Park at Gill's Green, including its extension (as provided for by Policies AL/HA 6 and AL/HA 7) for future employment (Class E, B2, B8) use in accordance with Policy ED1.

Section 6 – Development Management Policies

9. Section 6 of the SLP, sets out the Council's approach to employment and economic development (see pages 431 and 432) and the development management policies which would be applied to the assessment of development proposals.
10. As set out in the Council's responses to Matter 10, Issue 1 Questions 3 and 4 (Document ref TWLP/053), there are a number of development management policies which would assist in providing the diversity of economic development and employment offer, specifically within the rural areas. These include:

- Policy ED4: Rural Diversification (pages 438 to 440): As set out at paragraph 6.468 on page 438, this policy recognises that a range of business enterprises can prosper in the rural areas that may be within an agricultural holding but not be linked directly to the agricultural element of a farm. Such rural diversification schemes could include businesses directly related to the agricultural use, such as dairy and food production enterprises, woodland related activities, or other non-related enterprises such as leisure and tourism related uses, or niche businesses operating from redundant buildings. This policy makes provision for and sets out the relevant criteria which should be applied for development that forms part of a farm diversification scheme, or otherwise helps maintain the viability of rural businesses engaged in sustainable land management (see the policy wording at pages 439 and 440).
- Policy ED5: Conversion of Rural Buildings outside the Limits to Built Development (pages 440 to 445): Under this policy, for proposals which fall outside permitted development, and as set out at paragraph 6.480 (bullet point 1 on page 441), in order to support the objective of promoting a stronger rural economy, priority will be given to the change of use or conversion of rural buildings for business, recreation, and tourism uses. This policy makes provision for and sets out the relevant criteria which should be applied in the submission of any such proposal (see the policy wording at pages 444 and 445).
- Policy ED6: Commercial and Private Recreational (including equestrian) Uses in the Countryside (pages 445 to 447): As set out at paragraph 6.491, this policy seeks to support appropriate types of rural business development, including those for commercial and private recreational uses in the countryside, such as equestrian uses (riding schools, livery uses, horse training), fisheries, climbing activities, and off-road cycling activities. It is recognised that in accordance with NPPF advice, that recreational uses can not only make an important contribution to the health and wellbeing of communities, but also to the rural economy. This policy makes provision for and sets out the relevant criteria which should be applied in the submission of any such proposal (see the policy wording on page 447).

11. There are also other development management policies of relevance, including:

- Policy ED1: The Key Employment Areas (KEA's) (pages 431 to 433 of the SLP). As set out under the Council's response to Matter 10, Issue 1, Question 1 above (Document Ref TWLP/053), this policy designates areas for the provision of employment uses to serve the borough, including retention of existing, and proposals for new, employment provision within the KEAs. This includes the KEA at Hawkhurst Station Business Park at Gill's Green (referred to above).

Paragraph 6.445 in the supporting text to Policy ED1 on page 431 of the SLP [[CD 3.128](#)], recognises that in addition to the Key Employment Areas:

"...there are other smaller employment 'hubs' across the whole borough, particularly in the rural areas, and these will be afforded protection through the retention of existing employment sites and buildings as set out in Policy ED 2." (see below)

- Policy ED2: Retention of Existing Employment Sites and Buildings (pages 434 and 435 of the SLP) recognises greater flexibility for the change of use of buildings allowed under recent revisions to the Use Classes Order. However, where planning permission is required, the retention and protection of existing employment sites and buildings is a key policy aim of the Local Plan. Policy ED2 therefore seeks to retain existing employment sites and buildings within existing or alternative employment-generating uses subject to using detailed criteria, including location and suitability.

As set out in the Council's response to Matter 10, Issue 3, Question 2, with the exception of the KEA at Hawkhurst Station Business Park at Gill's Green, the KEAs under Policy ED1 above, are located in the north-western part of the borough. It is considered that in applying Policy ED2 to all existing employment sites and buildings, this will proportionally offer some protection to other areas of the borough including the other town and rural service centres within the borough and the smaller rural settlements, supporting both the wider and rural economy of the borough.

12. Provision is also made in the SLP for employment relating to tourism across the borough. Paragraph 6.500 of the supporting text to ED7: Retention of, and improvements to existing, and the promotion of new, tourist accommodation and attractions (see pages 447 to 449 of the SLP), recognises that the tourism industry is considered to be significant to the borough and an important contributor to the local economy in both the urban and rural areas in terms of providing investment

opportunities and generating employment. The second part of the policy - New, or improvements to, tourist accommodation and visitor attractions (see page 449) makes provision for new and/or the expansion of tourism related development proposals.

13. In addition, Policy ED3: Digital Communications and Fibre to the Premises (FTTP) (pages 436 to 438 of the SLP) seeks to support and promote the expansion of electronic and digital communication networks across the borough, including next generation mobile technology, which plays an important role in achieving sustainable economic growth in rural areas.

Summary

14. In summary, there are a range of objectives, policies and allocations across the Plan which seek to enable the development and diversification of agricultural and other land based rural businesses. This includes the expansion, adaption, diversification and modernisation of existing businesses, as well as making provision for the creation and development of new businesses within rural areas. It is therefore considered that the Plan and the policy approach is in accordance with paragraph 84 (b) of the NPPF.

Inspector’s Question 2: [Policy ED5 - justification of full programme of works]

What is the justification for requiring a full programme of works to be submitted with every planning application for the conversion of a rural building under Policy ED5?

TWBC response to Question 2

15. Introductory paragraph 6.474 of the supporting text to Policy ED5: Conversion of Rural Buildings outside the Limits to Built Development (see page 440 of the Submission Local Plan (SLP) [CD 3.128](#)) states that:

“Some buildings in the countryside, including barns and oast houses, are now unsuited to, or no longer required for, the purpose for which they were originally built. Many of these existing buildings are of historic or architectural interest and in themselves add to the character of the rural landscape of the borough and may be identified as non-designated heritage assets. Others are not of historic or architectural interest, but rather are of a more functional appearance: however, they are still reflective of the rural character and landscape.”

16. Moreover, it is considered that such buildings make a significant and important contribution to the rural landscape character and its sense of local distinctiveness. They are also a reminder of the evolution of the rural landscape in demonstrating how local and traditional building techniques and use of building materials have developed over time to serve a particular function.

Retention of existing buildings

17. In addition, as set out in the Council’s response to other questions relating to policies and proposals in rural areas, the Council seeks to minimise the impact of built development in rural areas to protect and conserve the intrinsic beauty, value, and locally distinctive character of the countryside. Therefore, priority is given to the retention and re-use of existing dwelling/structures and demolition and rebuild should only be considered in certain circumstances. This approach is considered necessary

given the high landscape value of the borough as described in the Council's Borough Landscape Character Assessment 2017 (see second paragraph of the summary box on page 15 of [PS 019](#)):

“It is predominantly a rural, agricultural landscape of grazed pastures and arable fields highlighted with broad belts of orchards and occasional hop gardens, all set within a framework of woodland. The landscape presents a peaceful and tranquil character, often with a sense of rural remoteness, which belies its location in the populous Southeast of England. The strong wooded framework is provided by the upland blankets of coniferous plantation, irregular blocks of ancient woodland, thin ghyll woodlands nestled in the valleys and woodland shaw boundaries that harmoniously knit the various agricultural landscapes together.”

18. Paragraph 3.2 on page 28 of this document sets out the past, current and potential future changes in the landscape which result in changes that detract from its character, as well as possible enhancement opportunities. Bullet points 3 and 5 set out detractors from the landscape as a result of inappropriate design, materials and additions to existing properties; with bullet point 5 stating that *“Redevelopment of rural properties will need to be properly justified and be subject to ...constraints and expected to be respectful of the local vernacular architecture.”*

19. Therefore, it is important that new development, including the conversion and re-use of existing rural buildings, does not detract from the landscape.

20. This approach is advocated by paragraphs 174 a) and b) of the NPPF, which state that:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes...;*
- b) recognising the intrinsic character and beauty of the countryside...’*

21. In addition, almost 70% of the borough is designated as High Weald AONB, which is of national significance and recognised as an important medieval landscape, and around 22% of the western part of the borough is designated as Green Belt. Together, the AONB and Green Belt cover 75% of the borough, with substantial overlaps.

22. Paragraph 150(d) of the NPPF makes provision for certain forms of development in the Green Belt, which includes the re-use of buildings, but these must be of a permanent and substantial construction:

“Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

d) the re-use of buildings provided that the buildings are of permanent and substantial construction;”

23. Also, as advocated in paragraph 8 (c) of the NPPF, one of the overarching objectives in achieving sustainable design, the environmental objective, is to minimise waste and pollution, mitigate and adapt to climate change, and reduce carbon output. In line with this, a number of SLP Policies such as EN1: Sustainable Design (criterion 3 of policy on page 326 of SLP); Policy H10: Replacement Dwellings outside the Limits to Built Development (pages 420 to 422 of SLP); ED4: Rural Diversification (pages 438 to 440 of SLP), Policy ED6: Commercial and Private Recreational (including equestrian) Uses in the Countryside (pages 445 to 447 of the SLP) and Policy ED5, give priority to the retention and re-use of existing dwelling/structures over rebuild.

Justification for full programme of works

24. Paragraph 6.482 of the supporting text to Policy ED5 (pages 441 and 442 of the SLP), of which criterion 4 is of particular relevance, states that:

“In order to conserve the intrinsic value and locally distinctive character of the countryside, the following issues will need to be considered, and information submitted (where applicable) as part of any planning application for rural conversion proposals:

4. A full programme of works shall be submitted detailing exactly what the conversion entails, from initial structural survey and analysis work (a schedule of repairs), how the work will be carried out, including external detailing, through to completion. The programming of the work to be undertaken will be controlled by way of a planning condition attached to any permission granted. The Council may require the review of

the survey and programme by an external independent consultant, and the applicant is expected to cover the costs of this”

25. This requirement is also set out at criterion 5 of the Policy ED5 itself (see pages 444 and 445 of the SLP).

26. Therefore, given the reasons set out above in terms of giving priority to the retention of existing rural buildings, the justification and reasons for requiring a full programme of works to be submitted with every application for the conversion of a rural building, are set out as follows:

- In accordance with criterion 2 of the Policy and for proposals in the Green Belt, paragraph 150 (d) of the NPPF as mentioned above, it needs to be established that the building is of permanent, substantial, and sound construction and capable of conversion to the proposed use without significant reconstruction, modification, or additions. The programme of works would include an initial structural survey and analysis work including a schedule of repairs and important features to be retained to assist with this.
- In accordance with criterion 4 of the Policy, the visual impact on the rural landscape of any proposal would need to be minimised so any proposed alterations to the building and provision of, or changes to, access arrangements will be in keeping with the character and appearance of the building and its wider landscape setting in terms of materials, design, and form. The programme of works would include full details of both internal and external alterations including the use of fenestration and materials as well as details of how the external space/curtilage around the building is to be used.
- In accordance with paragraph 6.483 of the supporting text to the Policy (see page 443), and criterion a. of the Policy, development proposals that would affect designated and non-designated heritage assets, such as listed buildings and conservation areas, or other traditional rural buildings, including those forming part of an historic farmstead, will be carefully assessed in terms of the impact they would have on the special character (and fabric where applicable), appearance, amenity, and setting of these assets. As above the programme of works would include a schedule of repairs and an analysis of any important features to be retained/repaired/removed which contribute to the fabric, character, appearance and setting of the heritage asset.

27. The submission of a full programme of works will ensure that the building is properly assessed both in terms of its structural integrity and important features which need to be retained, prior to the submission of an application; that any alterations to the building would be in keeping with the character and appearance of the building and its wider landscape setting; and that the works proposed are being properly carried out in accordance with any planning permission granted, both during construction and up to the point of completion. The Council has had experience of conversions of buildings involving such significant works that they are essentially demolition and rebuilds, which has been deleterious to rural character.

Summary

28. In summary, it is considered that requiring a full programme of works to be submitted with every application for the conversion of a rural building is justified in that its needs to be established whether a building is of substantial construction and worthy of conversion; it will clearly set out important features of such buildings which make a significant and important contribution to rural landscape character and local distinctiveness and what repairs are required; and it will ensure that any works will be properly undertaken – and will not be excessive - up to the point of completion. Such a requirement would ultimately minimise the visual impact of a proposal on the surrounding countryside in terms of its scale, form, massing and siting, in the interests of protecting and conserving the intrinsic beauty, value, and locally distinctive character of the rural landscape (both inside and outside the AONB), the openness of the Green Belt, and will reduce the carbon output of development.

Inspector's Question 3: [Policy ED5 - consistency with paragraph 80 of the NPPF]

Is Policy ED5 consistent with paragraph 80 of the Framework, which permits new homes in the countryside where the development would re-use redundant or disused buildings and enhance its immediate setting?

TWBC response to Question 3

Introduction

29. Paragraph 80(c) of the NPPF states:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

c) the development would re-use redundant or disused buildings and enhance its immediate setting;”

30. Firstly, it is recognised at paragraph 6.475 of the supporting text to Policy ED5 on page 440 of the Submission Local Plan (SLP) [\[CD 3.128\]](#) that it is possible to convert existing buildings from agricultural and other commercial uses to residential use under 'permitted development rights', without needing to obtain full planning permission. However, where restrictions apply, such as, an application site is in the AONB, a conservation area, or the building in question is a listed building, the proposal for conversion would not normally benefit from such permitted development rights and would require full planning permission for conversion. Therefore, given the extent of the High Weald AONB designation across the borough at around 70% and the high number of heritage designations, including conservation areas and listed buildings, this means that Policy ED5 would be applicable to a significant number of rural buildings.

31. Secondly, the Council considers that the delivery of housing and the promotion of the rural economy and employment are both important in the NPPF. In addition to NPPF paragraph 80 (c) above, paragraph 84 (a) states:

Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

32. While Section 5 of the SLP identifies sites for housing across the borough to help meet recognised housing needs, meeting economic needs, certainly in the rural areas, will continue to be affected by making effective use of existing buildings. Therefore, the priority given to employment-generating uses of rural buildings (including tourism and recreation) in Policy ED5 is considered to be essential to maintain the overall balance between homes and jobs across the borough. As set out at paragraph 6.478 of the supporting text to the Policy, the Council's Economic Needs Study (see paragraph 10.33 on page 159 of [CD 3.87](#)) recommends that continuing support be provided to rural based employment development by positively supporting proposals for conversion of existing redundant agricultural/rural buildings to business uses. This approach is also supported further by the Council's Economic Development Topic Paper (see paragraph 4.74 on page 30 of [CD 3.84](#)) and in SLP Development Management Policy ED 4: Rural Diversification (see pages 438 to 440 of [CD 3.128](#)).

33. Therefore, the Council has applied the following approach as set out under paragraph 6.480 of the supporting text to Policy ED5 (see page 441 of the SLP) for proposals for the conversion of rural buildings:

- “to support the objective of promoting a stronger rural economy, priority will be given to the change of use or conversion of rural buildings for business, recreation, and tourism uses;
- only after it has been demonstrated that reasonable attempts (see below) have been made to secure an alternative use associated with rural businesses or land management, or other business type use suited to a rural location without success, will conversion to residential use be considered. Under these circumstances, proposals for live-work properties will be looked on favourably, especially where they are related to traditional rural trades and land management.”

34. Moreover, Policy ED5 is considered to support Strategic Objective 1 on page 31 of the SLP, which seeks:

“To ensure sustainable development that contributes to both meeting housing, economic, and social needs and to conserving and enhancing the highly valued environmental qualities and amenities of the borough;”

35. Although priority is given to the conversion of rural buildings to economic, tourism and recreational uses, Policy ED5 policy does make some provision for residential conversions by the inclusion of additional criteria a. to d. relating to residential conversions (as set out on page 445 of the SLP).

36. The policy also includes wording which makes provision for the enhancement of the immediate setting of the building, as follows:

Paragraph 6.477 of the supporting text to the policy which states:

“Government advice in the NPPF promotes a prosperous rural economy, which can be aided by the conversion of existing rural buildings to business use, as well as the reuse of redundant buildings, which would result in the enhancement of their setting.”

37. And at criterion 9 in the policy wording:

“Landscaping proposals (hard and soft landscaping), including details of sensitive boundary treatments and any changes in levels, shall be designed to enhance both the immediate landscape setting of the building and the wider rural locality.”

38. In addition, as set out in the Council’s response to other questions relating to policies and proposals in rural areas, including Question 2 above, the Council seeks to minimise the impact of built development in rural areas to protect and conserve the intrinsic beauty, value, and locally distinctive character of the countryside. It is considered that more often than not, rural conversions to residential use require more fundamental changes to the original character and fabric of the building than employment uses, such as the subdivision to create individual habitable rooms, as well as external changes to form a curtilage area with the addition of domestic paraphernalia, which cumulatively can detract from the original character and setting of the building as viewed in the wider landscape. This further advocates the Council’s ‘economy first’ approach to the conversion of rural buildings.

39. In summary, Policy ED5 does make some provision for residential conversions as required by paragraph 80(c) of the NPPF, but as its primary aim is to support the conversion of rural buildings to employment uses to support the sustainable growth of the rural economy, it is considered to be more consistent with paragraph 84 (a). This is also in the context of minimising the visual impact of new development in the countryside to protect its intrinsic beauty and landscape character.

Inspector's Question 4: [Policy ED6 - consistency with paragraph 84 of the NPPF]

Does Policy ED6 support the sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed new buildings, as required by paragraph 84 of the Framework?

TWBC response to Question 4

40. Paragraph 84(a) of the NPPF states:

“Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;”

41. Firstly, Policy ED 6 (see pages 445 to 447 of the Submission Local Plan (SLP) [CD 3.128](#)) is not intended to support the growth and expansion of all types of businesses in rural areas but is focussed on making policy provision for both commercial and private recreational uses in the countryside (such as equestrian uses (riding schools, livery uses, horse training), fisheries, climbing activities, and off-road cycling activities). There are other policies in the Plan which make provision for other rural business uses, as referenced under Question 1 above, including Policy ED4: Rural Diversification (pages 438 to 440 of the SLP) which promotes development and diversification of agricultural and other land based rural businesses; as well as Policy ED5: Conversion of Rural Buildings outside the Limits to Built Development (pages 440 to 445) which promotes the retention and conversion of existing agricultural buildings in the countryside for business, recreation and tourism uses.

42. However, it is considered that Policy ED6 does support and make provision for the sustainable growth and expansion of recreational rural businesses, primarily through the conversion of existing buildings but also for well-designed new buildings where conversion is deemed not to be possible.

43. Paragraph 6.491 of the supporting text to the Policy (page 445 of SLP) is clear that the Council will support appropriate types of rural business development, such as those for commercial and private recreational uses listed above; and recognises that recreational

uses can not only make an important contribution to the health and wellbeing of communities, but also to the rural economy.

44. As set out in the Council's response to other questions relating to policies and proposals in rural areas, including Question 2 above, the Council seeks to minimise the impact of built development in rural areas to protect and conserve the intrinsic beauty, value, and locally distinctive character of the countryside. It also seeks to retain the openness of the Green Belt. Therefore, priority is given to the retention and re-use of existing dwelling/structures and demolition and rebuild should only be considered in certain circumstances. This approach is considered to be necessary and important as almost 70% of the borough is designated as High Weald AONB, which is of national significance and recognised as an important medieval landscape, and around 22% of the western part of the borough is designated as Green Belt. Together, the AONB and Green Belt cover 75% of the borough, with substantial overlaps.

45. In addition, and as also set out under Question 2 above, as advocated in paragraph 8 (c) of the NPPF, one of the overarching objectives in achieving sustainable design, the environmental objective, is to minimise waste and pollution, mitigate and adapt to climate change, and reduce carbon output. Again, priority is given to the retention and re-use of existing dwelling/structures over rebuild in Policy ED6 as well as other rural Development Management Policies in the SLP as listed under Question 2 above.

46. For these reasons, Policy ED6 is worded to be more restrictive than permissive. Paragraph 6.492 of the supporting text to the policy (see page 446), states:

"In order to minimise the visual impact of any such development on the landscape setting of the area, priority should be given to the conversion of existing buildings where they exist, and, where this is not possible, careful consideration should be given to the design, scale, siting, external appearance, and landscaping of any new development."

47. While criterion 1 of Policy ED6 itself states:

"Proposals for the development of commercial or private recreational uses in the countryside will only be permitted where:

1. Priority is given to the conversion of existing buildings over newly built development; and in the case of a new facility, it is satisfactorily integrated with existing buildings where they are present;”

48. In order that any new buildings are “well designed” as required by the NPPF, and have minimal impact on the rural landscape, it is considered that all criteria (1) to (12) of the Policy (as set out at page 447 of the SLP) satisfactorily make provision for this (as well as for the conversion of existing buildings). For example criterion 2 requires that:

“All new development is appropriate and sympathetic to its surroundings in terms of design, scale, siting, external materials, and appearance to avoid an adverse impact on the wider landscape”

49. In summary, the provisions of Policy ED6 are considered to be in accordance with the thrust of NPPF paragraph 84(a), in that its primary aim is to support the sustainable growth of both commercial and private recreational uses in the countryside, primarily through the conversion of existing buildings and where this is not possible or applicable, well-designed new buildings. However, this is in the context of minimising the visual impact of new development in the countryside to protect its intrinsic beauty and landscape character and openness of the Green Belt.