

Written representation appeal relating to
Non determination of planning application for the conversion of three holiday
cottages to residential use. planning class use C3

App number	PL/2025/09713
Submitted	15 th October 2025
Registered	18 th December 2025
Description:	Change of use from holiday cottages into three one-bedroom cottages (residential use with associated parking and amenity)
Location:	The Byers 1 to 3, 84 Westbrook, Bromham, Chippenham, SN15 2EE

1 Executive summary

- 1.0 This is a written representation appeal in relation to the non-determination of an application for a change of use to the existing three cottages that are categorised as holiday rentals into full C3 residential cottages, with associated gardens and parking.
- 1.1 This appeal summary should be read in conjunction with the detailed supporting statement and associated reports that were supplied to the LPA and attached to this appeal submission.
- 1.2 This practice has tried to engage with and work alongside the LPA, however as yet, some 6 months after lodging the application in mid-October 2025 is yet to be determined.
- 1.3 This appeal statement will try and be brief and keep to relevant points, even though a decision notice has not been issued instead of wasting the inspectorate's time.

2 Refusal reasons

No refusal reasons are known. It is therefore suggested that this practice sticks to items that may be in disagreement rather than those that are likely to be common ground.

The suggested headings are as follows:

1. Location and Spatial Strategy
2. Transport, accessibility, sustainability of location
3. Loss of Tourism Accommodation
4. Design and layout especially of amenity and parking
5. Highways
6. Representations
7. Relevant appeals

With the inspector's agreement this practice will take items 1 and 2 together as in many way they interlink and overlap.

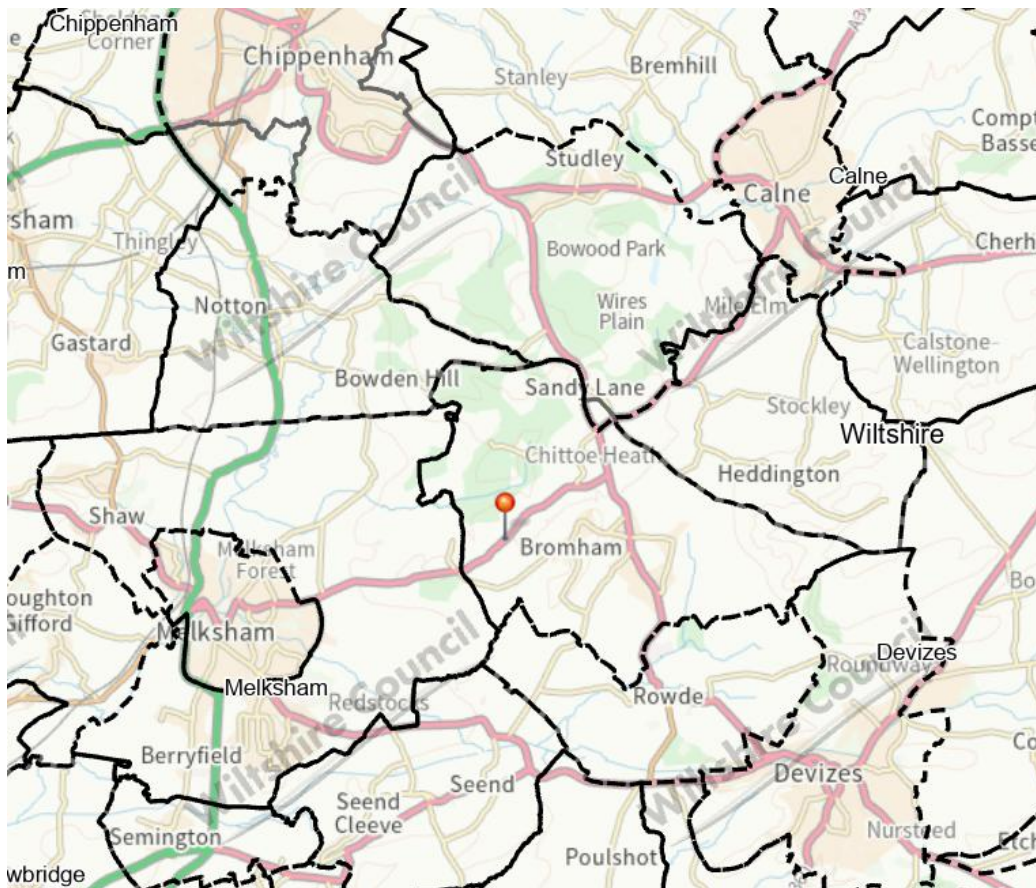
The Wiltshire Core Strategy is at the very end of its life and was drafted in 2012, therefore of diminishing relevance to this statement. In addition, Wiltshire have consistently underperformed in housing delivery especially when looked at against the 5 YHLS. The last published figure of housing delivery against demand quotes 2.42 years, not even close to the five-year target. We therefore ask the inspector to note the significant undersupply of housing and add weight to this appeal.

Potential Refusal reasons 1 & 2

- 2.0 This is previously developed land (PDL), that is not only already built upon but also in use on a daily basis with a mix of lawful residential uses and also the three holiday cottages. Therefore, we are not looking at a new-build scheme outside of a settlement boundary. With this as a benchmark the location cannot be debated, just the suitability of the location for the conversion to residential use.

Location

- 2.1 The cluster of buildings is located virtually equidistant between Melksham, Devizes, Calne and Chippenham. Good road links connect all these settlements to the site. Arguably the closest and easiest to get to is Melksham which is circa 2 miles away and served by road or bus. The site, the subject of this appeal, sits on the A3102 road between Melksham and Calne



Approximate Distances nearby settlements

Melksham circa 2miles

Devizes circa 4 miles

Calne circa 4.5miles

Chippenham circa 5 miles

2.2 Therefore whilst it would be easy to simply state that the proposed site, (which is already developed, PDL), is in the middle of nowhere in open countryside and unsustainable, it simply would not be true. Education, shopping, employment and commercial uses are all within a few minutes by car, cycle or public transport, and via one of these hubs further distances are provided by bus and train.

2.3 In terms of advertised bus services the following should be noted.

Bus services near 84 Westbrook, Bromham (SN15 2EE) are primarily operated by Faresaver, with key routes 33 and X33 providing direct connections between Chippenham and Devizes. Stops at The Greyhound and The Crescent are closest, with services running through Bromham village to Calne, Rowde, and surrounding areas.

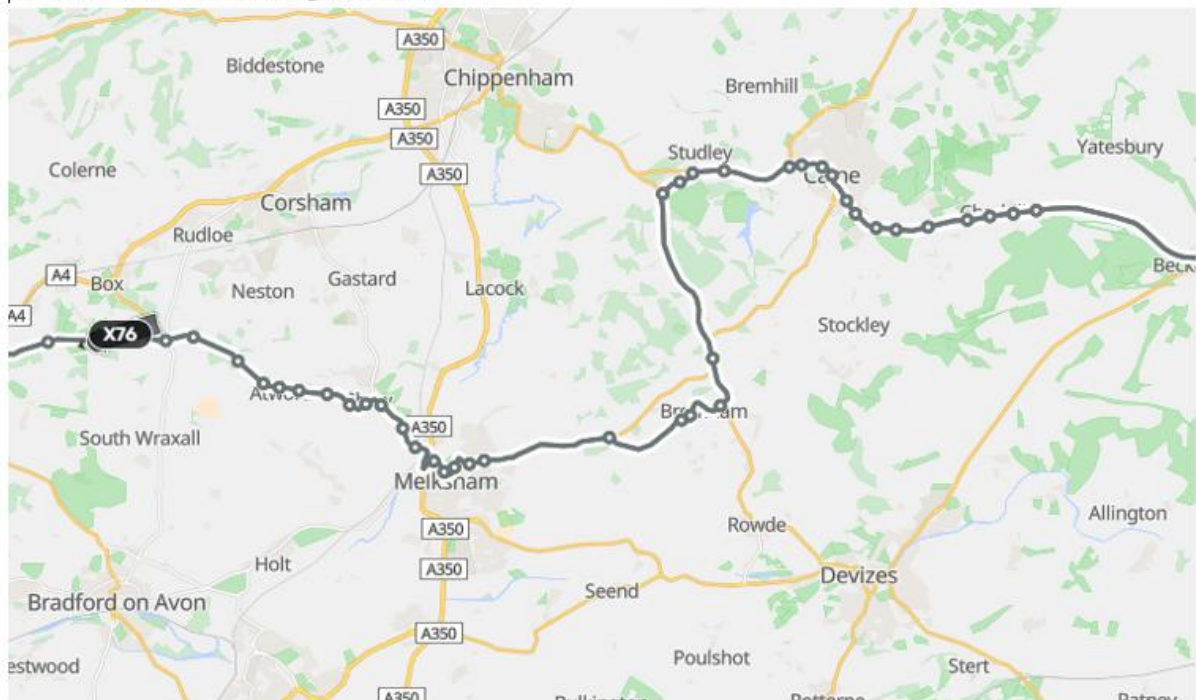
- Faresaver 33: Connects Chippenham - Calne - Bromham - Rowde - Devizes.
- Faresaver X33: Express service connecting Chippenham - Bromham - Rowde - Devizes.
- Swindon Bus Co' runs the X76 bus service between Melksham and Calne

Wiltshire Connect: On-demand services may be available for surrounding areas not served by fixed routes.

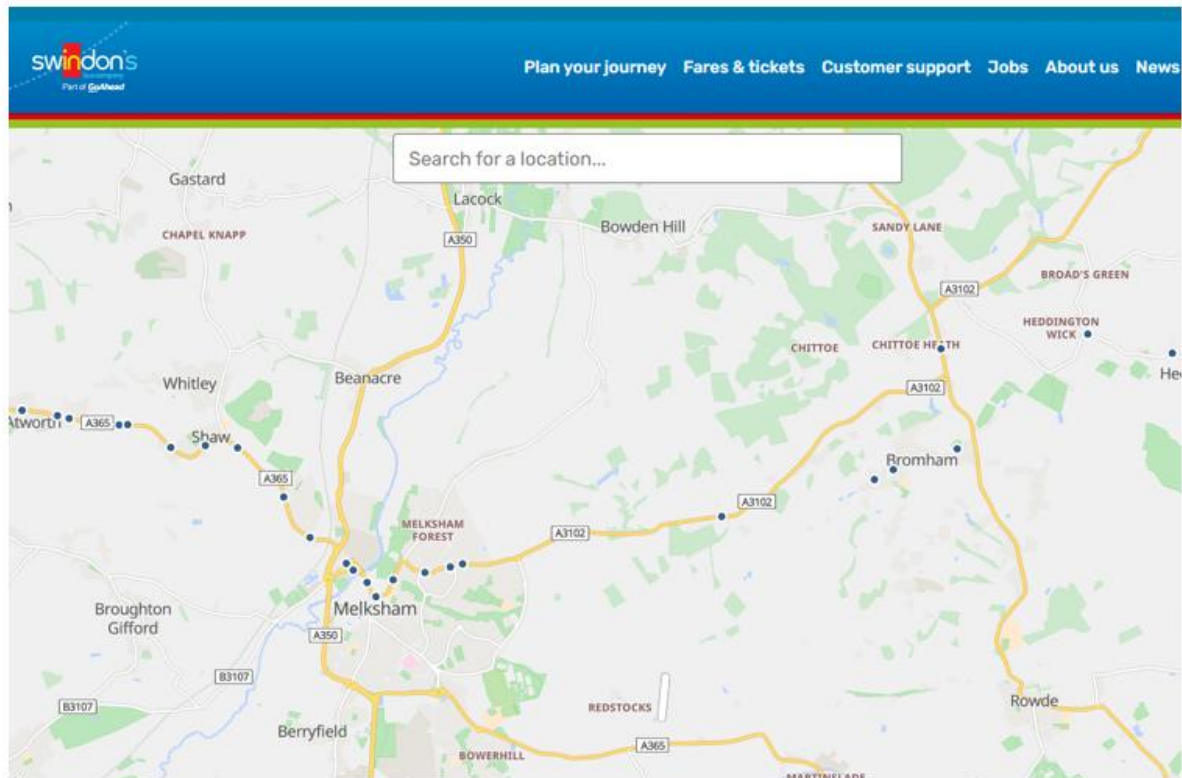


Nearest advertised bus stop is at the Westbrook Inn, however hail and stop or hop is quite normal in semi-rural areas. The distance to the bus stop from the site is 534m

Route of X76 Bus along the A3102



Bus Stops showing one at the Westbrook Inn



Nearby amenities

2.4 It is also important to note what the immediate village and nearby villages and towns offers by way of services and amenities.

The Byres, located at 84 Westbrook, Bromham (SN15 2EE), is a self-contained unit set within the Wiltshire countryside, offering close proximity to local village amenities including pubs (The Westbrook Inn, The Greyhound), a butcher, farm shop, and church. It is well-placed for visiting Lacock, Devizes, and Chippenham for further services.

Nearby Facilities & Amenities:

- The Westbrook Inn (country pub with garden/play area) is nearby 534 mtrs, along with The Greyhound in Bromham village.
- Local Services: Within walking distance of a butcher, village store, and farm shop.
- Attractions: Located near the National Trust village of Lacock and offers access to numerous scenic country walking and cycling routes.
- Transport & Location: 15 minutes from the M4; close to Devizes, Chippenham (mainline rail to London), and Bath (10 miles).
- Education: Near schools such as St Mary's Calne, Dauntsey's School, and Marlborough College. Other nearby Schools (Primary & Secondary Area):
- Bromham St Nicholas Primary School (Approx. 0.3 miles - Primary)
- Rowde Church of England Primary Academy (Approx. 1.5 miles - Primary)
- Chippenham Primary Schools (Various options within 3-5 miles)
- Secondary Schools: Several schools are available in nearby Chippenham or Devizes for older children.

2.5 With the above in mind it is clear that local services and education are not far away from the proposed dwellings.

2.6 The area does have fast broadband.

Turning now to the use of the car.

2.7 It may be stated that the proposal is unacceptable due to the reliance on a motor vehicle. We have already discussed what goes on within and around the village with regards to the pub, restaurant and what else is very close by in Melksham.

That being said it is not unusual in this modern age to not rely on a car. Especially in a cluster of existing housing with a nearby bus stop.

2.8 Amazon, other delivery companies and all the main supermarkets now offer daily deliveries to this village and already do so. In addition to this Just Eat and Deliveroo offer hot food and groceries delivered on demand. Therefore, there would be no absolute need for a vehicle to get food or any other shopping items, and the delivery vehicles are already going to the village daily.

In summary a single small development containing just three additional small residential dwellings, an existing use (holiday cottages) that already generates potentially more car movements, would produce so few traffic movements (plus or minus a couple of percent) as to not be discernable.

3 Loss of Tourism Accommodation

- 3.1 Although, as previously mentioned, the core strategy drafted in 2012 is at the very end of its life span, it is worth mentioning core strategy 39 and core strategy 40 which relate to tourism accommodation.

These policies mainly relate to creating tourism accommodation rather than its loss, however loss of Holiday Cottages are not specifically mentioned in these policies and it relates more to hotels and conference facilities or similar.

- 3.2 Given that this was a former farm and large farmhouse and the old outbuildings were granted permission to be used as holiday cottages in the 1980's; we were in a very different world at that point both economically and also in planning terms. Should the proposal come up now then the outbuildings would have benefitted from prior approval Class Q and it cannot be denied that a residential use would have been granted.

- 3.3 It is not abnormal for buildings to go through multiple changes over their lifespan and given the woeful five year housing land supply figures in Wiltshire and the fact that they comply with minimum size standards for residential use, this windfall of three extra small dwelling houses set amongst lawful residential dwellings actually fits very well into this former farm house setting which will create a small close knit community.

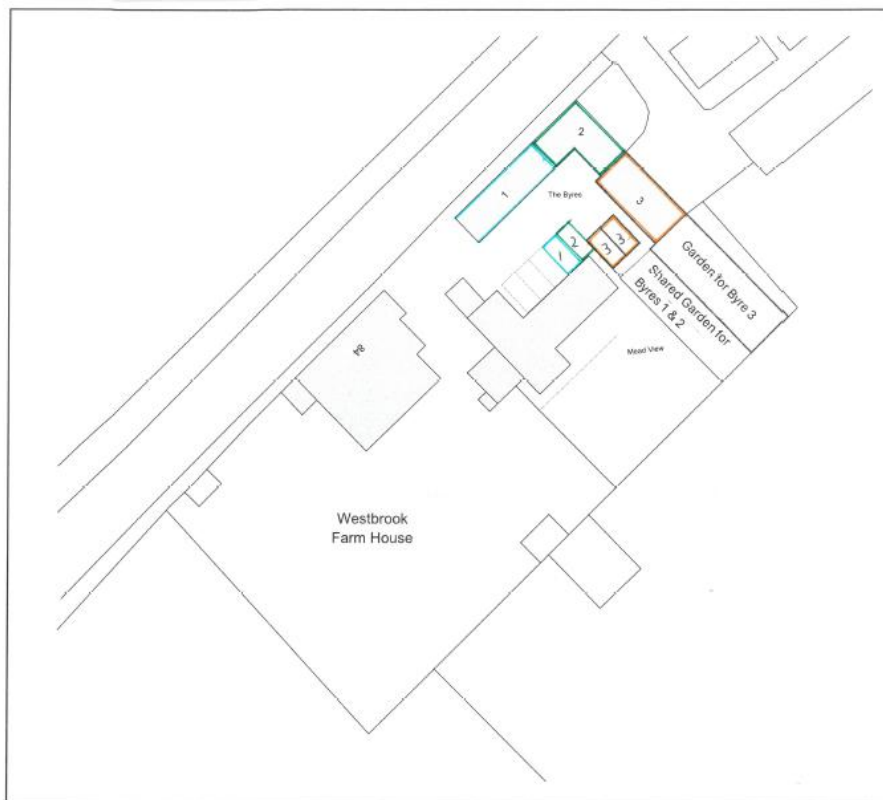
- 3.4 There has in recent years been a growing trend for Air BnB or similar and therefore the amount of holiday accommodation has increased in Wiltshire and not decreased.

4 Amenity and Parking

Parking

- 4.1 Safe and secure parking for each proposed cottage is provided, this has always been the case whether as a holiday cottage or should this proposal for a change of use to residential be allowed. In effect, nothing changes from the existing situation.
- 4.2 A parking and amenity plan was submitted as part of the application and is shown below.

The Byres – Parking and Amenity/Garden Areas



4.3 The plan clearly shows ample parking and a double space for three units.

Amenity Space

4.4 The same previously submitted plan also shows the generous garden (amenity) space for each unit. It is suggested that Byers 3 runs from the flank wall of that unit and that units 1 and units 2 share a garden. This could be split into two, however it is not uncommon for two units to share an amenity space.

5 Highways

- 5.0 This practice has already alluded to there being very little difference between the existing use and the proposed use. This is backed up by the Highways Authority's comments back in January which stated the following.

There will be an increase in daily vehicle movements onto the A3102 from the proposal site given the location has very little in sustainable transport options.

However, the access is existing and as a shared access is sufficiently wide enough to provide adequate visibility.

I can raise no highway objection.

- 5.1 Given that the LHA raises no objection on highways ground this practice sees little point in using extra words for the Inspector.

6 Representations

6.1 There have been no neighbour objections for this application. Given the application has been live for almost 6 months if there was a local objection it would have been noticed by and reported by now. This is a simple change of use with no works required internally or externally from one planning use to another slightly different planning use and therefore this practice is not surprised that it is welcomed by locals.

6.2 Bromham Parish Council responded to the consultation and support the proposal. They stated:

Bromham Parish Council voted unanimously to support this application.

Therefore with no objections associated with this application and one (the parish) supporting the proposal there is no need to comment further to the inspector under this heading.

7 Relevant Appeals

- 7.1 There have been some useful appeals within the Wiltshire LPA that support semi rural, edge of settlement and sustainability arguments.
- 7.2 Rather than copying and pasting all of the full decisions below; this practice has provided the inspector a simple summary.

1. Land at Stones Farm, Cricklade (Allowed - Jan 2025)

Case Ref: APP/Y3940/W/24/3351265 (Decision date: Jan 23, 2025)

The Issue: The site was outside the settlement boundary of Cricklade (a Local Service Centre). The council argued it was a "countryside" location and not sustainable.

The Outcome: The inspector allowed the appeal for 140 dwellings. Despite being outside the boundary, it was deemed to have acceptable access to services in Cricklade, and the need for housing outweighed the strict application of the spatial

2. Land off Sherston Road, Malmesbury (Allowed - Nov 2025)

Case Ref: PL/2024/06897 (Decision date: Nov 26, 2025)

The Outcome: Appeal allowed for up to 55 residential units against a refusal by Wiltshire Council, allowing development on a site previously deemed less sustainable than other locations.

3. Old Sarum Airfield (Allowed - April 2025/2026)

Case Ref: 315 dwellings/mixed-use (Decision date: April 2025)

The Outcome: An appeal for 315 homes was allowed. Although Wiltshire Council launched a high court challenge (which it lost in March 2026), the appeal win was based on the need for housing overriding sustainability concerns regarding the specific site location.

4. Land South of Ballingers, Urchfont (Allowed - March 2025)

Case Ref: APP/Y3940/W/24/3348374 (Decision date: March 11, 2025)

The Outcome: Allowed 21 dwellings, including affordable housing and self-build plots in a rural area, proving that even smaller sites outside traditional settlement limits can win on sustainability grounds due to broader policy needs

7.3 As can be seen from these appeal decision within the last 12 months, the core startegy is clearly outdated, the appeal inspectors are taking an opposing view to the LPA and the woeful lack of housing should not be overlooked.

Conclusion

- This proposal causes no demonstrable harm.
- This proposal provides a small windfall residential site that can be implemented immediately without the need for an extensive lead in time and build. As no works are required.
- The proposal already sits within three other lawful residential units which will provide a close knit community.
- There are no highways objection.
- This is a change of use only and not significant building works.
- There are no neighbour objections.
- The Parish Council unanimously supports the proposal.
- Each unit complies to national space standards.
- Each unit is provided with parking.
- Each unit has amenity space
- Employment, education and commercial services are all close by, in semi rural terms.
- Public transport serving nearby towns is available.