

APPLICATION FOR FULL PLANNING PERMISSION CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/09732
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	The Stables, Doctors Hill, Ashley, Box, SN13 8AT
DEVELOPMENT DESCRIPTION:	Retrospective permission for Change of Use of part of an existing barn for residential purposes
RECOMMENDATION:	That Planning Permission be REFUSED

PLANNING HISTORY AND PROPOSAL

In 2019 an application for the *“Erection of American barn, creation of a menage, associated works and change of use of the land for the keeping of horses”* at The Stables, Doctors Hill, was submitted. The officer’s report at that time described the development as follows: -

“The proposal is for an American barn type stable building (5 stables, a hay store/tackroom and WC in a building measuring approximately 10.8m x 10.8m, and about 3.9m in height); the creation of a 40m x 20m riding arena; the change of use of the land for the keeping of horses; and associated works, which includes an area of permeable surface for parking, turning and turnout and a manure storage area...The proposed barn is to be constructed from timber cladding with a black onduline roofing.

The rainwater run-off from the building will be collected in 2no 1,000 litre water butts for reuse with the horses and the WC will be treated in a cesspit.”

The application was subsequently approved in Feb 2020, with a number of conditions including:

“There shall be no more than 8 horses kept at the site at any one time, including foals at foot.

REASON: To prevent overgrazing of the land to the detriment of the landscape quality of the AONB.

The development hereby permitted shall only be used for the private stabling and exercising of horses and the storage of associated equipment and feed and shall at no time be used for any commercial purpose whatsoever, including for livery, or in connection with equestrian tuition or leisure rides.

REASON: In the interests of highway safety and/or to protect the living conditions of nearby residents.

There shall be no parking of horse boxes, caravans, trailers or other vehicles during the hours between dusk and dawn on the site.

REASON: In order to protect the living conditions of nearby residents and/or the rural character of the area.

There shall be no external/outdoor storage of any kind at the site and there shall be no portable buildings or structures, van bodies, trailers, vehicles or other structures used for storage, shelter, rest or refreshment, shall be stationed on the site without the prior approval in writing of the Local Planning Authority.

REASON: In order to protect the living conditions of nearby residents and/or the rural character of the area.

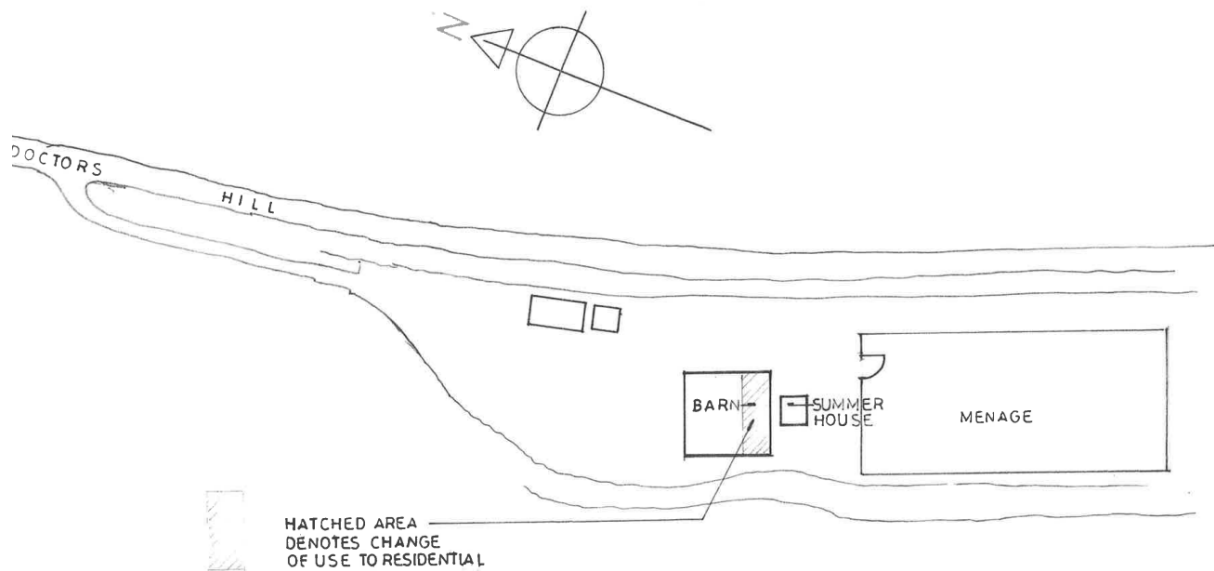
No external lighting shall be installed until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Professionals in their publication "Guidance Notes for the Reduction of Obtrusive Light GN01:2020", have been submitted to and approved in writing by the Local Planning Authority. The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed. There shall be no lighting of the riding arena.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site."

The imposition of these conditions on the 2020 permission clearly demonstrates the Council's intention to ensure that the barn remained strictly for rural equestrian purposes, safeguarding the openness and character of the countryside, preventing incremental domestic intrusion, and avoiding the proliferation of structures and paraphernalia that would undermine the rural setting.

It has become apparent that part of the barn is now being used for residential purposes, and this application seeks to regularise that by a change of use. Whilst records from the Council's enforcement file indicate that the only persons reportedly staying overnight on the site were occasional grooms caring for the horses, the Design and Access Statement (DAS) submitted with the application asserts that the applicant is residing within a portion of the

barn. Observations documented in the enforcement file, including the presence of multiple private vehicles, a camper van, a summerhouse, outdoor seating and tables, a drying airer, and a post box, suggest a level of domestic activity consistent with permanent residential use rather than occasional overnight stays. The submitted block plan below indicates the area of the barn that is being used as accommodation:

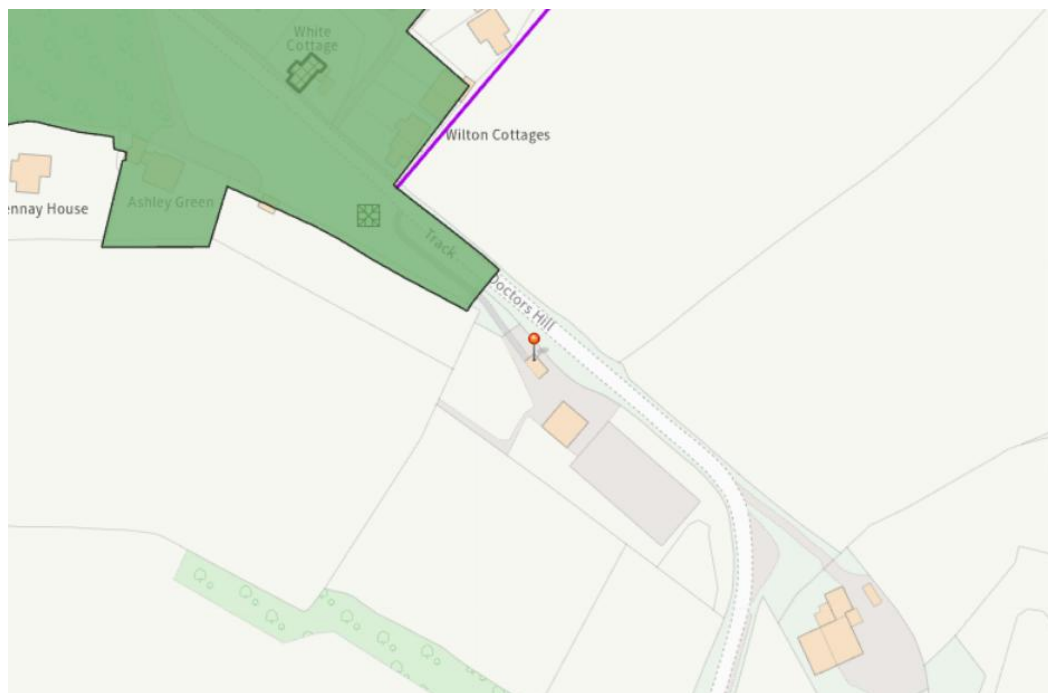


The DAS advises that the area that is in use as residential amounts to one third of the volume of the barn. The submitted block plan also shows that a summerhouse has been sited between the barn and the manege. An application which seeks planning permission for this has also been submitted and is being considered separately (ref: PL/2025/09919). In support of the application, the DAS advises *“Day to day management of the owner’s horses began to be problematic simply because of the remote nature of the land to her residence and the constant travelling between her home and the site often two or three times a day. The owner began to use part of the barn as living accommodation to allow a greater level of husbandry for the day to day management of her horses. This need came into sharp focus when on two separate occasions foals did not survive due to absence of attentive care.”*

SITE DESCRIPTION/CONTEXT

The application site is on the southern side of Doctors Hill on the outskirts of Ashley, within open countryside. Ashley, which forms part of Box Parish is outside of the framework boundary for Box. The site benefits from existing vehicular access from unclassified road ‘Doctors Hill’; the natural planting on the northern boundary of the site means that there is limited visibility of the barn from the highway.

The site, marked with the red pin on the plan below, is outside of the Ashley Conservation Area which terminates c.22m north-west of the site (washed in green on the plan below); however, the site is within both the Bristol, Bath and Western Wiltshire Green Belt (GB) and the Cotswolds National Landscape (CNL). With regard to the CNL the site is within the “Enclosed Limestone Valley” feature area, characterised by enclosed river valleys with steep sides separated by areas of Low Limestone Plateaux and High Wold Dip-Slope. The CNLMP identifies that *“the strong physical enclosure of the valleys results in a secluded character, the sense of which is heightened by significant areas of woodland, some of which is ancient and semi-natural. Areas of pastoral and arable use are interspersed with pasture and scrub. Fields vary in size, and are mainly enclosed with hedgerows with frequent hedgerow trees. Roads connecting settlements generally follow valley bottoms, with others serving isolated dwellings ascending the valley sides.”*





The application site is in Flood Zone 1, at the lowest risk of flooding from rivers and sea, and no particular risk of ground or surface water flooding has been identified. The site is within a consultation zone for bats associated with the Bath & Bradford on Avon Special Area of Conservation (SAC). There are no listed buildings in the immediate vicinity.

The photographs below show the access off Doctors Lane and the gated entrance to the site:

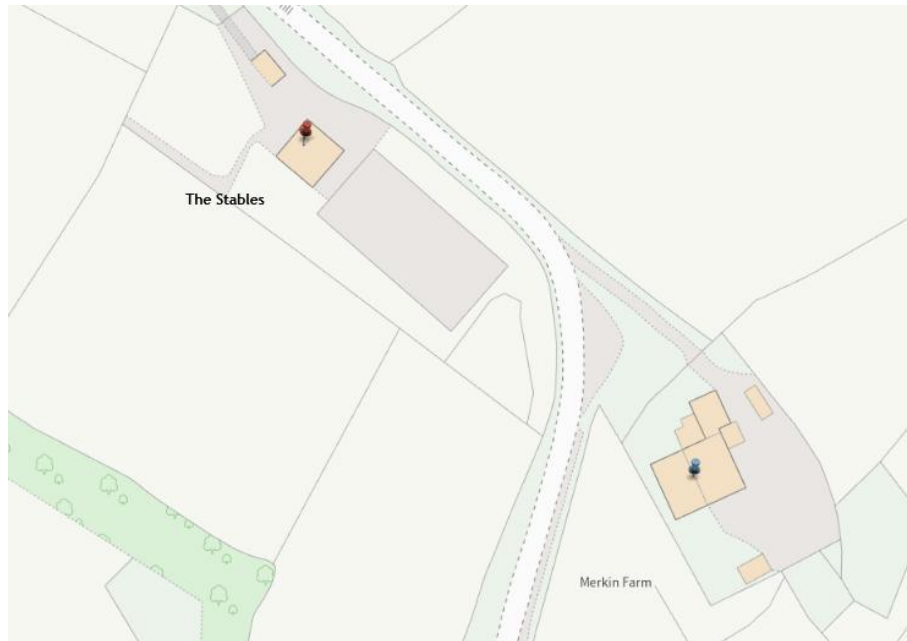


PLANNING HISTORY

Proposal / Summary

19/11042/FUL - Full planning permission Decision - Approve with Conditions Date: 24/2/2020 – Erection of American barn, creation of a menage, associated works and change of use of the land for the keeping of horses.

Also of relevance is a recent refusal of application PL/2025/04403 at Merkin Farm, which is 90m southeast of the “The Stables” – marked with blue pin on the plan below.



That application sought permission for “Change of Use of Existing Agricultural Building to a Separate Dwelling” and was refused 23 Feb 2026 for the following reasons:

- 1. The proposed residential development, by reason of the location of the site, would be contrary to the settlement, delivery and community area strategies of the Wiltshire Core Strategy. Insufficient evidence has been provided to demonstrate that sequentially preferable uses set out in Core Policy 48 of the Wiltshire Core Strategy (which provisions support for residential development in the countryside where set criteria is met) are not practical propositions, and the extent of the works proposed is not limited only to necessary extension or modification. The scheme is contrary to the aims of Core Policy 48 of the Wiltshire Core Strategy, and does not meet any other local plan exception policies for residential development in the countryside.*
- 2. The development proposed would result in the creation of a dwelling in a location that is remote from services, facilities and public transport. The site lacks safe and convenient pedestrian access and offers no reasonable alternatives to private car use for day-to-day needs of future occupants; the dwelling would be situated in an unsustainable location contrary to the aims of National Planning Policy Framework and Wiltshire Core Strategy policies.*

3. The level of demolition and re-development required to facilitate the residential use of the site, to the design-specification proposed, amounts to a substantial rebuild and re-construction rather than a genuine conversion of the existing building. The proposal is tantamount to a new dwelling, and the scheme has not demonstrated that the necessary exceptions for such development in the Green Belt can be met; the scheme therefore constitutes inappropriate development in the Green Belt, which is by definition harmful.

4. The domestic use of the land and encroachment of residential development into the rural landscape would not enhance the immediate National Landscape setting. The level of the fenestration and overall design of the dwelling proposed gives an overriding impression of a building in domestic use, which would fail to retain the functional agricultural character of the site. The proposal would, in a localised context, negatively impact the tranquillity of the National Landscape setting.

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Statutory Legislation:

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 3 Infrastructure Requirements;
- Core Policy 11 Spatial Strategy Corsham Community Area
- Core Policy 41 Sustainable Construction and Low-Carbon Energy;
- Core Policy 48 Supporting Rural Life

- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 60 Sustainable Transport
- Core Policy 61 Transport & Development;
- Core Policy 64 Demand Management

Saved policies of the North Wiltshire Local Plan

- H4: Residential development in rural areas

There is no Box Neighbourhood Plan at this time.

Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Local Transport Plan - including the Car Parking Strategy and Cycling Strategy

Cotswolds National Landscape Management Plan (CNLMP):

- Policy CE1: Landscape
- Policy CE4: Local Distinctiveness
- Policy CE5: Tranquillity
- Policy CE6: Dark Skies

National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

HOUSING LAND SUPPLY

The Councils Housing Land Supply (HLS) Statement (base date: April 2024) was published in June 2025 and covers the HLS for Wiltshire and each Housing Market Area within Wiltshire as set out in the WCS. The HLS position identified under section 6 of the statement expresses that the current number of years deliverable supply is 2.42 years.

Briefing Note (No. 25 – 04) dated 18.06.2025 reiterates that position and states under section 2.3 that: *“The council cannot demonstrate the requisite five-year housing land supply. The current position indicates there is a 2.42 years supply.”*

ISSUES

The main issues that need to be addressed in this case include:

- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme would have an acceptable impact upon the Green Belt (NPPF Chapter 13)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would have an acceptable landscape impact (CP 51)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 60, 61 and 64)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)
- Are there any other planning issues raised by the development?

CONSULTATION RESPONSES

WC Highways: Mixed response:

“I refer to the above consultation for planning advice dated 05/01/2026 with regard to Retrospective permission for Change of Use of part of an existing barn for residential purposes.

As this would lead to separate dwellings outside of identified development boundaries, the proposal would usually attract an adverse highway recommendation on sustainability grounds as follows:

The site is located outside of any settlement policy boundary, raising concerns with regards to the sustainability of the site for residential development due to the likely reliance upon the private car for any occupants and their visitors.

This proposal is therefore, in my opinion, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy and Section 9 of the National Planning Policy Framework

2024, which aim to reduce the need to travel particularly by private car and encourage the use of sustainable transport alternatives.

However, I shall be guided by you on this sustainability issue and wish to advise with regard to highways in the instance that you would be minded to permit a dwelling in this location.

The site is accessed from Doctors Hill, an unclassified section of public highway subject to a speed limit of 30mph, which immediately changes to 60mph to the south. The existing access serves the stables and would be suitable for residential access for the purpose of this retrospective proposal. It is not proposed to alter the access with the public highway.

It is indicated that a single vehicle parking space would be available for use in relation to the residential element, this would be in accordance with the minimum standards for residential development.

Other than the highlighted sustainability issue, the principle of a single residential unit ancillary to the equestrian use would not be considered detrimental in terms of capacity within the public highway. Therefore, it is considered that no highway objection be raised.”

WC Conservation: No comment

“The development does not lie within our consultation remit and in view of the need to be selective in what can be given consideration by this team to focus on cases where we can add most value we have not examined this proposal in detail and do not intend to comment. This should not, however, be construed in any way as implying approval or endorsement of the proposal. If assessment indicates that detailed conservation input is required please re-consult us.”

Box Parish Council: Object:

Box PC objects and refers to the original condition that this barn and summer house should not be used as a private dwelling - it amounts to planning creep.

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

One representation has been received, as follows:

“Our concern would be any sub letting or similar, in part or whole of the curtilage, to persons other than the applicants/owners, this could possibly lead to lack of care and maintenance of sharing boundaries, as indeed it has in the past, causing inconvenience and cost to ourselves. Suitable restrictive covenants should be considered for implementation. Existing restrictions to use of the land adjoining our, and other adjacent properties should be maintained.”

ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

“If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of Development

Policy Context

Core Policy 1: Settlement Strategy of the WCS establishes a hierarchy of settlements to guide where development should be focused. The policy prioritises growth in:

- Principal Settlements (e.g., Salisbury, Chippenham, Trowbridge) – main focus for strategic growth.
- Market Towns – support local services and employment; suitable for sustainable development.
- Local Service Centres – smaller towns and villages with a range of services; limited development supported.
- Large and Small Villages – development should be limited and respond to local needs.
- Outside the defined settlements – development is strictly controlled and generally not supported unless exceptional circumstances apply.

Core Policy 2: Delivery Strategy of the WCS sets out how development will be distributed and delivered across Wiltshire. The policy emphasises:

- Sustainable patterns of growth, reducing the need to travel and supporting local services.
- Development should be plan-led, aligning with the settlement strategy and supported by infrastructure.
- Windfall development (not allocated in plans) must still comply with the principles of sustainable development.
- Development outside settlement boundaries is generally not permitted, unless it meets specific policy exceptions (as set out in paragraph 4.25 of the WCS):
 - Additional employment land (Core Policy 34)
 - Military establishments (Core Policy 37)
 - Development related to tourism (Core Policies 39 and 40)
 - Rural exception sites (Core Policy 44)
 - Specialist accommodation provision (Core Policies 46 and 47)
 - Supporting rural life (Core Policy 48)

Together, CP1 and CP2 ensure that new development is strategically located, sustainable, and supports the character and function of Wiltshire's communities.

In addition to those exception policies detailed above, saved policy H4 of the NWLP provisions explicit exception criteria for new dwellings in the countryside, outside of framework boundaries.

CP11 of the WCS expresses that development in the Corsham Community Area should be in accordance with the Settlement Strategy set out in CP1.

CP48 to the Wiltshire Core Strategy states:

“Outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, and outside the existing built areas of Small Villages, proposals for residential development will be supported where these meet the accommodation needs required to enable workers to live at or in the immediate vicinity of their place of work in the interests of agriculture or forestry or other employment essential to the countryside. Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence.”

CP48 sets out sequentially preferable uses with employment, tourism, cultural and community uses being preferred and housing only considered once there is evidence to prove that the foregoing uses are not practical propositions. In isolated locations, CP48 further directs that the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances.

For the uses specified, CP48 sets out the following criteria which need to be demonstrated:

- (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.*

Saved Policy H4 of the NWLP supports some residential development in the open countryside, where the following criteria can be demonstrated:

- “(i) It is in connection with the essential needs of agriculture of forestry or other rural based enterprise*
- (ii) It is a replacement for an existing dwelling [...].”*

Assessment

The site is located outside of any defined settlement limits, in open countryside, and concerns residential development. As such the development broadly conflicts with the aims of CP1, CP2 and CP11.

The proposal is considered in the context of exception policy CP48, Supporting Rural Life. The criteria for conversion/reuse of rural buildings are addressed below:

(i) It is noted that part of the barn has already been converted into living accommodation without significant rebuilding. Plans of the living accommodation have not been provided and so whether this provides an adequate level of amenity is not known, however.

(ii) There are some existing dwellings positioned sporadically along both sides of Doctors Hill; however, those which can be seen further north-west are within (albeit to the edge) of the main cluster of buildings associated with Ashley and those to the south are more closely related to the hamlet of Kingsdown. The barn is physically detached from either rural settlement and, in contrast to other residential units accessed from the hill, is in a more distinctly rural position.

There is already some localised visual harm arising from the change of use with the provision of domestic paraphernalia and a summer house. This is discussed further below.

(iii) There is existing vehicular access to the site and, taking fully into account the representation received from the Councils highways team, the vehicular access is adequate to serve the site. There are no significant concerns that the scheme would not meet the aims of criteria (iii) of CP48.

(iv) In terms of access to local services, the degree of separation, when comparing the site to existing dwellings along Doctors Hill, is greater by virtue of there being no direct access from the barn to any existing pavements or PROW. Future occupants would not benefit from a safe and convenient pedestrian or cycle access to public transport options and local facilities; notwithstanding that the site can accommodate off-street parking for vehicles, the site is not in a sustainable location and a dwelling in this location would be contrary to the aims of criteria (iv) of CP48. That the site is adjacent to (and benefits from existing vehicular access from) Doctors Hill does, however, allow for some degree of functional connection between the barn and the built form of rural settlements. The site is therefore not considered to be in an isolated location insofar as the requirements of CP48 and paragraph 84 of the NPPF apply.

(v) The development does not relate to the re-use of a heritage asset and as such criteria (v) of CP48 is not applicable

Saved Policy H4 of the North Wiltshire Local Plan allows for new residential development in the open countryside only where it is demonstrated that the dwelling is required in connection with the essential needs of agriculture, forestry, or another rural-based enterprise, or where it constitutes a replacement dwelling.

The proposal does not seek permission for a replacement dwelling. The application must therefore be assessed against criterion (i), which requires demonstration of an essential need. This is a similar matter as set out within CP48 regarding housing to meet the needs of rural workers. Based on the information provided and the planning history this proposal, however, is not about rural workers accommodation. The justification advanced is similar in that it relates to animal welfare, but this is not understood to be a commercial operation. As such, the proposal does not accord with paragraph one of CP48. Policy H4 refers to 'rural based enterprise' indicating it too relates to matters of employment / commercial activity rather than the private keeping of horses.

Nonetheless, the submission has been given full consideration. The Design and Access Statement advises that occupation of part of the barn is necessary due to the distance between the applicant's previous residence and the site, the need to travel two or three times daily, and the requirement for a greater level of on-site husbandry for the horses. However, the submission does not provide substantive evidence to demonstrate that full-time on-site residential accommodation is essential to the operation of the approved private equestrian use. In particular, no details have been provided regarding the location of the applicant's previous residence, the travel distances involved, or why the management of the horses could not reasonably be undertaken without permanent residential occupation of the barn.

While the care of horses is acknowledged, the equestrian use was previously approved without any associated residential accommodation, and no clear evidence has been submitted to demonstrate that circumstances have materially changed such that a dwelling is now essential.

Accordingly, the proposal does not satisfy the requirements of Saved Policy H4 or CP48.

Conclusion

The site lies outside any defined settlement limits in open countryside. The proposal for residential use conflicts with the settlement strategy set out in CP1, CP2 and CP11, which direct new housing towards defined settlements and only support development in the countryside where specific exceptions apply.

Saved Policy H4 and CP48 require that any new dwelling in the open countryside either replaces an existing dwelling or is demonstrably essential to the operational needs of agriculture, forestry, or another rural enterprise. The application does not propose a replacement dwelling, and the applicant has not provided sufficient evidence to demonstrate that permanent on-site residential accommodation is essential. Furthermore, it is noted that the application relates to a private equestrian use. While some functional need for horse husbandry is acknowledged, the evidence does not indicate that it is so compelling as to justify the introduction of a dwelling in this location.

These concerns regarding residential development in the open countryside are consistent with the recent decision at Merkin Farm (PL/2025/04403 referred to earlier in this report) located approximately 90m southeast, which was refused on grounds including conflict with CP48 and the settlement strategy, and the absence of sequentially preferable uses.

The proposal is therefore contrary to CP1, CP2, CP11, CP48 and Saved Policy H4, and the principle of residential development on this site is not supported.

Impact on the Greenbelt

Policy Context

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. Development within the Green Belt is generally considered inappropriate unless it falls within specific exceptions set out in the NPPF Chapter 13. Any proposal that constitutes inappropriate development must demonstrate very special circumstances, which clearly outweigh the harm to the Green Belt and any other harm resulting from the proposal.

Assessment

The site is located within the GB and the CNL. The 2020 permission for the barn established that the building and land were to be used solely for private equestrian purposes, with strict conditions prohibiting residential occupation, external storage, domestic paraphernalia, and the introduction of additional structures.

Since that permission, it has become apparent that a portion of the barn is being used for permanent residential purposes. Observations from site and Council records indicate the presence of domestic paraphernalia, including a summerhouse (subject to a separate

retrospective application), outdoor seating and tables, a swing seat, clothes airers, potted plants, multiple private vehicles, a post box, and a large delivery box.

The introduction of these domestic features, as part of the material change of use, represent inappropriate development in the Green Belt. They materially alter the use and character of the land, diminish its openness, and conflict with the purposes of the Green Belt by introducing residential activity into an area previously restricted to equestrian use. Substantial weight is therefore afforded to this harm. The existing conditions of the 2020 permission, which were imposed to preserve the rural character and prevent what has been coined as “planning creep,” have been clearly breached.

Given the scale and permanence of the residential activity, and the proliferation of domestic paraphernalia, the development is considered to cause significant harm to the openness of the Green Belt and the character of the countryside. The presence of the summerhouse, outdoor furniture, and other domestic paraphernalia further illustrates the incremental domestication of the site. This substantial residential activity and associated paraphernalia on site are considered inappropriate development in the Green Belt, consistent with the reasoning applied at Merkin Farm, where the creation of a new dwelling in a similar rural context was refused due to harm to openness and countryside character.

Conclusion

The residential occupation of the barn, together with the associated domestic paraphernalia, constitutes inappropriate development in the Green Belt. It materially harms openness, conflicts with the purposes of Green Belt designation, and breaches the conditions of the 2020 permission. Substantial weight is therefore given to this harm, which provides a strong reason for refusal under national Green Belt policy.

Design and Impact on the Character and Appearance of the Area

Policy Context

Core Policy 57 of the WCS requires high-quality design that:

- Enhances local character.
- Responds to the natural, historic, and built environment.
- Retains important features (e.g., trees, hedges).
- Supports sustainable construction and compatibility with surrounding uses.
- Creates safe, legible, and accessible spaces.

Section 12 of the NPPF emphasises design that is:

- Visually attractive.

- Functionally effective.
- Contributes to the quality of the built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Building for a Healthy Life Framework promotes healthy, inclusive, and sustainable places.

The document encourages:

- Walkability.
- Access to green space.
- Active design principles for well-being.

Assessment

The barn and associated domestic paraphernalia are largely screened from public view by hedgerows and boundary vegetation along Doctors Hill. While this limits visual prominence from the public highway, it does not mitigate the impact on the character and appearance of the local area.

Below: view from highway southeast of the site:



Below: View from highway immediately northeast of the site



The introduction of outdoor furniture, clothes airers, potted plants, vehicles, and a summerhouse has resulted in a domestication of the site that is visually apparent within the site. The cumulative effect of these elements disrupts the rural character and contrasts with the surrounding agricultural and equestrian context.

Below: Photos from enforcement file of summerhouse and other domestic items:





The barn itself, though of simple form and scale, is now used in a manner that conflicts with its intended equestrian function. The incremental introduction of domestic paraphernalia gives the appearance of a residential curtilage where none previously existed, eroding the traditional rural character of the immediate area.

Conclusion

While the barn and associated paraphernalia are largely screened from public view, the domestic use of the site has resulted in a material change to the character and appearance of the local area. The development is visually intrusive within the context of its immediate surroundings and represents a clear departure from the intended rural equestrian function, contrary to the principles of high-quality design and the retention of local character promoted by Core Policy 57 and the Wiltshire Design Guide.

Amenity

Policy Context

Core Policy 57 of the Wiltshire Core Strategy requires development to protect the amenity of existing and future occupants, including:

- Ensuring adequate living conditions in terms of space, daylight, privacy, and outlook.
- Avoiding unacceptable harm to the amenity of neighbouring properties.

The NPPF (Section 12) and the Wiltshire Design Guide reinforce that development should not result in poor living conditions, and new housing should provide functional, usable space that meets modern standards.

Assessment

The isolated nature of the site means that the proposals are unlikely to result in any significant impacts on the amenity of neighbouring properties.

The barn is approximately 10.8m x 10.8m in footprint with a height of around 3.9m. Only about a third of the building has been converted for residential occupation. No floor plans of the living quarters have been provided, and as such it is not possible to confirm whether the space provides adequate levels of amenity for full-time occupation.

The limited scale of the occupied area within the barn reinforces the impression that the residential use is ad hoc rather than a well-justified, functional dwelling. Accordingly, the proposal fails to demonstrate that it would provide satisfactory living conditions in accordance with Core Policy 57 and the NPPF.

A representation has raised concerns that any subletting or use of the property by persons other than the applicant could lead to a lack of care and maintenance of shared boundaries and adjoining land. While no formal tenancy or subletting arrangements are proposed, this highlights the potential for impacts on neighbouring amenity should such arrangements occur.

Conclusion

While the proposals are unlikely to affect neighbouring properties due to the isolated location, the adequacy of the residential accommodation for the current occupants cannot be confirmed. The absence of floor plans or details on internal facilities represents a gap in demonstrating compliance with CP57 and the NPPF requirements for acceptable residential amenity.

Highways Impacts and Parking

Policy Context

Transport implications are a key factor in assessing planning applications, especially for larger developments. Proposals must demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, and those with mobility impairments.
- No severe residual impacts on the surrounding highway network.

- Promotion of sustainable travel, reducing reliance on private vehicles.
- Adequate parking and cycle provision, in line with adopted standards.
- Protection and enhancement of public rights of way and active travel routes.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

Proposals must also ensure safe access for refuse collection vehicles and comply with the Wiltshire Council Waste Storage and Collection SPD (2017).

Where necessary, Transport Assessments or Statements should be submitted to evaluate impacts and identify mitigation. Planning conditions or legal agreements may be used to secure off-site improvements, travel plans, or contributions to sustainable transport infrastructure.

Assessment

The Council Highways Officer has confirmed that the site is located outside of any settlement policy boundary, and as such is not considered a sustainable location for residential development. Occupants would be highly reliant on private vehicles for access to everyday services, employment, and education, as there is no convenient pedestrian or cycle connection to local facilities or public transport options. There is no footway along this part of Doctors Hill, and the nearest services and amenities are a significant distance away, reinforcing the need to travel by car.

The existing access from Doctors Hill is considered adequate for a single dwelling and would not require alteration. Sufficient on-site parking is provided to meet minimum standards for residential development. The highway officer has indicated that, aside from the sustainability issue, the proposed residential use would not result in adverse highway capacity or safety impacts.

Notwithstanding the adequacy of the access and parking arrangements, the isolated location and lack of sustainable travel options weigh against the proposal in terms of Core Policies 60 and 61 of the Wiltshire Core Strategy and Section 9 of the NPPF (and also reflect concerns previously cited at Merkin Farm, where lack of safe pedestrian access and limited alternatives

to car travel contributed to a refusal on sustainability grounds), which seek to reduce reliance on private vehicles and encourage sustainable travel.

Conclusion

While the development does not present any highway safety concerns and provides adequate parking, the site's isolated location and lack of footways or sustainable travel options mean that the proposal would fail to promote sustainable transport. This represents a further constraint against the residential use of the barn in accordance with adopted planning policy.

Landscape and Visual Impact

Policy Context

Core Policy 51 of the Wiltshire Core Strategy requires development to:

- Protect, conserve, and enhance landscape character and quality.
- Respect local distinctiveness, key views, and visual receptors.
- Give particular weight to impacts on National Landscapes (formerly AONBs) and locally valued landscapes.

The Wiltshire Design Guide SPD (2024) promotes a context-led approach, encouraging integration with natural features and settlement patterns while avoiding visual intrusion.

The Green & Blue Infrastructure Strategy (2022–2030) supports landscape protection through green infrastructure, habitat connectivity, and nature-based solutions.

The NPPF emphasises the need to protect and enhance valued landscapes, particularly those with scenic, historic, or ecological significance. Planning decisions should:

- Recognise the intrinsic character and beauty of the countryside.
- Safeguard key views, local distinctiveness, and landscape settings.
- Ensure development is well-integrated into its surroundings and avoids visual intrusion, especially in sensitive or designated areas.

Landscape impact must be considered alongside biodiversity, heritage, and green infrastructure objectives, with mitigation measures encouraged where harm cannot be avoided.

Paragraph 189 of the NPPF requires that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status of protection in relation to these issues.

Under Section 245 of the Levelling-up and Regeneration Act 2023, LPAs and other relevant authorities must now “seek to further” the statutory purposes of National Landscapes (formerly Areas of Outstanding Natural Beauty), replacing the previous duty to merely “have regard to” them.

This is an active duty, requiring authorities to take reasonable and proportionate steps to support the conservation and enhancement of the natural beauty, special qualities, and key characteristics of these designated areas when exercising any function that affects them.

The Cotswolds National Landscape Management Plan (CNLMP) provides further guidance relevant to the site:

- Residential use and the proliferation of equestrian paraphernalia in yards can harm the character and openness of enclosed limestone valleys.
- Horse paddocks, stables, jumps, fences, and associated domestic activity should be carefully sited, close to existing buildings, and minimised in number to avoid cumulative harm.
- Historic field boundaries, hedges, and trees should be retained or enhanced.
- Lighting should be minimised to conserve tranquillity and dark skies (Policies CE5–CE6).
- Development should conserve local distinctiveness and the scenic quality of the landscape (Policy CE4).

Assessment

The barn and surrounding yard are within an enclosed limestone valley of the Cotswolds National Landscape. Observations and aerial photography show the site has been subject to increasing residential activity, including: a summerhouse (subject to a separate application), outdoor furniture, potted plants, clothes airers, multiple vehicles, a post box, and a large delivery box.

While much of this activity is screened from public viewpoints by existing hedges and trees, the cumulative impact of residential paraphernalia and domestic activity is apparent and inconsistent with the guidance in the CNLMP, which resists residential uses in yards and seeks to minimise clutter in visually sensitive valley locations.

The residential occupation and associated paraphernalia have altered the rural character of the site, eroded its tranquillity, and detracted from the quality and scenic value of the local landscape. The spread of domestic items and vehicles constitutes visual clutter and demonstrates incremental domestication of a previously open, equestrian-use site. These impacts conflict with Core Policy 51, the NPPF, and the objectives of the CNLMP, particularly Policies CE1 (Landscape), CE4 (Local Distinctiveness), CE5 (Tranquillity), and CE6 (Dark Skies).

Conclusion

The existing residential occupation of the barn and associated domestic paraphernalia has caused harm to the character and appearance of the Cotswolds National Landscape. Despite screening from the public highway, the cumulative impact undermines the scenic quality, tranquillity, and local distinctiveness of the valley. The proposal is therefore contrary to Core Policy 51, the NPPF, and the guidance in the CNLMP, and is considered unacceptable in landscape and visual terms.

Ecology and Biodiversity Net Gain (BNG)

Policy Context

The ecological impact of development is a key planning consideration, especially for larger schemes. Proposals must assess and address potential effects on:

- Protected species
- Priority habitats
- Ecological networks
- Green and blue infrastructure

Core Policy 50 of the Wiltshire Core Strategy requires development to:

- Avoid harm to ecological assets.
- Deliver measurable Biodiversity Net Gain (BNG), in line with the Environment Act 2021.
- Support habitat restoration and connectivity.
- Integrate biodiversity into site design.

The Green & Blue Infrastructure Strategy (2022–2030) promotes nature recovery, ecosystem services, and habitat connectivity through development.

Unless exempt, National policy requires a minimum of 10% Biodiversity Net Gain (BNG) for major developments, demonstrated via:

- Biodiversity Metric calculations
- Ecological assessments (e.g. PEAs, Phase 1 surveys, protected species surveys)

Assessment

The site lies within the consultation zone for the Bath & Bradford-on-Avon Special Area of Conservation (SAC). While the retrospective residential use has been established, no ecological surveys were submitted or commissioned, and no pre-commencement conditions remain in place. Given that the works have already been carried out, formal ecological mitigation or enhancement cannot be secured through planning conditions.

Observations indicate that the barn conversion and associated domestic activity have already altered the site, with limited opportunities remaining for meaningful ecological improvements. No evidence has been submitted to demonstrate impacts on protected species, priority habitats, or ecological networks, and the retrospective nature of the proposal limits the ability to address any such impacts through design or mitigation.

With regard to Biodiversity Net Gain (BNG), the Environment Act 2021 requires major developments to achieve a minimum 10% gain. However, BNG is normally assessed and secured pre-commencement, using ecological surveys and Biodiversity Metric calculations. In this instance, as the development has already taken place, there is no mechanism to ensure BNG, and no proposals have been submitted. As such, the scheme cannot currently be considered to deliver measurable biodiversity enhancements.

Conclusion

The retrospective residential use of the barn cannot demonstrate that ecological impacts have been avoided or mitigated, nor can it provide measurable Biodiversity Net Gain. While no evidence of harm has been formally recorded, the inability to secure mitigation or enhancement weighs against the proposal in terms of Core Policy 50 and national biodiversity objectives.

Other material considerations

The Wiltshire Housing Land Supply Statement (published June 2025) provides the latest position on the Council's ability to demonstrate a five-year supply of deliverable housing

land, which is a material consideration in the determination of planning applications for residential development.

The NPPF requires a five-year housing land supply to be met in all circumstances. The accompanying Planning Practice Guidance on Housing Needs Assessment which sets out the housing requirement to be used in the calculation was revised at the same date and this has resulted in a substantial increase in the five-year housing requirement to be met from the previous calculation. As a result of this change of approach, the Council can currently demonstrate a 2.42 year housing land supply which represents a shortfall.

However, paragraph 11(d)(i) provides that planning permission should be refused where the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for doing so. The site lies within the Green Belt and the Cotswolds National Landscape, both of which are protective designations identified at footnote 7 of the NPPF.

As set out below, the proposed residential use is considered to constitute inappropriate development within the Green Belt and would result in harm to its openness and purposes. Substantial weight is afforded to this harm. Harm has also been found in relation to the National Landscape. In these circumstances, the identified conflict with Green Belt and National Landscape policies provide a strong reason for refusal under paragraph 11(d)(i), and the presumption in favour of sustainable development does not indicate that planning permission should be granted.

PLANNING BALANCE AND CONCLUSION

The development comprises the retrospective change of use of part of an existing barn to residential use in a location outside any defined settlement limits. The site is situated within the Green Belt and the Cotswolds National Landscape, both of which are designated areas of particular importance under footnote 7 of the NPPF.

The proposals conflict with the aims of Core Policies 1, 2, 11, 48, 51, 57, 60–64 of the Wiltshire Core Strategy and saved Policy H4 of the North Wiltshire Local Plan. The development has resulted in inappropriate residential use in the Green Belt, with associated paraphernalia diminishing openness, introducing clutter, and conflicting with the purposes of the Green Belt. It is also contrary to policies protecting the landscape character and special qualities of the Cotswolds National Landscape, as well as guidance in the CNL Management Plan regarding residential use in equestrian yards.

The site is isolated, with no material impacts on neighbouring amenity; however, the living accommodation provided is limited and no detailed floor plans have been submitted to demonstrate acceptable internal conditions for residential use. The location is unsustainable, with no safe pedestrian links to local services or public transport, and reliance on private vehicles is likely.

The considerations outlined above regarding the principle of development, Green Belt, sustainability, and landscape impact are consistent with recent decisions on comparable sites, including Merkin Farm (PL/2025/04403), where residential development in a similar rural context was refused for reasons relating to policy compliance, harm to openness, unsustainable location, and adverse impact on the National Landscape

While the Council acknowledges the potential personal circumstances of the occupants, including the care of horses, these do not outweigh the substantial harm to the Green Belt, landscape character, and sustainability objectives. Likewise, although biodiversity considerations are recognised, the retrospective nature of the works means that no ecological harm is anticipated beyond existing conditions, and there is no mechanism to secure Biodiversity Net Gain post hoc.

Tilted Balance:

Although Wiltshire Council cannot currently demonstrate a five-year housing land supply, the site is within the Green Belt and Cotswolds National Landscape and these considerations provide strong reason for refusing the development. These areas are specifically identified in footnote 7 of the NPPF as “areas or assets of particular importance,” meaning that the presumption in favour of sustainable development does not apply. Substantial weight must therefore be afforded to the harm identified.

On balance, the identified harms to the openness of the Green Belt, the character and appearance of the Cotswolds National Landscape, and the unsustainable nature of the site provide a strong reason for refusal, and the proposals are considered contrary to the development plan and national policy.

RECOMMENDATION: That Planning Permission be REFUSED for the following reasons:

1. Inappropriate Development in the Green Belt

The retrospective residential use of part of the barn, together with associated domestic

paraphernalia including a summerhouse, outdoor seating, clothes airers, potted plants, delivery boxes, and private vehicles, constitutes inappropriate development within the Green Belt. The development has resulted in a material loss of openness and conflicts with the purposes of the Green Belt. Substantial weight is afforded to this harm. The proposal is therefore contrary to Chapter 13 of the National Planning Policy Framework (NPPF) and Core Policies 1 and 2 of the Wiltshire Core Strategy (WCS).

2. Lack of Essential Need / Conflict with Saved Policy H4

The proposal is located in an open countryside location where new dwellings are only allowed based on established policy exemptions. The proposal does not involve a replacement dwelling and no substantive evidence has been provided to demonstrate that permanent residential accommodation is essential in connection with the employment needs of rural areas. The development is therefore contrary to paragraph 84 of the National Planning Policy Framework and saved Policy H4 of the North Wiltshire Local Plan and Core Policies 1, 2, 11 and 48 of the WCS, which only permit new dwellings in the open countryside where an essential functional need is demonstrated.

3. Harm to the Character and Appearance of the Area / Cotswolds National Landscape

The residential occupation of the barn and the proliferation of domestic paraphernalia has introduced visual clutter and incremental domestication into a previously rural site. The proposal fails to conserve or enhance the landscape character, scenic quality, and local distinctiveness of the Cotswolds National Landscape, contrary to Core Policies 51 and 57 of the WCS, the Wiltshire Design Guide SPD, and the Cotswolds National Landscape Management Plan, and is inconsistent with Chapter 15 of the NPPF.

4. Unsustainable Location

The site is remote from local services, public transport, and safe pedestrian or cycle routes. Occupation of the dwelling would be reliant on the private car, contrary to the aims of Core Policies 60 and 61 of the WCS and Section 9 of the NPPF, which seek to reduce reliance on private vehicles and encourage sustainable transport alternatives.

5. Occupant Amenity / Lack of Suitable Living Conditions

The barn has been partially converted to residential use without the submission of floor plans or details of internal layout. As such, it is uncertain whether the accommodation provides adequate living conditions for occupants. The proposal is therefore contrary to Core Policy 57 of the WCS, which requires high-quality and functional design.

