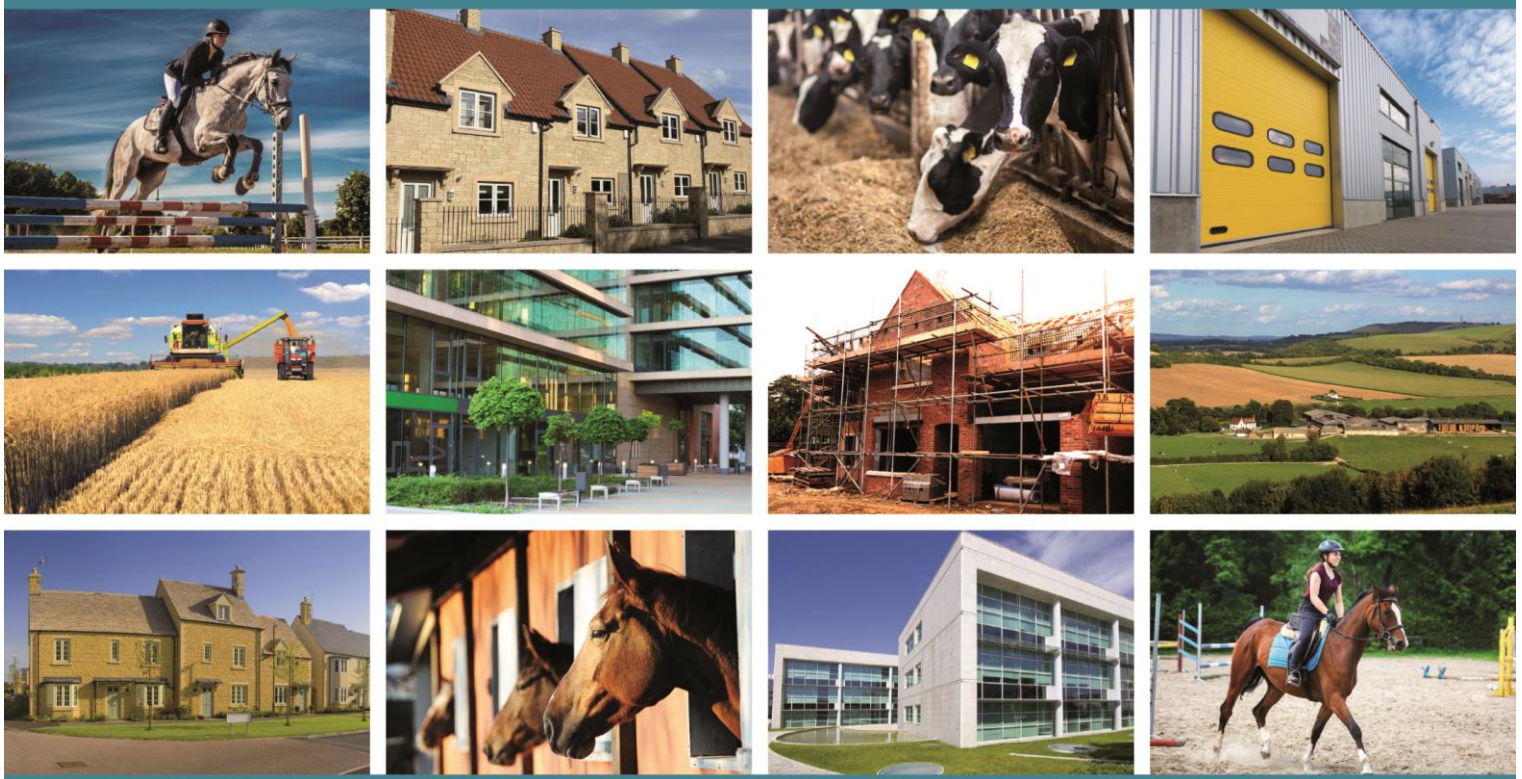
RCC TOWN PLANNING CONSULTANCY



Site: The Outbuilding, Dower House, Leigh Road, Holt, Wiltshire, BA14 6PR.

Proposal: Conversion of building to a dwellinghouse and associated works

On behalf of: Mr J Wheeler

Date of Issue: August 2023

RCC TOWN PLANNING CONSULTANCY

PLANNING STATEMENT

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1.0 INTRODUCTION

1.1 This statement has been prepared on behalf of the applicant to support their full planning application for the conversion of an outbuilding at Dower House in Holt to a 4-bedroom residential dwelling.

1.2 The statement will examine how the proposed development relates to the site and its context. The statement will also provide an explanation and justification for the scheme having regard to the national and local plan policy context.

2.0 BACKGROUND AND SITE CONTEXT

2.1 This application concerns a single-storey, rectangular building, believed to have originally been constructed as a cow shed associated with Halls Farm, Leigh Road, Holt. Consent was approved in the mid 1980's for its change of use to a stable. It now forms part of the Dower House holding and it is located to the far north-west of Dower House and sits within a well-defined site, bounded by an unclassified road to the north and the buildings associated with Halls House to the south.



Figure 1: Site location plans

2.2 The village of Holt is circa 1km to the south of the application site. Holt is defined as a 'large village' within the Wiltshire Core Strategy and benefits from a good access with the local road network, from where nearby towns and villages and their services can be readily accessed by bus, bike and car (including Bradford-on-Avon, Melksham and Trowbridge and their associated railway stations). Being a 'large' village, Holt itself benefits from a wide range of services and facilities, these include the local primary school, village shop, public house, play space, cafes, village hall and church. Consequently, although the site lies within the countryside insofar as planning policy is concerned, it does benefit from good access to a wide range of local and larger facilities which are on offer in the area.

2.3 There is no landscape, cultural or heritage designations covering the site. However, Holt Manor, a Grade II Listed building lies to the east of Dower House.

2.4 Although the application building is not listed or a curtilage listed structure, it is nonetheless considered to have some intrinsic historic significance being a mid-19th century cow barn (as detailed further in this statement). It is therefore considered to be a non-designated heritage asset. The building has now been underutilised for many years, with little investment into its maintenance and upkeep. It is now in need of work to sympathetically restore it and bring it back into an active use to secure its long-term retention.



Figure 2: View of the southern elevation



Figure 3: Southern elevation – looking eastwards



Figure 4: Southern elevation – looking westwards



Figure 5: West gable elevation



Figure 7: View of the rear (north) elevation from the roadside



Figure 8: View of the access and gates from within the site

2.5 As the building benefits from an existing vehicular access and a wide expanse of associated land, it readily lends itself to a residential conversion. The applicant therefore sought the pre-application advice of the Council on the conversion of the building to form a single dwellinghouse. The Council responded favourably, advising on the relevant criteria of policy CP48 (re-use of rural buildings), in particular advising that a structural survey should be submitted in support of any application. Guidance relating to ecology and design were also specifically provided. This pre-application advice is referred to in detail within this statement.

2.6 The only other planning history of relevance is planning permission W/85/00237/FUL relating to the change of use of the cowshed into stables.

2.7 This statement will now move onto a discussion of the proposed development and planning policy context before the discussion of the planning merits and heritage implications of the proposal. It should be read alongside the following reports:

- Protected Species Survey and Mitigation Strategy by Malford Environmental Consulting;
- Viability Report by Andrew Martin, Strakers
- Structural report by Jonathan Apted Engineering Design;
- Design & Access and Heritage Statement by Atelier 17 Ltd

3.0 PROPOSED DEVELOPMENT

3.1 A Design and Access Statement forms part of the application submission and this sets out in detail the approach to the conversion and the design features. A brief overview will be provided here.

3.2 The application building is a long rectangular building measuring 54m by 5.4m. In general terms it comprises a large central element divided into non-structural bays and has two smaller additions at either gable end. The external walls are constructed from mainly brick with smaller amounts of stone and concrete blockwork and sits under a pitched roof clad in clay tiles. The main central section of the building is divided into an open-fronted section (comprising 5 bays) and an enclosed section (comprising 7 stable compartments).

3.3 The Design and Access Statement notes that the 1844-88 1st Edition OS map shows the building form at this time. A solid back wall (roadside), solid bay to the west, solid gable to the east and open structure to the south 9represented by the dashed line)..

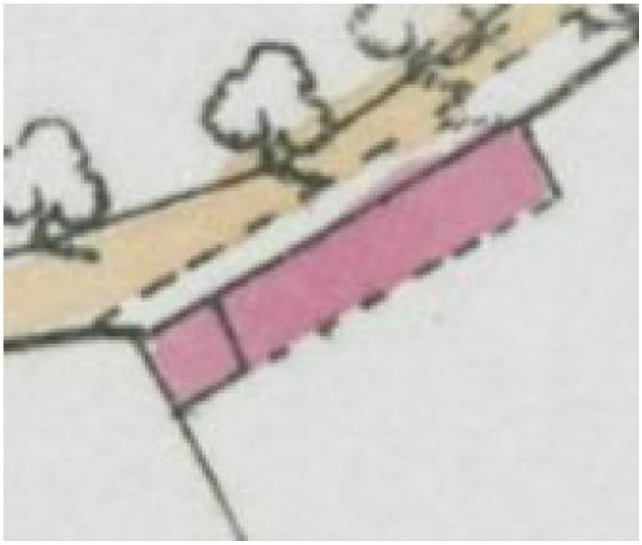


Figure 9: Enlargement of 1844-88 1st Edition OS Map

3.4 The proposal seeks to sensitively convert and reuse the barn, with the design concept very much seeking to remove the modern 1980's alterations (when the building was put to equine use) and utilise the conversion to retain and reintroduce features reflecting its original use as a cow barn.

> 5.6 The design approach is very much to work with and enhance the building exiting agricultural character. The first step is therefore to remove all of the external infill brickwork associated with the most recent equine use and return this this to its original more open character when this would have originally been used for cattle. This will include replacement oak posts and bath stone staddle stones
>
> 5.7 The earlier east end of the building contains mostly more private spaces and are more cellular so the timber louvres provide both solar control and privacy. At a larger scale, these glass / timber / louvre elements are designed to be an 'infill' in the historic openings preserving the legibility of the original building. The more modern west end of the building has opening infilled just in glass as these are the more open living spaces in the building. This achieves the same effect of preserving the legibility of the existing building.

3.5 The submitted plans demonstrate that, having regard to the detailed elevational treatment, the proposed conversion is of a high-quality design, maintaining and best utilising the existing structure to retain (where possible) and reflect the historic agricultural use of the building. The eaves height and ridge height of the

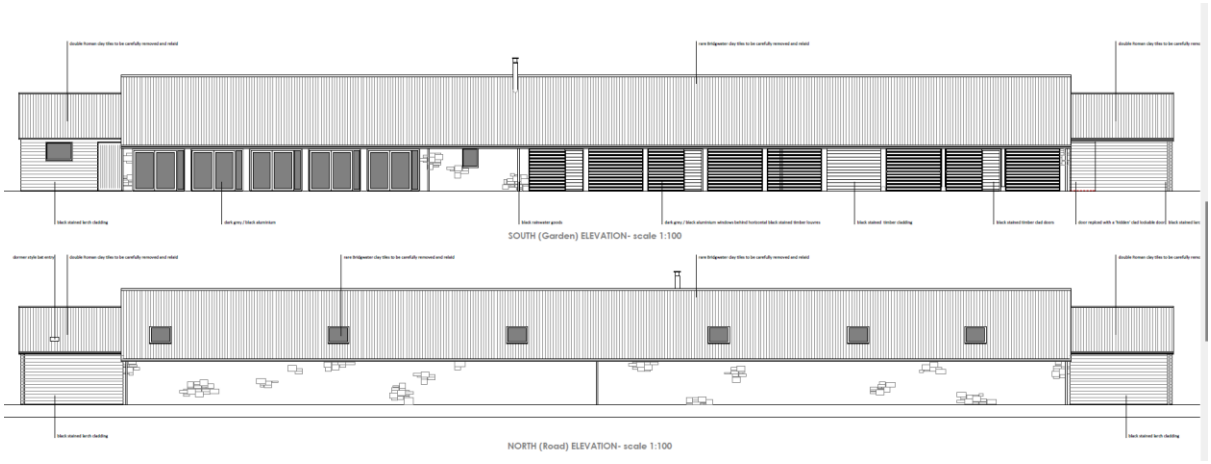


Figure 10: Proposed front and rear elevations

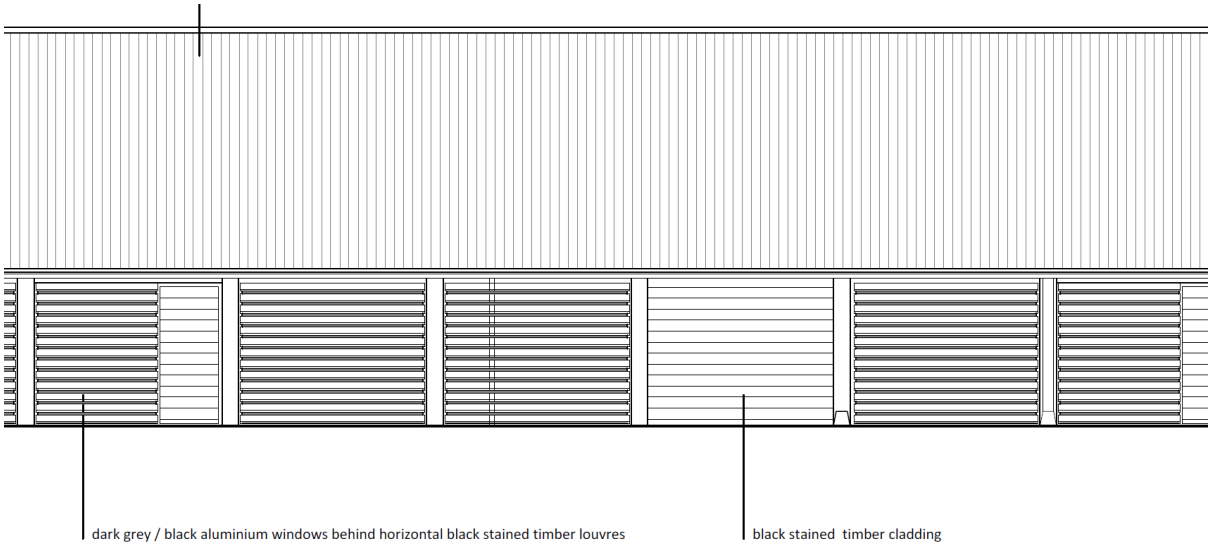


Figure 11: Sectional detail showing the timber louvres and cladding arrangement

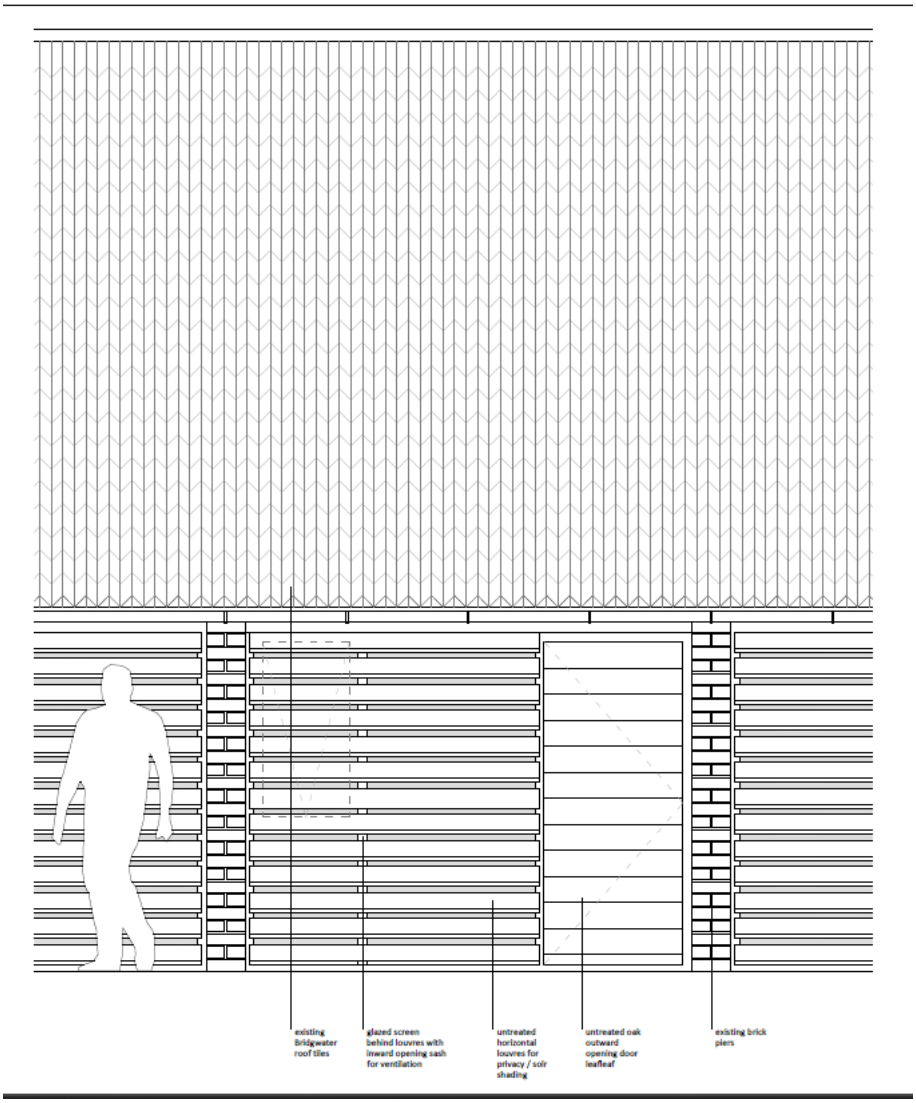


Figure 11: Partial elevation showing the timber louvres and cladding detail

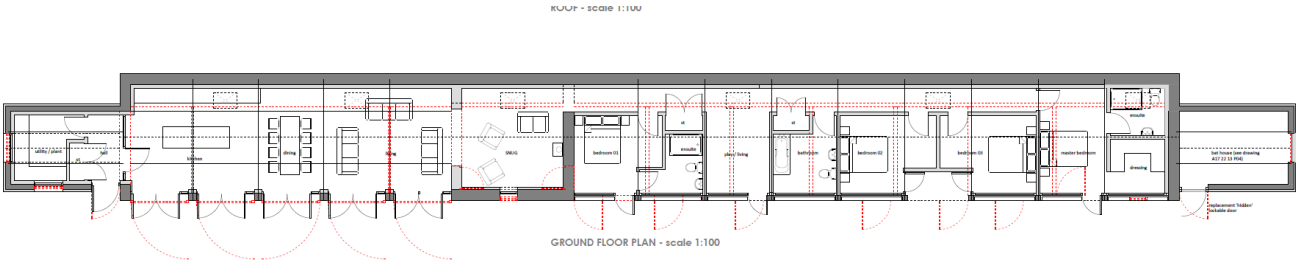


Figure 12: Proposed floorplan

4.0 PLANNING POLICY

4.1 The main planning policy framework relevant to this proposal is the Wiltshire Core Strategy 2015 (WCS) and the Holt Neighbourhood Plan (made January 2017).

4.2 At the national level, National Planning Policy Framework 2021 (NPPF) is the foremost material consideration. This is supplemented with the National Planning Practice Guidance (NPPG).

4.3 The relevant policies and guidance are set out in the tables below:

NATIONAL PLANNING POLICY FRAMEWORK

Chapter	Title
5	Delivering a sufficient supply of homes
9	Promoting sustainable transport
11	Making an effective use of land
12	Achieving well designed places
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

WILTSHIRE CORE STRATEGY

Chapter	Title
CP1	Settlement strategy
CP2	Delivery strategy
CP7	Spatial Strategy for the Bradford on Avon Community Area
CP48	Supporting rural life
CP50	Biodiversity and Geodiversity
CP51	Landscape
CP57	Ensuring high quality design and place shaping
CP58	Ensuring the Conservation of the Historic Environment
CP60	Sustainable transport
CP61	Transport and new development
CP64	Demand Management

HOLT NEIGHBOURHOOD PLAN

Chapter	Title
Policy H2.1	Quality design
Policy H2.3	Conversion of redundant farm buildings to residential
Policy P.1	Off-road parking
Policy E.1:	Environmental impact
Policy E.2:	Environmental impact

5.0 PLANNING ASSESSMENT

5.1 The key issues for the consideration of this proposal are:

- The principle of the development
    I. Housing Land Supply
    II. Policies of the Wiltshire Core Strategy and Neighbourhood Plan
- Design and visual impact
- Highway safety
- Impact on biodiversity;
- Residential amenity
- Impact on heritage assets
- Planning balance

Principle of development

I. Housing land supply in Wiltshire

5.2 Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. A significant material consideration is the advice and guidance contained within the National Planning Policy Framework (NPPF). The NPPF requires LPAs to identify a five-year supply of specific deliverable sites to meet housing needs, with an appropriate buffer. Where Councils are unable to demonstrate this, planning policies concerning housing delivery (including those within a made neighbourhood plan) are considered out of date and applications for housing development should be considered in line with paragraph 11d of the NPPF.

5.3 The 'Housing Land Supply Update' (May 2023) confirms that Wiltshire Council can only demonstrate 4.6 years of housing land supply (based on April 2022 data). As such, policies CP1, CP2 and CP48 of the WCS are considered out of date and applications for housing development should be considered in line with paragraph 11d of the NPPF. The relevant extract is set out below:

> For **decision-taking** this means:
>
> c) approving development proposals that accord with an up-to-date development plan without delay; or
>
> d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date[8], granting permission unless:
>
> i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed[7]; or
>
> ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

5.4 Whilst it is accepted that the triggering of paragraph 11d) of the NPPF does not mean out-of-date development plan policies should be ignored, the weight afforded to them is weakened and the 'tilted balance' is engaged. The term 'tilted balance' is used to define Paragraph 11 of the NPPF when engaged as the 'planning balance' is tilted from a neutral balancing exercise where if the harms outweigh the benefits planning permission is usually withheld, to a tilted balance where the harms should significantly and demonstrably outweigh the benefits for permission to be withheld.

5.5 Focussing now on the contents of subsection d) paragraph 11 of the NPPF, the application site is not within 'an area of particular importance' nor does it 'contain any assets of particular importance' (as defined by footnote 7). The proposal will therefore be assessed in terms of its 'benefits' and 'harms', using the planning policies of the local plan as a starting point. Section 5.0 of this statement will conclude with a discussion of the 'planning balance'

II. Development Plan Policies - Wiltshire Core Strategy and Neighbourhood Plan

5.1 Having regard to the principle of residential development in this location, CP2 of the WCS identifies exceptions to the general approach of the core strategy towards the location of new development. These exceptions seek to respond to both local circumstance and national policy. One such policy is CP48 – conversion of rural buildings.

5.2 The policy 'exception' to the provision of housing only in the most sustainable of locations has been permitted in order to help meet the Government's clear aim to significantly boost housing supply as set out in Chapter 6 of the NPPF and numerous ministerial statements, through in this instance, the re-use of existing under-utilised rural buildings. This is a better means of providing housing by efficiently using buildings which are already in existence, to limit the pressure on untouched countryside to provide for the growing demands on housing supply. Both national and local policy accept that residential conversions may be deemed acceptable even in isolated rural locations, which is certainly not the case here, given the sites very close proximity to both the village of Holt (designated 'large village') and the market town of Bradford on Avon.

5.3 The NPPF at paragraphs 79 and 80 support the principle of new housing in rural locations in certain exceptional situations. At paragraph 79 the NPPF states:

"*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*".

Paragraph 80 of the NPPF concerns development which would secure the reuse of a redundant building in the countryside, stating:

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

….b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

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

5.4 Policy H3.2 of the Holt Neighbourhood Plan also supports the conversion of redundant farm buildings to housing and requires such applications to be accompanied by a bat survey (and relevant mitigation) and meet the design criteria set out in Policy H2.1.

5.5 In the first instance, policy CP48 of the core strategy seeks the use of the building for employment, tourism, cultural or community uses. If this is not a practical proposition, a residential use would then be considered.

5.6 Policy CP48 states:

"*Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where it satisfies the following criteria:*

i. The building(s) is / are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building; and
ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas; and
iii. The building can be served by adequate access and infrastructure; and
iv. The site has reasonable access to local services ***or***
v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.' ***(Taken from adopted version of WCS which has not been correctly transposed in the online version)***

Only where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria. In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances, in line with national policy".

5.7 It is not necessary to demonstrate compliance with both criterion iv) and v) of policy CP48, but only one of the two. However, in this case compliance with both can actually be achieved.

5.8 To accept the principle of a residential use of the site, CP48 firstly requires applicants to demonstrate that the conversion and/or re-use of the building for

employment, tourist, cultural and community uses cannot be made viable or are not practical propositions. To this end, a viability assessment has been commissioned to inform this process, to assess the returns against the investment needed, and to help establish a viable new use for the building. This report is submitted in support of this application and serves to demonstrate that the conversion of the building for other potential uses would simply not be viable or practical propositions, given the likely values/rents achievable and the investment needed.

5.9 Furthermore, in terms of whether an alternate use would be a practical proposition, the site is located very close to Holt, Bradford on Avon and Melksham – settlements that already benefit from village halls and a range of other community uses. There is, therefore, unlikely to be the need, desire or funding for a further community building in this location. Moreover, an alternative community, cultural or employment use is likely to generate much higher levels of traffic than the proposed dwelling, with associated demands for increased parking provision, which would impact on the layout of the site and its surroundings. Increased vehicular trips associated with these alternative uses would also be likely to generate sustainability concerns.

5.10 The submitted viability report undertaken by Strakers demonstrates that the conversion of the building for other potential uses would simply not be a viable proposition, given the likely values/rents achievable and the investment needed to facilitate the conversion of the building for such uses. With no active use or financial input into the repair and upkeep of the building, the building would remain redundant, and its physical condition would deteriorate, to the detriment of the building, a non-designated heritage asset, and the appearance of the area. Likewise, it would also represent the waste of a valuable resource, i.e. a building that has already been constructed. It is clear therefore that a sympathetic residential conversion of the building is the only practical and viable option.

5.11 This statement will now address the five criteria of CP48, having regard to the principle of development.

i) Is the building capable of conversion

5.12 The building is in an overall good state of repair, as can be observed from external and internal inspections of the building. In May 2022, Atelier 17 Ltd undertook a visual structural survey of the outbuilding in support of the pre-application proposal. This has now been supplemented and supported by a further structural survey by Jonathan Apted Engineering Design. The purpose of these reports were to identify any areas of historic or progressive distress together with any structural inadequacies.

5.13 The report does not identify any major rebuilding elements that would be required and refers only to areas of localised repair. It notes that the building is of generally heavyweight construction and is in a sound construction and can accept the works necessary for conversion without significant structural intervention. The report concludes the following:

"I conclude that, subject to the detail of the alterations to comply with current regulations, the building can be successfully converted to residential use as the structure will accept the new load and alterations for openings etc without significant intervention.

Where repairs are noted above, these are necessary for the integrity of the existing building in its current form and not part of the conversion process."

5.14 It is clearly evident from the structural survey, photographs contained within this Planning Statement, the details contained within the viability report and a site visit that there is no question over the structural integrity of the building.

5.15 The submitted plans show that the proposed works to convert the building have been kept purposely 'restrained', utilising existing openings and maintaining the existing materials to the exterior faces where possible. Repair works will improve the appearance of the building and all new materials will match existing. Every effort has been made to retain historic fabric where feasibly practical and the layout was purposely chosen to aid this. Consequently, the extension will neither dominate nor detract from the existing stable and, rather, would serve to bring new life to this building.

5.16 We therefore conclude that the building is suitable for conversion without significant modification or demolition.

ii) The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas

5.17 The outbuilding is located to the north of Dower House and the buildings associated with Halls Farm. It benefits from an existing access, expansive area of hardsurfacing and a large area of lawn to the south. Beyond the building to the north runs an unclassified road, on which dwellings and rural buildings are sporadically sited. The immediate rural environment is not therefore devoid of development and the conversion of the existing building will have little impact upon both the character and appearance of the area.

5.18 The proposal is for a sensitively designed, small-scale development, converting an established building within the landscape to provide one dwelling. As shown on the submitted plans, it will retain its former agricultural character with a high-quality design that reflects its agrarian past.

5.19 The site is well contained with hedging and trees to all boundaries, with the building 'tucked' in close to the northern roadside boundary. In terms of public viewpoints, the surrounding rights of way network does not come close to the site, therefore affording only long-distance views of the site. From such viewpoints, the alterations to the building and change of use will be barely perceivable and would be viewed against the backdrop of the residential dwellings and various outbuildings to the south. From the roadside, a very small number of glimpsed and short-lived views of the site will be afforded through

gaps in the fencing and planting. These short-lived views would be of a high-quality and sympathetic conversion and would not cause any harm to either the character or appearance of this settled rural landscape.

5.20 Moreover, the intention (as set in the Design and Access Statement) is to introduce new areas of enhanced ecological value and a range of biodiversity at the site with the view to partially rewilding the site. This planting will further soften and screen views of the site.

5.21 Whilst the application site can be seen from a few public vantage points, the 'restrained' and sympathetic design of the scheme respects the former agrarian character of the site. As the overall form and appearance of the outbuilding would not be significantly altered, it represents a form of development that can be successfully accommodated within the surrounding landscape.

5.22 The proposals would not therefore result in significant alterations to the character or appearance of the rural landscape with views being largely as is – of a long rectangular building sat against the backdrop of the buildings associated with Halls Farm and the Dower House.

5.23 There are no immediate neighbours to the property whose amenities would be adversely affected by the proposals.

5.24 The conversion will therefore sit comfortably within the site and its surroundings and would not have a detrimental impact upon views or the character of the surrounding landscape, in accordance with policy contained within CP51 and CP57 of the Core Strategy and policies H2.1, E.1 and E.2 of the neighbourhood plan.

5.25 At the pre-application stage, the planning officer voiced concerns about the number of rooflights proposed to the north elevation and the amount of change to the southern elevation. The number of rooflights has been reduced in number and size. Furthermore, the elevational treatment of the south elevation has significantly improved with a reduction in glazing features (with the introduction of louvres) and much more appropriate and less domesticated fenestration. This sympathetic conversion of the thereby retains the key features and general character of the existing rural building, better reflecting its original use as a cow barn.

iii) The building can be served by adequate access and infrastructure

5.26 The proposed plans show that the existing vehicular access serving the site (to the north-west of the building) will serve the dwelling. The existing gates are to be set back further into the site to enable a vehicle to pull off the highway whilst the gates are opened. The existing access has historically been used for traffic associated with both agricultural and equestrian uses. The traffic generation associated with a single dwellinghouse would be much less. It is therefore concluded that the building can be served by adequate access. Highway matters are dealt with in more detail in the relevant section below.

5.27 Mains electricity and mains water supply already exist at the site. Surface water run-off from the roof will be stored in a grey water recycling underground

tank. Excess water will be taken to soakaways. Foul drainage will be dealt with by means of package treatment works.

5.28 At the pre-application stage, the planning officer was satisfied that the building would be served by adequate access and infrastructure.

5.29 For the aforementioned reasons, we therefore submit that the proposal conforms to criteria iii) of CP48 and policy H2.1 of the neighbourhood plan.

iv) The site has reasonable access to local services

5.30 In considering this criterion, it must firstly be remembered that policy CP48 is a policy which seeks to permit rural development within the countryside, outside of the usual 'sustainable' settlements. It therefore follows that 'access to services' in this regard should not be assessed in the same manner as non-exceptional development located within the settlements, and that there will necessarily be reliance on the private car to access local services. Nonetheless, we submit that this site is not unduly remote.

5.31 There is a well-used public right of way network leading from the site to the centre of the village – a distance of circa 1km. Cycling to the village centre is also a viable and practical option. Within the centre of Holt, there is access to a wide range of services and facilities, including bus stops providing connections to Trowbridge, Bradford on Avon, Frome, Melksham, Corsham and Chippenham, where users can access onward connections by rail. While it is accepted that in policy terms, the site lies within a countryside location, it is less than a mile from the facilities within Holt, identified as a large village within the WCS (and which include a primary school, village shop, church and village hall) therefore feasibly within cycling and walking distance. The NPPF does recognise, at paragraph 79, where there are groups of smaller settlements, development in one village may support services in a village nearby. This would likely to be borne out here.

5.32 It must be highlighted again that the planning officer, after discussing criteria i) of CP48 noted in their pre-application that they were "*content that the 4 other criteria of CP48 would be satisfied in this instance*". No concerns about the location of the site in relation to local services were therefore raised.

v) And the conversion or re-use of a heritage asset would lead to its viable long term safeguarding.'

5.33 As noted in paragraph 5.5 of this statement, policy CP48 requires demonstration with only one of criterion iv and v). However, in this case, both criterion can be met and are therefore both addressed.

5.34 The NPPF outlines government policy towards the historic environment. Section 16 "Conserving and Enhancing the Historic Environment" sets out the overall approach to heritage assets. At a local level, policy CP58 of the WCS relates to the conservation of the historic environment.

5.35 We are of the opinion that the barn constitutes a non-designated heritage asset as it forms part of the historic group of structures relating to Halls Farm and Manor House, reflecting the agrarian history of this area. It is an interesting and

attractive traditional structure and has value in terms of its historic role within the local farming industry. This position was confirmed by the planning officer in their pre-application response who.

5.36 We understand that the building was originally constructed as a cow shed associated with the surrounding agricultural land at some point between 1844 and 1888, which is when it first appears on OS maps. It remained in this use until consent was approved in 1985 for its change of use to equestrian (which is when it is assumed the internal timber portioning was introduced). However, since the applicant's purchased the site over 16 years ago, the building has been used as general storage space associated with Dower House.

5.37 Although various changes have taken place to the building over the years (e.g. the infilling of the south elevation with stable doors and timber gates), the building's essential character as an agricultural outbuilding is still evident. It reflects the historic influence of agriculture within the wider area and more specifically in relation to Halls Farm/Manor House. The building is generally a good quality, traditional structure and internally the evolution of the building, in relation to its previous uses is evident and presents as an interesting feature of the building.

5.38 The 'Wiltshire & Swindon Farmsteads & Landscape Project' notes that cattle barns were typically open fronted but sometimes partially infilled to accommodate other agricultural related uses. The 'Wiltshire and Swindon Farmsteads Guidance. Farmsteads Assessment Framework' states:

"Traditional farmsteads and buildings are heritage assets which make a significant contribution to both landscape character and local distinctiveness. In addition, through a diversity of uses, they also influence local communities and economies. As agricultural practices and the rural economy change, many such farmsteads and buildings become redundant from their original use, and are difficult to adapt to current farming needs: without appropriate uses they will not be maintained and may disappear from the landscape. New uses which both enhance and are sensitive to their historic character and significance are to be encouraged."

5.39 This is the case for the application building which is no longer required for agricultural or equestrian purposes and therefore sits redundant and requires a new use to safeguard its long-term future. We therefore submit that the residential conversion of the buildings would have a modest impact in comparison to the positive benefits arising from the reintroduction of an active use serving to facilitate the necessary investment for their long-term retention.

5.40 A viability assessment has been undertaken, to help establish a viable new use for the barn by assessing returns against required investments. As previously noted, independent residential use represents the only viable option for the use of the barns, offering long term security to the future of this heritage asset.

5.41 As such the proposal not only accords with relevant criterion under CP48 of the WCS but is also supported by national policy set out at paragraph 80 (b) of the

NPPF in that the proposal to reuse this vacant historical building for residential purposes represents the optimal viable use of the heritage asset.

Impact on biodiversity

5.1 Policy CP50 requires that assessment be made regarding the potential for the development to affect any protected species or habitats, on and off site. If applicable, measures should be proposed to mitigate any impacts which arise. The policy also advises that development should seek opportunities to enhance biodiversity. Chapter 15 of the NPPF provides further guidance on conserving and enhancing the natural environment.

5.42 This application is therefore accompanied by a protected species survey and mitigation report by Malford Environmental Consulting. Baseline ecological surveys, which included a Phase 1 (building/bat roost and nesting bird inspection) survey of the building and immediate surrounding land in the property curtilage was undertaken, plus additional Phase 2 bat surveys as appropriate.

5.43 The surveys and report conclude that the application building is a confirmed summer roost for low numbers of four species of bats: common pipistrelle, brown long-eared, lesser horseshoe and greater horseshoe. The report notes:

> The conversion of the building will result in the damage/modification or permanent loss of the roosts and could potentially also result in the injury/death/disturbance to bats if undertaken without appropriate safeguards. This would contravene wildlife legislation (see Appendix D).
>
> The proposed scheme is predicted to have a 'medium' adverse impact[5] as work will not affect a roost of high conservation status (i.e. not a breeding or winter hibernation roost), but does affect summer roosts of small numbers of two rare bat species (roosts of moderate conservation status).
>
> However, the planned work does not pose a threat to the favourable conservation status of the four species of bat identified and will not affect the ability of these four species to maintain their current range and distribution in the locality. The conversion of The Stables is considered to have no significant long-term impact on local populations of the four bat species.
>
> Conversion of the building will be covered by a Natural England licence under the provision of the Conservation of Habitats and Species Regulations 2017.

5.44 There was no evidence of current bird nesting associated with the building, but evidence of previous nesting activity was recorded and there is the possibility of bird nesting in the future.

5.45 Section 5 of the ecological report sets out mitigation measures, including timings associated with construction and the introduction of new habitat features. In particular, it details the creation of a new dedicated bat house within the eastern extension to the building. This is shown on the plans and is an important element of the scheme.

5.46 Subject to the mitigation and enhancement measures outlined within Section 5 of the ecological report, it is evident that development of the site would not

have any significant impact on protected species or their habitats. The report also details the approach to the 'three tests' for the Natural England licence.

5.47 As a result, it can be concluded that the proposal will not have any adverse impact on wildlife within or adjacent to the application site and therefore meets the requirements of policy CP50 of the WCS, the guidance contained in section 15 of the NPPF and policy H3.2, E.1 and E.2 of the neighbourhood plan.

Highway safety and parking

5.48 Turning to matters of highway safety, policies CP60 and CP64 aim to ensure developments adequately address matters of access arrangements and road safety alongside adequate parking provision. Policy P.1 of the neighbourhood plan seeks to ensure developments are served by sufficient off-road parking.

5.49 Paragraph 111 of the NPPF states that:

"*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be* ***severe***" (our emphasis).

5.50 Access to the site utilises an established gated farm access onto the unclassified village road. The access mouth and driveway are hardsurfaced with a concrete finish. The gates serving the site are not currently set back far enough to allow sufficient space for a car to pull off the road whilst the gates are opened. This will be addressed as part of the conversion, with the gates set further back into the site, meeting highway standards. This improvement is a highway betterment.

5.51 The proposed plans also illustrate how the site can comfortably accommodate off road parking and turning facilities to serve the new dwelling. This meets (and exceeds) the requirements of the Council's parking standards for a 4-bedroom dwelling.

5.52 In terms of visibility this is an existing access historically used by both agricultural and equestrian related traffic – both of which by their nature could lead to a range of larger vehicles using the access. Furthermore, this is a very quiet section of road with low traffic volumes. The number of trips associated with a single-dwellinghouse is very likely to be lower in number than these two previous uses.

5.53 For the reasons outlined above, it is considered that suitable access and parking arrangements are provided by the scheme to allow for the development of the site as proposed, in compliance with the requirements of CP60 and CP61 of the WCS and policies P.1 and H2.1 of the neighbourhood plan.

Impact upon residential amenity

5.54 Policy CP57 (vii) requires development to have regard to the compatibility of adjoining buildings and the impact on amenities of existing neighbouring

occupants. In this case the closest neighbours are Halls Farm, Dower House and The Manor House, all sited over 60m to the south.

5.55 The application building is already in situ and because of the separation distances with the closest residential properties, its residential conversion will have barely any perceivable impact upon the neighbouring properties. As a result, there will be no undue disturbance to the occupiers of the adjoining properties.

5.56 Additionally, the layout plan shows that the proposed dwelling itself would be served by sufficient amenity space.

5.57 As a result, the relevant amenity criteria of policy CP57 of the WCS can be satisfied.

Planning Balance

5.58 As outlined in paragraphs 5.2-5.5 of this statement, as the Council cannot demonstrate a 5-year housing land supply, the relevant local plan policies are out of date and the 'tilted balance' as set out in Paragraph 11(d) is therefore engaged.

5.59 As detailed within this report, the proposed dwelling fully complies with the core policies of the local plan, being the conversion of an existing rural building that specifically complies with the criteria of CP48. As shown on the submitted plans, the scheme is well designed and does not result in any adverse impact upon the host building or the character and appearance of the surrounding landscape. Furthermore, this statement has also demonstrated that the impact of the dwelling upon neighbours is considered acceptable as are its impacts in terms of highway safety and ecology. The dwelling would contribute towards the persistent lack of housing supply within Wiltshire.

5.60 It is accepted that this proposal only relates to the gain of one dwelling, but the cumulative impact of such developments play an important contribution to housing land supply at the County level. This has been the case for other applications across the County where the erection of a single dwelling was considered to make a small but important contribution to the lack of housing land supply. In the examples cited below, the contribution a single dwellinghouse made to housing provision was an important material consideration.

72 West Winds, Netherstreet, Bromham, SN15 2DP: Outline planning permission was approved under PL/2021/04596 for the demolition of a bungalow and erection of two dwellings. The relevant committee report notes that "*the development would bring a benefit in terms of a net increase of one dwelling in the local housing stock*" (paragraph 9.3). The site was described as being part of a "*small linear enclave*" of Netherstreet and the development was permitted despite the site being c0.5 miles beyond the closest point of the LOD of Bromham.

18 Locks Lane, The Common, Purton, SN5 4HD: Outline planning permission PL/2021/06368 approved alterations and extensions to the existing dwelling, alongside the erection of a detached four-bedroom dwelling (in place of an existing workshop). Here, the site is positioned alongside only one neighbouring dwelling and 0.12 miles from the LOD boundary of Purton. The delegated report considered the scheme in terms of its 'planning balance' and noted the lack of housing land supply and the position of the site in relation to existing built-form. The report also states that "*due to its relationship to the settlement of Purton, it is considered that the proposed dwelling would be located where it would, to a limited degree, maintain the vitality of a rural community*". In conclusion the limited harm arising from the conflict with policy was weighed up against the benefits the scheme, this was despite the fact that the Council openly acknowledged it was "*considered unrealistic to believe that future residents would walk to Purton*" and "*the proposal would likely lead to a reliance on the private car*".

The Brick Store, Dunkirk Hill, Devizes, Wiltshire SN10 2BD: Appeal decision APP/Y3940/C/20/3261363 relates to the occupation of a holiday let as a permanent dwelling (in breach of an occupancy condition). The Inspector acknowledged the site was outside of the LOD for Devizes (some 0.3miles) and that it is "*not one where unrestricted residential development would normally be permitted*". It was also accepted that it would be likely that there would be heavy reliance on travel by car, but this harm would be limited, because of the closeness of the site to Devizes, so that many car journeys would be short. Having regard to the lack of housing land supply and planning balance the Inspector stated:

> **Housing land supply**
>
> 15. The Council accepts that it cannot demonstrate a 5 year housing land supply. Whilst the shortfall is not great, it has worsened in the time that the appeals have been under consideration. Although there is no shortfall in this particular part of the county, this does not prevent paragraph 11(d) of the National Planning Policy Framework from being applied here, and the relevant policies most important for determining the appeal are out-of-date. There are no policies applicable here which protect areas or assets of particular importance, and thus the presumption in favour of sustainable development applies.
>
> 16. I have identified small harm arising from the need to travel, along with a conflict with the development plan. Although the addition of the dwelling to the housing stock would make the smallest possible increase, in view of the importance which the Government attaches to increasing the supply of housing, I give this benefit modest weight. Weighing these factors, I find the adverse effects of allowing the appeals would not significantly and demonstrably outweigh the benefits.

5.61 In terms of benefits, the proposal would contribute towards the persistent lack of housing land supply within Wiltshire. It is acknowledged this is only an increase in one dwelling, but other decisions (cited above) have given this weight, particularly considering the NPPF's requirement to support the Government's objective of significantly boosting the supply of homes. The scheme would also make the best use of a redundant building and ensure the

retention of a non-designated heritage asset. There would also be economic benefits associated with the proposal both through its construction work to convert the building and the spending associated with the future occupants of the site and the additional Council Tax payments which would be attracted.

5.62 In line with Paragraph 11 of the NPPF, a conclusion needs to be drawn as to whether the identified harms significantly and demonstrably outweigh the identified benefits as listed above. It is clearly evident that in this case there are no harms arising from the proposal and it should therefore be approved.

6.0 CONCLUSION

6.1 This statement has justified why the proposed scheme is entirely compatible with both the Wiltshire Core Strategy and the advice and guidance contained within the NPPF.

6.2 The site contains an outbuilding (considered to be a non-designated heritage asset) which is now surplus to the requirements of the applicant and a viable active use for the building needs to be found. The site already benefits from an established and suitable access and can readily accommodate any necessary parking provisions.

6.3 This statement, together with the submitted viability report has justified that the proposed conversion to residential is the only realistic use which will allow for the viable conversion of the building, thereby securing its long-term future in a manner that is sensitive to the wider landscape. The compliance of the scheme with policy CP48 and the relevant policies of the neighbourhood plan has also been explained within this statement.

6.4 The submitted ecological survey fully assesses and identifies likely impacts of the proposal on protected species and outlines adequate mitigation and ecological enhancements. This statement also explains why the proposal will not result in any severe impact on highway safety and will preserve residential amenities.

6.5 The proposal therefore complies with planning policy at all levels and accordingly, the Council is requested to approve this application.