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Head of Planning
Wiltshire Council
Bythesea Road
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10th October 2023

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

CONYGRE FARM, EASTON ROYAL, PEWSEY, SN9 5LU

Carter Jonas is instructed by Conygre Farm Ltd (the 'applicant') to submit an application in respect of the above mentioned property for the following:

"Change of use of visitor accommodation to Class C3 residential dwellings."

The following documentation forms the planning application:

- Application form,
- Location Plan (2308-PL00),
- Existing Site Plan (2308-SK01),
- Proposed Site Plan (2308-SK02), and
- Proposed Site Plan - coloured (2308-SK03).

The Site and Planning History

The application site comprises three accommodation units that have been used as visitor accommodation since they were granted planning permission in 2003 and 2005 (permission references K/046324 and K/51774/F). Each has its own front door and private amenity space as well as shared amenity space and car parking. The accommodation is beautifully presented and very welcoming and offers a good location close to Pewsey and the North Wessex Downs AONB with great amenities including an indoor swimming pool. Access to the site is via a drive off the B3087 Burbage Road.

The Mill House at the Farm was converted on both the ground and first floor to 2, two bedroom dwellings via the prior notification route under permitted development. (Prior approval decision 15/03581/PNCOU and 13/05729/PNCOU respectively). Planning permission was not required.

The Proposals

The proposals are to change the use of the three visitor accommodation units to Class C3 residential use. Mr and Mrs Brook have operated the accommodation successfully for many years, however since the COVID pandemic there has been a significant drop in bookings which is making the enterprise financially unviable.

Carter Jonas LLP is a limited liability partnership registered in England and Wales no. OC304417. Reg office One Chapel Place, London W1G 0BG. Regulated by RICS.

Classification L2 - Business Data

The accommodation has been let through Independentcottages.com and since July 2023 through Finestretreats.com as well. Hosting through these websites also filters down to Booking.com and Airbnb. Despite listing on additional website since July there have only been an additional two bookings.

The booking of the accommodation between 2016 and 2022 can be seen in the table below:

Year	Total
2016	301
2017	356
2018	398
2019	525
2020	185
2021	82
2022	98

Accompanying the application are the profit and loss accounts from 2015 to 2002 which are submitted confidentially. It can be seen that there is a healthy income from the holiday letting part of the business in 2016, 2017, 2018, 2019. From 2020 onwards during and post Covid in 2021 and 2022 the income from the holidays letting is noticeably reduced with associated knock on effect on the operating profit. The only exception is in 2021 when a covid grant was received from the Government, which is reflected in the profit and without the grant would have been a similar profit to 2022.

Post covid the holiday rental market has not bounced back, and to compound this there appears to be more competition from an increase in properties on the market in the local area and the income received from the holiday lets is not sustainable. Due to the lack of bookings and increased cost of heating the holiday cottages are now not rented out from November to March as it is not viable to do so. This period is used for any required maintenance.

Planning Policy

The Development Plan for Wiltshire includes the following:

- Wiltshire Core Strategy,
- Kennet Local Plan 2011 (Saved Policies 2007),
- Wiltshire Housing Site Allocations Plan,
- Pewsey Neighbourhood Plan, and
- Minerals Core Strategy.

The following policies contained within the Development Plan are considered relevant to the proposal. The policies are reproduced in full at Appendix A:

Wiltshire Core Strategy 2006-2026

- Core Policy 40: Hotels, Bed & Breakfasts, Guest Houses and Conference Facilities

- Core Policy 45: Meeting Wiltshire's Housing Needs
- Core Policy 48: Supporting Rural Life

Kennet Local Plan 2011 (Saved Policies 2007)

- Policy HC26 Housing in the Countryside,

Wiltshire Council is currently carrying out a review if its Local Plan with a Reg 19 Consultation that ends on 22nd November 2023.

Whilst still a material consideration, given the stage of preparation, the emerging Plan is deemed to hold little weight in the determination of this application.

Planning Assessment

Loss of Visitor Accommodation

Core Policy 40 (Hotels, bed and breakfasts, guest houses and conference facilities) resists the loss of visitor accommodation with the following exception "Proposals for the change of use of existing bed spaces provided in hotels or public houses or conference facilities to alternative uses will be resisted, unless it can be clearly demonstrated there is no longer a need for such a facility in either its current use or in any other form of tourism, leisure, arts, entertainment or cultural use."

As set out above and in the attached confidential information it is clearly shown that the income from the holding letting business has reduced significantly to the point where very minimal profit is being made and it is not a viable business proposition. As such it is our case that there is no need for the use.

Core Policy 48, Supporting rural life, supports the reuse of buildings in rural areas for residential use in special circumstances.

New Residential Use

There would be no impact by a change in the users of the buildings. The units are an existing residential use for visitors and the change to permanent occupiers would have no adverse impact. The physical building will remain unchanged.

As set out above an adjacent barn, The Mill House, was recently converted though permitted development rights to residential use so the principle of conversion to residential must now be acceptable if the loss of the visitor accommodation can be justified, which we believe it can.

There were no technical issues that required prior approval for the creation of the two new residential dwellings. It is argued that there are no technical issues that prevent the change of use of the three visitor accommodation units to Class C3 residential uses at the site.

There will be no changes to the outside of the building. There will be no additional impact on ecology, trees, archaeology, the North Wessex Downs AONB, Landscape, Archaeology or any other matter.

The three new dwellings will help meet the housing need of the District to a small extent.

There would be no increase in traffic movements from the site as a result of the proposed change of occupier.

Conclusion

It has been demonstrated that the existing visitor accommodation use is not financially viable following the decline in bookings since the COVID pandemic. The accommodation is of good quality and cannot be improved to encourage an increase in booking. The ongoing use of the units for holiday accommodation is not sustainable.

The conversion of Mill House at the Farm demonstrates that in principle the residential use at the site is acceptable.

I trust you have all you require to register the application but if you need anything further please do not hesitate to contact me.

Yours faithfully,

Mrs N L Brock MRTPI
Partner

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APPENDIX A

Wiltshire Core Strategy Adopted January 2015

Core Policy 40
Hotels, bed and breakfasts, guest houses and conference facilities
Proposals for new hotels, bed and breakfasts, guesthouses or conference facilities, together with the sensitive extension, upgrading and intensifi cation of existing tourism accommodation facilities will be supported within:
i. Principal Settlements and Market Towns
ii. Local Service Centres, and Large and Small Villages where the proposals are of an appropriate scale and character within the context of the immediate surroundings and the settlement as a whole
iii. Outside the settlements above, proposals that involve the conservation of buildings that for contextual, architectural or historic reasons should be retained and otherwise would not be.
In all cases it must be demonstrated that proposals will:
iv. not have a detrimental impact on the vitality of the town centre
v. avoid unacceptable traffic generation.

Proposals for the change of use of existing bed spaces provided in hotels or public houses or conference facilities to alternative uses will be resisted, unless it can be clearly demonstrated there is no longer a need for such a facility in either its current use or in any other form of tourism, leisure, arts, entertainment or cultural use.

Core Policy 45
Meeting Wiltshire's housing needs
Type, mix and size
New housing, both market and affordable, must be well designed to address local housing need incorporating a range of different types, tenures and sizes of homes to create mixed and balanced communities.

Housing size and type, including any distinction between flats and houses, will be expected to reflect that of the demonstrable need for the community within which a site is located. The Wiltshire Strategic Housing Market Assessment identifies the housing needs of Wiltshire. Any variation to this will need to be justified through the production of new, sound evidence from either an updated Strategic Housing Market Assessment or other credible evidence source.

In relation to affordable housing, other sources of credible evidence include the council's housing register and local needs surveys.

Core Policy 48
Supporting rural life
Dwellings required to meet the employment needs of rural areas
Outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, and outside the existing built areas of Small Villages, proposals for residential development will be supported where these meet the accommodation needs required to enable workers to live at or in the immediate vicinity of their place of work in the interests of agriculture or forestry or other employment essential to the countryside. Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence.

Improving access to services and improving infrastructure
Proposals which will focus on improving accessibility between towns and villages, helping to reduce social exclusion, isolation and rural deprivation, such as transport and infrastructure improvements, will be supported where the development will not be to the detriment of the local environment or local residents.

Conversion and re-use of rural buildings
Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy 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.
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.
iii. The building can be served by adequate access and infrastructure.
iv. The site has reasonable access to local services.
v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.
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.

Community ownership
Community ownership and/or management of local shops, pubs and other services will be supported where appropriate to retain a local facility through the following measures:
vi. Development proposals for the adaptation of a building, such as sub-division or change of use, will be supported where these are necessary to allow a viable continued use.
vii. Appropriately scaled enabling development will be considered, where this is environmentally acceptable and justified through a supporting viability study, and where it can help maintain and enhance the community uses provided.
viii. The facility may be protected from loss of its current use until such time as the community has had a realistic opportunity to take control of the asset.

New shops
New shops in villages will be supported where they are small in scale and would not threaten the viability of nearby centres. Farm shops will be supported where they utilise existing buildings, are small in scale and cause no unacceptable impact on nearby village shops or the character of the area.

Kennet Local Plan 2011 (Saved Policies 2007)

Policy HC26 - Housing in the Countryside
Outside of the Limits of Development defined for the villages listed in Table H.4 and outside of the existing built up area of the villages listed in Table H.5, new residential development will only be permitted in the following circumstances:
a) To provide accommodation for the essential needs of agriculture or forestry or other employment essential to the countryside as established in Policy HC27;
b) To provide holiday accommodation from the conversion of an existing building; or
c) Where the conversion of a listed building to residential use is the only economic means of retaining the historic structure. Provided that the development does not affect the character of the local landscape.