ALLEN PLANNING Ltd
Town Planning and Development Consultants

Wiltshire Council
Planning Department
FAO Jonathan Maidman
Via email

26th September 2023

Dear Mr Maidman

Prior Notification requirement – Class Q of the GPDO 2016 as amended
Change of use of existing agricultural building to form one "smaller" dwelling

Site at Stockbottom Farm, White Way, Pitton, Salisbury SP5 1SU
LPA ref PL/2023/05576

We refer to the above Prior Notification application which relates to the proposed conversion of an existing agricultural building and following our previous submission you have sought further information.

In your most recent email, you sought further information in terms of your concerns raised in respect of:

"Please can you confirm if the existing walls of the structure will need to be completely removed and replaced to facilitate the conversion? If they are not being removed, what will be done to fill in the holes because it appears to me that unlike some buildings, it will be very difficult to simply repair individual sections without actually removing the walls.

Turning to the lean-to linking element, daylight was also visible (as shown in the photograph below) therefore please detail what works will be undertaken to the walls and the join with the roof. "

NPPG Guidance

I must of course start with the guidance in this respect and Paragraph 105 of the NPPG as revised addresses all of the requirements of Part Q of the GPDO and states:

"The right allows either the change of use (a), or the change of use together with reasonably necessary building operations (b). Building works are allowed under the right permitting agricultural buildings to change to residential use: Class Q of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. However, the right assumes that the agricultural building is capable of functioning as a dwelling.

The right permits building operations which are reasonably necessary to convert the building, which **may include those which would affect the external appearance of the building** and would otherwise require planning permission.

This includes the installation or replacement of windows, doors, roofs, **exterior walls**, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building

to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations.

It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use.

Paragraph: 105 Reference ID: 13-105-20180615
Revision date: 15 06 2018
(our emphasis)

Further Information

With regard to the questions raised we have provided information within the Planning Application that outlines the work reasonably expected to be carried out to achieve compliance with Building Regulations.

We did not seek to cover all of the work that will be done on site because that level of detail is rarely specified as it relies on the builder, client and other members of the project team to solve problems as works proceed. Unlike new build projects, a change or use and refurbishment is “dynamic” and subject to many changes led by site specific conditions.

Given the specific matters raised in your latest email we can advise that the small holes in the timber boarding are created by knots that have fallen out of the weatherboarding and this is a natural consequence of the timber drying out and can be left un treated. Bees particularly like the holes and do no damage.

The new internal lining to the timber framed board will provide insulation and weatherproofing so the external board will act as a decorative “first defence” from the weather. The gaps to the sides of the frame abutting the dairy can be pointed with mastic from the inside but again the need for this would effectively be “belt and braces” and aesthetic rather than a matter of Building Regulation compliance from the building to function as a dwellinghouse.

In addition, the abutment at roof level is a simple process to make sure the valley is waterproofed and insulated internally. There would be no need to remove the existing 1/2 round plastic valley gutter in order to achieve this.

Furthermore, the small holes in metal sheeting on the diary are again not an issue for Building Control because the internal lining will provide insulation and waterproofing. The outer metal “skin” becomes a matter for the decorator and this is not covered by Building Regulations.

Overview

Part Q permits building operations which are reasonably necessary to convert a building to a dwelling and the NPPG advises that such may *include “those which would affect the external appearance of the building and would otherwise require planning permission.”*

Such works include, as set out in NPPG, works to exterior walls, to the extent that they are reasonably necessary for the building to function as a dwelling house.

It should not be lost on the LPA that a fundamental aim of planning policy and indeed legislation through the GPDO is the conversion of redundant agricultural buildings to form new housing within rural areas thereby avoiding the use of greenfield sites.

The filling of some small holes within the outer shell of the existing building would not be necessary for the building to successfully function as a dwelling and would be purely aesthetic

as set out in the assessment above and in any event these would, in our submissions, fall squarely within works to exterior walls that are not rebuilding.

On that basis and given that this building would comply with all of the other requirements of part q it is submitted that it is the epitome of the government's aims and objectives to re-utilise redundant agricultural buildings within the rural areas to provide the new homes.

In light of the above we would be grateful if you could now confirm that the Council will support the application however should the Council require any further information, then please do not hesitate to contact us.

Yours sincerely

anthony allen

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