

TOWN & COUNTRY PLANNING ACT 1990

PLANNING STATEMENT

PROPOSED CONVERSION AND REUSE OF AGRICULTURAL BUILDINGS FOR COMMERCIAL, RESIDENTIAL & HOLIDAY ACCOMMODATION AT

**POUND FARM, STUDLEY HILL TO STANLEY
LANE, STANLEY, CHIPPENHAM, WILTSHIRE,
SN15 3RG**

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Our Reference: LPC.5697

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Appendix A: Appeal APP/J3910/01/1077805
Pound Farm, Stanley, Chippenham

Appendix B: Council Briefing Note No.24-20
Implications of Revised NPPF

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared to support the submission of a planning application seeking full planning permission for the change of use and conversion of the former agricultural buildings at Pound Farm, Studley Hill To Stanley Lane, Stanley, Chippenham, Wiltshire, SN15 3RG to a mix of residential, holiday accommodation, and commercial, business and service uses.
- 1.2 The planning application is supported by a Design and Access Statement by Wood Architects which provides a detailed introduction to the site and the proposed development. This statement will provide a brief description of the location of the site and the proposed development, before providing an overview of the planning policy context and an assessment of the key material planning considerations, demonstrating the proposal's acceptability.

2.0 SITE DESCRIPTION & PLANNING HISTORY

- 2.1 The application site comprises the redundant agricultural buildings at Pound Farm. The agricultural buildings lie to the north-east of the Grade II Listed farmhouse which has recently been renovated. The site lies within the 'countryside' approximately 3 kilometres south-east from the centre of Chippenham.



Plan Identifying Location of Site

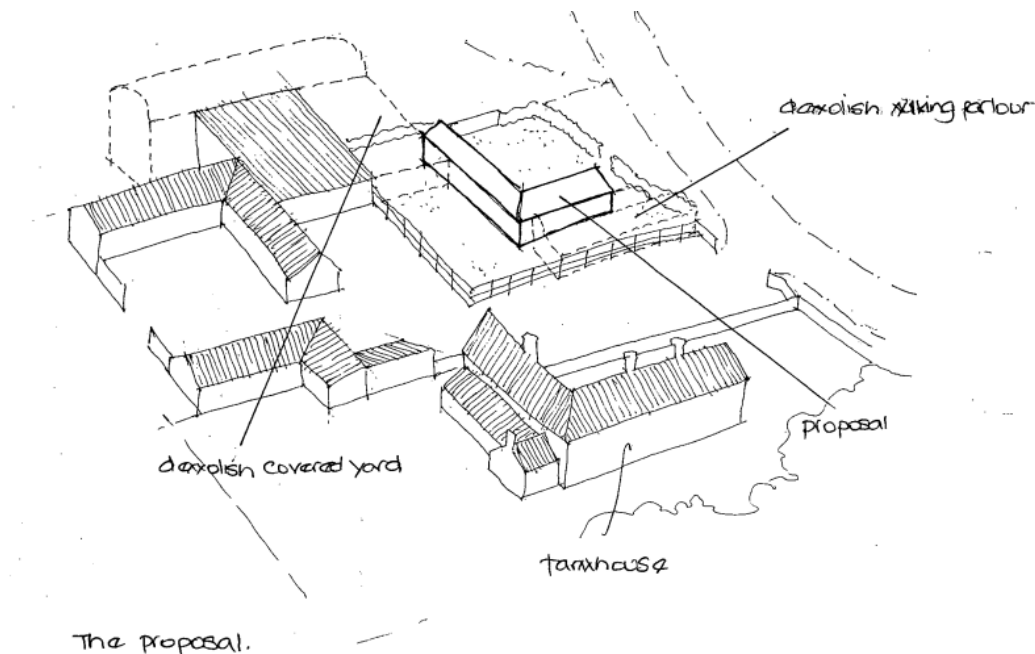
2.2 In terms of the planning history of the property, the listed farmhouse has been the subject of recent applications which relate to its repair and renovation, and there has been one previous application to change the use of the Granary building to a holiday let. The applications are as follows:

- **Listed Building Consent application PL/2023/03017** - Internal refurbishment of Grade 2 listed house to include: Repair of lime plaster to walls & ceilings; Concrete kitchen floor replacement; Lowering window to kitchen; Electrical rewiring; Installation of new bathroom; External lime pointing - Granted 25/07/2023
- **Planning application PL/2023/03020** - Replacement of windows, orangery glazing; replacement of skylights; opening of blocked-up doorway; installation of air source heat pumps and underfloor heating - Granted 14/07/2023
- **Listed Building Consent application PL/2023/03188** - Replacement of windows, orangery glazing; replacement of skylights; opening of blocked-up doorway; installation of air source heat pumps and underfloor heating - Granted 14/07/2023
- **Listed Building Consent application 14/08251/LBC** - Conversion of Store Room to Wet Room & Store Area - Granted 01/05/2015
- **Planning application N/01/01821/COU** – Change of Use of Agricultural Building (*Granary Building*) to Holiday Let – Refused 25/10/2001. Allowed at Appeal 11/03/2002

2.3 The older permission to convert the Granary building was not implemented but the building remains in place and is part of the developments the subject of this current planning application. The drawing below from application N/01/01821/COU shows the layout of the farmyard and identifies the Granary building.

2.4 The application was allowed at appeal where the Inspector noted that the main issue associated with the appeal was the effect the proposed development would have on the character and appearance of its rural surroundings. The Inspector concluded that “while the work involved in conversion would be extensive, the proposal would respect the character

of the building itself and, importantly, would benefit the character and setting of the listed farmhouse” (par 12).



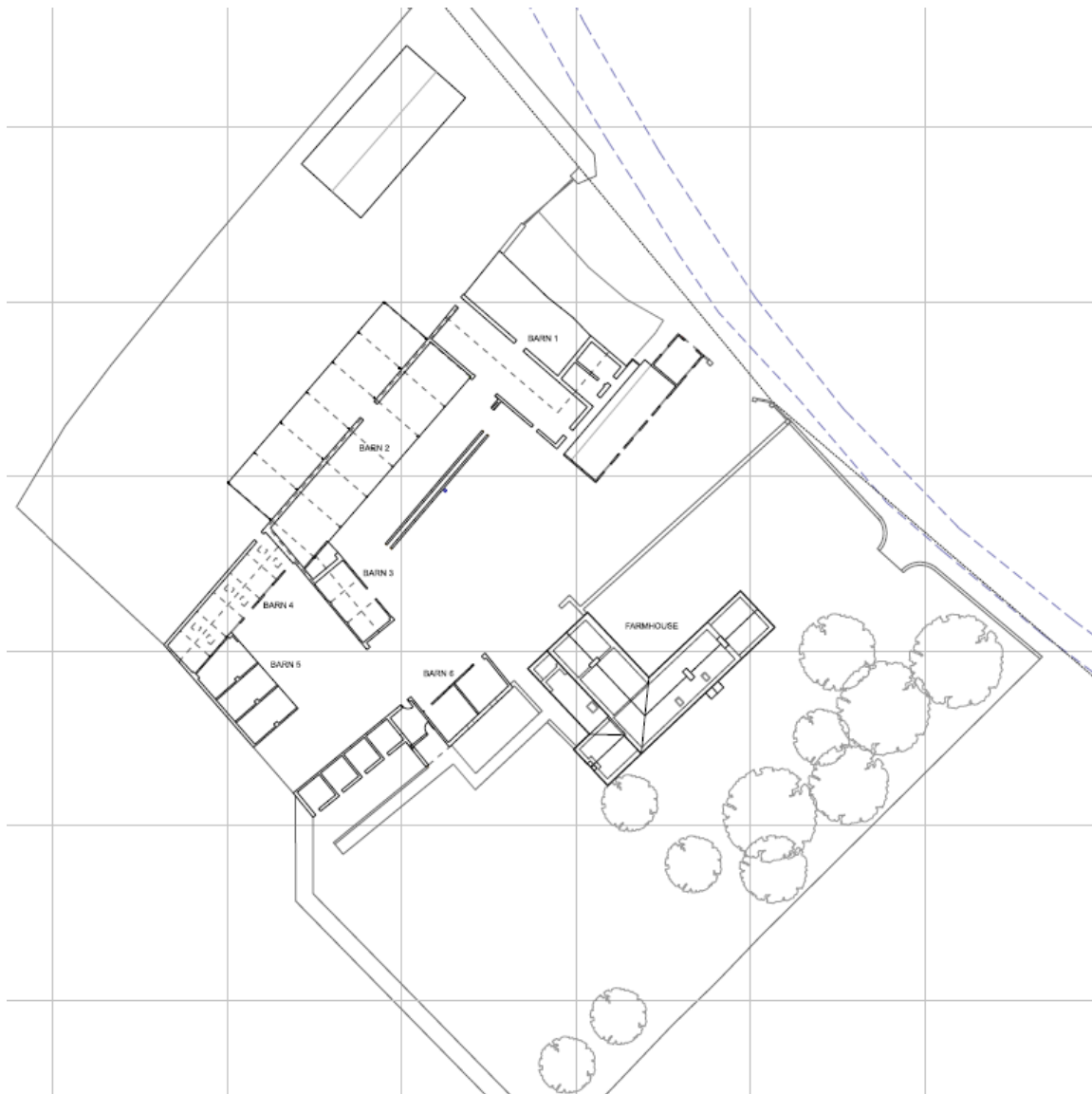
Planning Permission N/01/01821/COU – Proposed Drawing

2.5 The more recent planning permission and listed building consents, which allow the renovation of the dwelling house, have been implemented and associated conditions discharged where relevant (application ref PL/2023/07272). The works have been completed by the applicant who occupies the property with his family, and now that the long term future of the listed building is secured as a family home attention turns to the redundant outbuildings, which are identified on the submitted Existing Site Plan, an extract of which is below identifying barns 1 – 6.

2.6 The applicant therefore submitted the following pre-application enquiry:

- Pre-application Enquiry reference ENQ/2025/00171: Proposed Redevelopment of Farmyard for 1. Holiday accommodation - A mixture of self-contained holiday lets. 2. Commercial, business & service space - Office space for the owner's Architectural Studio and business operations - Artists studios & creative workshops. 3. Market rental- Long term market rental 4. Family accommodation (granny annex).

2.7 The Local Planning Authority provided a written response on the 08 July 2025 stating that “proposal to regenerate the existing farmstead into a mixed use development is broadly considered to be an approach that could give rise to significant benefits (economic/employment/provision of tourist accommodation)”. The written feedback followed a productive site meeting with the Case Officer on the 20 May 2025 where key material planning considerations were discussed within the context of broad support for the redevelopment of the brownfield site. This application presents the full masterplan for the redevelopment of the farmyard as advised by the Case Officer and addresses the constructive feedback received.

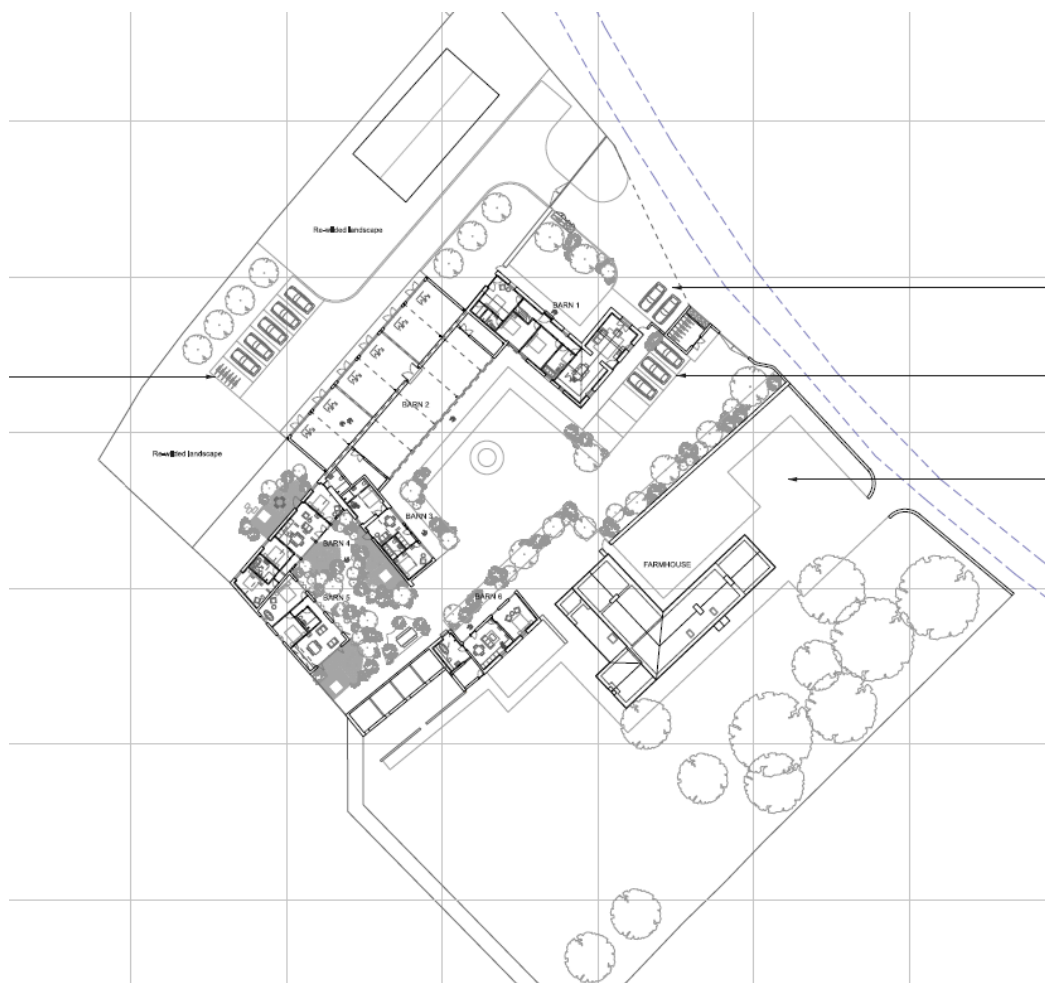


Existing Site Plan – Drawing No.X-001

3.0 PROPOSED DEVELOPMENT

3.1 The application seeks permission to change the use and convert the redundant agricultural buildings to a mixture of residential and commercial uses. The Design and Access Statement prepared by Wood Architects provides full details of the proposed scheme, including a summary of the proposed uses for each barns 1 – 6:

- Barn 1: Residential Unit - Market rental (Use Class C3)
- Barn 2: Commercial, business & service space (Use Class E), to include:
 - Office space for the owner's Architectural Studio and business operations.
 - Artists studios & creative workshops
 - Events space for local community events and gatherings
- Barns 3, 4 & 5: Holiday accommodation
- Barn 6: Granny annex / holiday accommodation



Proposed Site Plan – Drawing No.P-001

- 3.2 The scheme involves introducing a complementary range of uses but each would be low key and have a low number of vehicular movements. The intention of the owners is convert the central barn to a rural architecture studio for their own business and offer workspaces for local craftspeople in order to serve and support the local rural economy.

4.0 PLANNING POLICY CONTEXT

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

- Chapter 2 – Achieving Sustainable Development
- Chapter 4 – Decision-making
- Chapter 5 – Delivering a Sufficient Supply of Homes
- Chapter 9 – Promoting Sustainable Transport
- Chapter 11 – Making Efficient Use of Land
- Chapter 12 – Achieving Well-designed Places
- Chapter 15 – Conserving and Enhancing the Natural Environment
- Chapter 16 – Conserving and Enhancing the Historic Environment

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

Local Planning Policy

- 4.3 The development plan relevant to the developments the subject of the pre-application enquiry include the Wiltshire Core Strategy (WCS) (adopted January 2015) (which includes saved North Wiltshire Local Plan policies) and the Bremhill Parish Neighbourhood Plan (BPNP) (made 2018). The

key policies relevant to the assessment of the proposed developments are considered to be:-

Wiltshire Core Strategy

- Core Policy 1: Settlement Strategy
- Core Policy 2: Delivery Strategy
- Core Policy 8: Spatial Strategy for the Calne Community Area
- Core Policy 44: Meeting Wiltshire's Housing Needs
- Core Policy 48: Supporting Rural Life
- Core Policy 50: Biodiversity and Geodiversity
- Core Policy 51: Landscape
- Core Policy 57: Ensuring High Quality Design
- Core Policy 58: Conservation of the Historic Environment
- Core Policy 60: Sustainable Transport
- Core Policy 61: Transport and Development

North Wiltshire Local Plan

- Policy H4: Residential Development in the Open Countryside
- Policy NE18: Noise and Pollution

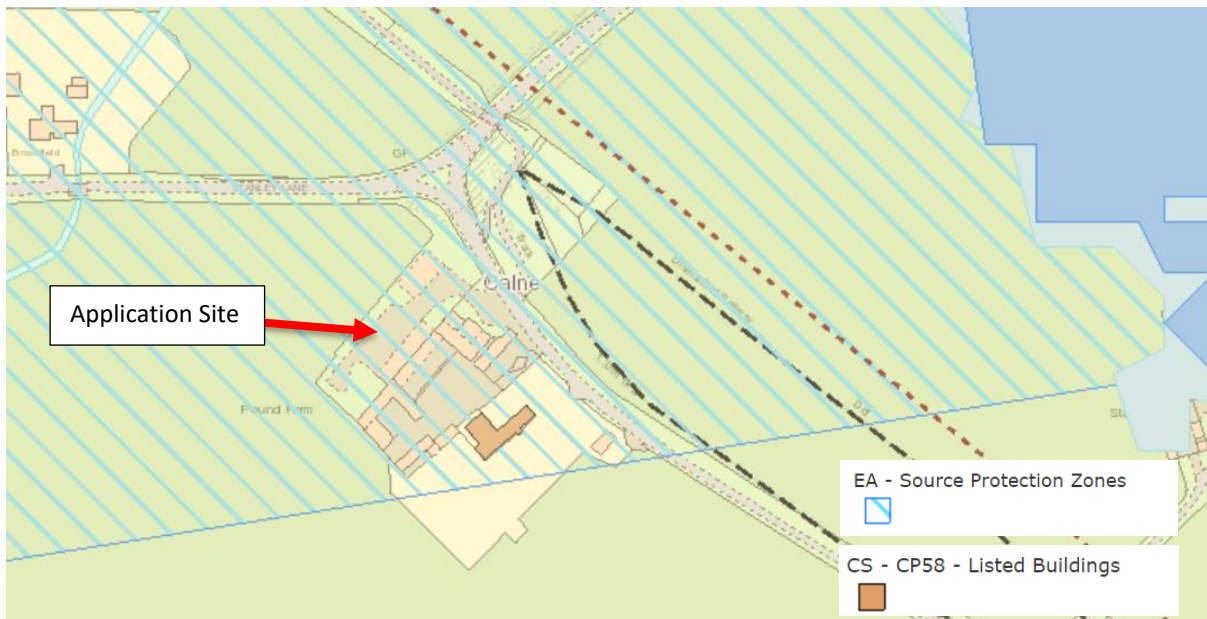
Bremhill Village Neighbourhood Plan

- Policy NP1: General Development
- Policy NP2: Bremhill Village Landscape
- Policy NP4: Biodiversity

4.4 The following Supplementary Planning Documents and Historic England Guidance Notes are also relevant in the determination of this application:

- Wiltshire Local Transport Plan 2011 – 2026: Car Park Strategy
- Wiltshire Council Design Guide (2024)
- Farm Buildings and Traditional Farmsteads (2010)
- National Farmstead Assessment Framework (2015)

4.5 The adopted Local Plan is accompanied by the Policies Maps, which provides a spatial representation of the Local Plan policies. The site is not subject to any national or local landscape designations. The site lies within Flood Zone 1 and is within Source Protection Zones: 2c identified by the Environment Agency.



Local Plan Policies Map

Emerging Planning Policy

- 4.6 The WCS was adopted in 2015 and is currently under review. The Council submitted the draft Wiltshire Local Plan to the Secretary of State for independent examination on 28 November 2024. There are no fundamental changes proposed to the Spatial Strategy of the Local Plan, as presented within Pre-Submission Draft (2020 – 2038) (Regulation 19) Wiltshire Local Plan (September 2023). However, a number of the policies from the WCS which are applicable to the development currently proposed will be updated. As such, they are considered relevant to this current application as explained in the following section.
- 4.7 The NPPF confirms that appropriate weight may be given to policies in emerging plans according to the stage of preparation of the emerging plan and the degree of consistency of the relevant policies in the emerging plan with national policy (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given) (par 49). The following draft Wiltshire Local Plan are considered relevant:-

- Policy 1: Settlement Strategy
- Policy 2: Delivery Strategy
- Policy 82: Housing in the Countryside

5.0 KEY ISSUES AND PLANNING ASSESSMENT

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

- i) Principle of Development
- ii) Impact on Local Natural and Historic Environment
- iii) Impact on Ecology

Principle of Development

Proposed Uses

5.2 The WCS includes a Spatial Strategy which sets the foundations for how ‘sustainable development’ is defined and applied within Wiltshire. It has three key elements; a Settlement Strategy, Delivery Strategy and Infrastructure Requirements. The settlement and delivery strategies define where development will be the most sustainable across Wiltshire’s settlements. The WCS states that “If a development proposal does not accord with the Core Strategy it is deemed unsustainable and will not be supported” (WCS, paragraph 47).

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

5.4 The WCS ‘exception policies’ that permit new development within the countryside, in line with the Delivery Strategy outlined in Core Policy 2, are listed within paragraph 4.25 and includes Core Policy 48 ‘Supporting Rural Life’. The policy outlines the type of development permitted within the

‘countryside’ to support rural communities and includes the conversion and re-use of rural buildings. It stipulates that proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy a set criteria, but if they are not practical propositions residential development will be considered. The relevant section of Core Policy 48 is as follows:-

Conversion and re-use of rural buildings

Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy the following criteria:

- i. The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building.
- ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.
- iii. The building can be served by adequate access and infrastructure.
- iv. The site has reasonable access to local services.
- v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.

Where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria. In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances, in line with national policy.

5.5 The proposed development seeks to change the use of Barn 2 to commercial, business & service space and Barns 3 – 6 to holiday lets which are supported in principle by Core Policy 48. The pre-app feedback noted that “The council is aware there is a general need for tourist accommodation within Wiltshire and the location close to the cycle route would appear to be able to support some level of holiday let accommodation”. The evidence that underpins the emerging Wiltshire

Local Plan also indicates there is a need and desire to secure new holiday accommodation in rural areas:

“Luxury, boutique and high-quality hotel and visitor accommodation businesses perform strongly in Wiltshire and represent an opportunity to attract lucrative markets. There is scope for additional supply at the higher end of the offer through the upgrading and repositioning of existing stock and the opening of new establishments. However, to support projected growth in the sector, visitor accommodation studies for the county identify a lack in many types of different accommodation. Opportunities for growth include: budget accommodation; holiday parks and eco lodges; boutique hotels in market towns; glamping, camping and caravan sites; pub and farm stay accommodation; activity holidays and residential centres.

If the county is to compete successfully and attract market segments that risk going elsewhere, it needs more of the above types of accommodation in rural settings. There is also a need to recognise that rural hotels and tourism businesses may benefit from permanent accommodation to aid the retention and attraction of staff and facilitate year-round operation” (WLP Paragraphs 5.31 – 5.32) (emphasis added).

- 5.6 The commercial use will be focused around the applicant’s own business and provide space for other local and rural based businesses. The pre-app feedback noted that “In broad terms these commercial uses would provide some benefits to the local economy that can be given positive weight in the overall balance”.
- 5.7 The proposed residential uses of Barn 1 is also supported by national and local planning policy and the pre-app feedback stated that “the size and location of the proposed unit (nearer to the site frontage) could lend itself better to a residential than a commercial use”. Core Policy 48 permits the conversion and re-use of rural buildings to dwellings provided it can be

demonstrated that employment, tourism, cultural and community uses are not practical propositions. The WCS does not define what is meant by 'practical propositions' and does not identify the evidence that needs to be submitted. In order for alternative uses to be viable and practical propositions they would need to be capable of being accommodated within the building, compatible with other established use, financially and technically viable, and would have to comply with other policies of the plan. It is evident that each case has to be determined on its own merits using planning judgement and a flexible and logical application of this test has been applied by the Council elsewhere.

5.8 The policy is now however out-of-date because since the adoption of the WCS there has been a material change in planning policy around the conversion of rural buildings. There are now permitted development rights that allow the conversion of rural building to dwellings and this is reflected within the emerging Wiltshire Local Plan (WLP). The Pre-Submission Draft 2020 – 2038 of the WLP explains that the policy is to be “updated and reframed as a housing exceptions policy, rather than a general rural policy. Housing elements of the policy are updated considering changes to the National Planning Policy Framework, the GPDO and to improve legibility” (p.300). The new draft Policy 82 'Housing in the Countryside' provides support for the conversion of rural buildings to dwellings.

5.9 The Bremhill Neighbourhood Plan also provides support for new dwellings within the countryside in certain circumstances. The Housing objective of the plan is to provide up to 20 dwellings to meet local need in the Parish of Bremhill. This will be achieved through:

- **permitting** small-scale infill sites and **conversions within the Parish.**
- supporting the **redevelopment of some brownfield sites to mixed uses.**
- making sure that developments include a mix of housing suited to local needs.

- 5.10 Policy NP1 ‘General Development’ states that “Proposals for converting farm buildings to dwellings will be supported, subject to the building being capable of conversion without major rebuilding or structural works”.
- 5.11 It is clear that both the national and local planning policy context provide support for the conversion and re-use of rural buildings for an unrestricted residential use. In addition to the support for residential development, the Local Plan provides broad support for conversion of rural buildings for alternative employment, tourism, cultural and community uses as noted above. This reflects the policies of the NPPF which states that planning policies and decisions should enable:
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses;
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 5.12 The proposed development involves the change of use and conversion of the agricultural buildings to an open market dwelling, holiday lets and a flexible commercial space. It is considered that both national and local planning policies, as outlined above, provide in-principle support for these uses. This was confirmed during by the Council as part of the pre-application feedback however it is recognised that the policies require a certain criteria to be met as discussed in the following section. It is also worth highlighting that any concern Officers may have about the acceptability of the proposed residential use of Barn 1 (Granary Building) would be outweighed within the context of the ‘tilted balance’ due to the Council’s housing land supply shortfall as discussed further below.

WCS Core Policy 48 and BVNP Policy NP1

Conversion & Repair of Barns 1 - 6

- 5.13 The policies of Local Plan require rural buildings to be structurally sound and capable of conversion without major rebuilding or structural work. The range of agricultural buildings at Pound Farm are of a different age and construction. The intention is to remove the more modern additions and repair and convert the traditional buildings. The pre-application feedback acknowledged the different form, age and condition of the buildings and advised that as some of the buildings will require works to bring them back into a viable use the works should be informed by both a Structural Survey and Statement of Significance. This application is therefore supported by a Structural Survey by Cooper Associates Consulting Structural Engineers which demonstrates the buildings are capable of retention, repair and conversion, in line with criteria i of Core Policy 48. The scheme is also informed by a Heritage Statement as discussed further below.
- 5.14 Criteria i of Core Policy 48 allows rebuilding work (provided it is not ‘major’) and necessary extension or modification provided it preserves the character of the original building. The scheme does not seek to extend buildings, but rather remove modern additions and convert and restore the buildings without increasing their footprint. The Design and Access Statement provides a visual overview of the masterplan which demonstrates the built form of the farmyard will be retained.
- 5.15 The pre-application enquiry advised that the conversion of the Granary building (Barn 1) requires the most amount of work which is recognised. The submitted Feasibility Study Report / Structural Survey by Cooper Associates Consulting Structural Engineers outlines that the areas of wall and most of the existing modern concrete ground slab can be retained, subject to some remedial works. The defective roof, which is modern in the context of this building, will be removed and replaced. The proposed development will retain as much of the original building as possible but overall the general form, character and appearance of the building will be

respected and retained. While some time has passed since the previous planning permission to convert the building, there has been very little change to the building itself therefore the previous conclusion of the Inspector remains relevant:-

“I have come to the view that the form, bulk, and general design of the existing building, when converted, would be in keeping with its surroundings. While the extent of the work involved is at the limit of what is acceptable in the conversion of existing buildings to new uses, the proposal would result in an improvement to the setting of the listed farmhouse” (emphasis added) (paragraph 10).

- 5.16 The building will not be extended, which is permitted by the policy, and the modifications and repairs will be limited to secure its conversion and preserve the character of the original building (criteria i of Core Policy 48). The proposed development is limited to the conversion of the building to a dwelling which would have a small curtilage. There would be no discernible impact on wider landscape character as a result of the development and there would be no impact, as a result of overlooking etc, on the amenities of the occupiers of neighbouring residents (criteria ii). The building has good existing access arrangements and already benefits from access to mains electricity, water and sewer infrastructure associated with Pound Farm (criteria iii). The site has reasonable access to local services (criteria iv) which is discussed further below.
- 5.17 The building is not a designated heritage asset, however it has some local heritage value because it forms part of the historic farmstead and is associated with the Grade II Listed farmhouse. The conversion of the building will secure its long term future and would contribute positively towards the significance of the Listed Building by improving its setting. The conversion of this building is also a fundamental part of the wider masterplan and important to retain the original plan form of the farmyard.

Site Location and Sustainability

- 5.18 The site lies within the ‘countryside’ however it is not remote or isolated being within close proximity to the ‘Principal Settlement’ of Chippenham which is accessible on foot, car or private (electric) vehicle. The development would have ‘reasonable access to local services’, which is the Core Policy 48 requirement. The site is a short drive from Chippenham and is accessible off-road on bike or foot. The North Wiltshire Rivers Cycle Route is directly to the north of Pound Farm and runs towards Chippenham. The Cycle Route also leads to Calne in the other direction. The site has good access onto the local highway network and is served by the necessary infrastructure. The proposed development will provide ample cycle parking spaces and storage to ensure the use of the cycle network is maximised.
- 5.19 It must be recognised that the proposal is being assessed under an exception policy that permits dwellings in the countryside where the use of the private car will not be uncommon. Indeed, paragraph 110 of the NPPF recognises that “opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”. The proposed development would not therefore be in conflict with Core Policies 60 ‘Sustainable Transport’ and 61 ‘Transport and Development’ which seek to ensure new development is within a sustainable location.
- 5.20 An Inspector applying the same policies to a barn conversion proposal (appeal reference 3284520) summarised that “Core Policies 60 and 61 of the CS generally underline the spatial strategy by requiring new development to be in accessible locations in order to contribute towards reducing the need to travel, particularly by private car. However, they do not seek to thwart the exception policies of the CS. This aligns with paragraph 105 [*now 110*] of the National Planning Policy Framework (the Framework) which allows for the variance between urban and rural areas to maximise opportunities for sustainable transport solutions to be taken into account in plan-making” (paragraph 4).

- 5.21 The second strand to Core Policy 48 specifies that “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”. This refers to the text within paragraph 84 of the NPPF which outlines that “Planning policies and decisions should avoid the development of **isolated** homes in the countryside unless one or more of the following **circumstances** apply: ... c) the development would re-use redundant or disused buildings and enhance its immediate setting; ...” (par 84).
- 5.22 The NPPF does not define what ‘isolated’ means in the context of paragraph 84, however the decision in the Court of Appeal, in Braintree District Council v SoS 28/03/2018, has clarified that ‘isolated’ in the NPPF means physically isolated. The application site is within close range of the ‘Principal Settlement’ of Chippenham and other surrounding settlements and is not therefore a remote or isolated countryside location. Notwithstanding this, even if an alternative view is taken the proposal is considered to align with the national and local policy objective because the proposal will re-use the redundant buildings and enhance their current appearance and its immediate setting, as set out within the Heritage Impact Assessment.
- 5.23 The pre-application feedback did however note that whilst the site is within the ‘countryside’ it is “not necessarily unsuitable due to the proximity of the protected cycle route that extends to the northwest into Chippenham and links to Calne” as mentioned above. It was advised that “The location could be considered accessible and, with some consideration of how sustainable modes of transport can be encouraged by future users of the site, it can be considered to be a location with potential to be able to promote sustainable transport”. The site certainly does offer this potential and all users and occupiers will be encouraged to use the direct links to Chippenham and Calne via bicycle with on-site parking for bicycles provided.

- 5.24 In light of the above, it is considered that the principle of the proposed development is supported by a key national planning policy objective which allows the conversion of rural building to dwellings and both strands of Core Policy 48 as outlined above.

Impact on Natural and Historic Environment

- 5.25 Criteria point ii. of Core Policy 48 seeks to ensure that developments involving the conversion and change of use of rural buildings will not detract from the character or appearance of the landscape or settlement, and criteria v. provides support for schemes that would lead to the viable long term safeguarding of a heritage asset. These objectives are reflected within Core Policies 51 'Landscape' and 58 'Heritage' of the WCS which seek to secure high quality design in all development and ensure there is no harm the character of the landscape or designated heritage assets.
- 5.26 The site does not lie within a designated landscape but is associated with, and within the immediate setting of, the Grade II Listed farmhouse. The proposed development will not harm the heritage significance of the property but enhance the setting of the listed building.
- 5.27 The NPPF advises that for heritage policy, 'significance' means "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting". The setting of a heritage asset involves the surroundings in which a heritage asset is experienced. "Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral" (p75).
- 5.28 Pound Farmhouse is a Grade II Listed Building (ref 1199331). It was first listed in 1987 and the official listing description is as follows:

BREMHILL STANLEY ST 97 SE 8/64 Pound Farmhouse II Farmhouse, C18, possibly on earlier core, extended in C19, rubble stone with stone

slate roof and ashlar ridge stacks. L-plan, two storeys, the end bays of each range apparently C19 additions with barge boarded gables. Main front has double-fronted centre with 6- panel door in C19 gabled barge boarded timber porch, brick cambered heads to windows to left, a triple casement below, casement pair above and plain casement pair each floor to right. Ridge stack to left of door and at original right end. C19 bay added at right end is of squared rubble with one ground floor 12-pane sash. Left end has roof hipped at angle and one-window range of plain casement pairs. C19 endbay has end-wall 12-pane sash each floor. Rear of main range has plain casement pair each floor to left and cambered- head casements and blocked door to right. Rear wing has ridge stack, 2-window range of cambered-head triple casements in stone surrounds and blocked cambered-head door to left. Twelve-pane sash each floor in end gable

5.29 The listing does not refer to the associated agricultural outbuildings, however it is recognised that section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 says that a Listed Building includes an object or structure attached to the building, and can also include any ancillary object or structure within the curtilage of the building, which forms part of the land and has done so since before 1st July 1948.

5.30 Historic England's Advice Note 10 on 'Historic Buildings and Curtilage' advises that the curtilage of a building (the principal building) is in general terms any area of land and other buildings that is around and associated with that principal building. There are three key factors to be taken into account in assessing whether a structure or object is within the curtilage of a listed building:

- the physical layout of the listed building and the structure;
- their ownership, both historically and at the date of listing; and
- the use or function of the relevant buildings, again both historically and at the date of listing

5.31 The majority of the agricultural buildings pre-date 1st July 1948. The residential curtilage of the dwellinghouse is however well defined and separate from the farmyard and agricultural buildings. There is a clear distinction in use i.e. domestic nature of farmhouse and agricultural use of outbuildings, albeit there is a clear physical relationship between the farmhouse and agricultural buildings in terms of their layout and proximity.

- 5.32 It is recognised that the Inspector noted during the assessment of application N/01/01821/COU that “The building is a prominent feature of the farmyard attached to the farmhouse. It seems to me that, as a curtilage building, it could be protected by the farmhouse listing. In any event, I consider that it forms an essential part of the setting of the farmhouse” (par 8).
- 5.33 The Inspector went on to state that “The restoration of the building to something like its original form seems to me to be an opportunity to ensure that the character and setting of the listed farmhouse and its yard would at least be preserved and, more likely, improved” (par 8). The Granary building remains within a similar condition and the current proposal involves restoring the building as previously approved to ensure the improvement to the setting of the listed building is now delivered.
- 5.34 This planning application is now however supported by a Heritage Impact Assessment by Assert Heritage Consulting which considers the significance of all buildings at the application property. The assessment concludes that Barns 1 – 6 cannot be considered to be curtilage listed and “the application proposals would not merely preserve but enhance the contribution that its setting makes to the significance of the listed Pound Farmhouse, better reflecting its historic agricultural character than the ill-kemp form of the existing yard”.

Impact on Ecology

- 5.35 The NPPF advises that new developments should protect and enhance biodiversity and geodiversity (paragraph 185) and Core Policy 50 ‘Biodiversity and Geodiversity’ of the WCS outlines that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.

- 5.36 The application site consists of an area of previously developed land and is not covered by any local, national or European nature conservation designation. However, due to the requirements of Core Policy 50 the application is supported by a Preliminary Ecological Appraisal and Bat Surveys which confirm the proposed development will not have an impact on any protected species. Furthermore, the application is supported by a Biodiversity Net Gain assessment which demonstrates the 10% requirement can be achieved on site.

6.0 HOUSING NEED & LAND SUPPLY

- 6.1 The NPPF states it is important that a sufficient amount and variety of land can come forward where it is needed to support the Government's objective of "**significantly boosting the supply of homes**" (emphasis added) (paragraph 60). The level of need identified within the development plan should not be seen as an upper limit, and new development that is otherwise sustainable should not automatically be refused, in particular in the context of the Council's housing land supply position.
- 6.2 It should be highlighted that paragraph 4.25 of the WCS states that the developments delivered through the exception policies represent additional sources of supply, of dwellings and employment land, to those identified in paragraphs 4.22 and 4.24 i.e. strategic allocations, existing commitments, windfall sites etc. This is an important point considering the Council's current housing land supply position, as identified below, and the weight to be attributed towards the benefits of the development, in terms of delivering a residential unit to help meet local need, and site specific heritage benefits.
- 6.3 The Council's most up to date Housing Land Supply Statement (HLSS) (Base date: April 2024 / Published June 2025) details that it has 2.42 years of deliverable housing land supply. The Wiltshire Local Plan (WLP) will identify future levels of need for new homes and employment land over the period 2020-2038, and it has reached the Examination stage. However, the evidence that underpins the draft WLP was prepared in accordance

with the now superseded December 2023 version of the NPPF and the examination stage has now been paused to allow the Council to undertake further work, the extent of which is currently undefined.

- 6.4 The Council published a Briefing Note (No.24-20) (available to view in Appendix B) which set out the implications of the new NPPF and revisions to the standard methodology on its housing land supply position. It explains that due to the change to the standard methodology, which is used to calculate local housing need, the number of homes the Council must plan for on an annual basis has increased from 1,917 to 3,525 (the annual Local Housing Need figure), an increase of 84%.
- 6.5 The Briefing Note explains that “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”. When the revised Local Housing Need figure is considered against the Council’s Housing Land Supply figures which can be delivered within five years, it results in **a 2.03 years supply** (*now 2.42*).
- 6.6 The Council therefore confirms that the tilted balance should be applied to housing application and highlights that “**the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply**” (emphasis added). The Council also advises within the Briefing Note that the application of the presumption in favour of sustainable development should be considered within the national aim of radically boosting the supply of housing.
- 6.7 In these circumstances, NPPF paragraph 11d advises that policies which are most important for determining the application (which in this case would include Core Policies 1, 2 and 8) should not be considered up to date. As a result, the presumption in favour of sustainable development as set out at Paragraph 11d of the Framework is engaged, so permission should be granted unless 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.

- 6.8 There are no policies within the NPPF, which aim to protect areas or assets of particular importance, that provide a strong reason for refusing the proposed development. The tilted balance is therefore engaged, however the proposed development is considered to be policy compliant as set out above, and therefore there would be no planning harms that would “significantly and demonstrably outweigh the benefits” of the development. The Planning Officer also indicated during the pre-application site visit that the conversion of Barn 1 would be considered positively in light of the Council’s housing land supply position and the application of the tilted balance.
- 6.9 The same conclusion has been reached by Inspectors in similar cases for the conversion of rural buildings. One example being a case for the conversion of an agricultural building to a tourist let and then self-contained dwelling under Core Policy 48 near Devizes (appeal reference 3261091). Paragraphs 15 and 16 of the decision were as follows:-
- 15. The Council accepts that it cannot demonstrate a 5 year housing land supply. Whilst the shortfall is not great, it has worsened in the time that the appeals have been under consideration. Although there is no shortfall in this particular part of the county, this does not prevent paragraph 11(d) of the National Planning Policy Framework from being applied here, and the relevant policies most important for determining the appeal are out-of-date. There are no policies applicable here which protect areas or assets of particular importance, and thus the presumption in favour of sustainable development applies.*
- 16. I have identified small harm arising from the need to travel, along with a conflict with the development plan. Although the addition of the dwelling to the housing stock would make the smallest possible increase, in view of the importance which the Government attaches to increasing the supply of housing, I give this benefit modest weight. Weighing these factors, I find the adverse effects of allowing the appeals would not significantly and demonstrably outweigh the benefits.*
- 6.10 The contribution made by the approval of minor developments and single dwellings throughout the Wiltshire Council area towards addressing

housing need should not be underestimated and now has greater importance considering the Council's substantial housing land supply deficit and the Government's objective to radically boost the supply of housing, as identified by the Council within the aforementioned Briefing Note.

7.0 CONCLUSION

- 7.1 The application seeks full planning permission for the change of use and conversion of the traditional agricultural buildings at Pound Farm. The development would secure sustainable long term uses for the buildings in line with the Spatial Strategy and exception policies of the Local Plan. The buildings would be sensitively repaired and converted which would enhance the appearance of the site and contribute positively to the settling of the Listed Farmhouse.
- 7.2 The site falls within the 'countryside' but is well related to the 'Principal Settlement' of Chippenham and therefore within reasonable distance of a range of local services and facilities. The exception policies of the Local Plan allow the conversion of rural buildings within the countryside and therefore the principle of the proposed development should not be considered contentious. The proposed development is limited to repairs, modifications and the conversion of the former agricultural buildings that will restore their original form, character and appearance and in turn will result in an enhancement to the environment within the immediate setting of the Grade II Listed Pound Farmhouse.
- 7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The proposal benefits from the presumption of sustainable development (Paragraph 11.d.ii of the NPPF / the tilted balance) which advises that planning permission should be granted unless 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.

- 7.4 Notwithstanding the above, the proposed development is considered to align with the objectives and policies of the Local Plan. However, should the tilted balance be applied, it is important to note that the proposed development would deliver both social, economic and environmental benefits and there would be no planning harms that would result from the development. There would therefore be no adverse impacts associated with the granting of planning permission that would significantly and demonstrably outweigh the benefits.
- 7.5 In light of the above, having considered the individual planning merits of the proposal, it is considered that the material considerations indicate that planning permission should be granted. It is therefore respectfully requested that full planning permission be granted.

Appendices

Appendix A: Appeal APP/J3910/01/1077805
Pound Farm, Stanley, Chippenham





Appeal Decision

Site visit made on 12 February 2002

by **C J Ball** DArch DArchCons RIBA IHBC FRSA

an Inspector appointed by the Secretary of State for Transport,
Local Government and the Regions

AD 2406

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2406

Date

11 MAR 2002

Appeal Ref: APP/J3910/A/01/1077805
Pound Farm, Stanley, Chippenham

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
- The appeal is made by Messrs Tutchers against the decision of North Wiltshire District Council.
- The application (Ref.01/01821/COU), dated 24 July 2001, was refused by the Council by notice dated 24 October 2001.
- The development proposed is the conversion of an agricultural building to a holiday cottage.

Summary of Decision: The appeal is allowed and planning permission granted subject to conditions set out in the Formal Decision below.

Procedural matters

1. The application encompasses the change of use of the building in principle and the proposed building works necessary to put the change of use into effect. I shall deal with the appeal on that basis.

Main issue

2. I consider the main issue in this appeal to be the effect the proposed development would have on the character and appearance of its rural surroundings.

Planning policy

3. The development plan for the area includes the North Wiltshire Local Plan Review 1995. Policies relevant to this appeal are Policy RTM2, which sets out the criteria for the provision of tourist accommodation in the countryside, and Policy RTM2A, which generally permits the adaptation of existing buildings for tourist accommodation where the form, bulk and general design of the existing building is in keeping with its surroundings, and subject to the proposed use and works meeting specified requirements. I shall also take account of the government advice set out in PPG7 *'The Countryside - Environmental Quality and Economic and Social Development'*
4. Pound Farm farmhouse is listed grade II for its special architectural and historic interest. In considering this appeal, I am required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building or its setting. I shall be guided in this by the government advice set out in PPG15 *'Planning and the Historic Environment'*.

Reasons

5. Pound Farm lies some 2 miles south-east of Chippenham, in open countryside. The farmyard contains a mix of traditional and modern buildings, some in a poor state of repair. The building in question is a single storey cattle holding shed and store, of traditional construction, although a major part of the roof has been lost and replaced with low pitched steel sheeting. Ugly modern additions to the building would be removed. The adjacent milking parlour and covered yard would both be demolished, allowing the building to stand in a separate plot fronting the road. The building is intended to be used for holiday visitor accommodation as part of a farm diversification scheme.
6. Paragraph 3.14 of PPG7 confirms that the re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial development, including tourism. It goes on to say that there should be no reason for preventing the conversion of rural buildings for business re-use provided, among other things, they are of permanent and substantial construction, their form, bulk and general design are in keeping with their surroundings and they are capable of conversion without major or complete reconstruction. This approach is broadly reflected in Policy RTM2A.
7. The building is of substantial traditional construction but is not in the best state of repair. Some of the walling is in poor condition and it would be necessary to provide a new roof structure for the majority of the building. However, this would be no more than work necessary to return the barn to its original form. No major alterations are proposed and much of the work could be classified as repair rather than reconstruction. There is no doubt that a substantial amount of work would be required to put the building into re-use. To my mind, the question of whether this would be so extensive that it would be tantamount to the erection of a new building is finely balanced.
8. The building is a prominent feature of the farmyard attached to the farmhouse. It seems to me that, as a curtilage building, it could be protected by the farmhouse listing. In any event, I consider that it forms an essential part of the setting of the farmhouse. The restoration of the building to something like its original form seems to me to be an opportunity to ensure that the character and setting of the listed farmhouse and its yard would at least be preserved and, more likely, improved. In my view, this tips the balance in favour of the proposal.
9. The building is constructed of local stone and brickwork in a traditional local vernacular style. The walls could be repaired without significant alteration or addition. No extensions are involved, the existing openings would be used and the overall form of the building would be restored. I consider that the conversion would respect the character and setting of the building itself and the local character of its surroundings.
10. I have therefore come to the view that the form, bulk and general design of the existing building, when converted, would be in keeping with its surroundings. While the extent of the work involved is at the limit of what is acceptable in the conversion of existing buildings to new uses, the proposal would result in an improvement to the setting of the listed farmhouse. While the farmyard location might not be suitable for a permanent dwelling, I consider that it would provide sufficient privacy and amenity for holiday accommodation. I consider that the proposed conversion would meet the objectives of Policies RTM2 and RTM2A in all material respects. I conclude that the proposed

development would have no significantly adverse effects on the character and appearance of its rural surroundings.

Conditions

11. It is therefore my intention to allow the appeal and grant planning permission. The proposal is for residential holiday accommodation in a rural area where conversion to permanent residential use may not be justified. Since I also consider that the farmyard location of the building would render it unsuitable for permanent residential use, I shall impose a holiday occupancy condition.

Conclusions

12. I find that, while the work involved in conversion would be extensive, the proposal would respect the character of the building itself and, importantly, would benefit the character and setting of the listed farmhouse. I consider that the environmental benefits are sufficient to justify the extent of the conversion works. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should be allowed.

Formal Decision

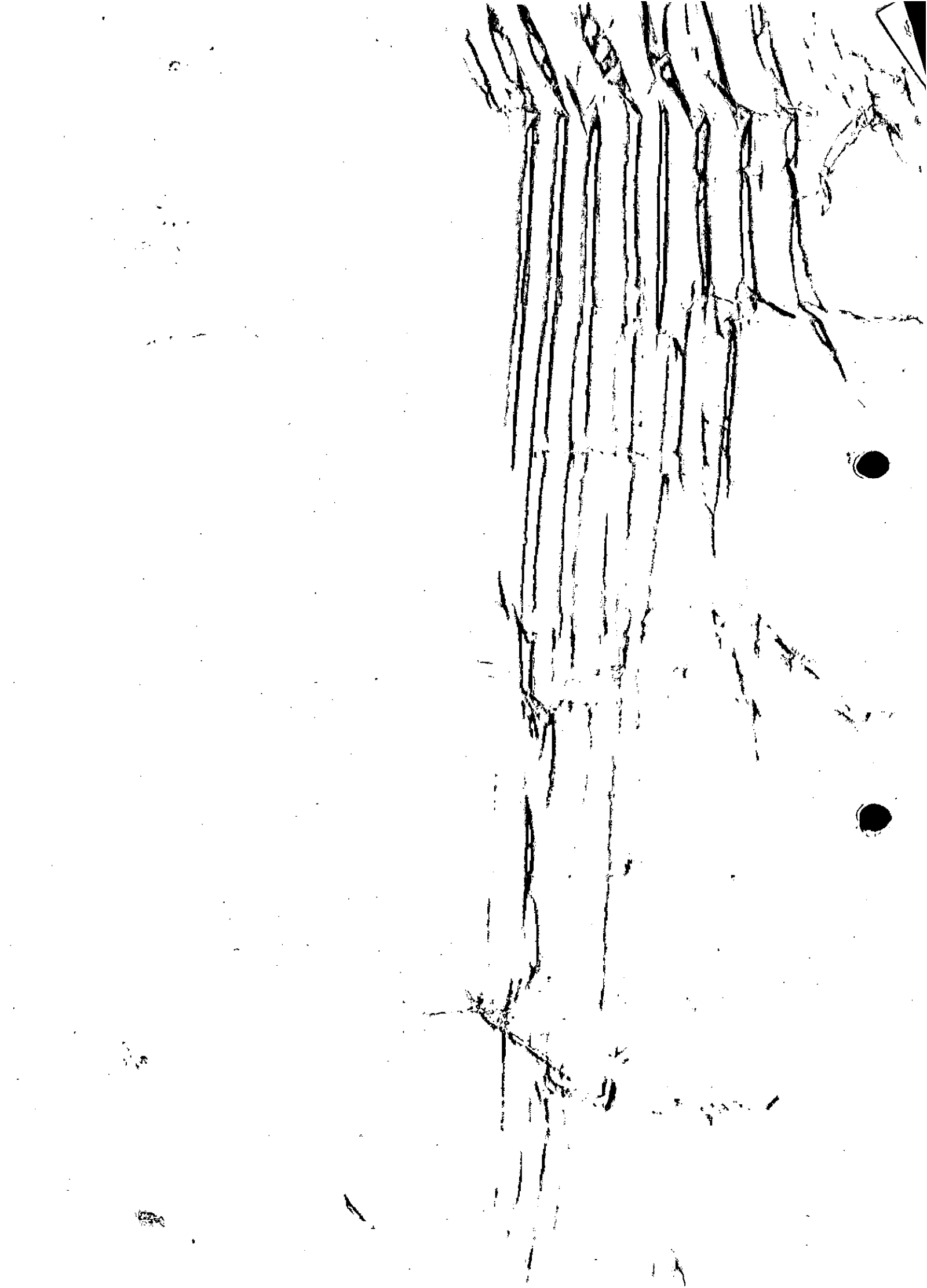
13. In exercise of the powers transferred to me, I allow the appeal and grant planning permission for the conversion of an agricultural building to a holiday cottage at Pound Farm, Stanley, Chippenham in accordance with the terms of the application reference 01/01821/COU, dated 24 July 2001 and the plans submitted therewith, subject to the following conditions:

- 1) The development hereby permitted shall be begun before the expiration of five years from the date of this decision.
- 2) The premises shall be used for holiday accommodation and for no other purpose (including any other purpose in Class C of the Schedule to the Town and Country Planning (Use Classes) Order 1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Information

14. This decision does not convey any approval or consent that may be required under any enactment, by-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.
15. Attention is drawn to the enclosed note relating to the requirements of the Chronically Sick and Disabled Persons Act 1970, as amended.
16. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court within 6 weeks from the date of this decision.

Inspector



Appendix B: Council Briefing Note No.24-20
Implications of Revised NPPF



Briefing Note No. 24-20

Service: Planning
Further Enquiries to: Nic Thomas, Director - Planning
Email: nic.thomas@wiltshire.gov.uk
Date Prepared: 17 December 2024

IMPLICATIONS OF DECEMBER 2024 NATIONAL PLANNING POLICY FRAMEWORK AND REVISIONS TO THE STANDARD METHODOLOGY ON THE HOUSING LAND SUPPLY

Overview

1. On 12 December 2024 the Government issued an update to the [National Planning Policy Framework](#) (NPPF). This followed a consultation into the proposed changes in summer 2024. The changes to the NPPF included amendments to the deliverable housing land supply policies, the terms under which a buffer should be added to the housing requirement to be used in the housing land supply calculation, and the implications of not being able to meet a sufficient deliverable housing land supply.
2. On the same date the Government also issued revisions to the Planning Practice Guidance (PPG) including the standard methodology for assessing and setting Local Housing Need, and published the [2023 Housing Delivery Test results](#).
3. The revisions that are pertinent to the housing land supply calculation and its implications are summarised as follows:
 - a) Local Planning Authorities are now required to demonstrate a deliverable supply of housing sufficient to meet **five** years against their housing requirement set out in adopted strategic policies (or against their Local Housing Need where the strategic policies are more than five years old) in all circumstances. Under the previous NPPF, Wiltshire was only required to demonstrate a **four-year** housing land supply because its draft Local Plan had reached an advanced stage.

- b) Local Planning Authorities are now required to add a buffer to the housing requirement in the **five-year** housing land supply calculation in all circumstances. The buffer to apply is driven by the council's latest Housing Delivery Test results, which for Wiltshire indicates a 5% buffer to be added¹. Under the previous NPPF a buffer was only required if the council's Housing Delivery Test results indicate under-delivery of 85% or lower against the housing requirement, which was not the case for Wiltshire.
- c) The revisions to the PPG have set out a revised standard methodology for the Local Housing Need – this is the calculation that establishes the housing figure to be used in the housing land supply calculation. The revision has changed the method from being based on future household projections, to being based on the amount of existing housing stock in the local authority area. The revision has also changed the adjustment factor which is based on the affordability of housing in the local planning authority. The figure for Wiltshire has changed as follows:

Number of homes per annum under previous Local Housing Need calculation ² .	Number of homes per annum under revised Local Housing Need calculation.	Percentage change
1,917	3,525	+84%

The implications of the revised Local Housing Need calculation are set out in paragraphs 5-7 for determining planning applications and appeals, and in paragraphs 8-11 for the implications on the emerging Local Plan.

- d) The consequences of not being able to demonstrate a five-year housing land supply are that the presumption in favour of sustainable development (often referred to as the 'tilted balance') applies. This is set out in paragraph 11d of the NPPF. This paragraph has also been amended in two ways. Firstly, where there are exception policies³ that prevent the 'tilted balance' applying that these provide a 'strong' reason for refusal, rather than a 'clear' reason for refusal. Secondly, to ensure that when the planning balance is being

¹ The 2023 Housing Delivery Test results were published on 12 December 2024. These indicate that Wiltshire had delivered 135% against its housing requirement in the last three years which is the period over which housing delivery is assessed in the test. This results in a 5% buffer to be applied on the five-year requirement in the housing land supply calculation.

² Under a 2024-base dated assessment

³ Footnote 7 of the NPPF sets these out.

carried out, that particular regard is had to certain key policies in the Framework⁴ related to directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

4. 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**.

Implications for decision-taking

5. Annex 1 of the revised NPPF indicate that new provisions apply immediately for determining planning applications and appeals.
6. Prior to the publication of the revised NPPF the council was already in a position where it was unable to demonstrate the requisite housing land supply (see member Briefing note [24-18](#)) and the 'tilted balance' was applied. The same implications for determining planning applications therefore continue to apply, however with other particular factors to consider because of changes to the NPPF. Firstly, the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply. However, and following on from this, the presumption in favour of sustainable development now requires decision-takers to have particular regard to key policies as set out in footnote 9 of the NPPF (highlighted in paragraph 3.d above) to ensure that proposals that can help improve housing land supply are properly and thoroughly assessed against the key policies.
7. The Government's response to the NPPF consultation growth agenda reiterates its Plan for Change. This sets out a commitment to rebuilding Britain, delivering 1.5m new homes along with the critical infrastructure that underpins economic growth. It further sets out that this will

⁴ Specifically policies related to affordable housing, isolated dwellings in the countryside, town centre uses, locations which are sustainable in terms of transport, efficient use of land and density, and design. See footnote 9 of the NPPF.

be achieved in part by reforming the planning system, and radically boosting the supply of housing, while delivering homes and places that are high-quality and genuinely affordable. The approach to applying the presumption in favour of sustainable development should be seen with this national objective in mind.

Implications for the Local Plan

8. Annex 1 of the revised NPPF provides transitional arrangements for plan-making which dictate how emerging plans will be treated in regard to the revised NPPF.
9. The council submitted the Local Plan for independent examination on 28 November 2024. Under the NPPF's transitional arrangements, the Plan (and the housing requirement) will continue to be assessed under the relevant previous version of the NPPF, which in this case will be the September 2023 NPPF. The Examining Inspector will need to be satisfied that the council can demonstrate a five-year housing land supply at the point of adoption. This will be assessed against the housing requirement in the emerging Local Plan which is lower than the revised Local Housing Need.
10. However, as the housing requirement in the emerging Local Plan will meet less than 80% of the revised Local Housing Need, the council will be expected to begin work on a new Local Plan promptly, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (when the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.
11. Upon adoption of the Local Plan, the five-year housing land supply will be assessed against the housing requirement in the plan (which is based on the previous Local Housing Need calculation) for a period of up to five years from adoption. However, the revised NPPF includes a clause that for authorities whose adopted housing requirement is substantially less than the revised Local Housing Need figure (which is the case for Wiltshire), they will be required to add a **20% buffer** to their five-year housing requirement from **1 July 2026** (the equivalent of a six-year housing land supply). To meet this increased buffer, the council will need to continue to approve planning applications to ensure a sufficient housing land supply can continue to be met at, and beyond, this date.

Implications for new Neighbourhood Plans

12. Where the presumption in favour of sustainable development (NPPF paragraph 11d) applies, NPPF paragraph 14 includes provisions as to how this affects Neighbourhood Plans that meet criteria related to their age and how the Neighbourhood Plan meets its identified housing requirement. These provisions in paragraph 14 are unchanged in the revised NPPF.

Summary

13. The revisions to the Local Housing Need and housing land supply aspects of the planning system are significant changes. They provide for a substantial uplift (84% plus 5% buffer) in the levels of housing that the council will need to plan for. This forms part of the Government's economic growth agenda.
14. The changes introduced on 12 December 2024 mean that the council now has a substantial shortfall in its housing land supply position (2.03 years). This alters the weight to give to housing supply when giving consideration to planning applications for residential development. This means balancing the strengthened need to boost housing supply against any adverse impacts of the proposal, considered against the development plan as whole, and any material considerations on a case-by-case basis. This will need to include consideration of what weight to assign to the most important policies.
15. The changes to the NPPF are wider than those set out above. They can be viewed via the following link, which show a comparison with the December 2023 version:
[NPPF December 2023.pdf → NPPF-December-2024.pdf - Draftable](#); which indicates moved, replaced and inserted text.



Appeal Decision

Site visit made on 12 February 2002

by **C J Ball** DArch DArchCons RIBA IHBC FRSA

an Inspector appointed by the Secretary of State for Transport,
Local Government and the Regions

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2406

Date

11 MAR 2002

Appeal Ref: APP/J3910/A/01/1077805
Pound Farm, Stanley, Chippenham

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Main issue

2. I consider the main issue in this appeal to be the effect the proposed development would have on the character and appearance of its rural surroundings.

Planning policy

3. The development plan for the area includes the North Wiltshire Local Plan Review 1995. Policies relevant to this appeal are Policy RTM2, which sets out the criteria for the provision of tourist accommodation in the countryside, and Policy RTM2A, which generally permits the adaptation of existing buildings for tourist accommodation where the form, bulk and general design of the existing building is in keeping with its surroundings, and subject to the proposed use and works meeting specified requirements. I shall also take account of the government advice set out in PPG7 *'The Countryside - Environmental Quality and Economic and Social Development'*
4. Pound Farm farmhouse is listed grade II for its special architectural and historic interest. In considering this appeal, I am required by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building or its setting. I shall be guided in this by the government advice set out in PPG15 *'Planning and the Historic Environment'*.

Reasons

5. Pound Farm lies some 2 miles south-east of Chippenham, in open countryside. The farmyard contains a mix of traditional and modern buildings, some in a poor state of repair. The building in question is a single storey cattle holding shed and store, of traditional construction, although a major part of the roof has been lost and replaced with low pitched steel sheeting. Ugly modern additions to the building would be removed. The adjacent milking parlour and covered yard would both be demolished, allowing the building to stand in a separate plot fronting the road. The building is intended to be used for holiday visitor accommodation as part of a farm diversification scheme.
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development would have no significantly adverse effects on the character and appearance of its rural surroundings.

Conditions

11. It is therefore my intention to allow the appeal and grant planning permission. The proposal is for residential holiday accommodation in a rural area where conversion to permanent residential use may not be justified. Since I also consider that the farmyard location of the building would render it unsuitable for permanent residential use, I shall impose a holiday occupancy condition.

Conclusions

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Formal Decision

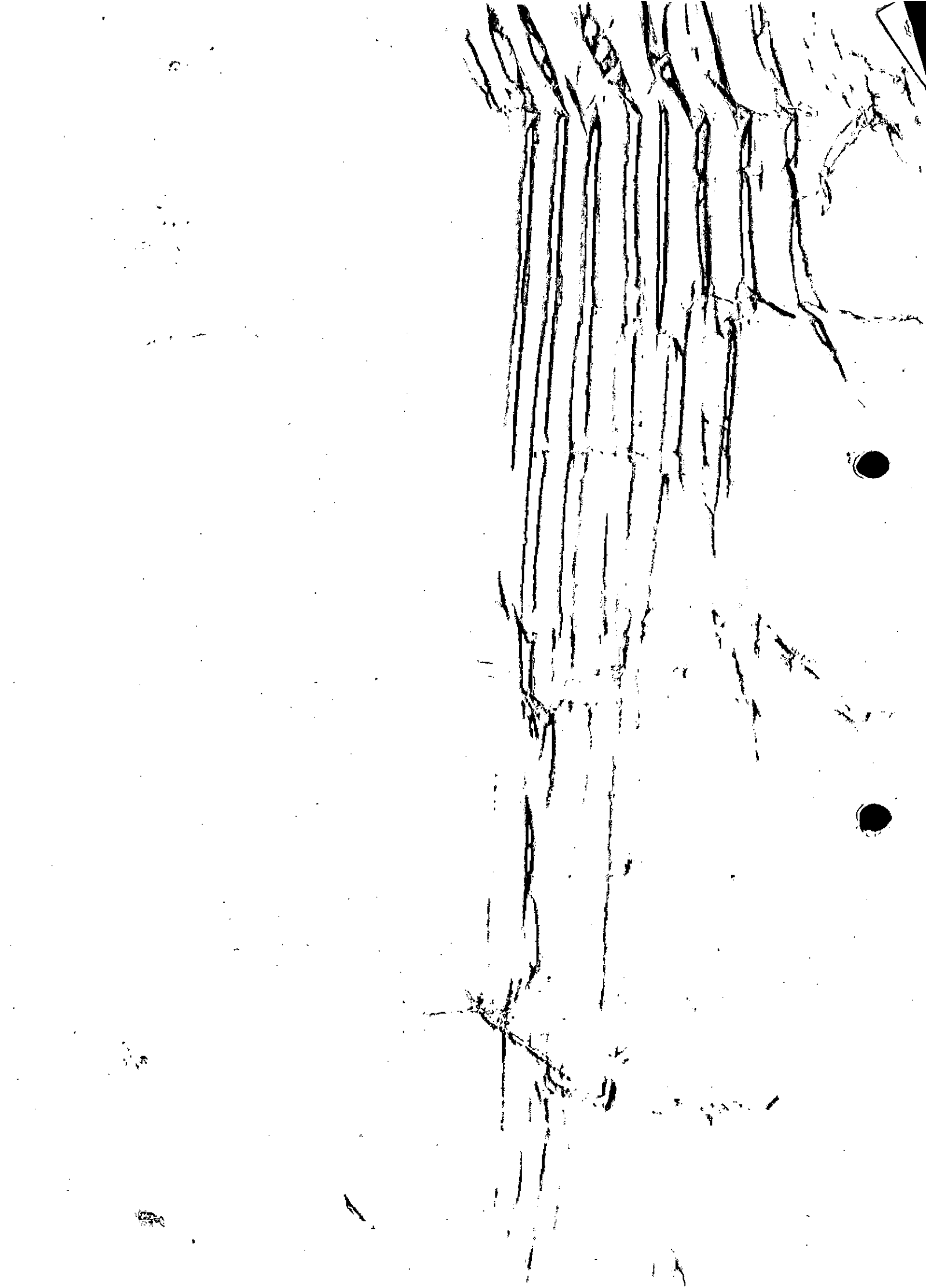
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- 1) The development hereby permitted shall be begun before the expiration of five years from the date of this decision.
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Information

14. This decision does not convey any approval or consent that may be required under any enactment, by-law, order or regulation other than section 57 of the Town and Country Planning Act 1990.
15. Attention is drawn to the enclosed note relating to the requirements of the Chronically Sick and Disabled Persons Act 1970, as amended.
16. A separate note is attached setting out the circumstances in which the validity of this decision may be challenged by making an application to the High Court within 6 weeks from the date of this decision.


Inspector



Briefing Note

No. 24-20

Service: Planning
Further Enquiries to: Nic Thomas, Director - Planning
Email: nic.thomas@wiltshire.gov.uk
Date Prepared: 17 December 2024

IMPLICATIONS OF DECEMBER 2024 NATIONAL PLANNING POLICY FRAMEWORK AND REVISIONS TO THE STANDARD METHODOLOGY ON THE HOUSING LAND SUPPLY

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1. On 12 December 2024 the Government issued an update to the [National Planning Policy Framework](#) (NPPF). This followed a consultation into the proposed changes in summer 2024. The changes to the NPPF included amendments to the deliverable housing land supply policies, the terms under which a buffer should be added to the housing requirement to be used in the housing land supply calculation, and the implications of not being able to meet a sufficient deliverable housing land supply.
2. On the same date the Government also issued revisions to the Planning Practice Guidance (PPG) including the standard methodology for assessing and setting Local Housing Need, and published the [2023 Housing Delivery Test results](#).
3. The revisions that are pertinent to the housing land supply calculation and its implications are summarised as follows:
 - a) Local Planning Authorities are now required to demonstrate a deliverable supply of housing sufficient to meet **five** years against their housing requirement set out in adopted strategic policies (or against their Local Housing Need where the strategic policies are more than five years old) in all circumstances. Under the previous NPPF, Wiltshire was only required to demonstrate a **four-year** housing land supply because its draft Local Plan had reached an advanced stage.

- b) Local Planning Authorities are now required to add a buffer to the housing requirement in the **five-year** housing land supply calculation in all circumstances. The buffer to apply is driven by the council's latest Housing Delivery Test results, which for Wiltshire indicates a 5% buffer to be added¹. Under the previous NPPF a buffer was only required if the council's Housing Delivery Test results indicate under-delivery of 85% or lower against the housing requirement, which was not the case for Wiltshire.
- c) The revisions to the PPG have set out a revised standard methodology for the Local Housing Need – this is the calculation that establishes the housing figure to be used in the housing land supply calculation. The revision has changed the method from being based on future household projections, to being based on the amount of existing housing stock in the local authority area. The revision has also changed the adjustment factor which is based on the affordability of housing in the local planning authority. The figure for Wiltshire has changed as follows:

Number of homes per annum under previous Local Housing Need calculation ² .	Number of homes per annum under revised Local Housing Need calculation.	Percentage change
1,917	3,525	+84%

The implications of the revised Local Housing Need calculation are set out in paragraphs 5-7 for determining planning applications and appeals, and in paragraphs 8-11 for the implications on the emerging Local Plan.

- d) The consequences of not being able to demonstrate a five-year housing land supply are that the presumption in favour of sustainable development (often referred to as the 'tilted balance') applies. This is set out in paragraph 11d of the NPPF. This paragraph has also been amended in two ways. Firstly, where there are exception policies³ that prevent the 'tilted balance' applying that these provide a 'strong' reason for refusal, rather than a 'clear' reason for refusal. Secondly, to ensure that when the planning balance is being

¹ The 2023 Housing Delivery Test results were published on 12 December 2024. These indicate that Wiltshire had delivered 135% against its housing requirement in the last three years which is the period over which housing delivery is assessed in the test. This results in a 5% buffer to be applied on the five-year requirement in the housing land supply calculation.

² Under a 2024-base dated assessment

³ Footnote 7 of the NPPF sets these out.

carried out, that particular regard is had to certain key policies in the Framework⁴ related to directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

4. 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**.

Implications for decision-taking

5. Annex 1 of the revised NPPF indicate that new provisions apply immediately for determining planning applications and appeals.
6. Prior to the publication of the revised NPPF the council was already in a position where it was unable to demonstrate the requisite housing land supply (see member Briefing note [24-18](#)) and the 'tilted balance' was applied. The same implications for determining planning applications therefore continue to apply, however with other particular factors to consider because of changes to the NPPF. Firstly, the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply. However, and following on from this, the presumption in favour of sustainable development now requires decision-takers to have particular regard to key policies as set out in footnote 9 of the NPPF (highlighted in paragraph 3.d above) to ensure that proposals that can help improve housing land supply are properly and thoroughly assessed against the key policies.
7. The Government's response to the NPPF consultation growth agenda reiterates its Plan for Change. This sets out a commitment to rebuilding Britain, delivering 1.5m new homes along with the critical infrastructure that underpins economic growth. It further sets out that this will

⁴ Specifically policies related to affordable housing, isolated dwellings in the countryside, town centre uses, locations which are sustainable in terms of transport, efficient use of land and density, and design. See footnote 9 of the NPPF.

be achieved in part by reforming the planning system, and radically boosting the supply of housing, while delivering homes and places that are high-quality and genuinely affordable. The approach to applying the presumption in favour of sustainable development should be seen with this national objective in mind.

Implications for the Local Plan

8. Annex 1 of the revised NPPF provides transitional arrangements for plan-making which dictate how emerging plans will be treated in regard to the revised NPPF.
9. The council submitted the Local Plan for independent examination on 28 November 2024. Under the NPPF's transitional arrangements, the Plan (and the housing requirement) will continue be assessed under the relevant previous version of the NPPF, which in this case will be the September 2023 NPPF. The Examining Inspector will need to be satisfied that the council can demonstrate a five-year housing land supply at the point of adoption. This will be assessed against the housing requirement in the emerging Local Plan which is lower than the revised Local Housing Need.
10. However, as the housing requirement in the emerging Local Plan will meet less than 80% of the revised Local Housing Need, the council will be expected to begin work on a new Local Plan promptly, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (when the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.
11. Upon adoption of the Local Plan, the five-year housing land supply will be assessed against the housing requirement in the plan (which is based on the previous Local Housing Need calculation) for a period of up to five years from adoption. However, the revised NPPF includes a clause that for authorities whose adopted housing requirement is substantially less than the revised Local Housing Need figure (which is the case for Wiltshire), they will be required to add a **20% buffer** to their five-year housing requirement from **1 July 2026** (the equivalent of a six-year housing land supply). To meet this increased buffer, the council will need to continue to approve planning applications to ensure a sufficient housing land supply can continue to be met at, and beyond, this date.

Implications for new Neighbourhood Plans

12. Where the presumption in favour of sustainable development (NPPF paragraph 11d) applies, NPPF paragraph 14 includes provisions as to how this affects Neighbourhood Plans that meet criteria related to their age and how the Neighbourhood Plan meets its identified housing requirement. These provisions in paragraph 14 are unchanged in the revised NPPF.

Summary

13. The revisions to the Local Housing Need and housing land supply aspects of the planning system are significant changes. They provide for a substantial uplift (84% plus 5% buffer) in the levels of housing that the council will need to plan for. This forms part of the Government's economic growth agenda.
14. The changes introduced on 12 December 2024 mean that the council now has a substantial shortfall in its housing land supply position (2.03 years). This alters the weight to give to housing supply when giving consideration to planning applications for residential development. This means balancing the strengthened need to boost housing supply against any adverse impacts of the proposal, considered against the development plan as whole, and any material considerations on a case-by-case basis. This will need to include consideration of what weight to assign to the most important policies.
15. The changes to the NPPF are wider than those set out above. They can be viewed via the following link, which show a comparison with the December 2023 version:
[NPPF December 2023.pdf → NPPF-December-2024.pdf - Draftable](#); which indicates moved, replaced and inserted text.