

Planning Statement

Town and Country Planning Act 1990

Project:	The conversion of a Class Q consent to full planning permission for a self-build dwelling
Client:	Mr Duncan Forster
Site Address:	Barn at Foxley Corner, Lydeway, Devizes, SN10 3PY
Issue and Revision Record:	Version 3 (13/04/2026)
Local Authority:	Wiltshire Council
Highways Authority	Wiltshire Council
Planning Portal Application Ref:	PP-14845619
MDP Reference:	DF04

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Appendix A – Images of site and its context



1. Introduction

- 1.1 This Planning Statement has been prepared to accompany a full planning application for the conversion of a Class Q to full planning permission for a self-build dwelling. This is at Barn at Foxley Corner, Lydeway, Devizes, SN10 3PY. The application has been submitted via the Planning Portal by Mark Doodes Planning (MDP) herein referred to as the Applicant or Agent interchangeably on behalf of our client Mr Duncan Forster as landowner.
- 1.2 The purpose of this Statement is to clarify and expand upon the above description of development and to consider the degree to which the proposals accord with national and local planning policies. The statement also reflects upon the degree to which the proposals can be described as *sustainable* development.
- 1.3 Any use of the word ‘paragraph’ is, for the avoidance of doubt, a reference to the 2024 National Planning Policy Framework (NPPF or the Framework).
- 1.4 The description of development is:

“The conversion of a Class Q to full planning permission for a self-build dwelling.”

2. Application Submission

- 2.1 This Statement is submitted with a number of documents which make-up the planning submission. These documents are all listed in the covering letter and do not need to be repeated here.
- 2.2 It is important, like with national planning policy, to read the application submission *as a whole*.
- 2.3 The development was not screened for EIA purposes as its nature and scale wasn’t considered to meet the applicable thresholds and criteria for such development as set out in Schedules 1 and 2 to The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 2.4 Paragraph 38 of the Framework states that LPAs should approach decisions on proposed development in a positive and creative way and continues by stating that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 2.5 Furthermore, Article 35 of the Development Management Procedure Order (2015) (DMPO) requires decision notices to include a statement explaining whether, and if so how, the LPA has worked with



the applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with a planning application.

- 2.6 We therefore look forward to working with the LPA within the spirit and encouragement required by the Framework and the DMPO.

3. Site and Surroundings

- 3.1 The application site is located on the northern side of High Street, from which access would be taken. This access was permitted under application Ref. PL/2024/00116. The site comprises a substantive, single-storey, barn building constructed mainly of corrugated metal sheeting. The barn comprises a central, pitched roof, element (the main barn) with adjoining mono-pitch elements at either side. There is a sizeable area of existing hardstanding to the rear of the main barn. The site is in a relatively wooded setting. Beyond this are open fields, including a field used as a private dog walking facility to the west. The application site and its context are shown at Appendix A to this Statement.
- 3.2 In terms of constraints, the site falls within the countryside. However, it does not fall within a conservation area, the Green Belt, a National Landscape or the setting of a listed building. The site falls within Flood Zone 1 as shown below.



Figure 1: Site shown within Flood Zone 1 (source: EA Flood Map for Planning 2026)

4. Planning History

- 4.1 The key element of planning history concerns application **Ref. PL/2024/06119**. This sought prior approval under Part 3 Class Q: Agricultural buildings to dwellinghouses and was submitted on 2 July 2024. Prior approval was refused on 15 August 2024. However, permission was granted under a subsequent appeal **Ref. APP/Y3940/W/24/3352918** on 21 February 2025. For ease of reference, the approved plans are as below.

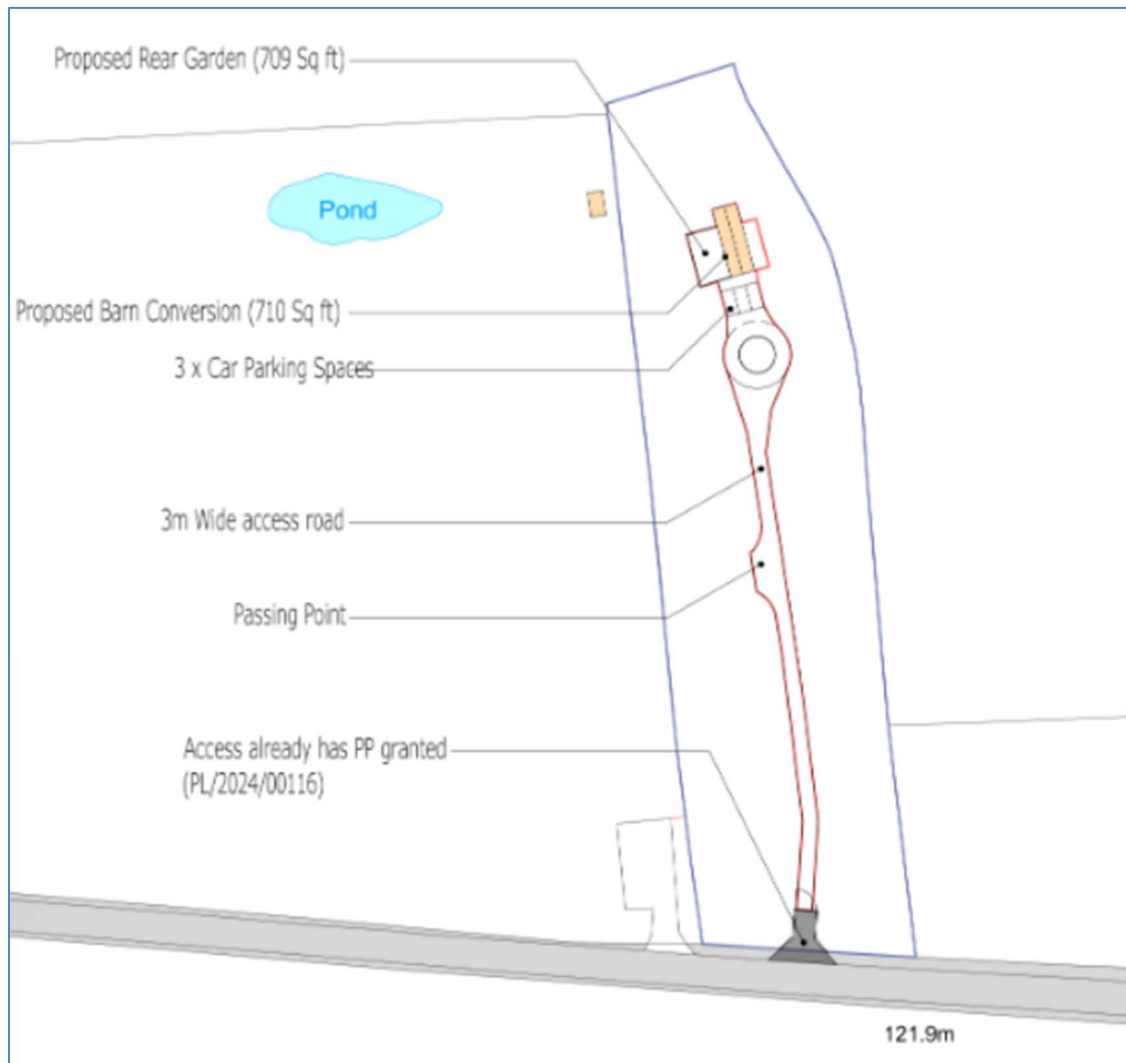


Figure 2: Approved Site Plan.



Figure 3: Approved floor plans and elevations

5. Proposed Development

- 5.1 This application is straightforward in that it seeks permission for the conversion of a Class Q (Ref. PL/2024/06119) into full planning permission for a self-build dwelling with a few changes.
- 5.2 The key differences are set out below. The following changes could not be implemented under the provisions of the Permitted Development (Class Q) regulations:
- The addition of roof photovoltaics;
 - The extrusion of the building by 3m to make for a more useable space, in excess of the 2015 UK minimum space standards.
 - The construction of a small battery storage system (Tesla Powerwall);
 - The construction of a small wood burner flue (detail to be provided); and

- The inclusion of a garden (minimum 10m in depth) in line with the Council's standards. This is as the prior approval development would not allow such a feature.
- Limited fenestration and opening changes to suit SIPS panel provider.

5.3 As such, it is considered that the simplest approach is to issue a new planning permission so these changes can be wrapped together. This will also have the fringe benefit of removing the sunset completion test found in Class Q whereby the project must be completed in under 3 years.

6. Planning Policy, Legal and Guidance Context

6.1 In accordance with the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application should be considered against the provisions of the adopted Development Plan, unless material considerations indicate otherwise.

6.2 In this instance, the development plan comprises the 2015 Wiltshire Core Strategy (including policies saved from former District Council Local Plans as shown at Appendix D to the Core Strategy) (CS), the 2017 Chippenham Site Allocations Plan, the 2020 Wiltshire Housing Site Allocations Plan and documents associated with minerals and waste (including the Minerals Core Strategy, Waste Core Strategy, Minerals Development Control Policies and Waste Development Control Policies).

6.3 Other material planning policy considerations include the National Planning Policy Framework 2024 (henceforth referred to as 'the Framework' or the NPPF) and Planning Practice Guidance (PPG).

6.4 Key policies, national guidance and law relevant to the proposed development at this site are set out below.

Wiltshire Core Strategy

6.5 **Core Policy 1: Settlement Strategy** – This policy identifies the settlements where sustainable development will take place. Development is directed to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages.

6.6 **Core Policy 2: Delivery Strategy** – This policy outlines the considerable overall housing need for the local authority area (42,000 homes). Outside of defined limits of development, development will not be permitted other than in circumstances as permitted by this plan.



- 6.7 **Core Policy 29: Trowbridge Community Area** – Development in the Trowbridge Community Area should be in accordance with the Settlement Strategy set out in Core Policy 1.
- 6.8 **Core Policy 45: Meeting Wiltshire’s Housing Needs** – New housing should address local housing need incorporating a range of different types, tenures and sizes of homes to create balanced communities.
- 6.9 **Core Policy 48: Supporting Rural Life** – Outside of defined limits of development of settlements, 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.
- 6.10 **Core Policy 50: Biodiversity and Geodiversity** – Amongst other things, this policy seeks to ensure that developments protect features of nature conservation and geological value and avoid disturbance to species and habitats. Biodiversity enhancement is encouraged.
- 6.11 **Core Policy 51: Landscape** – This policy states that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character. Amongst other things, this policy seeks to conserve landscape features of historic and heritage value and ensure developments do not harm important views and visual amenity. It also gives great weight to the conservation and enhancement of the landscape and scenic beauty within the AONB (now known as a National Landscape).
- 6.12 **Core Policy 57: Ensuring High Quality Design and Place Shaping** – Amongst other things, this policy seeks to ensure that proposals are sympathetic to historic buildings and that they have regard to the amenities of existing occupants and the compatibility with adjoining buildings and uses.
- 6.13 **Core Policy 60: Sustainable Transport** – Amongst other things, this policy seeks to reduce the reliance on travel by private car and supports and encourages sustainable transport modes.
- 6.14 **Core Policy 61: Transport and Development** – New Development should be located and designed to reduce the need to travel, particularly by private car. Sustainable transport alternatives are encouraged.

National Planning Policy Framework

Approach to Sustainable Development



- 6.15 **Paragraph 7** of the Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 6.16 **Paragraph 8** states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 6.17 **Paragraph 9** states that planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 6.18 **Paragraph 10** states that, so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. This is then detailed at **Paragraph 11**.
- 6.19 **Paragraph 39** makes it clear that decision-makers at every level should seek to approve applications for sustainable development where possible.

Design



6.20 **Paragraph 131** states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

6.21 **Paragraph 135** seeks to ensure that developments add to the overall quality of the area.

6.22 **Paragraph 139** states that development that is not well designed should be refused.

Living Conditions

6.23 **Paragraph 135** seeks to secure a high standard of amenity for existing and future users.

Biodiversity

6.24 **Paragraph 187** seeks, amongst other things, to improve biodiversity in and around developments and secure measurable net gains for biodiversity.

Highway Safety

6.25 **Paragraph 115** seeks to ensure that safe and suitable access to the site can be achieved for all users.

6.26 **Paragraph 116** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Housing

6.27 The Framework shows a clear Government intention to significantly boost the supply of housing. **Paragraph 61** states that it is important that sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.

6.28 **Paragraph 73** states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area.

6.29 **Paragraph 135** seeks to ensure that developments optimise the potential of sites and function well.

7. Planning Assessment

7.1 It is considered that the main planning issues associated with this proposal are:



1) Whether or not this is a suitable location for housing, with particular regard to local and national planning policy; and

2) The effect of the proposal on the character and appearance of the area.

1) Suitable Site

Policy Context

7.2 Core Policy 2 of the Core Strategy (CS) outlines the considerable housing need (42,000 units) within the local authority area over the plan period. It states that housing development will not be permitted other than in accordance with the objectives of the CS. Core Policy 1 of the CS identifies the settlements where sustainable development will take place. Development is directed to Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages. Outside of defined limits of development, development will not be permitted other than in circumstances as permitted by the plan. To support this strategy, Core Policies 60 and 61 of the CS seek to reduce the reliance on private vehicles and promote sustainable transport modes.

7.3 Taking everything together, the main objectives of the strategy shown by the above policies are to promote housing to meet identified needs and to restrict isolated and remote housing developments in open countryside locations. This objective is to ensure that the character of the countryside is preserved and to provide future residents with suitable homes and convenient access to services and facilities so that they support the vitality and viability of communities and minimise environmental harm resulting from travel.

Discussion

Principle of Residential Use

7.4 It is acknowledged that the proposal would be within the countryside, rather than a settlement. However, the principle of residential development has already been established through the prior approval given under application Ref. PL/2024/06119 at appeal. There would be no net increase in units at the site. On the contrary, this development would simply supersede the prior approval, making it impossible to implement both developments simultaneously.

7.5 On this basis alone, it would be most unreasonable for the Council to object to the principle of residential development at this site. While there would be some conflict with the spatial strategy of



the development plan, this would be entirely outweighed by the material consideration formed by the extant prior approval.

- 7.6 In making this assertion, the applicant is also mindful that paragraph 89 of the Framework states that decisions should recognise that sites to meet local community needs in rural areas may have to be found adjacent to or beyond existing settlements. The development, close to other built form, cannot be seen to be isolated for the purposes of paragraph 84 of the Framework¹.
- 7.7 Furthermore, while there would be travel to and from the site via private vehicle, it must also be acknowledged that no rural settlement can be expected to have the full panoply of services required for day-to-day living. Indeed, the importance of the interconnectivity of villages with other settlements to provide the suite of requisite services is recognised at paragraph 83 of the Framework. This indicates that the Government acknowledges that travel between areas by car is sometimes necessary. Moreover, the Framework, at paragraph 110, is clear that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. For the development plan's strategy of supporting the vitality of rural settlements to succeed, housing must be permitted here regardless of its direct connectivity to facilities. This is particularly so in the context of an extant development for a residential development.

General Housing Need

- 7.8 The Government's new Local Housing Needs Figures significantly increase the Council's housing need. On this basis, the Council cannot currently demonstrate a deliverable five year supply of housing land. This was confirmed recently by the Planning Inspectorate, who concluded that the Council can only demonstrate a 2.42 years supply of deliverable housing land.
- 7.9 Consequently, paragraph 11 of the Framework is engaged by virtue of footnote 7 to this paragraph. This states that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This balance, therefore, is not a 'traditional' balance. Instead, there is a considerable weighted layer in favour of this scheme known as the 'tilted' balance. Furthermore, housing policies are considered out-of-date. This alone reduces the weight that can be afforded to conflict with them.

¹ With particular regard to case law *Braintree DC v SSCLG (2018) EWCA Civ 610; (2018)* and *City & Country Bramshill Limited and SOSHCLG (2019) EWHC 3437 (Admin)*.



7.10 The Council's significant housing shortfall has also been confirmed in a number of recent housing applications that have been determined. These are as follows:

- PL/2025/0321 - 2 year housing supply.
- PL/2025/03261 - 2 year housing supply.
- PL/2025/03813 – 4 new units granted outside of any defined settlement boundary due to no housing land supply.
- PL/2025/02712 – Outside of settlement dwelling – allowed on tilted balance due to no housing land supply.
- PL/2025/03261 – Allowed unit acknowledging 2 year land supply.

7.11 The Council's land supply has been consistently failing to deliver requisite housing in recent years. This was only not the case during the period in which Councils could demonstrate a 4 year supply rather than 5. In 2022, the supply was 4.4 years. In 2024 it was 4.6 years. Now, it is 2 years. This is a chronic, persistent, housing shortfall that renders the Council's most important housing policies out-of-date.

7.12 Furthermore, the Government's new method for determining housing need has resulted in the national annual housing target increasing to 370,000 units. Previous Governments have frequently fallen short of their housebuilding targets, however. In 2023, the delivery total was around 230,000 houses. Figure 4 below shows that the number of new homes completed has fallen to its lowest level since 2016.



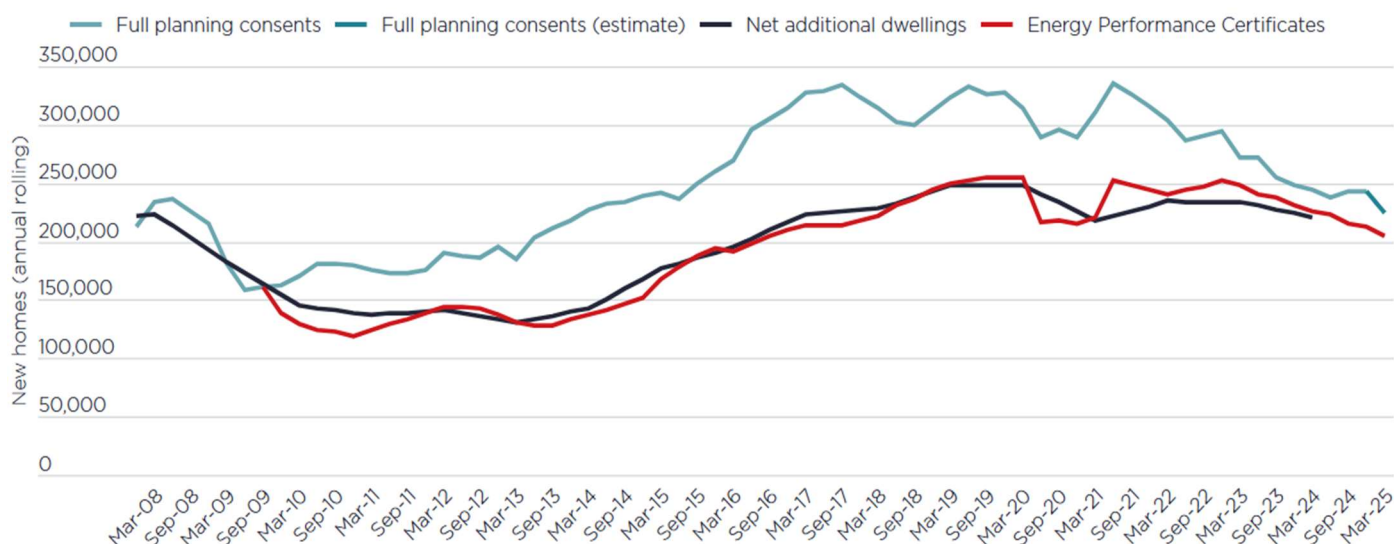


Figure 4: Graph showing new homes completions falling to lowest levels since 2016 (Source: MHCLG Live Tables 122, NB1, HBF, Glenigan (only 10+ units))

- 7.13 There is a significant national housing shortfall that alone demonstrates an unmet need and adds weight in favour of the provision of housing at this site.

Self-build

- 7.14 The Self-Build and Custom Housebuilding Act 2015 (as amended) places a statutory duty on local authorities to maintain a register of individuals and associations seeking to acquire serviced plots of land for self-build and custom housebuilding. Local authorities must also grant sufficient development permissions to meet the demand for self-build and custom housebuilding as evidenced by their register. This duty is intended to ensure that individuals wishing to build their own homes have suitable opportunities to do so.
- 7.15 National policy, as outlined in the Framework and PPG, also requires local authorities to address self-build demand by granting sufficient development permissions.
- 7.16 The explanatory note to the 2016 Housing and Planning Act states that:

“The Government has an ambition to double the number of custom-built and self-built homes by 2020. In March 2015 Parliament passed the Self-build and Custom Housebuilding Act 2015. The Act, which came into force on 1 April 2016, requires local planning authorities to compile a register of persons seeking to acquire land to build or commission their own home and to have regard to that register when carrying out their planning, housing, land disposal and regeneration functions. The Housing and Planning Act 2016 requires local planning authorities to ensure that there are sufficient serviced permissioned plots consistent with the local demand on their custom build registers. This is

intended to make it much easier for people to find land to build or commission their own home, diversifying housing supply and revitalising smaller builders who have not experienced the same level of recovery as the large housebuilders since the financial crisis.”

- 7.17 The recent amendments through the Levelling Up and Regeneration Act 2023 (LURA) underscore the importance of councils proactively supporting self-build projects. The LURA amendments clarified that only permissions explicitly for self-build housing can be counted towards statutory obligations, further emphasising the need for dedicated self-build permissions. This change means that local authorities can no longer count planning permissions that merely 'could' be for self-build towards their statutory obligations. Only permissions that are explicitly for self-build and custom housebuilding, as defined by the Act, can be counted.
- 7.18 Additionally, the LURA amendments clarified that demand not met within three base periods will be rolled over to the next base period, making it a cumulative requirement. This means that councils must proactively grant permissions for self-build plots to meet not only current demand but also any unmet demand from previous periods.
- 7.19 These legislative changes, which came into force in January 2024, highlight the increased accountability placed on local authorities to ensure that self-build housing demand is met in a timely and effective manner.
- 7.20 When forming policy for self-build the government guidance is clear:

"Relevant authorities should use preferences expressed by those on the register to guide their decisions when looking at how to meet the duty to grant planning permission etc. This will help ensure that relevant authorities permission land suitable for self-build and custom housebuilding which people are actually keen to develop."

Paragraph: 028 Reference ID: 57-028-20210508

- 7.21 A vast majority of those wanting to build their own house wanted to do so either on a single plot or on developments of between 1 and 10 homes.
- 7.22 The Right to Build Task Force - a government-supported organisation established to promote and enable the growth of the self-build sector - provides guidance on this matter. In their guidance document "Delivering a Sufficient Supply of CSB Homes" (PG2.1) paragraph 48 states:



“In planning positively for the future supply of CSB plots, LPAs must seek to deliver the type of plots preferred by prospective self-builders. It is therefore important that a range of opportunities are offered on large and small sites providing diversity, and that planning policies positively encourage CSB windfall proposals in appropriate areas such as infill plots, locations on the edge of settlements and brownfield sites.”

- 7.23 Therefore, policy that relies solely on a percentage of the large strategic sites to deliver self-build is in conflict with the most recent national advice. Such policy is likely to be considered unsound.
- 7.24 The LPA are also required to provide the latest details of how the LPA are meeting their obligations to Self-Builders. The Council has a need for **255 plots**. The Council is failing to meet its legal and register demands. As such, the provision of a self-build unit should weigh heavily in favour of the scheme.
- 7.25 Indeed, the Bacon Review (2021) highlighted that actual demand for self-build plots is likely much higher than indicated by the registers. It noted that only 13% of the population are aware of the Self-Build Registers, and many self-builders do not join them. The local need is likely much greater than depicted. This reinforces the considerable weight given to the self-build nature of the development.

Appeal Decisions

- 7.26 Recent appeal decisions demonstrate that substantial weight should be given to the provision of self-build housing in areas where councils are failing to meet their statutory duties under the Self-Build and Custom Housebuilding Act 2015 (as amended).
- 7.27 For example, in the appeal decision at Banbury Road, Gaydon, Stratford-Upon-Avon (Appeal Ref: APP/J3720/W/23/3336035, dated 14th June 2024), the Inspector allowed a Permission in Principle application for self-build housing. The Inspector stated:
- “...this site would assist the Council in its delivery of SBCH sites and help address its existing shortfall. Accordingly, the benefit of the proposed delivery of SBCH is attributed substantial weight in the planning balance.”*
- 7.28 Similarly, in the appeal decision at Malmesbury (Appeal Ref: APP/Y3940/W/23/3317252, decided on 5th March 2024), the Inspector acknowledged the deficit of self-build plots as a key consideration. The Inspector concluded:



"Given what would appear to be a considerable level of under-delivery against a high level of demand for self-build development, I find that I should give substantial weight to the self-build nature of the proposal."

7.29 In an inquiry decision at St Albans City Council (Appeal Ref: 3312277, decided on 22nd March 2024) the appeal inspector concluded: *"[...] substantial weight should also be afforded to self-build plots as a discrete element of housing supply."*

7.30 A local appeal at Shrivenham (APP/V3120/W/22/3297610) was allowed for 7 self-build plots in November 2022. The Inspector concluded that despite being adjacent to a listed building, and outside the defined built-up area of Shrivenham (therefore in open countryside and conflicting with Core Policies CP3 and CP4 of the VoWH Local Plan), the deficient supply of (and notable demand for) self-build homes was a sufficient material consideration to allow the appeal:

"I have outlined that the public benefits of the appeal scheme are considerable in respect of the contribution they make towards the provision of self-build and custom build houses.... the appeal scheme would not accord with the development plan, when considered as a whole, but the adverse impact of the proposal is a matter of moderate weight against granting planning permission.... This leads me to an overall conclusion that material considerations indicate the decision should be taken otherwise than in accordance with the development plan."

Supporting the Local Economy

7.31 The Framework places significant emphasis on the need to build a strong competitive economy, with paragraph 85 attributing significant weight to the need to support economic growth and productivity.

7.32 Indeed, the former coalition Government stated shortly after the Framework was launched that "its number one priority is to get the economy moving again" (Ministerial statement 6th Sept 2012). This strategic ambition remains the case once more 12 years later, in a post-EU Exit and COVID economic environment. As a barometer of the wider economic outlook, the Governor of the Bank of England, Andrew Bailey, announced at a Bank of England Monetary Policy Report Press Conference held on 4 August 2022, that GDP growth in the UK has slowed. Rachel Reeves, in a press release dated 28 January 2025, also stated that more is needed to go 'further and faster' to kickstart the economy. GDP growth in the UK has slowed and the economy is now in recession. Supporting it is now more important than ever.



- 7.33 Development is universally regarded as being a driver to growth and prosperity at the micro and macro level as well as serving a social role and allowing better movement of labour. The July 2020 White Paper carries the above sentiments forward and states that “Millions of jobs depend on the construction sector and in every economic recovery, it has played a crucial role.” In addition, the Royal Institute of Chartered Surveyors have recently highlighted that for every £1 spend on construction a further £2.84 is generated across the wider economy (Build Back Better May 2020, University of Birmingham Paper).
- 7.34 There would be clear short and medium term economic benefits associated with this development both at local and regional levels. This is through factors such as the creation of a wide variety of jobs and apprenticeships associated with construction and increased local expenditure to support local services and those further afield.
- 7.35 As such, this scheme would support nearby services and would maintain the vitality of the community. These social and economic benefits should be afforded significant weight. This is particularly so given the Framework’s objectives of enhancing or maintaining the vitality of communities (paragraph 83).

Local Need

- 7.36 The Strategic Housing and Employment Land Availability Assessment 2017 shows that there is a pressing need for one-bedroomed housing within the housing market area (HMA), and indeed neighbouring HMAs.
- 7.37 In addition, further work has been undertaken with regard to housing need (of all sizes) that supports the emerging LPR. This includes The Swindon and Wiltshire Joint Spatial Framework Issues Paper 2017 (SWIP). This shows that the Strategic Housing Market Availability Assessment (SHMA) indicates that Swindon Borough and Wiltshire should plan for a need for 3,650 new homes per year between 2016 and 2036. The current Local Plans, looking to 2026, plan for a combined requirement for 3,567 homes. The overall rate of growth anticipated in the SHMA is broadly unchanged. The SWIP also suggests that land to accommodate a further 27,000 new homes would be needed to meet the scale of needs suggested in the SHMA. In summary, the overall total is 73,000 dwellings for the period 2016-2036 to meet need as identified in the SHMA. Again, this is significant need.
- 7.38 Housing need for each HMA is also broken down in the SWIP. This is as follows: Swindon HMA: 29,000 dwellings (of which approximately 22,500 homes have been built or committed);



Chippenham HMA: 22,250 dwellings (of which approximately 9,000 homes have been built or committed); Salisbury HMA: 8,250 dwellings (of which approximately 8,000 homes have been built or committed); Trowbridge HMA: 13,500 dwellings (of which approximately 6,500 homes have been built or committed).

7.39 Overall, there is a considerable housing target across the relevant HMAs, with a significant number of outstanding houses required across them. Importantly, not only is there a need for all types of housing, but there is specifically a need for one-bedroomed properties across the Swindon and Wiltshire HMAs. The proposal would make a small, but nonetheless valuable, contribution in this regard and would meet a recognised local need.

7.40 In addition, it should again be noted that the Council has a housing land supply shortfall. The application of its housing policies is therefore failing to deliver requisite homes. Instead, it has inflated housing need. This reinforces the assertion that there is considerable local need for new homes in this HMA.

Overall Conclusion – Suitable Site

7.41 Taking everything together, there is an existing and extant permission for a residential unit at this site. The principle of residential development is therefore settled.

7.42 Furthermore, the scheme would support the vitality of local communities and would meet local and national housing need, including for one-bedroomed, self-build, dwellings.

7.43 It follows that the site is a suitable location for residential development. The scheme is in accordance with the overarching objectives of Core Policies 1, 2, 29, 60 and 61 of the CS.

7.44 Moreover, even if there was conflict with the Council's settlement strategy, simply by virtue of falling within the countryside, this would only be academic in nature. Additionally:

- There is an extant permission for a residential unit that would be replaced by this scheme.
- The Council's housing strategy is failing to provide requisite homes as it can only evidence a 2 year supply of deliverable housing land.
- Housing policies are restrictive and are out-of-date.



- The Framework and local policy assert that sites to meet local community needs in rural areas may have to be found adjacent to or beyond existing settlements.

7.45 For all of these reasons, technical conflict with the Council's spatial strategy, simply by virtue of the site being in the countryside, should carry only limited weight against this proposal.

2) Character and Appearance

7.46 This proposal is comparable to that previously approved in terms of the quantum of built physical presence. The footprint of the building would not be notably increased compared to that which would result from the conversion of the barn. It would not appear cramped upon this plot in terms of size and would not result in any 'overdevelopment' of the site in terms of the presence of built form. The amount of hardstanding would remain similar to that approved, as would the ratio of development to soft landscaping. The amount of garden space, and therefore the amount of residential paraphernalia within it, would be comparable.

7.47 The urbanisation of the site would be almost identical to the previous approval. The unit would also be comparable in scale to the converted barn. Set back from the carriageway and of limited overall height, the unit would not appear visually dominant or intrusive in any sense.

7.48 The proposed individual design of the dwelling would be high quality. It would be simple in form and would not be unduly perforated by fenestration. The window pattern would be logical and openings would not be excessive in number. The roofscape would not be perforated by excessive rooflights. As such, dwelling would not appear domestic in appearance and would be compatible with this semi-rural setting. There would also be no material change in terms of light spill compared to the approved dwelling.

7.49 Materials would be of a higher quality than those approved. This would give the dwelling a coherent architectural appearance that integrated more appropriately with this particular setting. The 'soft' materials palette would not draw the eye and would give this scheme an individual appearance without 'standing out' in this semi-rural context.

Overall Conclusion – Character and Appearance

7.50 Taking all of the above into account, the proposal would not materially alter the design, bulk or mass of the scheme compared to the approved unit. It would not notably increase the urbanisation



at the site compared to that approved. Rather, a more logical architectural rhythm for built form would arise that is of a greater aesthetic quality.

- 7.51 For these reasons, the proposal would not harm the character and appearance of the area. This is in accordance with Core Policies 51 and 57 of the CS.

Other Material Considerations

Living Conditions

- 7.52 The new dwelling would not materially increase the scale of the development given prior approval. It would not appear visually intrusive or oppressive from within residential properties (which are a considerable distance away) or their private gardens and would therefore not cause harm to living conditions in terms of outlook and access to daylight. The new unit would also be designed and positioned so that there would be no direct, close distance, views of neighbouring properties, preserving privacy.
- 7.53 Further, the small scale of the proposed development would only result in a minimal number of vehicular movements to and from the site. Such movements would not result in appreciable levels of noise and disturbance and would not be materially increased compared to the approved scheme.
- 7.54 Taking all of the above into account, the proposal would preserve the living conditions of the occupants of surrounding properties in terms of outlook, access to daylight, privacy and noise and disturbance. This is in accordance with Core Policy 57 of the CS.
- 7.55 Turning to living conditions for future occupants, the proposed unit would provide internal floor space to meet standards within the Technical housing standards – nationally described space standards. As such, they would not be unduly cramped internally.
- 7.56 The property would also offer a suitable garden area that would not be unacceptably shaded. This is a notable betterment compared to the approved development which did not offer such an external area. This garden would be 10m in depth, striking a balance between the provision of a garden for residents in line with Council standards and minimising further urbanisation. Sufficient distance would remain between the dwellings and surrounding buildings to ensure that they would not be overlooked or visually oppressed. External areas would also be below the WHO guideline criterion for the onset of moderate noise annoyance. Overall, the proposed dwelling would provide



high standards of accommodation for future occupants, in line with paragraph 135 of the Framework

Flood Risk

- 7.57 The site falls entirely within Flood Zone 1 where there is a low probability of flooding. Furthermore, the limited proposal would not *materially* increase (in the context of the site and its environs) the footprint of built form at the site and there is no evidence of surface water collection. Consequently, the proposal would not be unduly susceptible to flood events and would not increase the likelihood of such events off-site. This is in accordance with Core Policy 61 of the CS.

Highway Safety and Parking

- 7.58 The site is considered to be of sufficient size to accommodate requisite off-street parking spaces at the proposed unit. In terms of highway safety, there would be no effects in this regard that differ from the previous approval. The local highway authority raised no objection previously and it would not be reasonable to do so now. It is therefore considered that the scheme would not prejudice vehicular or pedestrian safety, in line with the requirements of Core Policies 60 and 61 of the CS.

Biodiversity

- 7.59 The proposal would not affect any protected species or any nationally, internationally or locally designated wildlife site. A Preliminary Ecological Appraisal (PEA) supports the application. This confirms that there is no evidence of bats and that built form has negligible potential to support this species. No nesting birds were noted.
- 7.60 As a self-build unit, the scheme would be except from formal biodiversity net gain (BNG). That said, the applicant would accept a condition requiring the proposal to result in such net gains. This could be achieved by, amongst other things, the introduction of; bat boxes within nearby trees, bat bricks/tubes within the dwelling, bird nest boxes within nearby trees, bee bricks, sparrow terraces and hedgerow creation and management. This would be in line with the provisions of paragraph 185 of the Framework and the requirements of the Environment Act. It weighs in favour of this scheme.
- 7.61 Overall, the proposal would accord with Core Policy 50 of the CS insofar as it seeks to protect features of nature conservation, avoid disturbance to species and habitats and enhance biodiversity.



Other Social Benefits

- 7.62 There are other social benefits associated with providing new housing of differing types and sizes that are commonly overlooked. These include providing homes for the children of existing residents so that they are not pushed further away from established family groups or childhood networks, providing local homes so that these children can care for elderly relatives and providing options to buyers who are looking to avoid the currently uncertain rental market. These factors also add weight in favour of this proposal.

8. Planning Balance and Conclusion

- 8.1 The Council cannot sufficiently evidence a five year supply of deliverable housing land. Consequently, paragraph 11 of the Framework is engaged by virtue of footnote 7 to this paragraph. This states that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This balance, therefore, is not a 'traditional' balance. Instead, there is a considerable weighted layer in favour of this scheme known as the 'tilted' balance.
- 8.2 The Government is seeking to significantly boost the supply of housing. This proposal would provide an additional dwelling of a type for which there is a recognised need (one-bedroomed, self-build, unit). This would be on a small site (for which the Framework specifically supports development at paragraphs 73 and 89) that could be delivered now. The proposed unit would also provide economic benefits through construction and occupation and would support the retention and growth of local services and facilities. The social and economic benefits identified in this assessment cumulatively attract significant weight.
- 8.3 The principle of development has been established by virtue of the recent prior approval. The scheme would make minimal changes compared to the approved scheme and would have no further effect on the rural setting.
- 8.4 Overall, there would be no harmful impacts that would significantly or demonstrably outweigh the benefits of the development. This scheme would therefore accord with the provisions of the Framework when read as a whole and the weighted presumption in favour of sustainable development remains applicable.



- 8.5 The proposal should therefore be approved without delay as it is in accordance with the development plan as a whole and there are no other considerations which outweigh this finding.

Overall Conclusion

- 8.6 It is concluded that the proposal would represent sustainable development for which the Framework advocates a presumption in favour. It is therefore respectfully requested that permission be granted.

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Appendix A – Images of site and its context





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