



RCC TOWN PLANNING CONSULTANCY



Site: Barns at Manor Farm, Rodbourne, Malmesbury,
Wiltshire, SN16 0EX

Proposal: Change of use and extension of barns to
form a detached dwellinghouse and creation of a
domestic curtilage.

On behalf of: Simon Grafftey-Smith

Date of Issue: October 2025



RCC TOWN PLANNING CONSULTANCY

PLANNING STATEMENT

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CONTENTS PAGE

Introduction	1.0
Background and Site Context	2.0
Proposal	3.0
Planning Policy	4.0
Planning Assessment	5.0
Conclusion	6.0

1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of the applicant to support their full planning application for the conversion and extension of barns within the grounds of Manor Farm to a single residential dwellinghouse.
- 1.2 The proposed plans show how the site would be arranged to create a new residential curtilage and parking arrangement as well as areas of hard and soft landscaping.
- 1.3 As the proposal lies within a conservation area and consists of the provision of one or more dwellinghouses, a Design and Access Statement is required. This has been provided separately by Mathewson Water Architects. This Planning Statement will provide an explanation and justification for the scheme having regard to the planning history at the site, as well as national and local plan policy and guidance context.



2.0 BACKGROUND AND SITE CONTEXT

- 2.1 This application centres around the applicants' desire to retain and sensitively convert a group of historic and underutilised agricultural buildings at Manor Farm in Rodbourne, Malmesbury. Rodbourne is a small hamlet on the outskirts of the market town of Malmesbury (circa 2 miles to the south). It is also positioned close to the village of Great Somerford which has a shop and post office, pub and primary school.
- 2.2 Manor Farm occupies a central position within Rodbourne, on the southern side of the road running through the hamlet. The general context is one of a small, verdant, settlement with trees dominating the streetcene and traditional buildings glimpsed from the roadside. Manor House has its own dedicated vehicular access and the yard is served by a further 3.
- 2.3 Manor Farn is still an agricultural holding but the buildings in question are now outdated for modern agricultural purposes. Being used largely for storage and as a hay/feed store, they are an underutilised resource that could be put to a more efficient use. This is of particular importance as the buildings are now requiring investment to ensure their long-term retention and repair and this simply can't be justified for agricultural purposes. The development of the site would also support the remaining agricultural activities at the site.
- 2.4 The application site is situated to the north of Manor House and together the buildings form a distinct group, positioned close together in a traditional yard layout. There are 8 buildings in total but these vary in age, scale

and construction. There are 3 smaller-scale, traditional, buildings which sit cheek by jowl alongside the 5 remaining larger modern structures/concrete extensions. The 3 traditional buildings are considered to be unlisted heritage assets given their clear historic evolution and relationship with Manor House, a large historic property set within formal grounds. It is these buildings that are to be retained, repaired and converted. The remaining modern buildings/extensions are to be removed as part of these proposals.

- 2.5 The buildings to be retained are largely constructed of traditional Cotswold stone and red brick, with both slate and clay roofing present. They have an intrinsic historic significance and together form an interesting and attractive group of traditional structures and have value in forming part of the historic farmyard setting and in relation to Manor House.
- 2.6 The Design and Access Statement, at Section 2.0, provides a useful description and explanation of all the buildings on site.





Figure 1: Site Location Plan (source: GoogleEarth)



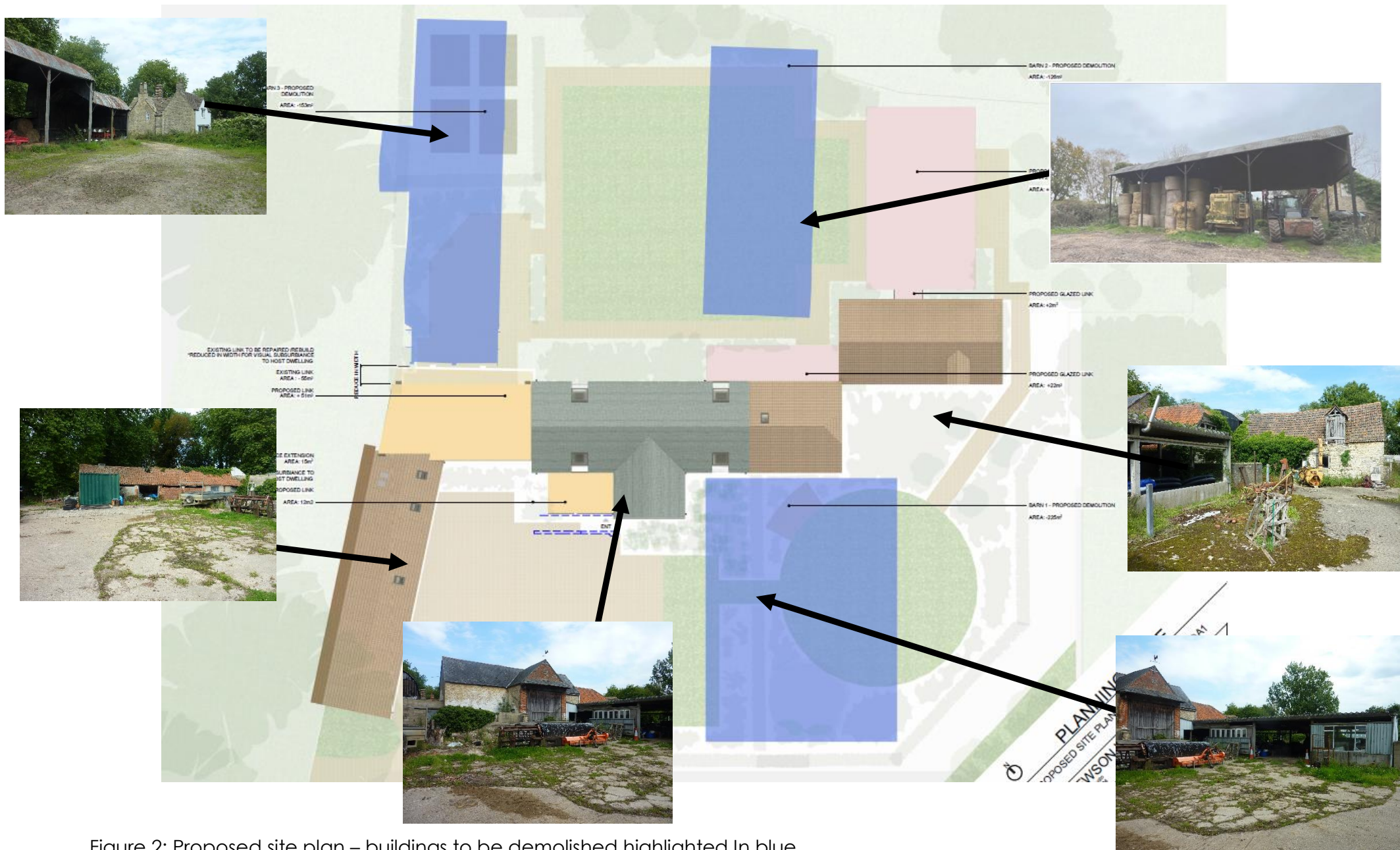


Figure 2: Proposed site plan – buildings to be demolished highlighted in blue

- 2.7 Planning permission was previously granted for the conversion and extension/alteration of the buildings to x4 holiday lets under 16/12349/FUL. Under this consent, a new build 5th holiday let was also approved as an extension to the cow barn that runs along the northern boundary. This permission has now expired and the decision has been taken to pursue a single dwellinghouse rather than 5 separate holiday lets.
- 2.8 Not only does the applicant have no desire to run a small group of holiday lets, this permission proved to be unviable. As this statement will detail, the residential conversion of the barn is the only feasible option for the re-use of the building and the submitted viability report demonstrates why other uses of the building would not be financially viable.
- 2.9 To this end, the scheme shows the sensitive conversion and modest extension of the retained buildings to create a single dwellinghouse. The proposed scheme is set out in more detail in Section 3.0 of this statement.
- 2.10 To minimise intrusion and avoid a “heavy-handed” approach to the conversion, the scheme proposes a new swimming pool building. As a new building, as well as extensions/alterations, were deemed appropriate under the holiday let approval, the same approach has been adopted here. This new structure is to be adjacent to a large, modern, Dutch barn. The replacement structure is significantly smaller in scale than the Dutch Barn that currently stands in this position and the

replacement has been designed with a barrel style roof to reflect the Dutch barn style it replaces.

- 2.11 Access into the site will remain as existing, from the access to the south of the buildings.
- 2.12 In terms of its wider setting, the site lies approximately 70m from the Grade II*-listed Church of the Holy Rood and within the Rodbourne Conservation Area. Public right of way MALW70 runs to the south-west of the site, from the main road to the countryside beyond the site. The application proposals do not impact this right of way which is outside of the extent of the scheme.
- 2.13 This statement will now move onto a discussion of the site and planning policy context before the discussion of the planning merits of the proposal. It should be read alongside the following reports:
- Design and Access Statement by Mathewson Waters Architects
 - Structural Engineer's Report by Ingleton Wood LLP;
 - Pure Ecology - Protected Species Survey,
 - Malford Environmental Consulting - Biodiversity Net Gain Report
 - Malford Environmental Consulting – Manor Farm, Rodbourne Statutory Biodiversity Metric
 - Viability Report by Strakers



3.0 PROPOSAL

- 3.1 The guiding principles behind the design process has been to retain as much historic fabric as possible, bring new life into the buildings and enhance the prominence of the main central barn.
- 3.2 To this end, modern buildings and extensions are proposed to be removed to better reveal the heritage buildings and the central barn as the primary structure. As described in the Design and Access Statement, the proposal is to create a single residential dwelling with extensive landscaped grounds.
- 3.3 The two modern Dutch Barns to the north-east and large single modern agricultural building to the south will be demolished. In addition, modern link extensions (largely constructed of concrete block and profile sheeting) will also be demolished and replaced. The removal of these large and inappropriate buildings will better reveal the heritage buildings and their group value at the site.
- 3.4 The remaining building will be sensitively repaired and converted to create the single dwellinghouse. The building work will include repairs to the external and internal walls, replacement /renovation of roofs and installation of insulation to ensure the buildings are suitable for residential use.
- 3.5 As a general approach, the scheme utilises existing openings where possible and is sympathetic to the heritage value of the buildings. The existing access would be used.
- 3.6 An area immediately to the north, east and south of the buildings would serve to provide a curtilage for the property as well as ample parking for future occupants.
- 3.7 A new pool building is proposed adjacent to the site of the existing Dutch barn – permitted to remain under the previous approval. The replacement building takes its design cues from that which it replaces – with its curved roof referencing the Dutch barn but at a reduced scale.
- 3.8 The previous approval at the site permitted the demolition of some of these modern structures, alongside the conversion and significant extension of the remaining buildings. The raising of the roof of the cow byre was also approved to facilitate its conversion. Many of these principles have been taken through to this new scheme.





Figure 3: Proposed site layout, with parking and part of the proposed landscaping shown

4.0 PLANNING POLICY

4.1 The planning policy framework relevant to this proposal is the Wiltshire Core Strategy 2015 (WCS) and the Malmesbury Neighbourhood Plan Volume I and II (2015).

4.2 Material considerations comprise the following:

- Wiltshire Local Transport Plan 2011-2026 Car Parking Strategy
- Wiltshire and Swindon Farmsteads Guidance and Assessment Framework
- The Wiltshire Design Guide (2024)
- National Planning Policy Framework 2024 (NPPF)
- National Planning Practice Guidance (NPPG)

4.3 The relevant policies and guidance are set out in the associated tables:

WILTSHIRE CORE STRATEGY

Chapter	Title
CP1	Settlement strategy
CP2	Delivery strategy
CP13	Malmesbury Community Area
CP48	Supporting rural life
CP50	Biodiversity and Geodiversity
CP51	Landscape

CP57	Ensuring high quality design and place shaping
CP58	Ensuring the conservation of the historic environment
CP61	Transport and new development

NATIONAL PLANNING POLICY FRAMEWORK

Chapter	Title
5	Delivering a sufficient supply of homes
9	Promoting sustainable transport
11	Making an effective use of land
12	Achieving well designed places
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment



5.0 PLANNING ASSESSMENT

5.1 The key issues are considered to be:

- Principle
 - I. Housing Land Supply and Paragraph 11d of the NPPF
 - II. Development Plan Policies
- Heritage Impact
- Design and visual impact
- Ecology
- Neighbour amenity
- Highway Safety

5.2 These will be considered in turn below.

PRINCIPLE ISSUES

Housing Land Supply in Wiltshire

- 6.1 Planning law requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 A significant material consideration is the advice and guidance contained within the National Planning Policy Framework (NPPF).
- 6.3 The NPPF requires LPAs to identify a five-year supply of specific deliverable sites to meet housing needs, with an appropriate buffer. Where Councils are unable to demonstrate this, planning policies concerning housing delivery are considered out of date and applications for

housing development should instead be considered in line with paragraph 11d of the NPPF.

- 6.4 Wiltshire Council is currently unable to demonstrate a five-year supply of specific deliverable sites to meet its housing needs. This position was confirmed in the Wiltshire Council Planning Briefing Note (No.24-20) dated 17th December 2024:

In summary, the changes to the NPPF now require Wiltshire to demonstrate a five-year housing land supply, including a 5% buffer, and must apply the revised Local Housing Need for decision-taking immediately. As the table in paragraph 3.c above shows, this results in a significant increase in the five-year housing requirement to be met from the previous calculation. When this is assessed against the housing land supply which can be delivered within five years, the recalculation shows a significant reduction in the number of years supply. The council cannot demonstrate the requisite five-year housing land supply and can demonstrate a **2.03 years supply**.

- 6.5 This briefing note confirms that Wiltshire Council can now only demonstrate 2.03 years of housing land supply (HLS). This is reflective of the persistent undersupply of housing within Wiltshire.
- 6.6 As such, housing related policies of the WCS are considered out of date and applications for housing development should instead be considered in line with paragraph 11d of the NPPF. The relevant extract is set out overleaf:



For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.

- 6.7 Whilst it is accepted that the triggering of paragraph 11d) of the NPPF does not mean out-of-date development plan policies should be ignored entirely, the weight afforded to them is weakened and the 'tilted balance' is engaged. The term 'tilted balance' is used to define Paragraph 11 of the NPPF when engaged as the 'planning balance' is tilted from a neutral balancing exercise where if the harms outweigh the benefits planning permission is usually withheld, to a tilted balance where the harms should significantly and demonstrably outweigh the benefits for permission to be withheld.
- 6.8 Focussing now on the contents of subsection d) paragraph 11 of the NPPF, the application falls within the Rodbourne Conservation Area. However, as the

statement will now set out, the application of the policies in the NPPF that protect heritage assets do not provide a strong reason for refusing the development.

- 6.9 Despite the triggering of paragraph 11d, the starting point for assessing the scheme is still against the relevant local plan policies and other guidance set out within the NPPF now follows.

Assessment against the 'principle' policies of the development plan

- 5.3 Having regard to the principle of residential development in this location, Core Policy 2 of the WCS identifies exceptions to the general approach of the core strategy towards the location of new development. These exceptions seek to respond to both local circumstance and national policy. This is to help meet the Government's clear aim to 'significantly boost the supply of homes' as set out in Chapter 5 of the NPPF and numerous ministerial statements.
- 5.4 The permissible exceptions include the conversion and re-use of existing rural buildings to an alternative use, subject to the criteria set out in Core Policy 48 (CP48). In the first instance, the core strategy seeks the use of the building for employment, tourism, cultural or community uses. If this is not a practical proposition, a residential use would then be considered.
- 5.5 This approach is reiterated within the NPPF, at paragraph 84, which supports the principle of new

housing in rural locations in certain exceptional situations although there is no requirement in the NPPF to consider alternative uses before residential use. Of relevance to this application are situations where a development would represent the optimal use of a heritage asset and/or the development would re-use redundant or disused buildings and enhance its immediate setting.

5.6 It is also important to note that CP48's 'cascade approach' of requiring applicants to demonstrate that employment, community or tourist accommodation uses are not practical propositions before a residential use can be permitted is out of date. The cascade approach conflicts with both the NPPF and emerging planning policy – both of which are material planning considerations. Emerging policy 82 of the revised Wiltshire Local Plan follows the same approach as the NPPF, i.e. it does not adopt a 'cascade' approach to conversion schemes and removes references to the need to demonstrate a residential conversion is a 'practical proposition' in comparison to the other uses as set out in CP48. It simply requires applicants for the conversion or re-use of a disused building in the countryside to provide evidence to show that the building is structurally sound and capable of conversion without major rebuilding, and that the development would enhance the character of the original building and its setting. A copy of emerging policy 82 is contained within **Appendix A** to this appeal statement.

5.7 Policy CP48 states:

"Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where it satisfies 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 or*
- 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".

(Taken from adopted version of WCS which has not been correctly transposed in the online version)

5.8 It is not therefore necessary to demonstrate compliance with both criterion iv) and v) of policy CP48, but only one



of the two. For reasons outlined within this report, the barns at Manor Farm are considered to represent an undesignated heritage asset and therefore it is criterion v) under which this proposal falls to be considered, alongside criterion i)-iii) of CP48, addressed later within this section.

- 5.9 It is accepted that CP48 does not directly address new build development associated with a conversion scheme as is the case here. Put quite simply, the applicants' are seeking to convert the building with minimal intrusion so as to retain as much of the historic fabric and character of the barn as is possible. The submitted floorplans and elevations clearly show this approach. It was decided to provide the additional desired accommodation within replacement extensions and a new build structure to the north. This was seen as a more sensitive approach rather than over-extending the barns or cause harm to its visual and historic integrity by "over-converting".
- 5.10 This statement will firstly look at the conversion element of the scheme under the terms of CP48 before moving to a discussion of the new build elements.
- 5.11 In order to accept the principle of a residential use of the site, CP48 requires applicants to demonstrate that the conversion and/or re-use of the building for employment, tourist, cultural and community uses are not practical propositions.
- 5.12 For the purposes of a community, cultural or employment uses, the site lies within a remote location,

within the open countryside and is not therefore an ideal location for alternative uses. In particular because an alternative community, cultural or employment use is likely to generate much higher levels of traffic than the proposed dwelling, with associated demands for increased parking provision, which would impact on the layout of the site, its surroundings and visual impact. Moreover, the submitted viability report undertaken by Strakers serves to demonstrate that the conversion of the buildings for other potential uses would simply not be a viable proposition, given the likely values/rents achievable and the investment needed to facilitate the conversion for such uses. The report also assessed the approved holiday let scheme (which has now expired) and concluded that this is also not a commercially viable option.

- 5.13 With no long-term active use or financial input into the repair and upkeep of the buildings, they will become redundant, and their physical condition would further deteriorate, to the detriment of the buildings, considered to be non-designated heritage assets and the general appearance of the area. It is clear, therefore, that a sympathetic conversion and extension of the ensemble of buildings for residential purposes is the only viable option to secure their future.
- 5.14 This statement will now address the relevant criteria of CP48, namely i-iii and v, having regard to the principle of development.



(i) The buildings are structurally sound and capable of conversion without major re-building and with only necessary extensions or modification which preserves the character of the original building

5.15 The barns are all in an overall good state of structural repair, as can be observed from external and internal inspections of the building. The structural report by Ingleton Wood LLP summarises that the buildings are structurally 'sound' and capable of conversion. It summarises at 2.0 the following:

"The old stone buildings can be salvaged and are considered to have the required structural integrity to be capable of forming a sound basis for the proposed conversion to residential use. The existing buildings will be linked by new build construction.

The modern agricultural farm buildings are to be demolished and removed as part of the conversion.

The anticipated ground conditions of Kellaway Sand Member as described by the British Geological Survey (BGS) mapping will provide a suitable bearing stratum for the foundations.

The existing buildings exhibit different degrees of dilapidation and will require a comprehensive renovation process, involving replacement of defective

timber elements, repair/local rebuilding of damaged masonry and stone walls and incorporating new structural elements e.g. ground floors, mezzanine floors, to suit the Architect's proposals".

5.16 The proposed works to convert the existing barns have been kept purposely 'restrained', sensitively utilising existing openings and maintaining the existing materials to the exterior faces where feasible. Repair works will improve the appearance of the building and all new materials will match existing. The specific use of each building has been very carefully chosen to minimise internal alterations and to respond to the building's particular size and form.

5.17 Windows and doors frames would utilise a contemporary and minimal approach so as to preserve the character of the buildings. New openings are extremely reserved with the aim of preserving the simple agricultural appearance of the barns.

5.18 We therefore submit that the plans make it clear that the repairs will be simple in nature and that a residential conversion can readily take place.

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;

5.19 The 'restrained' scale of the conversion ensures that the overall form and historic fabric of the retained barns



would not be significantly altered – with original walls and roofs all preserved and window openings kept to a minimum and modest in scale and appearance. Moreover, the external appearance of the buildings and wider site would be improved with the removal of the modern and poorly constructed extensions and the removal of the large modern buildings. This has the benefit of better revealing the attractive historic barns and reducing the massing in this part of the site. The footprints of the Dutch barns in particular are much larger than the retained structures so their removal will therefore ensure the historic buildings are the dominant feature at the site and utilitarian structures of poor appearance are removed.

- 5.20 An important part of the design process has been the creation of a landscaping scheme befitting of the site's rural location. The curtilage would extend no further into the adjacent fields than the current built form at the site. The garden area would therefore be well contained within the site boundaries, ensuring that the site does not become overtly domestic in appearance.
- 5.21 Overall it is therefore considered that the scheme would result in a much improved visual appearance of the site, to the benefit of the conservation area and wider landscape and as viewed from the public rights of way network. We therefore submit that the scheme represents a form of development that can be successfully accommodated within the surrounding landscape.

iii) The building can be served by adequate access and infrastructure;

- 5.22 The site benefits from an existing established and suitable access drive. The access is well surfaced and benefits from good visibility in both directions. This existing vehicular access already serves the farm and its use as a single dwellinghouse would generate significantly less traffic movements.
- 5.23 There is existing mains electricity and water on site.
- 5.24 Consequently, it is demonstrated that the site can be readily served by adequate access and infrastructure.

v) And the conversion or re-use of a heritage asset would lead to its viable long term safeguarding.'

- 5.25 Policy CP48 requires demonstration with only one of criterion iv and v) and as the proposal concerns heritage assets, this application is submitted for consideration against criterion v).
- 5.26 The NPPF outlines government policy towards the historic environment. Section
- 5.27 "Conserving and Enhancing the Historic Environment" sets out the overall approach to heritage assets. At a local level, policy CP58 of the WCS relates to the conservation of the historic environment.
- 5.28 We are of the opinion that the barns constitute a non-designated heritage asset. Firstly, this was the agreed position with planning application 16/12349/FUL. The extract below from the Delegated Report confirms this:



In principle, Core Policy 39 presumes against new holiday let accommodation in remote locations however the proposals also fall to be considered against Core Policy 48, which contains exceptional provision for the conversion of rural buildings – including to tourism uses – where these would lead to the long-term safeguarding of a heritage asset. In this instance, the fabric concerned, although unlisted, is demonstrably of some historic merit and the detail of the scheme makes better use of this through viable re-use and removal of unsympathetic modern additions, as discussed later. It is considered, on balance, that this justifies the principle of development in respect of the converted units, noting that CP39 expresses a preference in any case that new accommodation is contained within existing buildings.

5.29 We also submit that buildings to be retained are a non-designated heritage asset because they retain their essential character as an enclosed, historic farmyard. Together, they represent an interesting group of traditional structures of heritage interest.

5.30 The 'Wiltshire and Swindon Farmsteads Guidance. Farmsteads Assessment Framework' states:

"Traditional farmsteads and buildings are heritage assets which make a significant contribution to both landscape character and local distinctiveness. In addition, through a diversity of uses, they also influence local communities and economies. As agricultural practices and the rural economy change, many such farmsteads and buildings become redundant from their original use, and are difficult to adapt to current farming needs: without appropriate uses they will not be maintained and may disappear from the landscape. New uses which both enhance and are sensitive to their historic character and significance are to be encouraged."

5.31 This is the case at Manor Farm, where the buildings in question are significantly underutilised for agricultural purposes, with the buildings unable to meet the size requirements of modern agricultural practices and vehicles. The group of buildings will soon become redundant and therefore require a new use to safeguard their long-term future. We therefore submit that the residential conversion of the buildings would have a modest impact in comparison to the positive benefits arising from the reintroduction of an active use serving to facilitate the necessary investment for their long-term retention.

5.32 A viability assessment has been undertaken, to help establish a viable new use for the barns by assessing returns against required investments. As previously noted, independent residential use represents the only viable option for the use of the barns, offering long term security to the future of this heritage asset.

5.33 The proposed extensions will replace modern extensions and fabric of no heritage significance. The majority of the extension is single-storey in scale and has been specifically designed to respect the appearance and design of the remaining barns whilst being distinctly read as a modern extension. The use of carefully selected matching materials and complimentary modern glazed features enables the evolution of the property to be appropriately expressed, with the extensions remaining subservient to the scale and form of the original barns.



- 5.34 The demolition of the modern and insignificant buildings opens up the space in front of and to the rear of the heritage barns to better reveal their significance. Their removal then enables the reintroduction of the simple courtyard form at the site.
- 5.35 We therefore submit that the proposal not only accords with the relevant criterion under CP48 of the WCS but is also supported by NPPF. Having regard to the detailed design, it is considered that the proposal would not harm the setting of the undesignated heritage assets. Moreover, the scheme better reveals this asset and creates an appropriate and enhanced setting, representing significant and much needed repair and investment into the structures.

New Build Element

- 5.36 Turning to the new build element, it is clear from the submitted plans that the conversion works are the minimum required to convert the building to a residential use. The applicants are strongly committed to preserving the buildings 'as is' with minimal intervention and avoiding an overtly domestic approach to the scheme.
- 5.37 The additional accommodation has therefore been created through replacement extensions and a new building of a significantly improved design. This was the same approach adopted for the approved holiday let scheme, where both extensions and new separate buildings were approved. However, this new proposal

results in significantly less built form than the approved scheme as it includes the demolition of the two Dutch barns which did not form part of the previously approved scheme.

- 5.38 The proposed extension must also be considered within the scale and context of the existing buildings and the level of demolition that is proposed. The extract below from the Design and Access Statement sets out the amount of development, confirming that the massing of buildings on site will be reduced by 433m².

AMOUNT:

The proposed scheme will result in a **reduce** of the mass of the buildings located on the site by at of total: **433m²**

Barn 1:	- 152m ²
Barn 2:	- 126m ²
Barn 3:	- 225m ²
Further Reductions :	- 7m ²
Swimming Pool Building:	+63m ²
Linking Structures :	+24m ²

- 5.39 The Design and Access statement compares the reduction in overall mass of buildings on site with the development approved under 16/12349/FUL. This



previously approved scheme only resulted in a reduction in the site massing by 205m².

- 5.40 Within this context, the new link extensions and pool building can be readily assimilated within the site. They have been purposely designed so as to have minimal impact on the setting of the heritage barns and also upon views of the site from within the surrounding countryside. The new structures are sited on or adjacent to the position of the existing buildings but have a much smaller mass as shown on the submitted plans. Their modest scale also helps to ensure that the heritage barns remain the dominant feature on the site and these structures remain subservient in scale and design. The new extensions are stepped back from the building lines of the original buildings and are of a modern glazed design. This allows the original host buildings to remain legible with the extension clearly a 21st century addition in a different, contemporary language.
- 5.41 Turning back to the matter of principle, although CP48 does not explicitly refer to new build development, it nonetheless sets out that matters of viability, re-use of buildings in the countryside and retention of heritage assets are important considerations for development within the rural environment. It's considered that the quality of these barns and the minimal approach that has been taken for their conversion are material considerations that must be taken into account when looking at the scheme as a whole and consequently the

need for this 'restrained' level of new build development.

ECOLOGY AND BIODIVERSITY NET GAIN

- 5.42 Policy CP50 of the WCS recognises that Wiltshire's natural environment is one of its greatest assets and requires that development proposals must demonstrate how they protect features of nature conservation. The policy also advises that development should seek opportunities to enhance biodiversity. Chapter 15 of the NPPF provides further guidance on conserving and enhancing the natural environment.
- 5.43 Policy CP51 requires that development make a positive contribution through "the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses)".
- 5.44 Pure Ecology was commissioned to complete protected species surveys in support of the proposed scheme. Desk-based review and fieldwork undertaken in 2024 identified no statutory or non-statutory sites likely to be affected, and the site itself supports only modified grassland and hardstanding of limited ecological value.
- 5.45 One building (B4) was confirmed to host small day roosts of brown long-eared, lesser horseshoe and soprano pipistrelle bats of *Local* importance; all other structures offered negligible potential. Consequently, a *Natural England Bat Mitigation Licence* will be required prior to works.

- 5.46 The proposed mitigation and enhancement strategy includes provision of a dedicated bat loft within the converted structure, installation of crevice-roosting features, sensitive lighting design, provision of integrated nesting boxes for birds, alongside orchard and habitat planting.
- 5.47 In line with Core Policy 50 of the WCS and Biodiversity Net Gain (BNG) requirements, a separate BNG report by Malford Environmental was also commissioned alongside the relevant metric. This details how a 84.08% gain is to be achieved on site. This is a significant gain well in excess of the required 10%.
- 5.48 With the aforementioned mitigation and new habitat measures implemented, the project is considered compliant with the NPPF and principles set out in Core Policies 50 and 57 of the WCS.

HIGHWAY SAFETY

- 5.49 Policies CP60 and CP64 deal with the traffic impacts of development and parking standards. These policies aim to ensure developments adequately address matters of access arrangements and road safety alongside adequate parking provision.
- Paragraph 116 of the NPPF states that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation,

would be severe, taking into account all reasonable future scenarios".

- 5.50 Access to the site utilises an existing entrance and access point which benefits from sufficient visibility in both directions. The site is currently used by farm related traffic and was deemed acceptable for use by x4 holiday lets under the previous approval. A single dwellinghouse will generate significantly less traffic and is therefore considered acceptable in highway safety terms.
- 5.51 The plans demonstrate that the site can comfortably accommodate off road parking and turning facilities to serve the new dwelling that meet the requirements of the Council's parking standards.
- 5.52 For the reasons outlined above, it is considered that suitable access and parking arrangements are provided by the scheme to allow for the development of the site as proposed, in compliance with the requirements of CP60 and CP64 of the WCS and the scheme represents a sustainable form of development in this regard.

RESIDENTIAL AMENITY

- 5.53 There are no neighbouring dwellings immediately abutting the barns to be used as a dwellinghouse. Roman Cottage and Manor House itself are the closest residential dwellings but these are sited sufficient distance from the proposals. No issues of neighbour amenity are therefore raised by this proposal.



6.0 CONCLUSION

- 6.1 As the Council cannot demonstrate a 5 year housing land supply, the relevant housing policies of the Wiltshire Core Strategy are considered to be out of date. Consequently, the 'tilted balance' as set out in Paragraph 11(d) is therefore engaged and applicable here. It is again important to emphasise what is meant by the term 'tilted balance'. This term is used to define Paragraph 11 of the NPPF when engaged as the 'planning balance' is tilted from a neutral balancing exercise where if the harms outweigh the benefits planning permission is usually withheld, to a tilted balance where the harms should significantly and demonstrably outweigh the benefits for permission to be withheld.
- 6.2 The harms are considered to be that the development comprises a modest element of redevelopment, however, this is considered to be a very minor degree of harm within the context of the level of built form that currently stands at the site, the removal of modern and unsympathetic buildings from the site and the level of new build previously approved at the site.
- 6.3 The gains are that the development offers an ideal opportunity for a single dwelling to contribute towards the severe lack of housing land supply within Wiltshire. Although this scheme only represents the gain of one single dwelling, it has been well established by Inspectors and the Council on other sites within the

County, that the granting of one additional dwelling is considered to offer a positive contribution towards the lack of HLS.

- 6.4 Additionally, the barns are redundant heritage assets, and a viable active use needs to be found in order to safeguard the future of the group. The site already benefits from an established and suitable access and areas for parking provision. This statement, together with the submitted structural survey and viability report, has justified that the proposed conversion to residential use represents the optimal use for the barns and is the only option which will allow for their viable conversion, thereby securing the long-term future of these un-designated heritage asset.
- 6.5 The compliance of the scheme with policy CP48 has also been explained within this statement.
- 6.6 A further positive aspect of the scheme is the significant gain in BNG that will arise as a result of the scheme. The submitted BNG report details how a net gain of 84.08% will be achieved.
- 6.7 This statement also justifies why that the proposal will not result in any severe impact on highway safety and will preserve residential amenities.
- 6.8 This statement has also set out how the proposal conforms to CP48 and justified why the proposed development does not result in any material harm. In particular, the development would not cause demonstrable harm to the landscape or appearance of the site. There would also be economic benefits



associated with the proposal both through the spending associated with the future occupants of the site and the additional Council Tax payments which would be attracted.

- 6.9 The scheme, when complete, will be one of a high-quality build and finish.
- 6.10 In line with Paragraph 11 of the NPPF, a conclusion needs to be drawn as to whether the identified harms significantly and demonstrably outweigh the identified benefits as listed above. It is clearly evident that in this case they do not and the identified harm falls some way short of outweighing the benefits of this proposal.

