

TOWN & COUNTRY PLANNING ACT 1990

PLANNING STATEMENT

PROPOSED CHANGE OF USE OF CONKWELL GRANGE BARN TO RESIDENTIAL STORAGE

**CONKWELL GRANGE, CONKWELL, LIMPLEY
STOKE, BATH, WILTSHIRE, BA2 7FD**

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Our Reference: LPC.6222

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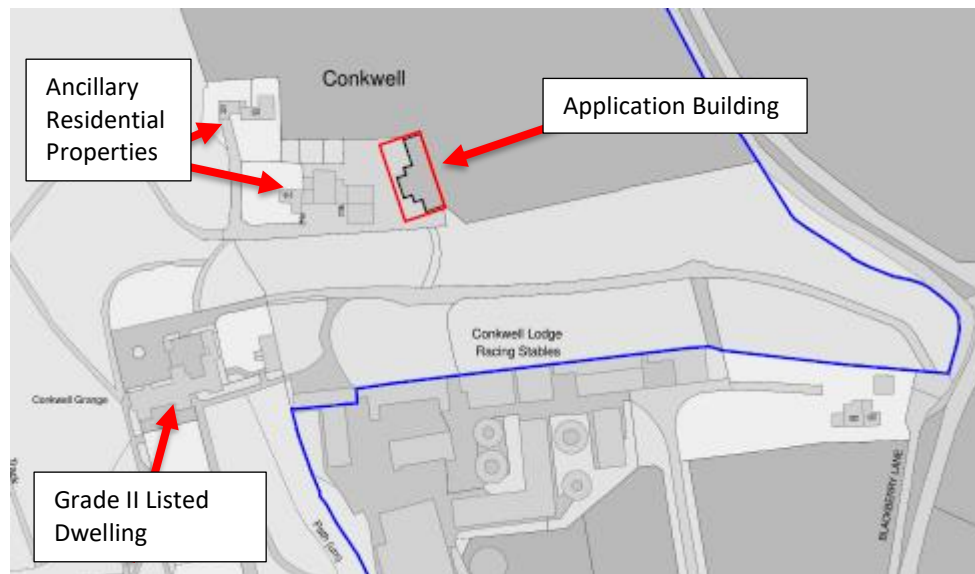
1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared to support the submission of a planning application seeking full planning permission for the change of use of a rural building, known as Conkwell Grange Barn, at Conkwell Grange, Conkwell, Limpley Stoke, Bath, Wiltshire, BA2 7FD, to residential storage.
- 1.2 This statement will describe the location of the site and will set out what is proposed by the planning application. The statement will then provide an overview of the planning policy context and an assessment of the key material planning considerations, demonstrating the proposal's acceptability.
- 1.3 The full planning application follows a series of former planning applications and consents which have permitted the change of use and conversion of the application building to a dwelling along with its extension and alteration. The current proposal however is limited to the change of use of the building to residential storage associated with the occupation of the main dwellinghouse at Conkwell Grange.
- 1.4 The planning application is supported by the following documents and existing and proposed plans:-
 - Document. Planning Application Form
 - Document. Community Infrastructure Levy Form
 - Document. Design & Access Statement by Holland Green
 - Drawing No.010-100 Rev.PL-1. Title. Location Plan
 - Drawing No.021-100 Rev.PL-1. Title. Existing Site Plan
 - Drawing No.022-101 Rev.PL-1. Title. Proposed Site Plan
 - Drawing No.031-100 Rev.PL-1. Title. Existing Ground Floor
 - Drawing No.031-102 Rev.PL-1. Title. Existing Roof Plan
 - Drawing No.032-100 Rev.PL-1. Title. Existing North & South Elevations
 - Drawing No.032-101 Rev.PL-1. Title. Existing East & West Elevations

- Drawing No.033-100 Rev.PL-1. Title. Existing Sections A & B
- Drawing No.051-105.1 Rev.PL-1. Title. Proposed Ground Floor
- Drawing No.051-105.2 Rev.PL-1. Title. Proposed Roof Plan
- Drawing No.052-105.3 Rev.PL-1. Title. Proposed North & South Elevations
- Drawing No.052-105.4 Rev.PL-1. Title. Proposed East & West Elevations
- Drawing No.053-105.5 Rev.PL-1. Title. Proposed Sections A & B

2.0 SITE DESCRIPTION

- 2.1 The application property, Conkwell Grange, comprises a Grade II Listed dwellinghouse set within 125 acres of land, consisting of a mix of woodland, pasture and gardens. The property has a number of ancillary cottages, in addition to the application building which is known as Conkwell Grange Barn, none of which are curtilage listed.



Location Plan

- 2.2 The application building is a former grain store which was constructed in the 1950s, as confirmed within the Officer's Report for planning application W/87/0360/FUL (which is discussed further below). The building measures 8m x 32m (26 ft x 106ft) and has a projecting bay, and has an internal ground floor area of 291sqm (3,132 sqft). The building was constructed with a steel frame and finished with natural stone and small clay tiles.

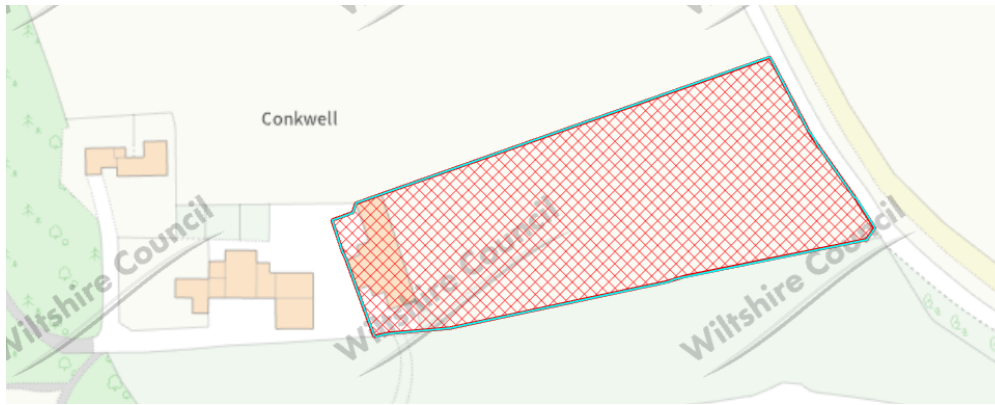


Photograph of Application Building

2.3 The property has an extensive planning history but the following planning applications are related to Conkwell Grange Barn and material to the assessment of the development currently proposed:-

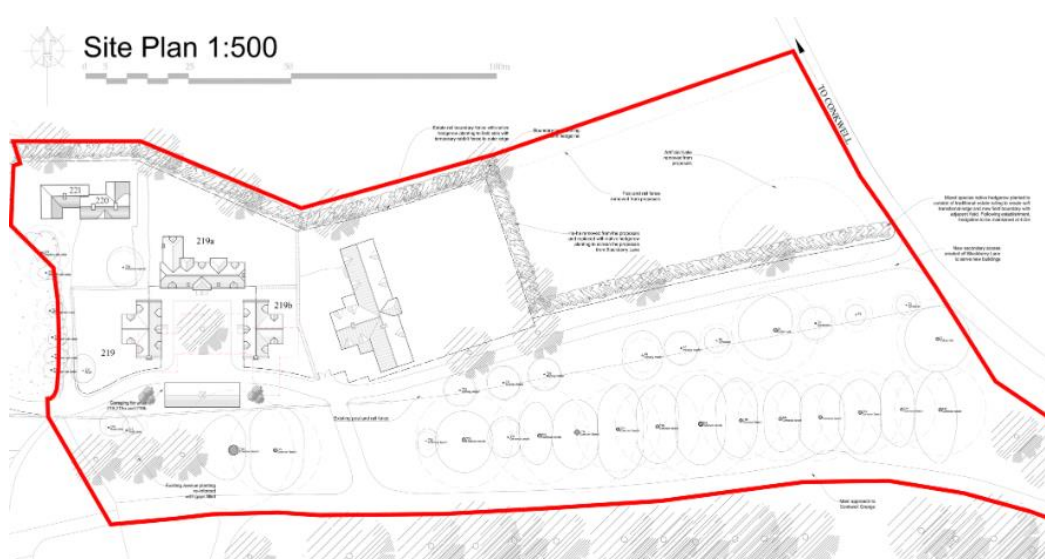
- **Application Reference W/87/00360/FUL** - Conversion of existing steel structure barn into one dwelling – Approved 05/05/1987
- **Application Reference 18/07078/FUL** - Demolition of existing residential units (Nos. 219, 219a, 219b, 219c and 219d) and erection of No.3 replacement housing units, ancillary garaging, a new Courtyard, access driveway and associated landscaping, including variations to partially implemented consent ref. W87/0360/FUL; and full retention of No 220 and 221 – Approved 11/01/2019
- **Application Reference 19/04532/FUL** - Variation of application W87/0360/FUL to include extension following demolition of existing store building, substation and adjacent garage, amended internal layout and revised fenestration – Approved 27/07/2019
- **Application Reference 19/11295/VAR** - Demolition of existing residential units (Nos. 219, 219a, 219b, 219c and 219d) and erection of No.3 replacement housing units, ancillary garaging, a new Courtyard, access driveway and associated landscaping, including variations to partially implemented consent ref. W87/0360/FUL; and full retention of No 220 and 221 – Approved 13/01/2020
- **Application Reference W/05/02651/FUL** - Conversion of grain store to 2 dwellings - Withdrawn 05/05/2006

2.4 The planning history reveals that planning permission has previously been granted for the change of use and conversion of the application building to create a single dwellinghouse. The first permission was in 1987 (planning permission reference W/87/00360/FUL), and later the dwelling as approved along with its curtilage was included on the approved drawings for planning permission reference 18/07078/FUL in 2019. The map below identifies the site area and original curtilage permitted for the new dwelling in 1987.



Map showing Site Area of Application W/87/00360/FUL

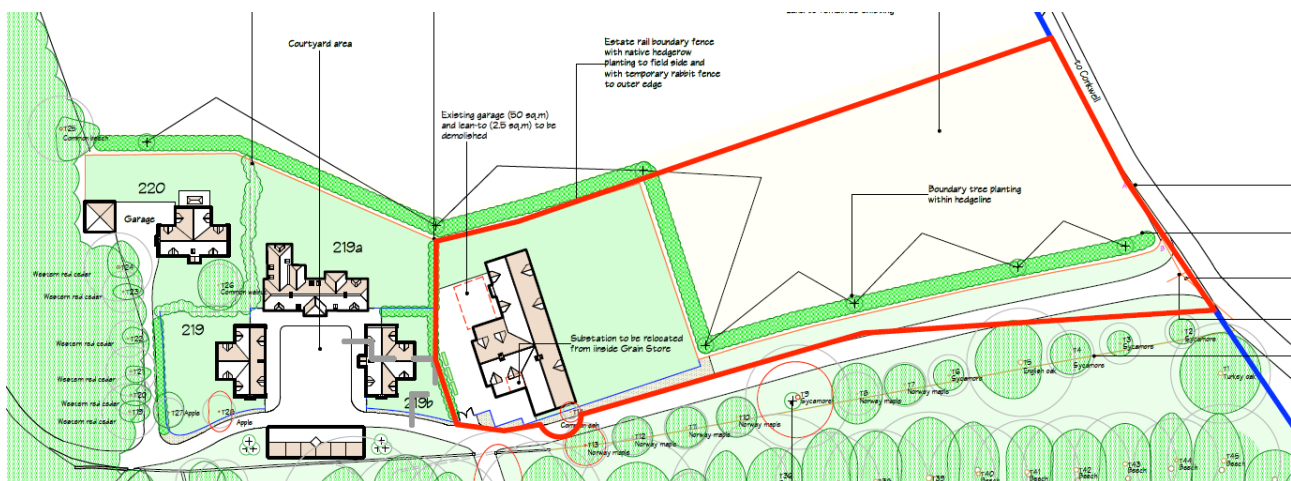
- 2.5 The first planning permission, reference 18/07078/FUL, in 2019 was for the demolition of existing residential units, Nos. 219, 219a, 219b, 219c and 219d), immediately to the west of Conkwell Grange Barn, and the erection of three replacement dwellings, ancillary garaging, a new courtyard, access driveway and associated landscaping. The permission also allowed “variations to partially implemented consent ref. W87/0360/FUL” as stipulated on the decision notice, which included a reduction to the permitted curtilage, amended access arrangements, and updated boundary treatments and associated landscaping. An extract from the approved site plan is included below which shows the change of use and conversion of the current application building to a dwelling was part of the approved wider scheme.



Application 18/07078/FUL - Approved Site Plan

(‘Revised Site Plan – received 1 January 2019’)

2.6 The second planning permission, reference 19/04532/FUL, in 2019 granted amendments to the conversion of Conkwell Grange Barn as permitted under planning permission W/87/00360/FUL. The application explained that minor amendments were required to address related functionality, natural lighting of internal areas, storage capacity considerations and other general aesthetic enhancements. The planning permission allowed small extensions following the demolition of an existing store building, substation and adjacent garage, an amended internal layout and revised fenestration. An extract from the approved site plan is included below.



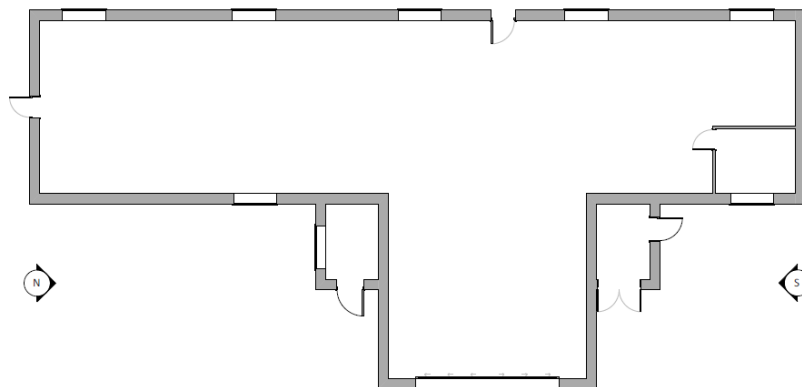
Planning Permission 19/04532/FUL- Approved Proposed Site Plan (drawing ref. 1080.061)

2.7 The Case Officer's report for application 19/04532/FUL notes that Officers cannot accept that W/87/0360/FUL has a lawful extant permission, albeit the subsequent decision notice clearly permits an amendment to the original permission, however planning permission 18/07078/FUL had been implemented; "The proposed new access from Blackberry Lane has already been approved and at the time of the site visit had begun to be implemented. Additionally the red outline for 18/07078/FUL effectively permitted the proposed landscaping scheme and garden area for the Grange".

2.8 The developments previously permitted, including the implementation of the planning permission 18/07078/FUL, is an important material consideration when considering the current proposal, as discussed further below within section 5.

3.0 PROPOSED DEVELOPMENT

- 3.1 The application seeks full planning permission to change the use of the application building, which is currently underutilised, for residential storage purposes. The building was originally built and used for agricultural purposes but has been used for residential storage for many years by the current and former owners of the property.
- 3.2 The proposed development does not involve any operational development. The scope of the application is limited to the change of use of the building only to enable it to be used for residential storage purposes including the applicant's private car collection.
- 3.3 The existing and proposed floor plans have been included below to demonstrate the proposed use can be accommodate without the need for any internal or external alterations.



Existing Floor Plan



Proposed Floor Plan

4.0 PLANNING POLICY CONTEXT

National Planning Policy

4.1 The National Planning Policy Framework (NPPF), and associated Planning Practice Guidance, sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions. The policies within the following chapters of the NPPF are relevant to the assessment of the proposed development:-

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision-making
- Chapter 6 – Building a Strong, Competitive, Economy
- Chapter 11 – Making Efficient Use of Land
- Chapter 12 – Achieving Well-designed Places
- Chapter 13 – Protecting Green Belt Land
- Chapter 15 – Conserving and Enhancing the Natural Environment

4.2 The NPPF highlights that planning law (section 70 [2] of the Town and Country Planning Act 1990 and section 38 [6] of the Planning and Compulsory Purchase Act 2004) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

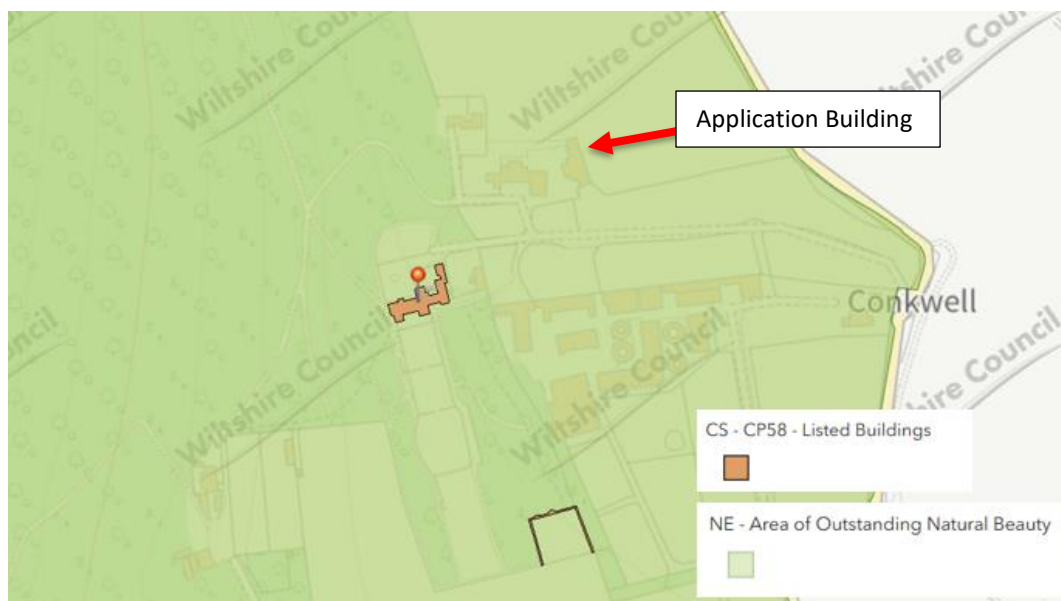
Local Planning Policy

4.3 The development plan relevant to the application include the Wiltshire Core Strategy (WCS) (adopted January 2015) (which includes saved West Wiltshire Local Plan policies). The site lies within the Winsley Designated Neighbourhood Plan Area but a Plan has yet to be produced. The key policies relevant to the assessment of the proposed development are considered to be:-

- **WCS** Core Policy 1: Settlement Strategy
- **WCS** Core Policy 2: Delivery Strategy

- **WCS** Core Policy 7: Spatial Strategy: Bradford on Avon Community Area
- **WCS** Core Policy 48: Supporting Rural Life
- **WCS** Core Policy 50: Biodiversity and Geodiversity
- **WCS** Core Policy 51: Landscape
- **WCS** Core Policy 57: Ensuring High Quality Design

4.5 The adopted Local Plan is accompanied by the Policies Maps, which provides a spatial representation of the Local Plan policies. The site lies within Flood Zone 1. The property is washed over by the Bristol, Bath and Western Wiltshire Green Belt and the Cotswolds National Landscape. The property also lies within the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and includes Ancient Woodlands of Challenges Grove.



Local Plan Policies Map - WCS

4.6 The following Supplementary Planning Documents are also relevant in the determination of this application:

- Wiltshire Local Transport Plan 2011 – 2026: Car Park Strategy
- Wiltshire Council Design Guide (2024)
- Trowbridge and Westbury Bat Mitigation Strategy SPD (February 2020 / Updated July 2025)

- Cotswold National Landscape Management Plan

Emerging Planning Policy

- 4.7 The WCS was adopted in 2015 and is therefore being reviewed. The review is termed the 'Local Plan Review'. Wiltshire Council submitted the Wiltshire Local Plan to the Secretary of State for Housing Communities and Local Government for independent examination on 28 November 2024. There are no fundamental changes proposed to the Spatial Strategy of the Local Plan, however regard has been had to the new and updated draft policies as presented within Pre-Submission Draft (2020 – 2038) (Regulation 19) Wiltshire Local Plan (September 2023).
- 4.8 It is however important to recognise that the draft Plan pre-dates the recently published NPPF (12 December 2024 [as amended]) and therefore there are a number of draft policies that do not align with the most up-to-date national planning policies.

5.0 KEY ISSUES AND PLANNING ASSESSMENT

5.1 In light of the context of the site and relevant national and local planning policies the key material planning considerations are considered to be:-

- i) Principle of Development
- ii) Impact on Historic Environment
- iii) Impact on Natural Environment (National Landscape & Green Belt)
- iv) Impact on Ecology and Bath and Bradford on Avon Bats SAC

Principle of Development

5.2 The WCS includes a Spatial Strategy which sets the foundations for how 'sustainable development' is defined and applied within Wiltshire. It has three key elements; a Settlement Strategy, Delivery Strategy and Infrastructure Requirements. The settlement and delivery strategies define where development will be the most sustainable across Wiltshire's settlements.

5.3 Core Policy 1 'Settlement Strategy' and Core Policy 2 'Delivery Strategy' of the WCS outline that there is a presumption in favour of sustainable development within the Principal Settlements, Market Towns, Local Service Centres and Large Villages and development should be restricted to within the Limits of Development other than in exceptional circumstances, as set out within the relevant core policies contained within the plan, i.e. the 'exception policies'.

5.4 The WCS 'exception policies' that permit new development within the countryside, in line with the delivery strategy outlined in Core Policy 2, are listed within paragraph 4.25 and includes Core Policy 48 'Supporting Rural Life'. The policy permits new build rural enterprise dwellings within the countryside or the creation of new dwellings through the conversion of existing buildings, or the re-use of rural buildings for employment, tourism,

cultural, community and residential uses, subject to a set criterion being met as discussed below.

- 5.5 The proposed development does not seek to create a separate self-contained dwelling, which has previously been permitted by the Local Planning Authority, but seeks to continue to use the building for residential storage purposes, including the owner's private car collection, which is a residential use ancillary to the occupation of the main dwellinghouse. The re-use of the building aligns with the objective and requirements of Core Policy 48 as considered in further detail within the following sub-heading:

Core Policy 48 'Supporting Rural Life'

- 5.6 Core Policy 48 of the WCS permits the conversion and re-use of rural buildings to a residential use provided it can be demonstrated that employment, tourism, cultural and community uses are not practical propositions. The WCS does not define what is meant by 'practical propositions' and does not identify the evidence that needs to be submitted. In order for alternative uses to be viable and practical propositions they would need to be capable of being accommodated within the building, compatible with other established use, financially and technically viable, and would have to comply with other policies of the plan. It is evident that each case has to be determined on its own merits using planning judgement and a flexible and logical application of this test has been applied by the Council elsewhere.
- 5.7 The policy is, however, now out-of-date because since the adoption of the WCS there has been a material change in planning policy around the conversion of rural buildings. There are now permitted development rights that allow the conversion of rural buildings to dwellings (which the Delegated Report for planning application 19/04532/FUL stated apply to the application building) and this is reflected within the emerging Wiltshire Local Plan (WLP). The Pre-Submission Draft 2020 – 2038 of the WLP explains that the policy is to be "updated and reframed as a housing exceptions policy, rather than a general rural policy. Housing elements of

the policy are updated considering changes to the National Planning Policy Framework, the GPDO and to improve legibility” (p.300). The new draft Policy 82 ‘Housing in the Countryside’ provides support for the conversion of rural buildings to residential uses/dwellings.

- 5.8 In addition to the above, the planning history of the application site is important to the assessment of the use currently proposed. The title of planning permission 19/04532/FUL, as referred to on the Decision Notice is “Variation of application W87/0360/FUL” which would appear to confirm the Council’s acceptance of the extant historic permission, albeit the associated Delegated Report considers the proposed development on its own merits. The Council’s assessment was based against Core Policy 48 and whilst evidence had not been submitted to demonstrate other uses would not be ‘practical propositions’, Officer’s concluded that due to the context of the site, its history, and the design and appearance of the building, a residential use is acceptable in principle.
- 5.9 In light of the above, the proposed residential use is considered to be acceptable in principle, however, it is considered important to reiterate that the development currently proposed is only for an ancillary residential use, as opposed to a single self-contained dwelling previously approved. The proposed development must however comply with criterion ‘i’ to ‘v’ of the policy as shown within the relevant extract from Core Policy 48 below:-

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.

5.10 The application does not propose the creation of a separate new residential unit and is limited to the change of use of the building to ancillary residential storage purposes only. The entire criterion of Core Policy 48 do not therefore apply to the proposal, however a proportional analysis is provided below:

- **CP48, i:** the application does not propose any operational development, however the building is structurally sound and is capable of being converted or extended (and previously permitted by the Council).
- **CP48, ii:** the proposed development will involve utilising the existing building to store cars and domestic paraphernalia, with no external storage, so there will be no impact on the character or appearance of the landscape. Furthermore, the storage use has no potential to impact on the amenities of the residents occupying neighbouring rural properties.
- **CP48, iii:** the application building is already served by a safe and convenient access to the highway network, and the revised access arrangements approved under planning permission 18/07078/FUL, and partly implemented, improve the connectivity of the application building with the main dwellinghouse.
- **CP48, iv:** the site is within a sustainable location being well related to the 'Large Village' of Winsley, however the proximity to local services and amenities is not relevant due to the proposed ancillary residential storage use only.

- **CP48, v:** the introduction of the proposed use will secure the long term future of the building, however it is not considered to have any heritage value (as discussed further below).

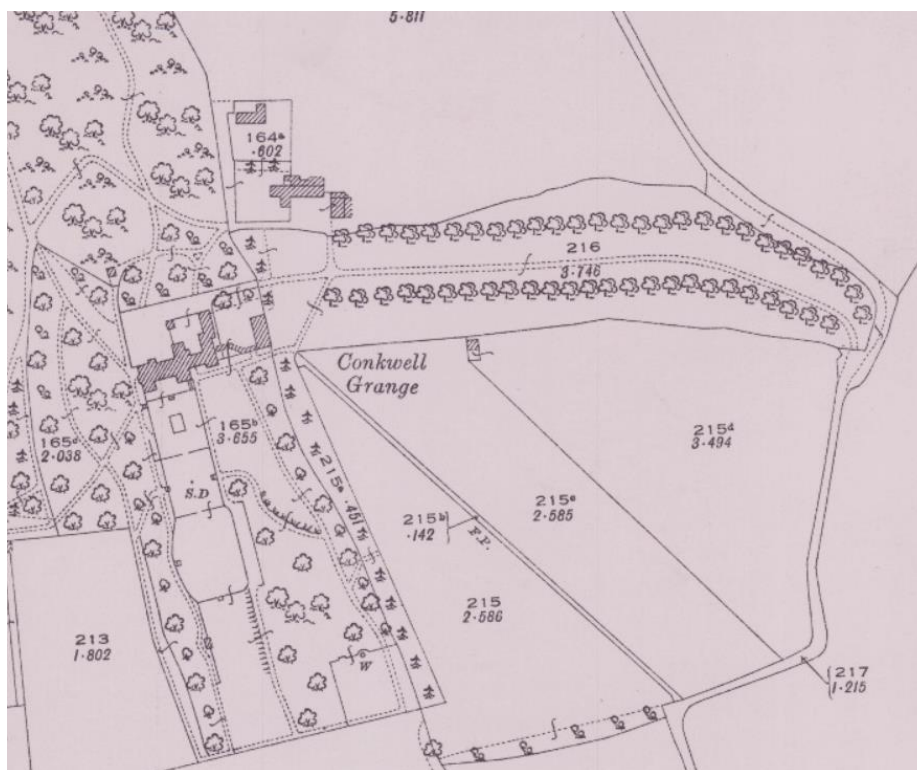
5.11 The proposed re-use and change of use of the application building for residential storage purposes in association with the main dwellinghouse is considered to align with the Spatial Strategy of the Local Plan and therefore acceptable in principle. The application does not propose any operational development so there will be potential for any adverse landscape or environmental impacts as explained within the following sections.

Impact on Historic Environment

- 5.12 The duty placed on the Council under sections 16 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990 is the requirement to have special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
- 5.13 The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. It outlines that application for development should describe the significance of any heritage assets affected, including any contribution made by their setting. Furthermore, the effect of an application on the significance of a non-designated heritage asset will require a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.14 In terms of designated heritage assets, Conkwell Grange is a Grade II Listed (Historic England List Entry Number 1180870) building. The Historic England list entry provides the following description; "The Country house, dated 1907, by Sir E.G. Dawber for J. Thornton, squared rubble stone with ashlar dressings, tall hipped stone slate roofs and prominent rubble stone stacks with ashlar quoins. ...". The setting of the Grade II Listed building is an important consideration but it is recognised that the LPA advised

during a previous application at the site (reference 18/07078/FUL) that “In regards to Conkwell Grange, its setting is not considered to extend beyond its initial enclosed landscaped garden and is also located on lower ground than the application site. It is considered that the proposal(s) would have no adverse impact on the setting of the listed building”. There remains no intervisibility between the listed building and application, and the development itself does not propose any operational development, therefore there will be no impact on any designated heritage assets.

- 5.15 In terms of the application build itself, it is finished within natural stone and a slate roof, but it is a more modern building constructed with a steel frame and is not part of the original Conkwell Grange Estate. The historic map included below shows it was not built as part of the original estate but is a much later addition understood to have been erected during the 1950s. The building does not have any special historic or architectural interest, it is a modern addition along with the extensive cluster of agricultural and equestrian buildings at Conkwell Grange Farm, and is not therefore considered to be a non-designated heritage asset.



Historic Map 1898 - 1939

Impact on Natural Environment (National Landscape & Green Belt)

National Landscape

- 5.16 The application site lies within the Cotswolds National Landscape and therefore regard must be had to the purpose of conserving and enhancing natural beauty of the landscape as required by the Countryside and Rights of Way Act (2000), and confirmed within the NPPF which advises that great weight should be given to conserving and enhancing its landscape and scenic beauty.
- 5.17 The objective outlined above is reflected within Core Policies 51 'Landscape' and 57 'Securing High Quality Design' of the WCS which seek to secure high quality design in all development and ensure there is no harm to landscape character. The Local Plan also designates the landscape as a Special Landscape Area therefore all new development must ensure no harm to landscape character.
- 5.18 The position of the site within the National Landscape is therefore an important material planning consideration but the development currently proposed will be limited to the change of use of the building only, with no external alterations or new lighting. As such, there will be no impact on the character and appearance of the landscape.

Green Belt

- 5.19 The application site also lies within the West Wiltshire Green Belt. The NPPF specifies that the Government attaches great importance to Green Belts and advises that a Local Planning Authority should regard development in the Green Belt as 'inappropriate'. There are however a number of exceptions as outlined within Paragraph 154 of the NPPF, which includes the re-use of buildings provided that the buildings are of permanent and substantial construction. The proposal will result in the re-use of the application building and will have no impact on the openness of the Green Belt.

Impact on Ecology and SAC

- 5.20 The NPPF advises that new developments should protect and enhance biodiversity and geodiversity (paragraph 185) and Core Policy 50 'Biodiversity and Geodiversity' of the WCS outlines that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.
- 5.21 The site is located within several consultation zones for bats associated with the Bath & Bradford on Avon SAC and is next to Conkwell Wood, a deciduous woodland, that is likely to support roosting bats. However, the development currently proposed is limited to the change of use of the application building, there will be no internal or external works, or new lighting, therefore no potential to impact protected species which may be presented within or adjacent to the application site or wider environment.
- 5.22 In terms of the requirement to secure Biodiversity Net Gain (BNG), it has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The requirement is to deliver 10% BNG, however there are exemptions which include developments that impact less than 25 square metres of on-site habitat. These exemptions apply therefore there is no BNG requirement. However, it is recognised that Core Policy 50 specifies that all development should seek opportunities to enhance biodiversity therefore bird and bat boxes can be installed on the application building to meet this objective.

6.0 CONCLUSION

- 6.1 The application seeks full planning permission to change the use of a rural building at Conkwell Grange, Conkwell, Limpley Stoke, Bath, Wiltshire, BA2 7FD to residential storage ancillary to the main dwelling house.
- 6.2 The application building is a simple steel frame building originally built and used as a grain store. The building is now underutilised but is of a scale and position which will enable it to meet the current needs of the applicant for the storage of a private car collection. The principle of the development aligns with the objective of Core Policy 48 of the Local Plan and is not considered contentious.
- 6.3 The dwellinghouse at the property is Grade II Listed and the site falls within the Cotswolds National Landscape and Bath & Bradford on Avon SAC consultation zone, however the application is limited to a change of use of the building only with no external alterations or new lighting. As such, there is no potential for any adverse landscape or environmental impacts.
- 6.4 The proposed development aligns with the relevant policies of the Local Plan and having considered the individual planning merits of the proposal it is respectfully requested that full planning permission be granted.