

PLANNING JUSTIFICATION STATEMENT **INCLUDING STRUCTURAL APPRAISAL**

**‘CHANGE OF USE’ OF AGRICULTURAL BUILDING TO A DWELLINGHOUSE (CLASS C3)
AND ASSOCIATED WORKS**

AT

**BARN ADJACENT TO MAYS FARM, 25 THE STREET, HULLAVINGTON,
WILTSHIRE, SN14 6DP.**



Report Ref: 2983/PJS/PRIORS

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Prepared by:

**Ian Sullivan Architecture Ltd
101 Victoria Road
Swindon
SN1 3BD**

T: [REDACTED]

E: [REDACTED]

W: iansullivanarchitecture.co.uk

CONTENTS

1. Introduction
2. Previous Planning History
3. Photographs
4. Planning Policy
5. Flood Zone
6. Proposals
7. Structural Appraisal
8. Conclusion

1. Introduction

- 1.1 This Planning Justification Statement has been prepared by Ian Sullivan Architecture Ltd on behalf of the applicant, Malford Properties Ltd, to accompany a Class Q Application submitted in respect of the site known as Barn adjacent to Mays Farm, Hullavington, SN14 6DP.
- 1.2 This Class Q Application is submitted to determine if prior approval is required for a proposed: 'Change of use' of agricultural building to a dwellinghouse (Class C3) and associated works.
- 1.3 The application site is located on the southern edge of Hullavington village with residential dwellings to the north and west and open countryside and arable farmland to the south and east. The nearest large towns are Chippenham to the south and Swindon to the east.
- 1.4 Hullavington is identified as a large village in the Wiltshire Core Strategy. The application site is situated just outside of the defined settlement boundary and is subsequently considered to be within the open countryside for development management purposes.



Site Location Plan

The application site does not fall within a Conservation Area, there are no scheduled monuments and the site is not within the defined Greenbelt or Area of Outstanding Natural Beauty (AONB).

The application site does not contain any statutory or locally listed buildings, however there are listed buildings within the village.

- 1.5 The application site comprises an unused agricultural building with an area of hardcore surfacing and rough grassland.

- 1.6 The building is a single storey open-fronted agricultural barn in 5 bays, approximately 19m long x 6.5m wide and comprises a hardcore base. The barn is constructed of natural stone with brick piers and cast iron supports + saddle stones. The roof covering consists of corrugated metal sheeting with timber king post roof trusses.
- 1.7 The barn is vacant and is not currently fulfilling its full potential as it comprises a parcel of land occupied by an agricultural building that is considered suitable for a 'change of use' and conversion.
- 1.8 The site area amounts to 295m².
- 1.9 Entry to the site is served off 'The Street', utilising the existing access track which runs alongside Mays Farm.
- 1.10 An existing footpath is located at the entrance to the existing access track with footpath connections leading to sustainable services.



Existing Site Plan

2. Previous Planning Application History

- 2.1 There is no previous planning application history associated with the application site.
- 2.2 Planning application history adjacent the site includes the following: -

Application Ref: 18/03185/FUL

Address: The Barns at Mays Farm, 25 The Street, Hullavington, SN14 6DP.

Proposal: Erection of 2 no. new dwellings.

Status: Application refused on 16/07/2018.

Appeal Ref: APP/Y3940/W/18/3208030 (Application Ref: 18/03185/FUL)

Address: The Barns at Mays Farm, 25 The Street, Hullavington, SN14 6DP.

Proposal: Erection of 2 no. new dwellings.

Status: Appeal allowed and planning permission granted on 22/01/2019.

3. Photographs As Existing

External Photographs



Front view of site.



Front view of site.



View of new housing.



Front view of barn.



Front view of barn.



Side view of barn.



Side view of barn.



Rear view of barn.

Internal Photographs



Barn floor / walls / roof.



Barn floor / walls / roof.



Barn floor / walls / roof.



Barn roof.



Barn piers.



Barn floor / walls / roof.

4. Planning Policy

Eligibility – The Current Building and Site

4.1 Class Q allows for suitable agricultural building conversion to a dwelling house (Class C3 use).

4.2 Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) – Schedule 2, Part 3, Class Q, sets out that permitted development can consist of:

Change of Use of Buildings on Agricultural Units and former Agricultural Buildings to Dwellinghouses (Class C3), which may include extension of the building and/or building operations reasonably necessary for the conversion.

4.3 Under Class Q development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to: -

- a) Transport and highways impacts of the development,
- b) Noise impacts of the development,
- c) Contamination risks on the site,
- d) Flooding risks on the site,
- e) Whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,
- f) The design or external appearance of the building, and
- g) The provision of adequate natural light in all habitable rooms of the dwellinghouses.

Eligibility – The Proposed Change of Use

4.4 It is proposed to utilise the existing agricultural building to form 1 no. residential unit (Class C3) within the structural fabric, with the addition of a single storey extension to the rear.

4.5 The established agricultural unit does not exceed 150m².

[Changes to Class Q planning \(effective May 2025\)](#)

4.6 The UK government updated Class Q permitted development rights for converting agricultural buildings to residential dwellings in May 2024. A one-year transition period allowed landowners to apply under the old rules until May 20, 2025. This was the most significant change affecting Class Q around May 2025.

4.7 Key new regulations:

- **Reduced maximum dwelling size:** The cap for an individual dwelling has been reduced from 465m² to 150m².
- **Increased number of dwellings:** The total number of dwellings that can be created on an agricultural unit has increased from five to ten.
- **Increased maximum total floor space:** The total cumulative floor space has increased from 865m² to 1,000m².
- **Wider eligibility:** The rules now apply to former agricultural buildings no longer part of an active agricultural unit, as long as they haven't been used for a non-agricultural purpose.
- **New criteria:** Buildings must have been part of an established agricultural unit as of July 24, 2023, or for 10 years before the start of development.
- **Extensions now permitted:** Single-storey rear extensions up to 4 meters are now allowed, and external walls can be expanded up to 200mm for new cladding or insulation.
- **Transitional deadline:** The deadline for prior approval applications under the old rules was May 20, 2025.

[New extension allowances](#)

4.8 **Single-storey rear extensions** are now permitted as part of the conversion: -

- **Maximum depth:** 4 meters + 4 meters height.
- **Placement:** Must be on an existing hard surface, such as concrete or tarmac, that was in place before July 24, 2023.
- **Restriction:** Side or front extensions are not allowed.

4.9 **External insulation and cladding:** External dimensions can be extended by up to 200mm to accommodate insulation and new cladding.

4.10 Planning Policy relevant to this small-scale development proposal is contained within: -

- [National Planning Policy Framework \(December 2024\)](#);
- [Wiltshire Core Strategy \(Adopted January 2015\)](#); and
- [National Design Guide January 2021 \(NDG\)](#)

Under the provisions of section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The Development Plan covering the site comprises of the Wiltshire Core Strategy.

[National Planning Policy Framework December 2024 \(NPPF\)](#)

- 4.11 The National Planning Policy Framework (NPPF) was published in December 2024 and replaced the first NPPF published in March 2012, and minor amendments that were published in July 2018, February 2019 as well as July 2021 and the previous full versions in September 2023 and December 2023.
- 4.12 The NPPF published in December 2024, contains specific sections dealing with the delivery of a sufficient supply of homes (5) and achieving well designed places (12).
- 4.13 At the outset, paragraph 10 of the NPPF states: “... at the heart of the Framework is a presumption in favour of sustainable development.”
- 4.14 For sustainable development and decision making, paragraph 11 sets out that development should be approved without delay where it accords with an up-to date Development Plan. In the circumstances where there are no relevant policies, or the relevant policies are out of date, permission should be granted unless there are restrictive policies in the NPPF for that area or in circumstances where the adverse impacts would significantly and demonstrably outweigh the benefits.

[Achieving Well-Designed Places](#)

- 4.15 Guidance on design is set out at paragraphs 131 to 141. Paragraph 131 sets out the importance of good design in sustainable development and that planning policies should be clear about design expectations as this is essential to achieving well designed places.

[Wiltshire Core Strategy \(Adopted January 2015\)](#)

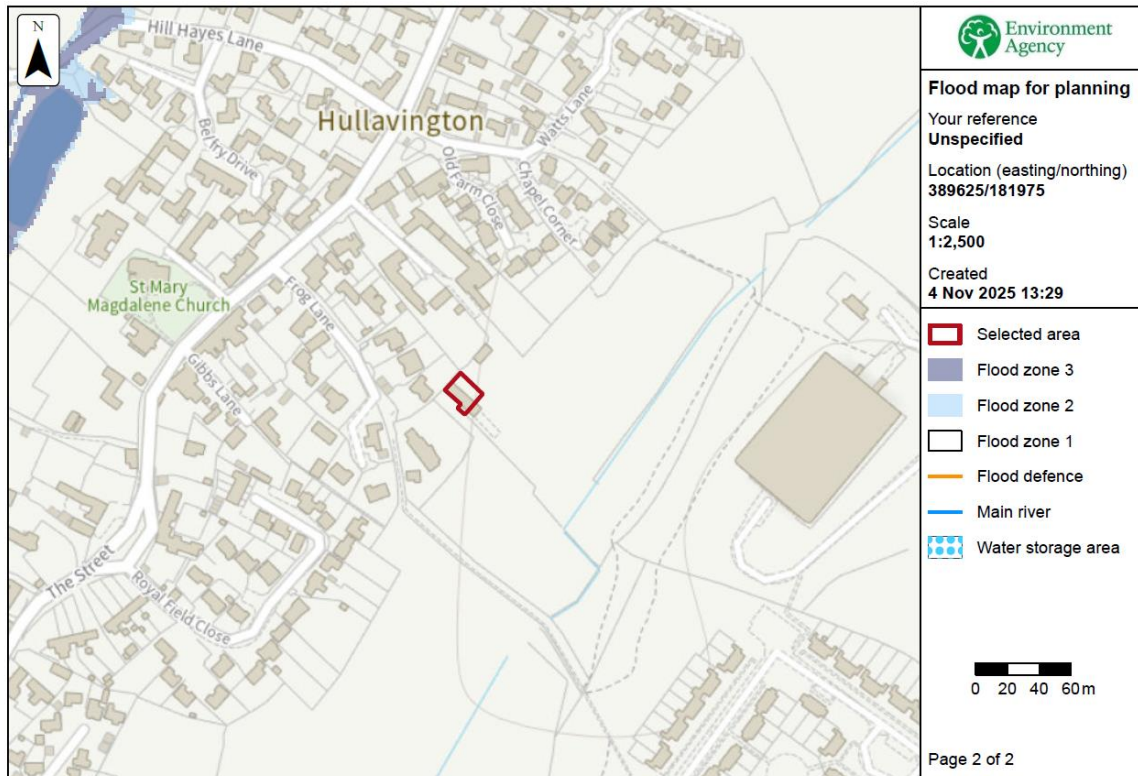
- Core Policy 1: Settlement strategy
- Core Policy 2: Delivery strategy
- Core Policy 48: Supporting Rural Life
- Core Policy 51: Landscape
- Core Policy 57: Ensuring High Quality Design and Place Shaping

[National Design Guide \(Updated January 2021\)](#)

- 4.16 The NDG is intended to complement the NPPF.

5. Flooding

- 5.1 The site lies within Flood Zone 1. Land within Flood Zone 1 has a low probability of flooding from rivers and the sea.



Flood Mapping Area.

6. Proposals

- 6.1 The proposals involve 'change of use' of agricultural building to a dwellinghouse (Class C3) and associated works.



- 6.2 It is considered that the proposed 'change of use' of agricultural building to form a dwellinghouse (Class C3) meets the criteria for the conversion potential under the Class Q criteria (maximum of 150m²), taking account of the general character of the buildings and the identified constraints.

- 6.3 This prior approval application is supported by the above Proposed Site Plan, which identifies the following: -

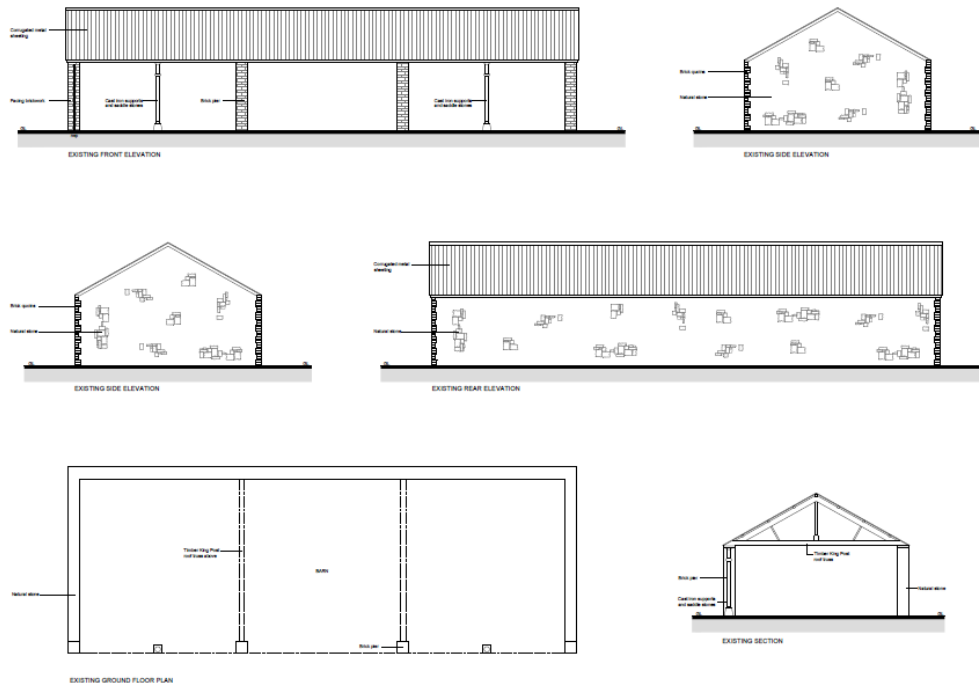
- The existing, permitted and proposed development in the vicinity of the Application Site;
- The existing access track serving the Application Site;
- Existing hedgerow / planting retained;
- New garden area / area of hardcore;
- 2 no. car parking spaces with electric car charging point;
- Bin and cycle storage;
- Primary and secondary access doors; and
- Ecology details.

- 6.4 The vehicular access serving the site is via the existing track served off The Street. There are residential properties within the vicinity of the site.

As Existing

6.5 Existing Internal Floor Area

The existing internal floor area of the barn amounts to 121m².



Existing Floor Plan and Elevations

6.6 The existing external and internal plans identify the following: -

Roof

- Corrugated metal sheeting;
- Existing timber king posts + timber A-frame roof trusses + timber purlins and timber ridge beam to be retained.

Walls

- Natural stone with brick piers;
- Cast iron supports + saddle stones;
- Brick quoins.

Floor

- Hardcore base.

6.7 [Proposed \(Class Q\) – Dwellinghouse \(Class C3\)](#)



[Proposed Floor Plan and Elevations](#)

[As Proposed](#)

6.8 The proposed external and internal plans identify the following: -

[Roof](#)

- Existing timber king posts + timber A-frame roof trusses + timber purlins and timber ridge beam to be retained;
- Standing seam roof sheeting with rooflights.

[Walls](#)

- Cast iron supports and saddlestones;
- Natural stone, facing brickwork piers and brick quoins retained and made good;
- Insulated timber framework and vertical cedar boarding;
- Timber windows and doors.

[Floor](#)

- New concrete insulated slab.

6.9 The 'change of use' proposes an open plan kitchen / dining area with double internal doors leading to the lounge area. Two double bedrooms are proposed, each with ensuite facilities. Bedroom 1 is incorporated within the existing structural fabric of the building and bedroom 2 is formed by a single storey extension to the rear. A separate WC / cloakroom is incorporated.

6.10 [Proposed Internal Floor Area](#)

The internal ground floor area of the proposed dwellinghouse is 130m².

[Highways Impact and Access](#)

- 6.11 A safe pedestrian and vehicular access remains as existing via an existing track, served off 'The Street' which runs alongside Mays Farm. An existing footpath is located at the entrance to the existing access track with good footpath connections leading to sustainable services.
- 6.12 It is considered that the proposed use of the building to (Class C3) residential use will increase the number of cars on site, however it is unlikely to generate a substantial material increase in traffic movements to what the existing established vehicle movements related to the existing use would generate. Vehicular movements are likely to be fairly small relating to the proposed (C3) use, so as not to be obtrusive. Therefore, no Transport Statement is submitted.

[Car Parking / Vehicle Charging](#)

- 6.13 2 no. car parking spaces are provided to serve the proposed dwellinghouse.
- 6.14 1 no. bollard electric charging point is provided.

[Cycle Storage](#)

- 6.15 2 no. cycle spaces are provided with the proposed cycle shed.

[Waste Management](#)

- 6.16 Bin storage is provided within the site. Bin collection will be managed under a private management company.

[Ecology](#)

- 6.17 The proposals incorporate ecological enhancements to the building in the form of Swift boxes and bat tubes. A Preliminary Roost Assessment – Prepared by BlueJay Ecology Ltd, has been undertaken and accompanies this application as supporting documentation.

[Landscaping](#)

- 6.18 The proposed scheme and landscape mitigation measures would introduce desirable and recognisable local characteristics and offer restoration and enhancement to the immediate vicinity.
- 6.19 Incorporate a framework of shrubs where possible enhancing the biodiversity of the site by establishing rich and diverse habitat types and creating new planting.

Noise

- 6.20 The 'change of use' to a dwellinghouse (C3) will not generate noise levels that are of concern to surrounding buildings. Therefore no Acoustic Report is submitted.

Drainage

- 6.21 Foul drainage to discharge into Bio Disc treatment plant to soakaway. Surface water drainage to discharge into soakaway, subject to a percolation test in accordance with BRE DIGEST 365.

Contamination

- 6.22 The existing building was used for agricultural storage / an animal shelter (byre) and the proposed use therefore is not susceptible to contamination.
- 6.23 The existing building comprises a hardcore base. The proposals incorporate a new concrete insulated slab which is considered a suitable floor surface for the (C3) residential use.

Flooding

- 6.24 The site and wider area are not susceptible to surface water flooding or subject to this constraint as the proposals are in Flood Zone 1, defined by the EA Flood Risk Assessment Maps.

7. Structural Appraisal

- 7.1 The purpose of this Structural Appraisal is to determine the current form and condition of the building proposed for conversion and to assess whether it is capable of conversion, without the need for significant or major structural reconstruction or alteration, whilst acknowledging that new external fabric is required.
- 7.2 This report is a record intended to determine structural form of the building and the general condition of structural elements with the intention of informing the proposals for the conversion of the building.
- 7.3 This Class Q Application is submitted to determine if prior approval is required for a proposed: 'Change of use' of agricultural building to a dwellinghouse (Class C3) and associated works.

General Description of Existing Barn

- 7.4 The barn is an open-fronted animal shelter (or Byre) in 5 bays. It is about 19m long x 6.5m wide.
- 7.5 It is orientated NW – SE, and the ground slopes up towards the NW gable. The eaves height at the SE end is about 2.3m and the double-pitched roof slopes up at about 30° to an overall height ridge of 4m or so.
- 7.6 The two gable walls and the rear wall (facing SW) are of rubble stone construction with no openings. The front ends of the gable walls are formed in red brickwork toothed to the rubble stone.
- 7.7 The front wall has 5 open bays. At the third points there are brick piers 450mm sq, matching the brick ends of the two gable walls. Between these in the two outer bays there are ornate cast iron columns on stone staddles. It seems likely that the cast iron columns are historical replacements for simple timber posts.
- 7.8 The roof is covered with corrugated steel sheet, quite rusty particularly towards the eaves. There would probably have been a tile or slate roof originally. The pitch is too shallow for stone tiles.
- 7.9 The roof is supported directly on timber purlins (150 x 100), three per slope and timber ridge beam spanning between the main roof frames.
- 7.10 There are two types of roof frame. Two traditional king post frames span onto the brick columns. Three lighter A-frames with raised collars span onto a timber sole plate and onto the cast iron columns and brick piers.
- 7.11 There is a hardcore base.

Observations

- 7.12 Generally speaking this barn is in good condition and is suitable for conversion.
- 7.13 The brick front end of the NW gable wall needs some minor repointing work to make good.
- 7.14 A few courses of stone at the top of the wall should be re-bedded where this requires some minor work.
- 7.15 Two cast iron columns within the barn are retained. The detailing of glazed and boarded panels along this elevation are recessed (set back) into the building.
- 7.16 Analysis of the roof structure:
- Timber purlins and ridge beam are satisfactory as installed in their current condition.
 - The two king post frames are also satisfactory in their current condition.
 - The three A-frames are installed as is the collar set in place.
- 7.17 A hardcore base is suitable for accepting an insulating slab, in assessing barns for conversion. It doesn't affect the structural assessment.
- 7.18 It is proposed to replace the rusty corrugated roof sheets, but this is not a structural issue.

Summary

- 7.19 From a structural point of view, this is a sturdy, well-built barn and clearly suitable for conversion.
- 7.20 In summary these are:
- Minor repointing works to the end of the NW gable wall.
 - Retaining (all three) of the front posts.
 - Retaining the collars and the three A-frames.

General Description of Proposed Barn

- 7.21 Roof
- Standing seam roof with upstands – This is considered as a lightweight solution with little to no additional loading onto the existing roof structure. Insulation to the roof will be required and it may be possible to accommodate this within the new ceiling structure;
 - Rooflights.
- 7.22 Walls
- Insulated timber framework and vertical timber boarding – This would be structurally independent of the existing steel frame;

- The existing walling and roofing elements are suitable for retention and of a sound condition to accept the substituted roofing and walling materials as proposed with no additional loadings to that of the existing;
- Standing seam roofing + vertical timber framework + timber cladding – This will be fitted independently and will not contribute to any additional support to the structure which will remain in its current form;
- Timber painted windows and doors.

7.23 [Floor](#)

- An insulated concrete slab is to be installed on the hardcore base.

7.24 There is no introduction of any new structural elements necessary forming the 'change of use' and conversion of the building. The structure will remain independent to the changes involving the new fabric.

8. Conclusion

- 8.1 The proposals involve 'change of use' of agricultural building to a dwellinghouse (Class C3) and associated works. The proposal will improve the site in terms of utilising an unused agricultural building, which is structurally capable of conversion and would reinstate the building into active use.
- 8.2 It is proposed to utilise the existing building to form 1 no. dwellinghouse (Class C3) within the existing structural fabric, along with a modest extension to the rear.
- 8.3 With regards to the proposal, insulation will be required in accordance with an architectural and energy specification. It is proposed to retain the existing building which provides an adequate structural core in order to convert the current building into a single dwelling.
- 8.4 Relevant Building Regulations approvals and 10-year warranty documents will be obtained to satisfy the future use obligations.
- 8.5 We would submit that the existing building is structurally sound and in a good condition to convert in order to provide a single dwelling within the footprint and height limits of the existing building as per the criteria of a prior's approval.
- 8.6 The established agricultural unit does not exceed the 150m² criteria.
- 8.7 In conclusion, we would submit that the application scheme responds positively to the identified opportunities and constraints and is acceptable in all respects.
- 8.8 We would therefore request that approval is granted for the proposed 'change of use' and associated works in this instance based upon the merits of the application.

Ian Sullivan

November 2025