

**TOWN & COUNTRY PLANNING ACT 1990
(AS AMENDED)**

**TOWN & COUNTRY PLANNING
(GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015 (AS AMENDED)**

*Application for Prior Approval Under Class Q of the GPDO 2015 (as amended), for
Change of Use of Agricultural Building into Single Residential Dwellinghouse (Class
C3) with Associated Operational Development*

DUTCH BARN AT BARROW STREET FARM, MERE, WILTSHIRE, BA12 6AB



PLANNING STATEMENT

ON BEHALF OF MR T. MERRELL

MAY 2026

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1.0 APPLICATION SITE AND PROPOSAL

- 1.1 The application site is a Dutch Barn which belongs to and is used for agricultural storage purposes in association with the wider agricultural operations at **Barrow Street Farm. Barrow Street, Mere, Wiltshire, BA12 6AB**. The Dutch Barn will be accessed via the main access into Barrow Street Farm and will be served by 2 existing gravelled parking spaces, as shown within the supporting plans and site photographs provided.
- 1.2 This application seeks to change the use of the existing agricultural building/ Dutch Barn and land within its curtilage to a single residential dwellinghouse, with a total proposed floor area of less than 150m² (149m² proposed). This change of use is within the parameters set out in Class Q, which allows for the change of use of agricultural buildings, and land within their curtilage, to use class C3 (residential), together with building works reasonably necessary for the building to function as a residential dwelling.
- 1.3 The proposed curtilage of the building is shown edged red on the proposed site plan and location plan, which equates to an area of 135m² (the footprint of the existing building is 136 m²). The total area of proposed curtilage is therefore no greater than the footprint of the existing building to be converted, therefore falling within the criteria of Class Q.
- 1.4 The proposed development is permitted by Class Q, Part 3, Schedule 2 of the Town & Country Planning (General Permitted Development) (England) Order 2015 ("GPDO 15") although Condition Q.2 of Class Q requires this application to be submitted to the Council, as Local Planning Authority ("LPA"), for a determination as to whether prior approval is required before the development commences.
- 1.5 This application is supported by a set of existing and proposed plans, as well as some recent site photographs. It is also supported by a structural appraisal undertaken by *Nigel Challis Ltd*, which concludes that the conversion can be carried out in compliance with the criteria of Class Q and that the existing principal structural elements of the building are in a satisfactory condition, therefore meeting the criteria mandated by Class Q.

1.6 The following supporting plans and documents accompany this application:

- Application Form
- Covering Letter (26022)
- Planning Statement (26022)
- 26022-1 - Existing Site Survey
- 26022-2 - Existing Plans, Elevations and Sections
- 26022-3 - Proposed Site Plan
- 26022-4A - Proposed Plans and Elevations
- 26022-5 - Location Plan
- Barrow Street Farm Barn Structural Appraisal by Nigel Challis Ltd
- Site Photographs (26022)
- The requisite planning application fee

2.0 PLANNING HISTORY

2.1 None relevant to application site.

3.0 PLANNING POLICY CONTEXT

National Planning Policy

3.1 Paragraph W (10) of Part 3, Schedule 2 of the GPDO 2015 states that:

“The local planning authority must, when determining an application (for prior approval)...having regard to the National Planning Policy Framework issued by the Ministry of Housing, Communities and Local Government in December 2024, so far as relevant to the subject matter of the prior approval, as if the application were a planning application.”

3.2 The sections of the National Planning Policy Framework (“NPPF”) relevant to the subject matters of prior approval are as follows:

- 9 (Promoting Sustainable Transport)
- 12 (Achieving Well-Designed Places)
- 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change)
- 15 (Conserving and Enhancing the Natural Environment)

3.3 Development Plan

There is no explicit requirement for the LPA to assess an application for prior approval against the Development Plan although, for completeness, regard has been given to the Wiltshire Core Strategy (2015). The following development plan policies are considered relevant to the subject matters for prior approval:

- CP48 (Supporting Rural Life)
- CP56 (Contaminated Land)
- CP57 (Ensuring High Quality Design & Space Shaping)
- CP61 (Transport & Development)
- CP62 (Development Impacts on the Transport Network)
- CP67 (Flood Risk)

3.4 Other Material Planning Considerations

Planning Practice Guidance (PPG)

4.0 ANALYSIS OF PLANNING CONSIDERATIONS

Principle of Change of Use

- 4.1 Paragraph 105 (13-105-20180615) of the Planning Practice Guidance (“PPG”) states that *“The Class Q permitted development right assumes that the agricultural building is capable of functioning as a dwelling and permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission”*.
- 4.2 Given the legislative provision for the change of use of an agricultural building to dwellinghouses and the inherent assumption in the PPG that an agricultural building is capable of functioning as a dwelling subject to some building operations, the principle of a change of use cannot be disputed.

Matters for Prior Approval

Transport and Highway Impacts of the Development

- 4.3 The proposed dwelling will be served by an existing means of access from/ onto Barrow Street, which currently serves Barrow Street Farm. Please see the details provided within the proposed site plan and location plan. The existing access has been in regular use for many years with no recorded incidences. The proposed dwelling will generate far fewer movements/ activities compared to the current agricultural use, and as such will offer significant highway safety benefits.
- 4.4 There is sufficient space for the access and turning of vehicles, so that vehicles can enter and leave the site in a forward gear, with 2 existing car parking spaces being provided to serve the dwelling, which are within its proposed domestic curtilage. There is also space to pull a vehicle off the highway, so as not to cause an obstruction.
- 4.5 The existing access is therefore safe and suitable having regard to Chapter 9 of the NPPF and Development Plan Policies DP61 and DP62.
- 4.6 Paragraph 116 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on the highway safety or the residual cumulative impact on the road network would be severe. This is not the case with the very limited amount of traffic generated by the proposed dwelling, which will provide highway safety benefits compared to the existing situation.

Noise Impacts

- 4.7 The proposed residential use is not a noisy activity, and the existing building is well situated in relation to other existing uses/ properties, which are suitably removed from the application site. There will be no adverse noise impacts with this proposal in accordance with Chapters 12 and 15 of the NPPF and Development Plan Policy DP57.

Contamination Risks on the Site

- 4.8 The existing and former use of the site has not led to any ground contamination and will not be Contaminated Land as described in Part 2A of the Environment Protection Act 1990 (as amended). As such, the proposals comply with the relevant part of Chapter 15 of the NPPF and Development Plan Policy DP56.

Flooding Risks on the Site

- 4.9 The existing building and land within its curtilage are within an area defined on the Environment Agency's flood maps as being at the lowest risk of flooding (Zone 1). As such the proposal will not be at risk of flooding and will not increase the risk of flooding elsewhere, in accordance with Chapter 14 of the NPPF and Development Plan Policy DP67. Paragraph 176 in the NPPF confirms that minor development involving change of use is not subject to the sequential or exception tests set out in Chapter 14 of the NPPF.

Whether the Location or Siting of the Building Makes it Otherwise Impractical or Undesirable for the Proposed Change of Use

- 4.10 The subject building and land within its curtilage have road access, power source and other services, and the dwelling will not be adjacent to other uses such as intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals. As such, the location of the building does not make it otherwise impractical or undesirable for its proposed change of use, having regard to guidance contained in paragraph 109 in the "When is Permission Required?" section of the PPG.

Design and External Appearance

- 4.11 In the first instance, it should be clarified that there is no specific test in the GPDO 2015 (as amended) as to whether the design or external appearance of the building is suitable for a change of use. The appropriate test, as set out in Q.2. (1), is actually to determine the design or external appearance of the proposed change of use and building operations permitted by Class Q (a) and (b).
- 4.12 The proposed building works fall within the building operations considered reasonably necessary to convert agricultural buildings into dwellinghouses as set out in paragraph 105 of the National Planning Practice Guidance and which are discussed in '*Hibbitt & Another -v- Secretary of State for Communities and Local Government (1) and Rushcliffe Borough Council (2) (2016) EWHC 2853*'.
- 4.13 On the planning drawings, our detailed plans show how the building can be converted using all the existing fabric of the building, walls and roof, whilst also utilising the

position of existing window and door openings, with some new or enlarged ones also proposed in line with Class Q provisions.

- 4.14 The fabric of the existing building, comprising the walls and roof covering, will be retained as part of the change of use, with insulation taking place inside the structure (see site photographs and structural appraisal provided).
- 4.15 The proposed development will achieve a good design by responding to local character creating a visually attractive form of development and adding to the overall quality of the area. The suitability of the building for conversion and the robustness of the structure is confirmed in the structural appraisal prepared by Nigel Challis Ltd and is included within the application documents.

The provision of Adequate Natural Light

- 4.16 The proposal includes the provision of adequate natural light in all habitable rooms of the dwellinghouse, in line with the requirements of part (g) of the Conditions set out in Q.2. (1) of the Class Q legislation.

Permitted Development

- 4.17 For the avoidance of doubt, the proposed change of use and associated building operations are permitted by Class Q (b) and (c) of the GPDO as it complies with the limitations set out in Q.1, as follows:
- (a) The site was (and still is) part of an established agricultural unit on (and before) 24th July 2023, trading as Barrow Street Farm;
 - (b) N/A;
 - (c) The floor space of the dwelling does not exceed 150m² (149m² proposed);
 - (d) There has been no previous development under Class Q, and the proposal will not result in more than 10 dwellings (1 proposed) or a cumulative floorspace more than 1,000m² changing use (149m² proposed);
 - (e) The site is not occupied under an agricultural tenancy;
 - (f) N/A;
 - (g) There has not been any Part 6 Class A(a) or Class B(a) development carried out 10 years before the development under Class Q begins;

- (h) The development will not result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point;
- (i) No extensions are proposed;
- (j) The development under Class Q(c) would not consist of building operations other than those specified in (i) and (ii);
- (k) The site is not on article 2(3) land;
- (l) The site is not, and does not form part of, a site of special scientific interest, a safety hazard area, a military explosives storage area;
- (m) The site is not, and does not contain, a scheduled monument;
- (n) The building is not a listed building;
- (o) The existing building is capable of complying with the nationally described space standard;
- (p) The building has suitable existing access to a public highway.

5.0 CONCLUSION

- 5.1 The proposed development is permitted by Class Q of the GPDO 2015 and, having regard to the NPPF as if this were a planning application, there will not be any adverse transport, highway and noise impacts, no unacceptable contamination or flooding risks and the location does not make it otherwise impractical or undesirable for the change of use to Class C3. As such, the LPA is respectfully requested to determine that prior approval is not required so that development may begin and contribute to the Council's supply of deliverable housing sites.

BRIMBLE LEA

MAY 2026