

18th February 2026

Our Ref: SWLC.LPC2065

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

Dear Sir/Madam

Town and Country Planning Act 1990
Change of use of Oxen Cottage from holiday accommodation to independent dwelling at Nables Farm, Upper Seagry, Chippenham, Wiltshire, SN15 5HB

As your records will show planning permission has recently been approved to change the use of The Anchorage from holiday let accommodation for use as a self-contained dwelling (LPA Reference: PL/2025/04856).

In addition to the above property there are two other holiday lets still remaining on the wider site (Oxen Cottage and Woodman's Cottage). Accordingly, I have pleasure to enclose two separate applications seeking to change the use of these units as independent dwellings too. This application specifically refers to Oxen Cottage.

With regard to each of these properties the site circumstances and relevant planning policy framework are exactly the same as considered in respect of application PL/2025/04856) and it is therefore intended to draw on the statement previously submitted regarding The Anchorage, and the officer's detailed planning appraisal to support the same change of use, as two separate applications.

In this regard it is important to note that the Parish Council was supportive of the recent application and noted the benefits of adding to the supply of housing in the Parish, particularly making use of the buildings that are already there.

The site's planning history has meant that the two holiday let uses are an anomaly, as by various planning routes there are now 16 separate dwellings across the former farm site, either present or where works have been commenced within the scope of an extant permission. There are now no sound planning reasons therefore to treat the last two remaining units as suitable only for short stay holiday let usage, and differently from the surrounding neighbours.



The aerial site layout extract inserted above has been annotated to identify the full range of residential properties in the applicant's control (and as listed below).

- A Leaffield House-(subdivision as 2No dwellings PL/2022/02508)
- B The Anchorage (1No dwelling PL/2025/04856)
- C The Tractor shed (2No dwellings PL/2025/01981)
- D Nables Farmhouse
- E Woodman's Cottage (Holiday use)
- F Oxen Cottage (Holiday use)
- G Building No 1 (2No dwellings)
- H Building No 3 (3No dwellings)
- I PL/2024/00866 (5No dwellings)

Both the properties, known as Oxen Cottage and Woodman's Cottage (the subject of the two applications herein enclosed) were approved by application N/00/00558/FUL, which was described as 'Proposed conversion of 2No Barns to form self-catering holiday accommodation'.

The history regarding Woodman Cottage has allowed other uses since then, as listed below.

N/05/00384/S73A – Variation of Condition 5 (N/00/00558/FUL) to allow occupation of Barn by a carer.

N/08/01167/S73A – Variation of Condition 5

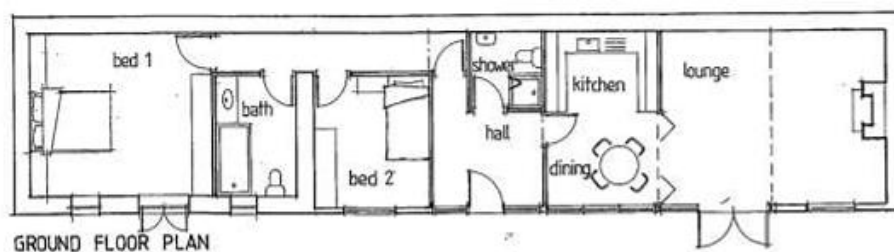
N/11/02312/S73A – Variation of Condition 5 of N/00/00558/FUL to allow occupation of a carer for a further 3 years.

14/06814/VAR – Variation of Condition 2 of N/11/2312/S73A to allow occupation by a carer for further 3 years.

The conditional holiday restrictions for both remaining holiday lets were said to be required, 'To ensure that the development is occupied only as holiday accommodation because the site is within an area where the local planning authority would not normally permit new dwellings'. This is of course now patently not the case.

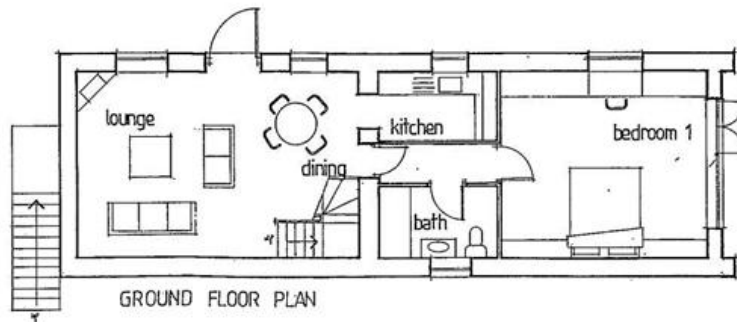
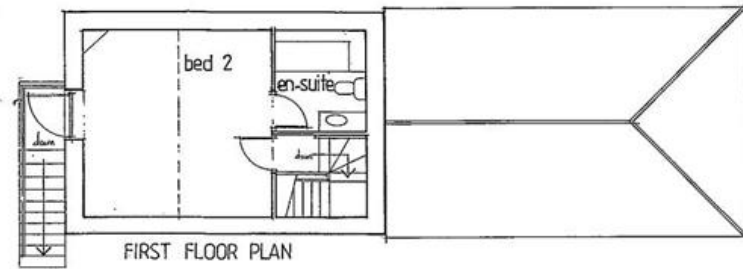
Photographs and floorplans extract for both remaining holiday lets are inserted below.

Oxen Cottage



Woodman's Cottage





Planning Assessment

In light of the direct comparison for both new applications with the assessment of the change of use of The Anchorage it is the purpose of this supporting Planning Statement to effectively reproduce the delegated report format in that case, relating of course to the two smaller units in question. There are no new issues raised.

Section 38 (6) to the Planning and Compulsory Purchase Act 2004 requires that all planning decisions are made in accordance with the Development Plan unless material considerations indicate otherwise. The main planning policy framework relevant to this proposal is the Wiltshire Core Strategy 2014 (WCS).

The National Planning Policy Framework (NPPF) provides the Government's planning policies for England and explains how they should be applied. Together with the online Planning Practice Guidance (PPG) it is a material planning consideration. The following policies from the WCS, and other aspects of the Development Plan are believed to be relevant to the application proposals.

Wiltshire Core Strategy (WCS) -

- CP1: Settlement Strategy
- CP2: Delivery Strategy
- CP3: Infrastructure Requirements
- CP10: Spatial Strategy for the Chippenham Community Area
- CP41: Sustainable Construction and Low-Carbon Energy
- CP50: Biodiversity and Geodiversity
- CP57: Ensuring High Quality Design and Place Shaping
- CP60: Sustainable Transports
- CP61: Transport and Development
- CP64: Demand Management

CP67: Flood Risks

Saved Policies of the North Wiltshire Local Plan (NWLP)

H4: Residential Development in Rural Areas

Seagry Neighbourhood Development Plan (NDP)

SNP6: Small Infill Development -

SNP9: Electric Charging Points

Wiltshire Local Transport Plan 3 (LTP4)

Parking standards (LTP3)

The Wiltshire Housing Site Allocations Plan (WHSAP)

Other material considerations

Wiltshire Design Guide (WDG)

Waste storage and collection: guidance for developers 2011

Wiltshire Council Level 1 Strategic Flood Risk Assessment (SFRA)

Technical housing standards

The main issues in the consideration of this application are:

- Principle/Sustainable Development
- Design and Neighbouring Amenity
- Ecology/Biodiversity
- Highways Safety/Access
- Flood Risk/Drainage

Principle/Sustainable development

Context CP1 and CP2 of the WCS relate to the spatial strategy for Wiltshire, setting the policy foundations for sustainable development within the county. CP10 of the WCS expresses that development in the Chippenham Community Area should be in accordance with the Settlement Strategy set out in CP1. CP2 outlines that, other than in circumstances permitted by other policies within the WCS, development will not be permitted outside the limits of development, as defined on the policies map.

Supporting text found at 4.25 identifies the exception policies within the WCS as being: CP34, CP37, CP39, CP40, CP44, CP46, CP47 and CP48. In addition to those exception policies, saved policy H4 of the NWLP provisions explicit exception criteria for new dwellings in the countryside, outside of framework boundaries. The site is located outside of any defined settlement limits, in open countryside, and effectively proposes conversion of a former barn to a new dwelling and, as such, broadly conflicts with the aims of CP1, CP2 and CP10. The scheme does not meet any of the exception criteria of the WCS, nor the saved policy H4 of the NWLP.

Notwithstanding the above, the Council have accepted that the requisite housing land supply cannot be demonstrated and as such, for applications including housing provision, the policies which are most important for determining the application should be considered out-of-date. The NPPF directs, under paragraph 11, that in

these circumstances planning permission should be granted unless one or both of the following apply:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

Paragraph 14 of the NPPF goes on to further express that:

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: (a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and (b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement.

For the avoidance of doubt, as the NDP was made in May 2021 it therefore became part of the development plan less than 5 years ago; however, the NDP does not contain policies and allocations to meet its identified housing requirement and as such the requirements of paragraph 14(b) of the NPPF have not been met.

Paragraph 11d(i)

The site is located within flood zone 1 and has not been identified as being in an area at high risk of surface or ground water flooding. The site is not located within (or in close proximity to) a SSSI, SAC, Ramsar, SPA, SAC or CWS and is not designated as green belt or local green space.

Furthermore, the site is not within a National Landscape or Conservation Area, is not part of a National Park area, or defined as Heritage Coast, irreplaceable habitat, or a designated heritage asset.

Paragraph 11d(ii)

The scheme is not for major development and, notwithstanding the rural location, on this occasion the development would not result in the creation of an isolated home in the countryside.

Consultation with the Councils Highways Team in respect of application PL/2025/04856 raised concerns regarding the sustainability of the location for 1 No new dwellings but raised no concerns regarding the suitability of the existing access. Further comments on highway's impacts (including parking provisions etc) of the scheme will be made later.

There is no operational development proposed as part of this scheme; however, it will also be assessed whether an independent dwelling would negatively impact the

prevailing character of the setting. Further comment and assessment of design/visual impacts of the scheme will be made later too.

Benefits and harm

This scheme relates to housing development and, whilst for one dwelling only in respect of each application and consequently representing only a minor benefit to the housing supply for Wiltshire, granting permission would result in a net increase to the number of residential units which would consequently bring about some benefit to the housing supply for Wiltshire.

Potential harm has, however, been identified by virtue of the site being in an unsustainable location and planning balance must be applied to determine whether the scheme is acceptable.

Design/Visual Impacts and Neighbouring Amenity

Policy CP41 of the WCS relates to sustainable construction and low-carbon energy and encourages development including building conversions to incorporate design measures to reduce energy demand.

Policy CP57 of the WCS requires high quality design and place shaping for all new development including extensions, alterations and changes of use.

Section 9.2 of the WDG sets expectations around private amenity space, providing the following minimum standards (subject to site specific constraints) for gardens, applicable to houses:

Type of private amenity space	1 storey houses	2 storey houses	3 storey houses
Minimum rear garden area	Equal footprint of dwelling	Equal footprint of dwelling	Equal footprint of dwelling
Minimum length of garden	9m if north facing, 5m otherwise	12m if north facing, 10m otherwise	15m if north facing, 10m otherwise

Technical housing standards deal with internal space within new dwellings. Setting requirements for the Gross Internal floor Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home. There are set criteria for measuring and the table on the next page is taken from the Government's publication regarding Technical Housing Standards and shows that in respect of Oxen Cottage, being a two bedroomed property with a floor area of 97.24m² its use as an independent dwelling satisfies the minimum space standards indicated.

Table 1 - Minimum gross internal floor areas and storage (m²)

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
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

The councils SPD on 'waste storage and collection' provides guidance for developers and includes the following summarised points relating to the external storage of waste:

(5.4.1) Waste storage areas should be appropriate located [...] within the boundary of the property [...] These storage facilities should not obstruct sight lines for pedestrians, drivers and cyclists and should not interfere with pedestrian or vehicular access to buildings.

(5.4.2) External storage spaces must be on hard standings, and they should be away from windows [...]

(5.4.3) Rear-garden storage is preferable where possible provided that there is a suitable route to the collection point [...]

Drawing No LPC 2065 PR 601 provides details of the intended residential curtilage associated with the new chapter of use, and within which space is clearly allocated for the siting of refuse and recycling facilities. The collection of the residential waste, instead of the commercial holiday let will simply mirror the established practices of other nearby residents.

The living conditions which would be achievable at the site are entirely commensurate with the wider grouping's acceptable amenity. No operational development is being proposed, and the defined amenity space ensures appropriate levels of private amenity will be achievable and the necessary GIA would be more than the minimum required without the need for extensions etc.

The application was once a traditional farm building before being converted for holiday let usage. Its rural character will not be changed by the unrestricted residential use being proposed. The proposed dwelling is directly adjacent to other residential units which would be in-keeping with the proposed use of this site as an independent dwelling.

Biodiversity, Geodiversity and Trees

Given that the scheme does not include any operational development and is to simply allow for occupation of the building as an independent dwelling, as a continued use it is not believed that either application enclosed triggers the need for BNG, and are thus exempt.

Policy CP50 of the WCS outlines that Wiltshire's natural environment is one of its greatest assets and identifies protection measures necessary for consideration when assessing the impact of development on biodiversity and geodiversity. As with application PL/2025/04856 though there are no ecological concerns relating to both new proposals.

Highways Safety/Access

Policy CP61 of the WCS requires new development to be served by safe access to the highway network.

Policy CP64 of the WCS relates to demand management measures which includes car parking management and standards. There is a requirement for a minimum of 2 No parking spaces for the two bedroom unit in question. It obviously already is served with parking for visitors, however for completeness drawing No LPC 2065 PR 601 shows the allocated parking associated with the new independent chapter of use.

The site is in open countryside and is not in a location is understood not to be considered to be sustainable insofar as access to services etc. The scheme conflicts with the aims of WCS policies and is contrary to para 115(a) of the NPPF which requires sustainable transport modes to be prioritised, notwithstanding the balance provided at paragraph 110. The site will, however, be served by a safe/suitable access. The Council's Highways team has raised no concerns in the past regarding residential traffic, resulting from various residential developments at Nables Farm generally, and the simple swap for the existing comings and goings, onto the C-road would not result in a negative impact on the transport network or highway safety.

As referenced above, the site can achieve sufficient off-street parking for a 2-bed dwelling, and it can reasonably be conditioned that such parking be provided etc. prior to first occupation. Furthermore, there is sufficient amenity area to allow for cycle storage to be provided and this too has been shown on the site layout details, and can be similarly conditioned, thus encouraging a non car related transport option to be accommodated.

Policy SNP9 of the NDP relates to the provision of electric vehicle (EV) charging for all new houses. The scheme will result in a material COU from holiday let to residential and as such building control regulations associated with charging requirements will likely apply, thereby meeting the aims of SNP9.

Flood Risk/Drainage

Policy CP67 of the WCS relates to flood risk and provides direction for development proposed in flood zones 2 and 3 and includes the requirement for development to

reduce the rate of rainwater run-off and to improve rainwater infiltration to soil and ground, unless site or environmental conditions make these measures unsuitable.

The site is on land in flood zone 1, at the lowest risk of flooding and whilst there is known groundwater issues at the site, the development does not include any further hardstanding or any development which may otherwise exacerbate the existing situation.

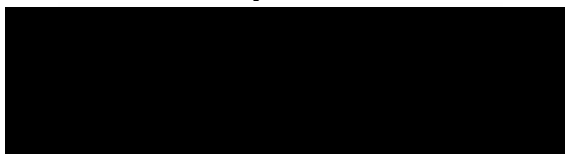
Summary and Conclusions

The site is in open countryside and strictly speaking not in a sustainable location; as such, there would be adverse impacts of permitting a dwelling in this location given the necessary dependence on private car use. The existing use of course attracts its own vehicle movements and potentially from across the country. It is not a greenfield application.

Whilst the application may therefore be contrary to the aims with CP1, CP2 and CP10 of the WCS and para 115(a) of the NPPF no other adverse impacts (which cannot reasonably be conditioned in order to fully mitigate the harm) have been identified as part of assessing this application. Moreover, the precedent recently created by the change of use of the nearby property known as The Anchorage is a material consideration of substantial weight. Furthermore, taking fully into account the titled balance, the benefit to the HLS for Wiltshire that a single dwelling would bring (whilst modest individually) would outweigh the identified harm. With the inclusion of necessary conditions, the scheme is acceptable on balance.

I trust the above comments, and unashamedly mirrored assessment approach to application PL/2025/04856 are sufficient to ensure your similarly positive assessment, however if there are any matters arising to ensure your support, please do not hesitate to contact me direct.

Yours faithfully



Simon Chambers
Director

Enc.

CC Mr A Jackson