

27th November 2025

Our Ref: SWLC.LPC2065

Development Services – North
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Dear Sir/Madam

Town and Country Planning Act 1990

**Re: Change of Use from Holiday Accommodation to Independent Dwelling –
The Anchorage, Nables Farm, Scotland Hall, Upper Seagry, SN15 5HB**

As your records will confirm the above matter was recently approved by application PL/2025/04856. That permission was subject to several conditions precedent and it is the purpose of this submission to seek to discharge the conditional controls in question. Specifically, the following commentary addresses the reasons for the imposition of condition Nos 3, 4, 5 and 6.

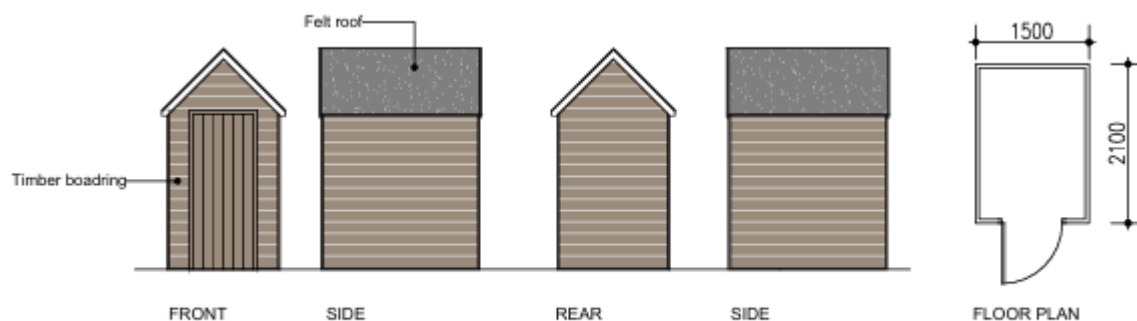
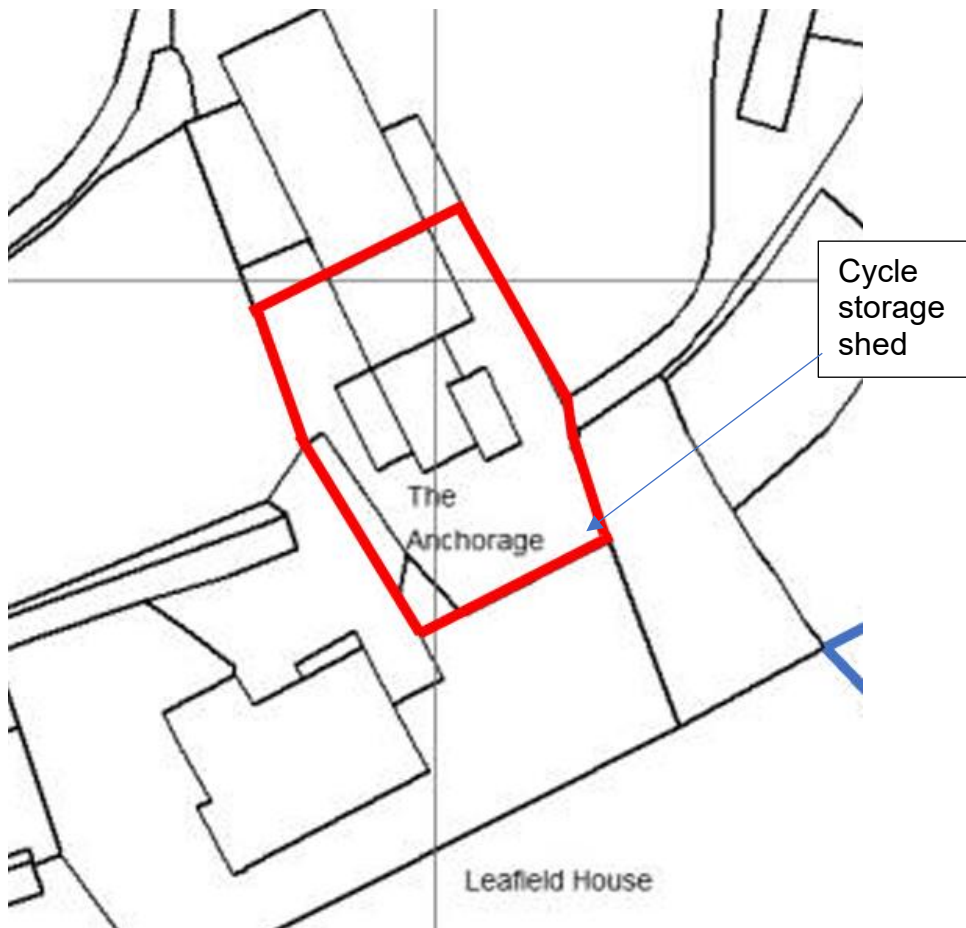
For ease of reference I have inserted the conditional wording for each of these items, together with a suitable narrative to explain how the reasons for imposition have been addressed.

Condition No 3

The dwelling hereby approved shall not be occupied until details of secure covered cycle parking have been submitted to and approved in writing by the Local Planning Authority. These facilities shall be provided in accordance with the approved details and made available for use prior to the first occupation of the development hereby permitted and shall be retained for use at all times thereafter.

REASON: To ensure that satisfactory facilities for the parking of cycles are provided and to encourage travel by means other than the private car.

The plan extract inserted on the next page shows the red lined application site and has been annotated to identify the positioning of a secure cycle shed as required. The details of this standard facility and shown below that, which will be retained once the property is independently occupied.



TIMBER CYCLE STORE / SHED

Condition No 4

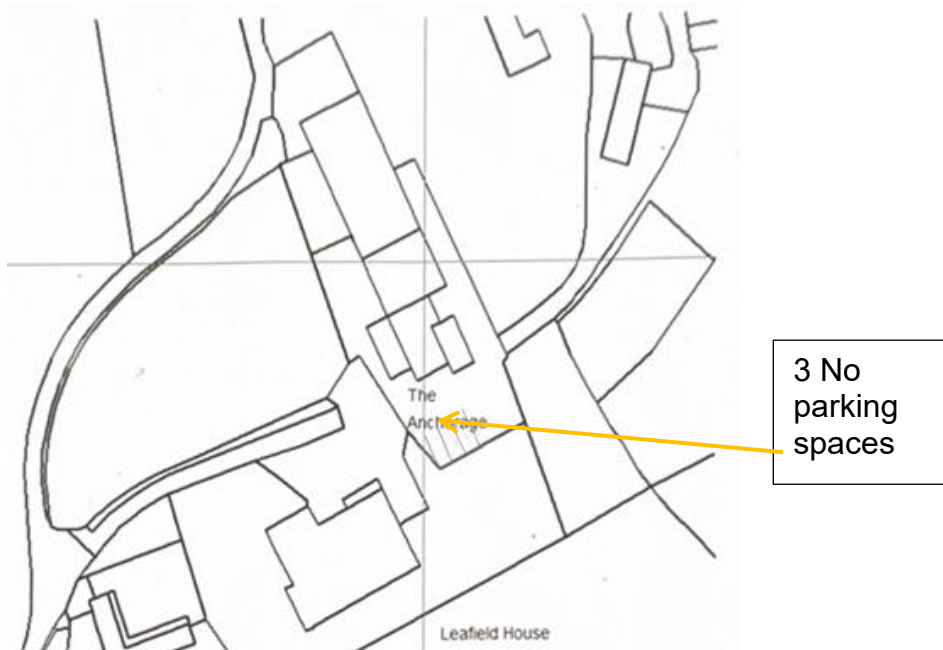
The dwelling hereby approved shall not be occupied until details of parking for 3 vehicles together with vehicular access thereto has been submitted to and approved in writing by the Local Planning Authority. These facilities shall be provided in accordance with the approved details and made available for use prior to the first occupation of the development hereby permitted and shall be retained for use at all times thereafter.

REASON: *To ensure that adequate provision is made for parking within the site, in the interests of highway safety.*

The supporting planning statement submitted with application PL/2025/4856 indicated that, 'Parking and access, as well as suitable amenity space are all provided for the current visitors and sufficient for a permanent residential use'. It was anticipated that this would have been simply safeguarded by condition.

However, as requested above the aerial photograph extract inserted below shows the area used for parking by the previous party visitors. This is of course well in excess of the three spaces required to satisfy your Council's adopted parking standards and therefore so as to directly address the conditional wording above the following plan extract inserted on the next page identifies three spaces as required.





Condition No 5

The dwelling hereby approved shall not be occupied until a site layout plan showing the distance between the dwelling and potential agricultural odour sources has been submitted to the Local Planning Authority. If the dwelling is identified as being within 400m of intensive livestock operations, an Odour Impact Assessment and measures for reducing odour impacts to occupiers of the dwelling must be submitted to an approved by the Local Planning Authority. Any necessary measures for reducing odour impacts must be provided in accordance with the approved detail prior to the first occupation of the development hereby permitted and shall be retained thereafter.

REASON: *In the interests of the amenities of the area.*

It is a matter of fact that the original holiday let use was not limited in any respects because of the potential odour from the surrounding farmland. Indeed, mindful of the advice at Article 35 to The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended), requiring all reasons for refusal to be complete and precise, there was no previous concern regarding residential amenity in respect of the assessment of application PL/2023/06342 either.

Furthermore, by application references Nos 17/03098/FUL, 17/03101/FUL, 17/03100/FUL and 17/03127/FUL, for the mobile chicken houses approved on the farm land to the west and north of the application property no issue was raised in the officer's decision report which suggested that the use would conflict with the nearest neighbours. Indeed, at that time Leaffield House was in separate ownership and independent use.

The number of residential properties sanctioned at Nables Farm totals 15 plus 2 holiday lets, prior to the approved use of The Anchorage and at no time has it been

indicated that the increasing number of houses provided would be undesirably located. There have been no material change in circumstances that indicates this property would be any more affected than any other present or approved.

The aerial photograph extract inserted below includes a 130m measured line (yellow) and thus shows that the four chicken houses are all within 400m of the application property, as well as all the other residential properties on site (present and proposed).



The condition only requires an Odour Impact Assessment, in the event that the dwelling is within 400m from 'intensive livestock operations'. The chicken houses in question are not believed to constitute 'intensive' operations, particularly given that by design the chickens can come and go throughout the day, as part of the free run system operated.

Only recently the adjacent building to The Anchorage was approved for conversion as two new dwellings by application, PL/2025/01981, pursuant to Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

Item Q.2 (1) (e) required an assessment whether the location or siting of that building made it otherwise impractical or undesirable for the building to change from agricultural to a use falling within Class C3 of Schedule to the Use Classes Order.

The Government's online PPG advice sets out that 'impractical' reflects that the location and siting would 'not be sensible or realistic', and 'undesirable' reflects that it would be 'harmful or objectionable'. The example of a building on top of a hill with no road access, power source or other services is given as an instance where conversion may be considered impractical and the example of the location of a building adjacent to other uses such as an intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals is given as an example of a case where conversion may be undesirable. The officer's decision report for the above application made no reference to concerns about 'intensive poultry farming'.

Consistency therefore reinforces the fact that the four chicken houses are not 'intensive livestock operations'. Consequently, the above aerial photograph satisfies the only relevant part of the conditional wording.

Intensive farming is defined as high stocking densities. Overall size and operational intensity determine if it should be considered intensive. The threshold generally refers to a capacity over 40,000 poultry birds, whereas each of the four mobile houses has a maximum capacity of only up to 2,000 birds explaining why in this instance the second aspect of the above condition as worded regarding commissioning a Noise Impact Assessment within 400m of an 'intensive livestock operation' does not apply.

Condition No 6

The dwelling hereby approved shall not be occupied until a site layout plan showing the distance between the dwelling and agricultural buildings. If the dwelling is identified as being within 400m of intensive livestock operations, a Noise Impact Assessment, conducted in accordance with BS4142:2014+A1:2019, and necessary mitigation measures (e.g. acoustic glazing, orientation, or separation distance) must be submitted to an approved by the Local Planning Authority. Any necessary measures for reducing odour impacts must be provided in accordance with the approved detail prior to the first occupation of the development hereby permitted and shall be retained thereafter.

REASON: *To ensure the creation/retention of an environment free from intrusive levels of noise and activity in the interests of the amenity of the area.*

As I hope the narrative provided demonstrates it is not intended to revert to first principles and examine whether the conditions imposed satisfy the six tests for imposition, but it is again important to note the officer's comments on the subject of noise only very recently and with regard to the new residential use approved for the immediate neighbouring building.

Your Council's public protection teams specifically commented in respect of application PL/2025/01981, and the subject of noise, saying that 'Due to the close proximity of other residential dwellings and holiday cottages' it was recommended that there be an hours of work during construction limitation.

No such condition was applied to the approval, presumably as the environment was not considered overly sensitive. Noise is of course an applicable matter for consideration for the Class Q submission as detailed at Q.2 (1) (b). The officer's decision report raised no possible concerns about the impacts of noise on that development.

It follows therefore that as the impacts of noise has only recently been assessed and it was found that the environment is satisfactorily free from intrusive levels of noise and activity there was no actual planning reason to impose the above condition to make the proposal any more acceptable than any other house in this area.

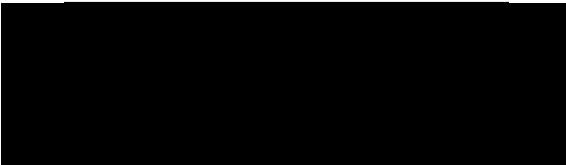
On top of that I have already explained that the chicken houses accommodate a free range flock of at the absolute maximum 2000 birds, so do not fall to be considered as an intensive livestock operation, within 400m of the dwelling, or its neighbours. The relevant noise impact assessment has already been made, and there are no reasons to require any further assessment, for the reasonable residential amenity of the area. Consistency again forces the conclusion therefore that the four chicken houses are not 'intensive livestock operations'. Consequently, the above aerial photograph satisfies the only relevant part of the conditional wording.

The environment has of course already been assessed to be acceptable from a noise perspective, and the proximity of the nearest agricultural buildings has been shown in respect of condition No 5 earlier.

I trust the above comments and related information is sufficient to allow the dwelling's use to continue by discharging the conditions. It has been demonstrated that there are satisfactory facilities for parking of cycles and cars and that the environment is an acceptable (and well established) residential one regarding odour and noise and there are no intensive livestock operations that undermine this position.

Should you have any questions to allow this matter to proceed positively please do not hesitate to contact me.

Yours faithfully



Simon Chambers
Director

Cc: Mr A Jackson