

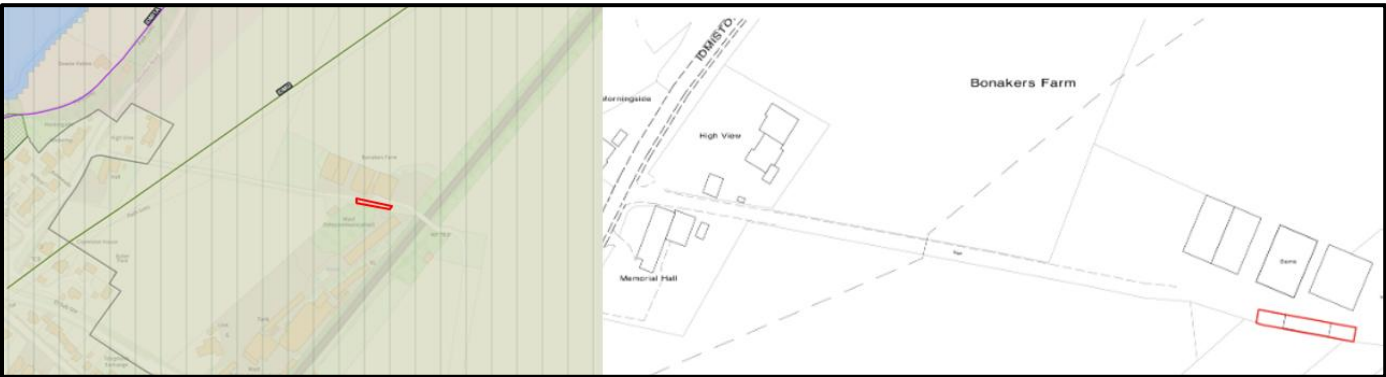
DELEGATED REPORT

Application Reference:	PL/2024/08352
Application Type:	Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses
Site Address:	Bonacres Farm, Idmiston Road, Porton, SP4 0LD
Proposal:	Prior Approval Part 3, Class Q Agricultural Barn to be converted to residential use
Recommendation:	Prior Approval be REFUSED

SITE DESCRIPTION/CONTEXT

The site is situated in the designated countryside, to the east of the defined settlement boundary of the Large Village of Porton (identified by a thick black line on the Constraints Plan in PLAN A below), as determined by Wiltshire Core Strategy (WCS) policies CP1 (Settlement Strategy), CP2 (Delivery Strategy) and CP4 (Amesbury Community Area). It is situated on the edge of an existing farm yard and is accessed via a long track leading from the village/Idmiston Road to the west. The track also serves the other farm buildings in this yard; and an agricultural worker’s dwelling (known as High View) that exists at the Idmiston Road end of the track and which is in the same ownership as this site. Permission has recently been granted to redevelop the agricultural worker’s dwelling site with 3 market houses and a replacement agricultural worker’s dwelling (under ref: PL/2025/04645). As part of that scheme, no evidence was submitted to suggest that there is no longer a functional or financial need for an agricultural worker’s dwelling to serve the existing farming use at Bonacres Farm/this site, hence the worker’s dwelling was replaced and continued to be secured as part of that scheme.

The wider farmyard is to the south and east of a number of paddocks/fields associated with the farm. To the south, the outbuildings and grounds used as Porton Garden, Aquatics & Pets Centre abut the site. The railway line contains the eastern boundary of the wider farmyard. To the west, as well as the aforementioned agricultural worker’s housing site, Porton’s Memorial Hall and associated parking provision also exist adjacent to the access track.



PLAN A – Constraints & Location Plans

The site is situated within a Special Landscape Area, as defined by saved Salisbury District Local Plan (SDLP) policy C6 (identified as a green wash with vertical hatching on the Constraints Plan in PLAN A above). The site is not situated within a conservation area or within the vicinity of any listed buildings and none of the trees on the site are protected by virtue of a Tree Preservation Order (TPO). As is indicated by the purple and green lines on the Constraints Plan on PLAN A above, a comprehensive network of public rights of way exist in the vicinity of the site to the west, including a bridleway (Ref: IDMI12) and a public footpath (Ref: IDMI1A).

Whilst it is in Flood Zone 1 and some distance from the river, the site is also situated within the catchment of the River Avon Special Area for Conservation (SAC). It is also within the 15 kilometre recreational buffer of the New Forest SAC, Special Protection Area (SPA) and Ramsar site; and is within the 6.4 kilometre recreational buffer of the Salisbury Plain SPA.

As can be seen in the site photos in PHOTOS 1 & 2 below, the site currently consists of a linear, single storey, modern agricultural building with a shallow pitched roof. It currently measures 17.3 by 5.13 metres in footprint; and extends to a maximum height of 3.9 metres to its ridge (2.9 metres to its eaves). It is evident from the site visit that significant *recent* works have been undertaken to the building including the recladding of the existing walls and roof; rudimentary openings being cut into the western, northern and eastern elevations; supplementary supporting timber work being added internally to the original steel frame; and a new concrete slab being laid. There is also evidence of waste/services being accommodated within the western end of the new concrete slab.



PHOTO 1 – Site Photos of Site Access & Existing Building



PHOTO 2 – Site Photos

No planning history exists for the building. The supporting documentation confirms that it was in use for agricultural purposes on 24th July 2023 and that it has existed since 2001. It also confirms that the building and site are not subject to an agricultural tenancy. The building is however currently empty and the supporting documentation does not confirm what agricultural purpose it is currently or was last used for, but it does confirm that the farm yard is still an active agricultural enterprise. There was also evidence on site of the other buildings being used to store machinery and hay.

A google aerial photo search, (shown in PHOTOS 3&4 below) confirms that 'a' building has existed on this part of the farm yard since 2001, but it appears to have been a very different building to the one that is on the site today. In 2001 a small building existed on this side of the farmyard and by 2017 this building had been extended quite significantly. In 2017 it appears to have consisted of a very long, open fronted building that was being used for storage of some sort (it looks like hay bales). By 2023 the building appears to be very overgrown and enshrouded in vegetation, but by 2025 the site had been cleared and the building that is now the subject of this application is on the site.

This planning history/google imagery however confirms that the new cladding; concrete base; and installation of waste etc has occurred between 2023 and 2025, but given that the new works involve domesticating fenestration and waste/service installation; and given the submission of this application, it is clear that these preemptive works were not essential for the purposes of agriculture and have thus been undertaken unlawfully, without the benefit of planning permission, to enable the conversion of the building for a residential purpose.

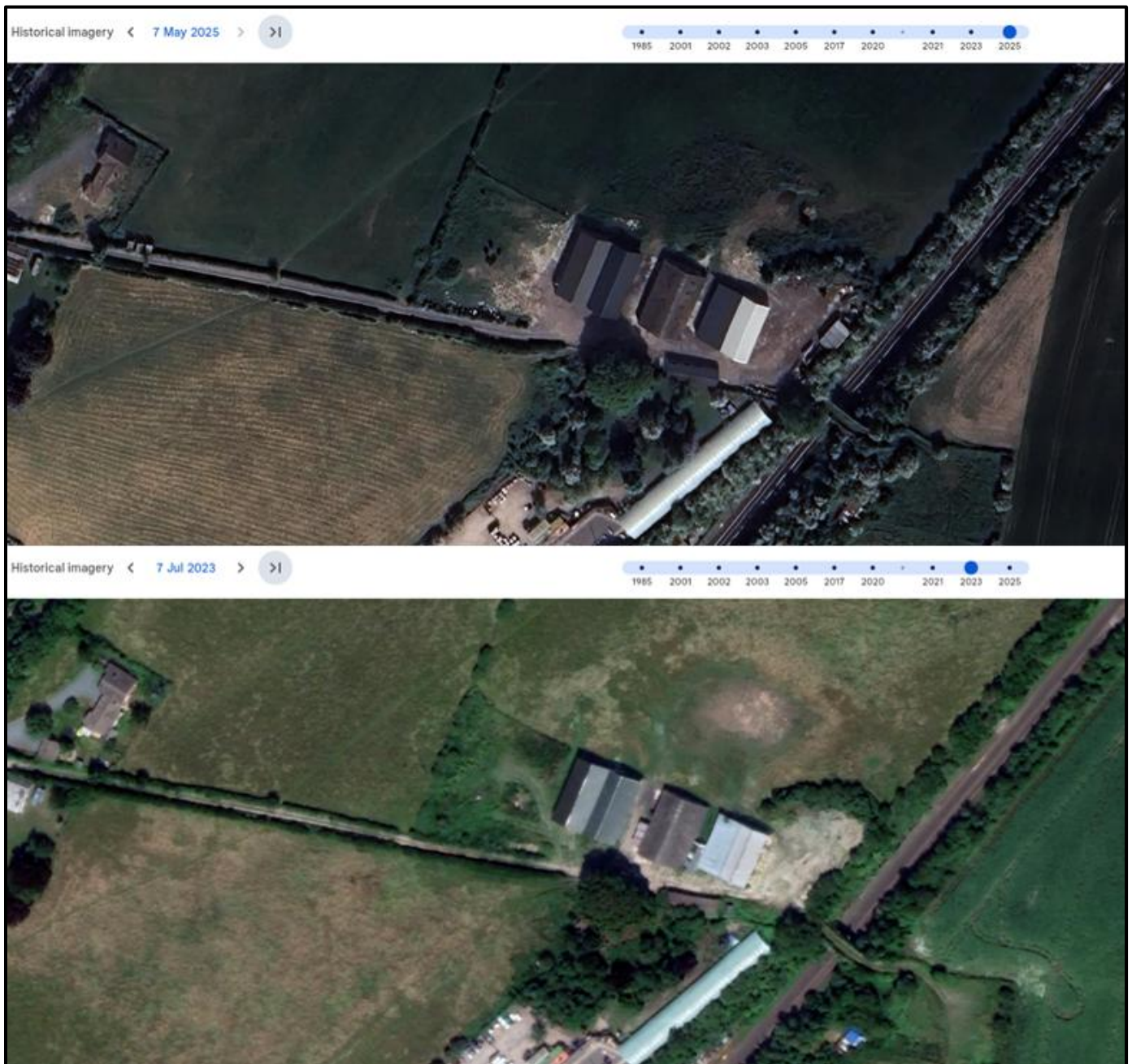


PHOTO 3 – Google Earth Images 2023-2025

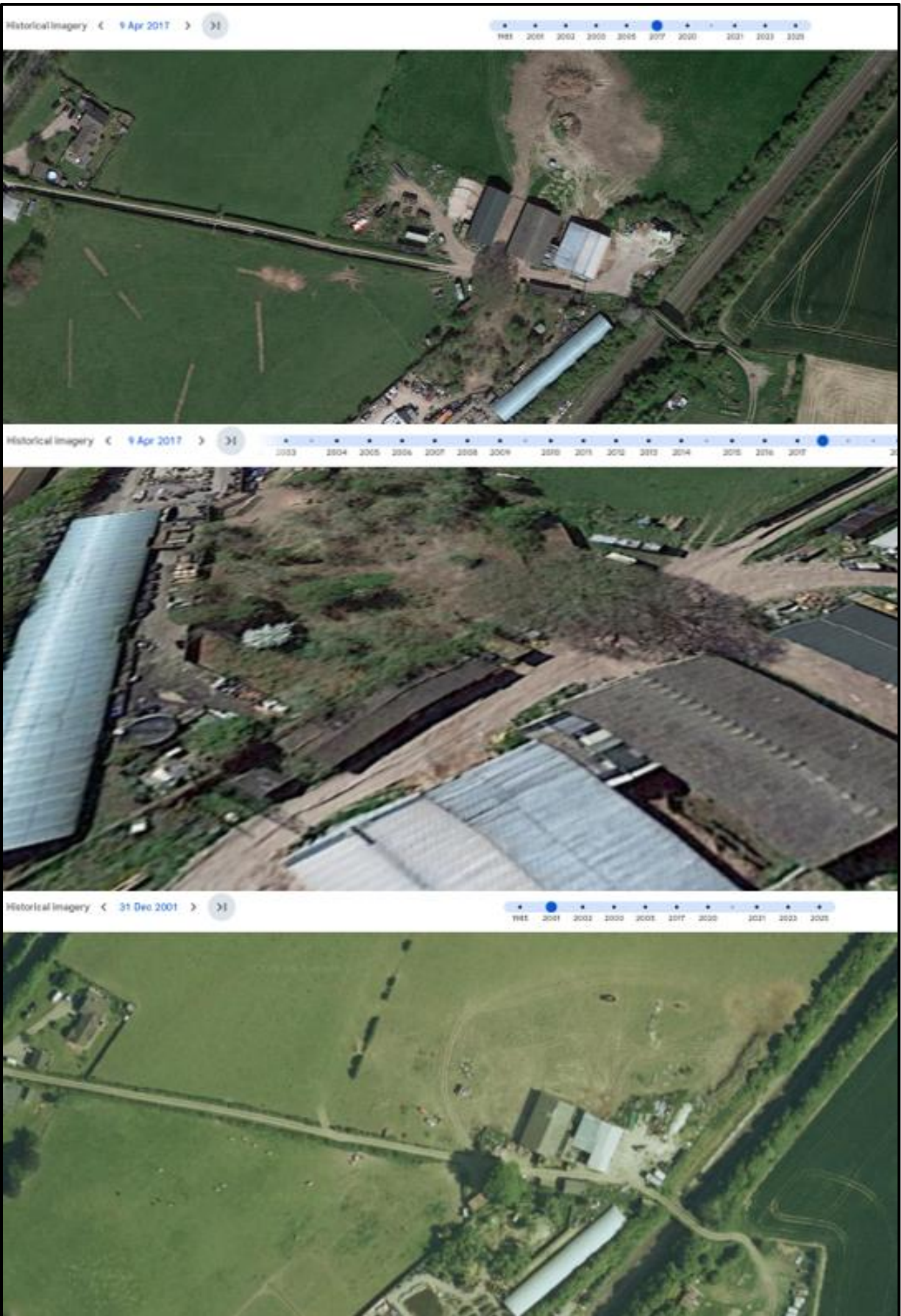
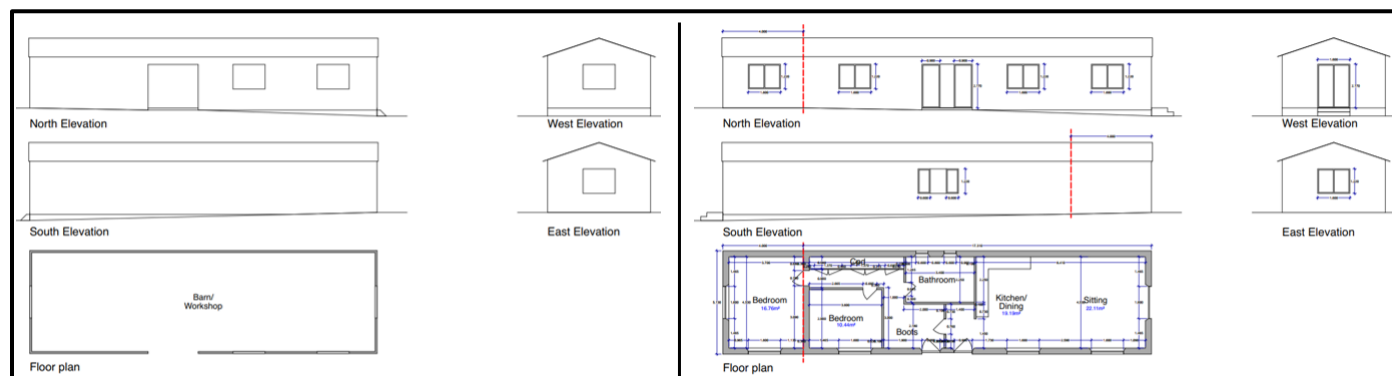


PHOTO 4 – Google Earth Images 2001-2017

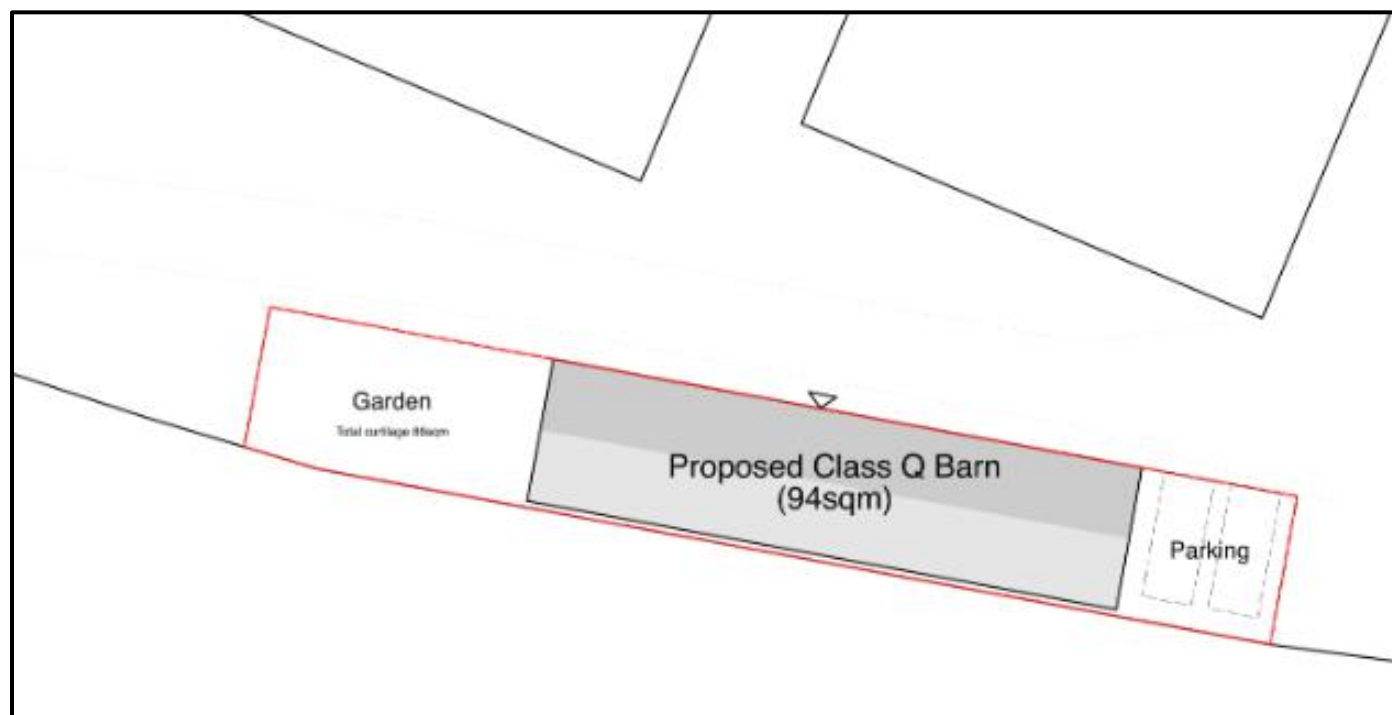
The building is situated immediately adjacent to its southern boundary and faces out into the farm yard to the north. Whilst openings currently exist on the western, northern and eastern elevations of the building; its sole access/doorway is situated in the northern elevation (and has done since at least 2017).

PROPOSAL

This is a prior notification application proposing the change of use of the existing building into a single storey, 2 bedroom dwelling (Use Class C3). As can be seen in PLANs B&C below, a 4 metre long extension is also proposed on the eastern elevation of the existing building to create 1 of the 2 bedrooms. The building will otherwise be laid out with kitchen/dining room; sitting room; boot room; and bathroom and consist of a new dwelling of approximately 94 square metres in footprint. New openings and replacement windows are identified on all elevations. The existing window opening on the western elevation is to be changed into a pair of glazed doors which will open out onto a new garden area, which, as can be seen in PLAN C below, is identified as measuring approximately 86 square metres in size. To the east of the extended building, 2 parking spaces are identified to serve the proposed dwelling. The main entrance into the building will continue from the northern elevation.



PLAN B – Existing & Proposed Plans



PLAN C – Proposed Site Plan

The application is accompanied by a Visual Inspection Structural Report from June 2025 (which postdates the most recent alterations that have occurred to the building). It confirms that other than some light surface rust, the existing frame; steel profile cladding; and concrete base are all sound and the building is watertight

overall. It confirms that the conversion works will include the upgrading of the building to comply with Building Regulations and will principally include: internally lining the external walls with timber studwork, accommodating the required insulation; internally lining the roof with a suitable insulation; and decorative finish. It is therefore expected that the existing cladding will be retained/reused as part of the conversion works.

The application is put forward in line with Class Q of Part 3 of Schedule 2 of the Town & Country Planning (General Permitted Development)(England) Order 2015 (as amended) (GPDO). The application submission has confirmed that the proposals are to be considered in line with the amended permitted development rights, which came into effect on 21st May 2024; and the assessment is based on the updated provisions of Class Q accordingly. As is identified in PLANS B & C above, dimensioned floor and elevation plans of the proposed building's conversion have accompanied the application; as well as a Planning Statement setting out how it complies with Class Q of the GPDO.

PLANNING HISTORY

S/1973/0337 (adj Site)	Erection of bungalow for farm worker. Permission – 26.11.73 subject to an occupancy condition: <i>"The occupation of the dwelling shall be limited to a person solely or mainly employed or last employed in the locality in agriculture as defined in Section 290(1) of the Town and Country Planning Act 1971 or in Forestry (including any dependents of such a person residing with him) or a widow or widower of such a person"</i> .
S/1983/1079 (adj Site)	O/L – Residential agricultural bungalow for use by working farmers (Owner). Refused – 23.11.1983
S/1985/0194 (adj Site)	O/L – Agricultural bungalow. Refused – 27.03.1985. Appeal Dismissed – 18.12.1985
S/1987/1716 (adj Site)	Extension to be used as granny annexe and erection of garage. Permission – 16.12.1987
S/1988/0920	O/L Application – Erection of chalet bungalow. Refused – 20.07.1988
S/2003/0354	Agricultural building open sided barn for the storage of farm machinery, straw and hay (replacement building). Permission – 22.05.2003
S/2006/8008	Change of use of agricultural barn used for storage of farm machinery, hay and straw to include a maximum of half the area storage and baling of farm waste plastic before transportation for recycling. Permission – 05.06.2006
PL/2023/03232 (adj Site)	Relocation of existing agricultural dwelling & construction of 3 new dwellings. Refuse – 28.06.2023
PL/2023/08067 (adj Site)	Demolition of existing dwelling and annexe and construction of 4 dwellings. Refused – 24.06.2024. Appeal Dismissed – 14.04.2025
PL/2024/07489 (adj Site)	Demolition of existing dwelling and annex and construction of 4 dwellings (Resubmission of PL/2023/08067). Permission – 21.02.2025
PL/2025/04645 (adj Site)	Demolition of existing dwelling and annexe and the erection of 3 no. four bed dwellings and 1 no. two bed agricultural workers dwelling with associated parking areas and garden space. Permission – 12.12.2025

POLICIES

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

Town & Country Planning (Permitted Development)(England) Order 2015 (as Amended) (GPDO)

PRIOR NOTIFICATION PROCESS

Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted development rights are subject to conditions and limitations. In some cases, the permitted development right will require the Local Planning Authority to approve certain matters (a process generally referred to as 'prior approval').

Class Q of Part 3 of Schedule 2 to the GPDO, as amended in 2024, permits the change of use of buildings on agricultural units; and former agricultural buildings, to dwellinghouse uses; and allows extensions and building operations reasonably necessary to convert the building to a residential use (within the C3 use class), effectively saying that such works constitute permitted development. However, in accordance with Class Q, before beginning the development, the applicant is required to 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 the Schedule 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

The provisions of Paragraph W of Part 3 of the GPDO are also relevant to this process as it sets out the procedure for applying for prior approval. It states that the Local Planning Authority must have regard to the National Planning Policy Framework 2021 (sic. this part of the GPDO has not been updated since the NPPF was updated in 2024) in so far as it is relevant to the specific subject matter of the prior approval outlined above, although there is no requirement to have regard to the development plan (in this case the WCS; SDLP; and the Idmiston Neighbourhood Plan) in the consideration of such an application.

Local representations have been made raising concerns about the scheme in terms of compliance with the adopted development plan policies and the principle of the proposals in such a countryside location and whether there is an agricultural need for another dwelling on this site. However as is addressed above, Class Q effectively confirms that the proposed change of use and other works required to use an existing agricultural building for residential purposes is permitted development and does not need planning permission. The principle of such a proposed change of use is therefore established. The Local Planning Authority can only consider the acceptability of the detailed scheme against the very limited criteria set out in the Class (outlined above). The adopted development plan policies (including the neighbourhood plan) are not therefore relevant in this regard and if allowed, the new dwelling would be an unencumbered market dwelling, the occupancy of which will not be restricted or tied to the agricultural holding.

CONSULTATIONS

Highways – No Objection

Public Protection – Objection

- The proposed residential building is located around 40 metres from the mainline south western railway. As such there are likely to be impacts associated with transport noise.
- No assessment of noise has been carried out and so the applicant must engage a competent noise consultant to provide a report to the following requirements.
- This report must be submitted prior to the approval of any change of use.
- It must provide the following:
 - An assessment of the acoustic impact arising from the operation of nearby agricultural activities. Background levels are to be taken as a LA90 1 hour and the ambient noise levels shall be

expressed as an LAeq 1 hour during the daytime [07:00 - 23:00] and shall be expressed as an LA90 and LAeq 5 minutes during the night [23:00 – 07:00] at the boundary of the nearest residential noise-sensitive receptor.

- The assessment shall include a scheme of attenuation measures to demonstrate the development can achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the proposed residential development.
- An assessment of acoustic impact arising from railway noise must include an acoustic design statement in accordance with the principles of ProPG: Planning & Noise, New Residential Development: Supplementary Document 2 Good Acoustic Design and a scheme of attenuation measures demonstrating the following can be achieved at the development:
- That noise from trains must achieve the following criteria as a minimum:
 - 1) Bedrooms (night-time - 23.00 - 07.00) shall not exceed 30 dB LAeq
 - 2) Bedrooms (night time – 23:00 – 07:00) individual noise events shall not exceed 45 dB LAFmax by more than 10 times
 - 3) Living Rooms (daytime - 07.00 - 23.00) shall not exceed 35 dB LAeq
- The site/building may contain contamination from the following historical uses:
 - 1) Contamination from historical use as agricultural premises including the presence of asbestos containing materials.
 - 2) The proposed site is located immediately adjacent to a former extensive sidings built for transfer of troops and freight to Porton Military Railway. According to our register, this site is classed as medium risk for land contamination.
- Please add a contamination condition to any decision

UPDATE:

- Due to the proximity of a working farm and transport noise, it is unclear whether amenity can be protected even after mitigation is applied.
- As such we need to info upfront and conditions would not be appropriate.

Idmiston Parish Council – Objection

- The IPC objections are based on the failure to satisfy key policy tests under Class Q (Part 3, Schedule 2, GPDO) and also to accord with local planning objectives under the Idmiston Neighbourhood Plan.
- Local and strategic policy context – growth, housing mix and impact on local character
- The Idmiston Neighbourhood Plan (NP) — made 25 April 2017 — remains part of the Development Plan for the area.
- The NP envisages meeting parish housing needs through “appropriate” development, with an emphasis on maintaining the parish’s rural character, avoiding undue pressure on village services, and ensuring any new dwellings reflect local needs and settlement patterns.
- The Wiltshire Core Strategy expects housing in villages such as Porton to respond to demonstrable need and support mixed, balanced communities — in type, size and tenure.
- The current application does not appear to meaningfully demonstrate how the proposed dwelling would contribute to local need (e.g. affordable housing, smaller housing for downsizers or first-time buyers), nor how it will preserve or enhance the character of the parish or settlement pattern.
- Granting the conversion risks undermining the NP’s carefully considered strategy for sustainable, modest growth.
- Even under permitted-development rights (Class Q), there remain strict limitations on what is permissible.
- Key policy considerations include: structural soundness; no substantial demolition or rebuilding; no major external alterations; and suitability of location in terms of access, services, flood risk, contamination, environmental impact and setting.
- The IPC is aware that the site of the proposed barn lies close to or within sensitive ecological / landscape-designated land — being adjacent to or near Porton Down SSSI, and such proximity raises real risk to biodiversity, ecology, and landscape character.

- It is unclear whether the applicant has sufficiently demonstrated that the barn is structurally capable of conversion without major rebuilding or extensive works, as required.
- The impact of residential use — including increased traffic, domestic waste, noise, lighting, and garden/domestic activity — may have a detrimental effect on the surrounding natural environment, habitats, and wildlife corridors, particularly given the ecological sensitivity of the area.
- The conversion does not necessarily represent the “re-use of existing building stock which contributes to sustainable rural housing” in a way that aligns with the NP’s vision of safeguarding rural landscape and community, especially when the dwelling may not meet local housing needs (see point 1).
- Risk of setting a precedent for unsustainable or excessive conversions
- Granting prior approval for this conversion may set a precedent whereby redundant or marginal agricultural buildings throughout Idmiston parish (or its environs) are converted to residential use — even when not aligned with local need, environmental protection or landscape sensitivity.
- This risks eroding the countryside character, overburdening limited local infrastructure, and undermining the NP’s long-term strategy for sustainable development.
- Lack of clear demonstration of compliance with Idmiston NP housing strategy
- The NP’s housing strategy aims to deliver housing that meets need, protects local character, and avoids speculative or ad hoc development
- The applicant’s submission does not convincingly quantify local housing need (e.g. for small or affordable units) or show how this conversion supports balancing community needs with landscape conservation.
- As such, the proposal risks being out of step with the NP’s objectives.
- On balance, the IPC believes that the application fails to satisfy the relevant policy tests — both under national Class Q permitted-development criteria and under the locally adopted Idmiston NP.
- Approving this prior-approval conversion would undermine the careful planning framework designed for the parish and could lead to unacceptable impacts on landscape, ecology, community balance and housing provision.

REPRESENTATIONS

Letters – 4 letters of Objection received. The following comments made:

- The site in question has been recently, minimally refurbished and while in an appropriate location, this dwelling would be in very close proximity to any livestock, should the surrounding fields and barns be used for agricultural purposes.
- Are there sufficient measures in place to comply with health and safety requirements both inside the property and in the farmyard areas?
- Development by stealth?
- We simply don’t need more large houses in the village. We have lots on the market not selling and more land for sale with permission that’s not selling.
- A residence at the site of the agricultural buildings establishes a residence beyond the current curtilage / boundary of residential development of the village of Porton as agreed in our Neighbourhood Plan.
- There is no need to expand the curtilage as there is still plenty of undeveloped land within that boundary.
- I feel that any further planning approval should wait for the 'building out' of the existing approved plans for the High View / Bonacres Farm site.
- The track up to the barns and the proposed dwelling, although recently improved, would probably require re surfacing for regular non agricultural traffic
- This could cause issues with runoff water flowing down onto Idmiston Road.
- If this track is ‘tarmacked’, how soon would it be before a change of use for the barns is submitted, with easy access to the fields for further housing development?

- The ingress and exit from the track onto Idmiston Road is not without issues, this is a busy road with traffic to and from the local primary school, Porton Down, Idmiston village, the Memorial hall next door and general through traffic, including W& D buses, especially at the beginning and end of each day, visibility is not easy and extra vehicles would add to these issues.
- Planning application PL/2024/07489 has been granted for the site at the bottom of the track this includes provision for an agricultural dwelling, will there now be two agricultural dwellings?
- This seems a little excessive for such a small agricultural holding. If this application is granted, perhaps the planning application PL/2024/07489 will be altered to include another family home, which raises concerns for the over development of that site.
- the applicant already has permission to construct 4 dwellings at Bonacres farm
- I am concerned about the protection of the agricultural tie.
- I object to the loss of valuable agricultural land & this proposal is a threat.
- It is of no benefit to the community or the environment & is completely superfluous.
- This is agriculture land let's keep it that way we might need it one day!

ISSUES

The main considerations which are material to the determination of this application are listed below:

- Whether the proposal constitutes permitted development
- Whether the prior approval of the local planning authority is required

PLANNING ASSESSMENT

Class Q of the GPDO confirms that the following works *are* permitted development:

- (a) *'a change of use of –*
- a building that is part of an established agricultural unit and any land within that building's curtilage, or*
 - a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage*
- to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order;*
- (b) *development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or*
- (c) *development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building.'*

As is identified above, the application confirms that the wider farm yard is still in use for agricultural purposes; that the building on this site was in use for agricultural purposes in 2023; and that the building is part of an established agricultural unit. Planning History for the adjacent site also confirms that the agricultural unit benefits from an agricultural worker's dwelling, which has recently been allowed to be replaced for an essential worker associated with this farm. A recent site visit also confirmed that whilst this building is currently empty, other buildings in the farm yard are still in use for the storage of hay and machinery. There are no grounds to therefore dispute that the building is situated within an established agricultural unit nor that the proposals could not therefore benefit from permitted development rights. External alterations have occurred and an extension is also being proposed as part of this application and so the detailed works and whether they are '*reasonably necessary*' will also need to be assessed in line with sub-paragraph (c).

In addition, the red line site also includes additional land around the building to provide gardens and parking to serve the new dwelling. Criterion (a)(ii) however confirms that the site can include '*any land within the building's curtilage*'. Paragraph Q.3 of this Class further confirms that '*curtilage*' should be interpreted as:

For the purposes of Class Q, "curtilage" means the lesser of—

- the piece of land, whether enclosed or unenclosed, immediately beside or around the building on an established agricultural unit or former agricultural building (as the case may be), closely associated with and serving the purposes of that building, and*

- (b) *an area of land immediately beside or around the building on an established agricultural unit or former agricultural building (as the case may be) no larger than the land area occupied by that building.*

In this instance the red line encompasses an area that is approximately 196 square metres in size. The existing building that is on the site measures 89.44 square metres in size. The red line therefore encompasses an area of land that is larger than the existing building (approximately 106 square metres comparative to the 89.44 square metres). However, the definition of curtilage does not confirm how to consider the proposed extension and whether the 4 metre long extension proposed should be included in the calculation of 'the building' or indeed excluded from the resultant curtilage calculation, or not. If the floor area of the 'building' is calculated to include the extension identified then it will have a footprint of 113.42 square metres and thus the curtilage identified for parking and gardens will cover an area of 82.58 which is less than the land occupied by that building either before or after extension. Given the lack of clarity in the GPDO on this matter, the Local Planning Authority accepts that Criterion (b) of the '*curtilage interpretation*' is therefore satisfied and this area can be considered for a change of use associated with the new dwelling.

There are also a number of caveats to this general acceptability set out in Paragraphs Q.1 and Q.2 of this Class. These will also therefore be assessed in more detail below.

Class Q.1 Permitted Development Criteria:

Class Q.1 confirms that Development is **not** permitted by Class Q if—

- (a) *in the case of a site that is part of an established agricultural unit, the site was not part of the established agricultural unit—*
(i) *on 24th July 2023, or*
(ii) *where the site became part of the established agricultural unit after 24th July 2023, for a period of at least 10 years before the date development under Class Q begins,*

The submitted documentation confirms that this site/building is part of an established agricultural unit; and that this was in agricultural use on 24th July 2023. This criterion is therefore satisfied by this proposal.

- (b) *in the case of a site that was (but is no longer) part of an established agricultural unit—*
(i) *the site was part of an established agricultural unit on 24th July 2023,*
(ii) *where the site ceased to be part of an established agricultural unit after 24th July 2023, the site has not been part of the established agricultural unit for a period of at least 10 years before the date development under Class Q begins, or*
(iii) *since ceasing to be part of an established agricultural unit, the site has been used for any non-agricultural purpose,*

As has been highlighted above, the application confirms that this site does form part of an established agricultural unit. The adjacent plot benefits from an agricultural worker's dwelling in association with this farm yard; and there was evidence on site that other buildings in this farm yard are being used for agricultural purposes. The Local Planning Authority is therefore satisfied that the site is part of an established agricultural unit and thus this criterion is not relevant to this application.

- (c) *the floor space of any dwellinghouse developed under Class Q having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeds 150 square metres,*

The building as extended will have a footprint of 113.42 square metres; and the supporting documentation confirms that the new dwelling will have an internal floor area of 94 square metres. The new dwelling will be well below the 150 square metre allowance and this criterion is therefore satisfied.

- (d) *the development under Class Q, together with any previous development under Class Q, within the original limits of an established agricultural unit (see paragraph Q.3(2) of this Part) would result in—*
- (i) *the cumulative number of separate dwellinghouses having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeding 10, or*
 - (ii) *the cumulative floor space of dwellinghouses having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeding 1,000 square metres*

No other dwellings have been developed on this agricultural unit under the provisions of Class Q. if allowed the number of dwellinghouses permitted within this agricultural unit will not exceed 10; or 1,000 square metres and this criterion is also therefore satisfied.

- (e) *the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained*

The application confirms that this site has never been occupied under an agricultural tenancy. This criterion is therefore satisfied.

- (f) *less than 1 year before the date development begins—*
- (i) *an agricultural tenancy over the site has been terminated; and*
 - (ii) *the termination was for the purpose of carrying out development under Class Q, unless both the landlord and the tenant have agreed in writing that the site is no longer required for agricultural use*

The application confirms that this site has never been occupied under an agricultural tenancy. This criterion is therefore satisfied

- (g) *development under Class A(a) or Class B(a) of Part 6 of this Schedule (agricultural buildings and operations) has been carried out on the established agricultural unit during the period which is 10 years before the date development under Class Q begins,*

From the site history it is evident that the last new agricultural building permitted on this site was allowed in 2003. The application also confirms that no Part 6 developments have occurred at the site in the past 10 years and there is no planning history to dispute this claim. This criterion is therefore satisfied.

- (h) *the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point, other than—*
- (i) *extension of the building allowed by paragraph Q.1(i);*
 - (ii) *protrusions of up to 0.2 metres to accommodate building operations allowed by paragraph Q.1(j)(i),*

The detailed works of the proposed conversion will be considered in more detail below, but the supporting documentation confirms that other than the proposed extension; the existing external cladding will be retained and reused; and thus no works will extend more than 0.2 metres beyond the external dimensions of the existing building. It is therefore considered that the proposed works satisfy the requirements of this criterion as well.

- (i) *the development under Class Q(b) would result in an extension that—*
- (i) *has more than one storey,*
 - (ii) *is sited anywhere other than to the rear of the existing building,*
 - (iii) *extends beyond the rear wall of the existing building by more than 4 metres,*
 - (iv) *has eaves the height of which exceed the height of the eaves of the existing building,*
 - (v) *is higher than whichever is the lower of—*
 - (aa) *the highest part of the roof of the existing building, or*
 - (bb) *a height of 4 metres above the ground,*

- (vi) *extends beyond a wall that forms a side or principal elevation of the existing building, or*
- (vii) *would be sited on land that, before the development under Class Q(b), is not covered by a hard surface that was provided on the land by virtue of any development, and—*
 - (aa) *the hard surface was not provided on the land on or before 24th July 2023, or*
 - (bb) *where the hard surface was provided on the land after 24th July 2023, the hard surface has not been situated on the land for a period of at least 10 years before the date development under Class Q(b) begins,*

The proposals involve an extension to the existing building that is to be 4 metres in length. This is to extend from the eastern elevation and is to have eaves and ridge heights that are to match the existing building; and it is to be positioned on an existing area of hard standing.

However, there is some confusion as to whether the extension is to be sited anywhere other than on the rear of the existing building. As can be seen in PLAN D below, the applicant has ticked yes to this question on the submitted application form, and the form therefore confirms that the proposals would exceed the limits set by the legislation. The supporting Planning Statement however states that the extension is to be erected on the rear of the building.

Will any proposed extension: • be more than 1 storey; • be sited anywhere other than the rear of existing building; • extend beyond the rear wall of existing building by more than 4 metres; • extend beyond side or principal elevations of the existing building; • create eaves higher than the height of the current building's eaves; • be higher than the highest part of the roof of the existing building, or exceed 4 metres in height; • be on land that is not already covered by a hard surface, with that hard surface having existed on or before 24th July 2023 or, where the hard surface was provided after 24th July 2023, has been in place for at least 10 years before development begins. ☒ Yes ☐ No / No extension proposed <i>If you have answered yes above, the proposal will exceed the limits set by legislation. In this circumstance, you should not continue with this application and seek advice from the Local Planning Authority on the best course of action.</i>

PLAN D – Extract from the Submitted Application Form

Principal Elevation is not defined in the GPDO. Appeal case law confirms that establishing what is the front elevation and thus the principal elevation is not always clear cut. It can mean the elevation that faces a main road for instance; but is usually the elevation that contains the main entrance to the building. In terms of an agricultural building, it is considered that the building's function and relationship with its associated farm yard would be key indicators in determining the front/principal elevation.

In this instance, whilst the western elevation of the building faces the main road and site access, this elevation only has a window opening in it. The sole entrance/access into the building is (and always has been, as seen in the aerial photos in PHOTOS 3&4 above) on the northern elevation. The northern elevation also faces into the existing farmyard and the other buildings in this complex and therefore from a functional and operational point of view this is considered to be the main/front elevation of this building. The Local Planning Authority therefore considers that the front/principal elevation of this building is the northern elevation which thereby confirms that the southern elevation is the rear of the building. The extension however is to extend from the eastern elevation of the building which is thus a side elevation. It is therefore considered that this proposal does **not** satisfy part (ii) of this criterion and does not therefore benefit from permitted development rights within this class.

- (j) *the development under Class Q(c) would consist of building operations other than—*
 - (i) *the installation or replacement of—*
 - (aa) *windows, doors, roofs, or exterior walls, or*
 - (bb) *water, drainage, electricity, gas or other services,*
 - to the extent reasonably necessary for the building to function as a dwellinghouse, and*

- (ii) *partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(j)(i),*

The supporting guidance to the GPDO, set out in the Planning Policy Guidance (PPG), confirms what works are permitted under the Class Q permitted development right for change of use from an agricultural building to a residential use. It confirms that this Class '*...allows the change of use, together with reasonably necessary building operations. The Class however assumes that the agricultural building is capable of functioning as a dwelling. The right permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore, it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right*'.

In this instance, the proposals are supported by a visual structural survey that confirms that other than some surface rust, the existing wall/roof cladding, structure and concrete slab are in good order. Other than the proposed extension, only small changes to existing openings and some additional fenestration is identified and so the application suggests that this criterion is met in full.

However, there is some doubt about whether the preemptive works that have already been undertaken to the building have gone beyond what would reasonably be necessary to convert the building and which would be allowed within the remit of this criterion. As can be seen in the site photographs in PHOTOS 1&2 above, significant new works have been undertaken to the building prior to the submission of this application; and the google images in PHOTOS 3&4 confirm that these works have taken place since 2023. The nature of the works also confirm that they were not essential for the purposes of agriculture and therefore do not benefit from permitted development or planning permission.

The submitted structural report was carried out in June 2025, and obviously post dates the preemptive works being undertaken and so does not shed any light as to the condition of the original building. The new works appear to have included the enclosure of an entirely open fronted barn; new cladding on all elevations; reroofing; the installation of additional internal supports to the existing frame; and the laying of a new concrete slab – including waste and service provisions. Indeed, it appears that the only 'original' part of the existing building that remains on site today is the steel skeletal frame.

Case law contained in the findings of *Hibbitt and another v Secretary of State for Communities and Local Government (1)* and *Rushcliffe Borough Council (2)* [2016] EWHC 2853 (Admin), confirm that the building must be capable of conversion to residential use without operations amounting to complete or substantial rebuilding of the preexisting structure. On the basis of the site visit and google imagery discussed above, the Local Planning Authority considers there to be significant doubt that the existing building is original and that significant elements of the building have already been replaced (unlawfully) in advance of this application (in this case new walls, roof and slab). It is therefore concluded that the works that have already taken place; along with the new works identified in this application, would go beyond what would be considered reasonable and necessary for the conversion of the building to a residential use and is tantamount to a new build. It is therefore considered that this proposal does **not** satisfy this criterion either.

(k) the site is on article 2(3) land

The site is not situated in an area designated as a conservation area; specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981; the Broads; a National Park; or a World Heritage Site; and is not within a National Landscape designation. Whilst the site is situated in a Special Landscape Area, this is a local designation that is not caught within the article 2(3) land definition. The site is not therefore on article 2(3) land and this criterion is satisfied accordingly.

(l) the site is, or forms part of—

- (i) a site of special scientific interest;*
- (ii) a safety hazard area;*
- (iii) a military explosives storage area*

The site is not in an SSSI, a safety hazard area or a military explosives storage area. This criterion is therefore satisfied.

(m) the site is, or contains, a scheduled monument

The site is not and does not contain a scheduled monument. This criterion is therefore satisfied.

(n) the building is a listed building.

The agricultural building that is the subject of this application is not a listed building. This criterion is therefore satisfied.

(o) the existing building, excluding any proposed extension under Class Q(b) but including any proposed building operations under Class Q(c), would not be capable of complying with the nationally described space standard [NSS] issued by the Department for Communities and Local Government on 27th March 2015 as read with the notes dated 19th May 2016 which apply to it

The NSS sets out the national, minimum, gross internal floor area that is required for each tenure and type of new dwelling in order to achieve an acceptable level of accommodation to meet the future needs of the intended occupants. In this instance the scheme proposes to convert this existing building into a 2 bed, single storey house; and the floorplans suggest that each room is to be large enough to fit a double bed, therefore making the unit suitable for up to 4 people. The supporting documentation also confirms that the dwelling, as extended, will have an internal floor area of 94 square metres.

If the 16.76 square metre internal floor area of the proposed extension, which is not considered to accord with criterion (i) of this Class, were to be removed, the proposed dwelling would constitute a 1 bedroom, single storey dwelling suitable for up to 2 people; and would have an internal floor area of 77.24 square metres.

As can be seen in PHOTO 5 below, the NSS confirm that for a 2 bed, 4 person, single storey dwelling, the minimum floor area that should be secured is 70 square metres. For a 1 bed, 2 person, single storey dwelling, this decreases to 50 square metres. Either with or without the extension, the proposed dwelling would therefore satisfy the requirements of this criterion.

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
1b	2p	50	58		1.5
2b	3p	61	70		2.0
2b	4p	70	79		2.0
3b	4p	74	84	90	2.5
3b	5p	86	93	99	2.5
3b	6p	95	102	108	2.5
4b	5p	90	97	103	3.0
4b	6p	99	106	112	3.0
4b	7p	108	115	121	3.0
4b	8p	117	124	130	3.0
5b	6p	103	110	116	3.5
5b	7p	112	119	125	3.5
5b	8p	121	128	134	3.5
6b	7p	116	123	129	4.0
6b	8p	125	132	138	4.0

PHOTO 4 – The National Space Standards & Proposed Gross Internal Floor Area For Each Unit

(p) the building does not have suitable existing access to a public highway.

The proposed development is to utilise the existing access track that already exists and serves the other buildings in this farm yard as well as the agricultural worker's dwelling. The Highway Authority has raised no objection to the use of this access or the junction onto the Idmiston Road to serve a new dwelling. It is therefore considered that the site has a suitable existing access onto the public highway and this criterion is therefore met.

The proposed development is **not** considered to comply with *all* of the criteria set out in Class Q of Part 3 of Schedule 2 to the GPDO and is **not** therefore considered to be permitted development. The application is therefore recommended for refusal on that basis and an application for planning permission will need to be submitted in order for the proposals to be granted permission.

Class Q2 Prior Approval criteria:

Notwithstanding that it is considered that the proposals do not represent permitted development under Class Q of Part 3 of Schedule 2 to the GPDO as set out in Paragraph Q.1, it is also necessary to determine whether the prior approval of the authority would have been required for the detailed elements as set out in Paragraph Q.2 of the GPDO. In considering whether prior approval would have been required for the proposed works, the Local Planning Authority must have regard to the following matters:

- (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 the 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

and the provisions of Paragraph W (prior approval) of this Part also apply to this application. These matters are therefore addressed in more below:

(a) transport and highways impacts of the development

Much local concern has been raised about traffic and highway safety matters. However, as is identified above, the Highway Authority has been consulted about this prior approval application and has raised no objection to the use of the existing access to serve a new dwelling at this site; confirming that the junction with the public highway is acceptable and safe. It is therefore considered unlikely that the proposed development, if permitted, would have resulted in any adverse implications for highway safety.

(b) noise impacts of the development

The change of use of the existing agricultural building into a single residential dwelling would not result in any particular noise impact for the surrounding uses. It is also considered that the residential use of this barn is likely to result in less noise than would be generated by the use of this building for its original agricultural purpose. The proposals are therefore unlikely to result in any noise impacts for surrounding uses/users.

The Council's Public Protection Officer has, however, raised an objection to the likely noise impacts 'for' the future occupiers of this development. These will be discussed in more detail below, within the consideration of the siting and location of the development (criterion (e)).

(c) contamination risks on the site

The Council's Public Protection Officer has confirmed that as a result of its historical uses, the site/building may contain contamination including the presence of asbestos containing materials. The proposed site is also located immediately adjacent to a former extensive sidings built for transfer of troops and freight to Porton Military Railway. The site is therefore classed as medium risk for land contamination.

However, the Public Protection Officer has also suggested that this matter could be dealt with by condition. If the scheme were considered to benefit from permitted development, and was acceptable in all regards, a condition could therefore be attached to the decision to secure any pre assessment works and remediation that may be necessary.

(d) *flooding risks on the site*

The site is in Flood Zone 1 and in an area that is at low risk of ground water flooding. There is therefore no flooding risk at the site or for the proposed development.

(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 (dwelling houses) of the Schedule to the Use Classes Order*

As has been addressed above, the site is situated in the countryside which is considered to be an unsustainable location as it has limited access to public transport or public facilities/services. However, the explanatory PPG and GPDO accept that this is not something that would warrant a reason for refusal under this criterion of Class Q for this type of application, as most former agricultural barns are situated in countryside.

The Local Planning Authority does however have to consider whether the siting of the building would make the proposed change of use impractical or undesirable. Impractical or undesirable are not defined in the regulations, but the PPG confirms that Local Planning Authorities should '*apply a reasonable ordinary dictionary meaning in making any judgment. Impractical reflects that the location and siting would "not be sensible or realistic", and undesirable reflects that it would be "harmful or objectionable".*'

In this instance, the existing building is situated on the edge of an existing farm yard and it has been established that its principal elevation fronts on to this yard. The supporting documentation confirms that the farm is still in active use and recent permissions for the adjacent agricultural worker's dwelling and a site visit confirm that there are still some farming activities operating from the site. The documentation has not confirmed what type of agricultural activity is operating from the site, but the functional and financial justification for an agricultural worker's dwelling are usually related to the care of livestock rather than arable production. In any event, planning permission would not be required for the farm to intensify its use or to bring cattle/livestock onto the site and therefore the Local Planning Authority would have very limited control over the agricultural use of the site in the future. Given its position on such a working farm, the Local Planning Authority is not satisfied that the proposed use of this building as an unencumbered market dwelling would be particularly appropriate and is likely to result in significant amenity issues for the future occupants in terms of noise, odours, and potentially safety with regards to large machinery and vehicles passing by the principal elevation/front door of the new dwelling and sharing its access.

The wider farm yard is also situated immediately adjacent to a railway line. The Council's Public Protection Officer has also therefore raised concern about the potential noise that could arise from the railway line use and its impact for the residential amenities of the future occupants. It has been confirmed that this matter could not be addressed post determination by condition and needs clarifying before the Local Planning Authority can conclude that the proposals are acceptable.

Given the potential conflict from the adjacent continued use of the farmyard for agricultural purposes; the presence of the railway line and its associated activity; and the absence of any noise assessment to accompany the application, it is therefore considered that the location and siting of this building would be impractical and undesirable for a future residential use and this criterion would **not** therefore be met. If the scheme were considered to satisfy the permitted development criteria set out in Class

Q.1 above, the Council would therefore in any event refuse the prior approval of the scheme on this basis.

(f) *the design or external appearance of the building,*

The existing building is of a size, height and finish that is functional in form and is not particularly attractive. The building is not however of significant size and as a result of the rudimentary openings that have been created in each elevation, currently has quite a domestic appearance and scale. Whilst it was never envisaged for its long term use as a dwelling; and the level of works that have occurred to the building are considered to have gone beyond those acceptable under the criteria in paragraph Q.1 (as discussed above), the building is not visible from the public domain. The existing access track from the Idmiston Road and surrounding public rights of way is long and does not allow views of the existing building. It is also well screened from wider views by the other much larger buildings in this farm yard and/or is well contained by the railway line and site boundaries. It is not therefore considered that the proposed design or external appearance of the building would require further assessment or likely result in any implications for the Special Landscape Area designation to warrant a refusal of the prior approval on this basis.

(g) *the provision of adequate natural light in all habitable rooms of the dwellinghouses*

In this instance, as is seen in the plans provided in PLANs B&C above, new/altered windows are identified in all elevations. This enables all of the habitable rooms and bedrooms proposed in the building to be served by windows. In terms of the requirements of this criterion/Class Q, it is considered that adequate natural light will be provided for all habitable rooms. The proposals are therefore considered to satisfy this criterion.

Class W:

Class W of Part 3 of Schedule 2 of the GPDO sets out the procedure for applying for Prior Approval from the Local Planning Authority for such works that are considered to be permitted development by Class Q of the same part. Criterion (11) of this Class confirms the following:

- (11) *The development must not begin before the occurrence of one of the following—*
- (a) *the receipt by the applicant from the local planning authority of a written notice of their determination that such prior approval is not required;*
 - (b) *the receipt by the applicant from the local planning authority of a written notice giving their prior approval; or*
 - (c) *the expiry of 56 days following the date on which the application under sub-paragraph (2) was received by the local planning authority without the authority notifying the applicant as to whether prior approval is given or refused*

In this instance, as has been set out above, a number of preemptive works have been undertaken to the building in advance of the applicant applying for the prior approval of the Local Planning Authority. These appear to have included the infilling of an open sided elevation; the recladding and reroofing of the building; the addition of new supporting joists to the internal frame; and a new concrete slab. The works have also included some more domesticating elements including the creation of rudimentary openings in the elevations to provide 'windows' and the installation of waste and service. Given the nature of the works, it is considered that these works have been undertaken in readiness for the building's conversion to a residential use rather than for any agricultural need.

The wording of part (11) of Class W confirms that development that requires an application for prior approval cannot be begun before the receipt by the applicant from the Local Planning Authority of a written notice of their determination that such prior approval is not required. It is accepted that any works for the adaptation of the building to the new use that affect only the interior of the building, or which do not materially affect the external appearance of the building, do not amount to development (by virtue of section 55(2)(a)) but their

completion so that the building is ready for imminent occupation for its new use may amount to a change of use so as to constitute the commencement of development for that purpose. Thus, the commencement of such internal and external works identified above that have occurred to this building before the submission of the application and the Local Planning Authority's determination that prior approval is not required, is not permitted development and is therefore unlawful.

This point was confirmed in the case of Rushcliffe [3259439], decided in December 2020. The Inspector noted that works had recently been carried out at the premises, including the installation of a new floor, and new internal blockwork walls. The Inspector considered that these related '*closer to a potential residential use of the building than any intended for agricultural improvement or maintenance*'. As such, the conversion of the building had already commenced, notwithstanding that the works which had been carried out were not development within the meaning of the 1990 Act. The fact that works have been undertaken to the building in readiness for its use as a residential dwelling therefore further confirms that the proposals are not permitted development and this matter will be added to the reason for refusal accordingly.

Other Matters:

The procedural notes for permitted development, in clause 3 of the GPDO raises a few other matters that are also relevant to this prior notification application, and will need to be considered:

- (1) Subject to the provisions of this Order and regulations 75 to 78 of the Conservation of Habitats and Species Regulations 2017 (general development orders), planning permission is hereby granted for the classes of development described as permitted development in Schedule 2.**

As is identified above, whilst the site is not adjacent to a river or in Flood Zones 2 and 3; the site *is* situated within the catchment of the River Avon SAC and therefore has potential to cause adverse effects, alone or in combination with other developments, through discharge of phosphorus in wastewater. The site is also within the 15 kilometre recreational buffer of the New Forest SAC, SPA and RAMSAR sites; and is within the 6.4 kilometre recreational buffer of the Salisbury Plain SPA.

The creation of a new household in this area has potential to increase pressure on these designations. The provisions of the Conservation of Habitats and Species Regulations 2017 (as amended) (Habitat Regs) are therefore relevant to the development. Whilst the matters of ecology and protected species are not issues that are identified in the Class Q criteria for consideration as part of the prior approval process, the procedural notes of the GPDO makes it clear that permitted development rights do not override the requirements of the Habitats Regs and that Regulations 75-78 still apply. The Habitats Regs address the requirements for protecting sites that are internationally important for threatened habitats and species (for example, as is relevant in this instance, SACs and SPAs (often referred to as European Sites)). This includes a requirement for assessment of 'plans and projects' by 'the competent authority' (e.g., the Local Planning Authority) which are likely to have a significant effect on the sites. A separate application under the Regulation 75 and 77 of the Habitat Regs would therefore be necessary for any scheme found to be acceptable within the permitted development provisions of the GPDO.

In this instance however, this scheme has not been found to represent permitted development and in any event its prior approval would have been refused due to its siting and location. This matter is not therefore considered to be relevant in this instance.

- 5) The permission granted by Schedule 2 does not apply if—**
- (a) in the case of permission granted in connection with an existing building, the building operations involved in the construction of that building are unlawful;**
 - (b) in the case of permission granted in connection with an existing use, that use is unlawful**

Similarly to the matter discussed above regarding Class W, the Local Planning Authority is of the view that significant preemptive works have been undertaken to the building in advance of this application; and given the nature of some of these works, these could not be deemed as being essential or necessary for the purposes of agriculture. It is therefore considered that the building operations involved in the construction of the existing building are unlawful; and that the permitted development rights, set out in Class Q of Part 3 of Schedule 2 to the GPDO cannot not apply to this building. Planning Permission would therefore be required to undertake any works or use of the building to regularise the existing situation.

CONCLUSION:

It is considered that the preemptive building operations that have occurred to this building in advance of the submission of the application are unlawful and therefore need regularising. The building cannot therefore benefit from any permitted development rights as set out by the procedural noted in Paragraph 3 - Permitted Development, criteria (5)(a) of the GPDO. As some of the works are also considered to amount closer to a potential residential use of the building than any intended for agricultural improvement or maintenance, it is also considered that the proposed conversion has commenced in advance of the submission or determination by the Local Planning Authority that Prior Approval is not required and therefore the works do not satisfy criterion (11) of Class W of the GPDO in this regard either.

In any event, the proposed extension will extend to the side of the building; and the level of works identified to convert the building for residential purposes that have already taken place and/or are now proposed, are considered to go beyond those allowed by criteria i) and j) of Paragraph Q.1 of Class Q of Part 3 of Schedule 2 to the GPDO and so are not considered to constitute permitted development anyway.

It is also considered that the proposed location and siting of the existing building on an existing active farm; facing out onto other agricultural buildings that are and/or could be brought back into intensive agricultural activity; and adjacent to a railway line, is likely to result in significant detrimental harm for the amenities of any future occupiers of the proposed dwelling. The siting and location of the site/building is therefore considered to be impractical and undesirable for a new dwelling. The proposals are therefore considered to be contrary to the provisions of criterion (e) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the GPDO.

It is therefore recommended that this prior notification application should be refused; and should the applicant wish to pursue the proposed works, a full planning application would need to be submitted for assessment accordingly.

RECOMMENDATION:

Prior Approval be REFUSED for the following reasons:

- 1) The building on the site is considered to be unlawful and cannot therefore benefit from permitted development rights, as per the Procedural Notes (note 3 - Permitted Development, criteria (5)(a)) of the Town & Country Planning (General Permitted Development)(England) Order 2015 (as amended). Furthermore, some of the works that have already occurred to the building are also considered to amount closer to a potential residential use of the building than any intended for agricultural improvement or maintenance, and so it is considered that the works that have occurred already constitute a commencement of the conversion of the building in advance of the submission or determination by the Local Planning Authority that Prior Approval is not required and therefore the works do not satisfy criterion (11) of Class W of the GPDO in this regard either. In any event, the building works that have already occurred to the building and/or are now identified are not considered to satisfy criteria (i) or (j) of Paragraph Q.1 of Class Q of Part 3 of Schedule 2 to the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended). The proposals are not therefore considered to benefit from the provisions of this change of use permitted development right and instead planning permission would be required for the proposed works.

- 2) The proposed development, by virtue of the building's location on an existing active farm; facing out onto other agricultural buildings that are and/or could be brought back into intensive agricultural use; and adjacent to a railway line, is likely to result in significant detrimental harm for the amenities of any future occupiers of the proposed dwelling in terms of noise, odour and incompatible activities. The site/building is therefore considered to be in an impractical and undesirable location for a new dwelling and the proposals are therefore contrary to the provisions of criterion (e) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended).