

Our ref.; SA/ClassQ

30th April 2026

Planning Services,
Wiltshire Council,
Monkton Park,
Chippenham,
Wiltshire,
SN15 1ER

Willis & Co.

Chartered Town Planners
30 The Causeway
Chippenham
Wiltshire
SN15 3DB

Telephone: (01249) 444975
Facsimile (01249) 655556
Email: Willisplan@aol.com

Dear Sir,

Town and Country Planning Act 1990.

Prior Approval Application for the change of use of an agricultural building to a dwelling (Class Q) at Christian Malford Farmhouse, Main Road, Christian Malford, Chippenham, SN15 4DF

We are instructed by Ms Z. Maculan to prepare and submit this application for Prior Approval under the provisions of Class Q of The Town and Country Planning (General Permitted Development) (England) Order 2015. Please find enclosed in support of the application;

- The completed application forms;
- The location plan and existing site plan numbered ZM-JH-01;
- The proposed site plan numbered ZM-JH-02;
- Existing floor plan and elevations numbered ZM-JH-03;
- Proposed floor plan and elevations numbered ZM-JH-04;
- A full structural survey prepared by DSA Civil & Structural Design Engineers (DSA);
- The appropriate application fee.

Please Note officers should contact the Agent prior to visiting the site to ensure that entry can be gained.

Definition of Terms

This letter contains reference to the following terms, which are detailed below for clarity.

The Site - defined under Part x of The Town and Country Planning (General Permitted Development) (England) Order 2015 as *"the building and any land within it's curtilage"*. In this instance the site refers to the building and curtilage outlined in red on plan numbered ZM-JH-01.

Curtilage - defined under Part x of The Town and Country Planning (General Permitted Development) (England) Order 2015 as *(a) the piece of land, whether*

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enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or (b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building. The curtilage is shown on the enclosed plans.

Established Agricultural Unit (EAU) - defined under Part x of The Town and Country Planning (General Permitted Development) (England) Order 2015 as agricultural land occupied as a unit for the purposes of agriculture for the purposes of Class Q on or before 24th July 2023 or for 10 years before the date the development begins. The Established Agricultural Unit comprises of the buildings found at Christian Malford Farmhouse (formerly Great Ridgeway Farmhouse), Main Road, Christian Malford, Chippenham. The wording of the legislation is quite specific in identifying and referring to the Established Agricultural Unit as opposed to the planning unit. They should not be interpreted as one and the same thing.

The holding is not subject to any agricultural tenancy.

Background Information and History

The application site had an agricultural use and is found at Christian Malford Farmhouse, Main Road, Christian Malford. It has been split into ownership between the applicant and Chippenham Farm Sales (CFS). The site is or was last in an agricultural use. The application site and building are solely within the applicant's ownership. The farmhouse and farm were split in 2006 [REDACTED]

The agricultural building, that is the subject of this submission, was last used for agricultural purposes on or before 24th July 2023.

For clarity the agricultural building that is the subject of this application is labelled as 'Building A' on the attached site plan. A concurrent application to convert part of the building to a flexible commercial use (Class E and B8 uses) is submitted and that is labelled as 'Building B'. It is proposed that the Class Q and flexible commercial uses will relate to one another and create a live-work unit; that is; the office will be used by the occupant of the proposed dwelling. Whilst a legal agreement tying the uses together has not been submitted with the application, the applicant would be happy to provide, and pay the LPAs reasonable fees, for such an agreement at the request of the LPA or agree to a suitable condition being included in the decision notices. We invite a discussion once the applications are validated to ensure that the flexible commercial use will not be seen to create an issue regarding residential amenity. Of course, we

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note that the existing dwellings are surrounded by agricultural land uses which are not considered to impact on the residential amenities experienced by the existing dwellings; a view that must also be taken in this instance.

The applicant's purchased the farmhouse around 5 years ago from a farmer that kept sheep in the barn as well as using it for agricultural storage, which was its last use. Therefore, the agricultural building, that is the subject of this application, was last used as a general-purpose agricultural building. Importantly, the building was used for agricultural purposes on and before the important date of 24th July 2023 and has not been used for any other purpose since it was purchased by the applicant. In summary, it was last used for agriculture on and before July 2023 and has not been used for any other purpose. It was/is part of an EAU.

The general-purpose agricultural building is surrounded by fields, the B4069 and residential dwellings.

The site is found on the B4069; Main Road; between Christian Malford and Dauntsey. The main farmhouse, Christian Malford Farmhouse; is listed with the agricultural building that is the subject of this application being found behind the farmhouse.

On the point of the Christian Malford Farmhouse (listed as Great Ridgeway Farmhouse) being a Grade II listed building (Historic England listed entry number: 1283206), we feel it relevant to discuss why this does not impact on the applicant's ability to apply for the conversion of the agricultural building into Class Q and flexible commercial uses.

The agricultural building, that is the subject of this application, is not listed itself and while it being found within the curtilage of the listed building it is important to discuss the definition of curtilage in this regard. In the Martin Goodall book, A Practical Guide to Permitted Changes of Use (4th Edition)' the curtilage expressly defined in statute is discussed.

In paragraph B.2.2 on page 428 of the book it states:

"The essential point that must be emphasised, and which is particularly important in relation to determining the curtilage of a listed building (as discussed in paragraph B.2.3 below) is the relationship that the curtilage bears to the building in questioned must be functional, and not merely spatial. The proximity of a building (such as a barn) that is alleged to be within the curtilage of a nearby farmhouse, even one that is very close to the barn, will not have the effect of placing it within the curtilage of the farmhouse in the

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absence of the essential functional relationship required by the rule in Sinclair Lockhart's Trustees..."

It is therefore quite clear that the agricultural building is not considered curtilage listed as it does not have a functional relationship with the listed building. They are not related in this manner and is only spatially close to the farmhouse. Therefore, the fact that the Christian Malford Farmhouse is listed does not have any bearing on the submissions and the conversion can be determined in relations to the relevant regulations.

The site is not found within a National Landscape.

The agricultural building is primarily built from pre-cast reinforced concrete columns at regular centres supporting a lightweight steel roof structure and providing fixing points for the wall panels. The elevations are formed from a combination of precast concrete panel system, blockwork and profiled metal sheeting. The full details of the structure can be read in the enclosed structural survey provided by DSA.

There is no planning history of previous Class Q applications on the agricultural unit.

The Application

The Prior Notification seeks to convert part of the 1no. general-purpose agricultural building barn, as indicated on the enclosed plans, into a separate dwelling house.

As of 24th July 2023 or before, the site and building was in use for agricultural purposes, solely as general-purpose agricultural building. It has not been used for any other purpose since this time.

The application site comprises of a single agricultural building labelled on the enclosed site plan numbered ZM-JH-02.

The building is structurally sound as shown by the enclosed updated structural report. The applicants commissioned a structural survey which was prepared by DSA dated 15th April 2026.

I will not repeat the findings of the report and ask that the planning officer reads the report in conjunction with this application submission but in summary it suggests that the *"it is our conclusion that this barn is structurally strong enough to take the likely loading which it will be subjected to from its change to residential usage without any significant alteration or enhancement. Therefore,*

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it would comply with and satisfy the requirements of Class Q(b) and Q(1)(i)(i)(aa), together with Class R, for the change of use of an agricultural building."

The report confirms that not only is the building structurally sound, including the roof, but that the alterations will improve the thermal efficiency of the building which is of great benefit.

Therefore, DSA conclude that the barn is structurally strong enough to take the loading for the change of use of the agricultural building to the proposed usage.

The footprint of the agricultural building covers a total area of approximately 432sq.m and measures 2.9m to the eaves and 4.9m to the highest point of the ridge. The height of the building will not be altered as part of the proposals. The lean-to to the rear and a small central section of the building will be demolished to separate the proposed Class Q and the flexible commercial use elements which is in full accordance with Class Q (j) (ii) to reasonably allow the building operations permitted for the building to function as a dwellinghouse. The minimal partial demolition isn't a necessity as such but will allow the building to better function as a dwelling. It is considered to be an alteration. The Class Q dwelling will measure the same height to the eaves and the ridge but will be provided with a GIA 129.6sq.m.

In the Martin Goodall book, A Practical Guide to Permitted Changes of Use (4th Edition)' the partial definition of an agricultural building in relation to Class Q developments is discussed.

Paragraph 9.4.4 on page 166 onwards notes (Inter alia):

"Although Shimizu (UK) Ltd v Westminster CC [1997] 1 W.L.R. 168 related to a listed building (and specifically to the provisions of the Listed Buildings Act), the judgement of the House of Lords in that case dealt with the issue of whether the definition of 'demolition' is in fact to be treated as an 'alteration'.

This point was discussed in the speech of Lord Hope, where he observed on page 183: " According to its ordinary meaning, the word "demolish" when used in reference to a building means to pull the building down – in other words, to destroy it completely and break it up. I agree therefore with Millett L.J. [1995] 1 E.G.L.R. 167, 169, when he said that demolition, with or without replacement, on the one hand, and alteration, on the other, are mutually exclusive concepts. In relation to a building, its destruction and breaking up cannot constitute a mere alteration. Once the works are over, the old building has gone. Conversely, therefore, partial demolition (or demolition of part only) of a building amounts to an alteration, rather than 'demolition'."

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Therefore, this further supports the fact that partial demolition is permitted under Class Q conversions as the partial demolition is seen as an alteration.

The dwelling will be provided with a garden which will be no larger than the footprint of the agricultural building to be converted to the dwelling as well as an on-site parking and turning areas within the proposed curtilage.

The development will make use of the existing sound concrete framed structure to echo the functional appearance of origin use of the building. Although the proposals will include the creation of windows and doors, which is allowed under the regulations, most of the works will be internal to allow for the provision of internal walls.

It is agricultural land which, in the main, surrounds the site and it is for this reason that the proposed appearance of the dwelling will be sympathetic to the existing building and surrounding rural area, with residential fenestration being created, to ensure that the proposed dwelling maintains an agricultural appearance and is in keeping with the character and appearance of the surrounding area. The existing and proposed elevations clearly show the suitable additions made, in terms of windows and doors, to all the elevations to ensure that the building has a residential appearance and can be used as such.

Any established vegetation on and around the site and building, which minimises views in and out of the site from the public realm, will remain. The applicant does not intend to plant any additional landscaping as part of this application, but should the local planning authority feel that further landscaping is required then this is something that the applicant would be happy to discuss during the determination process.

As the proposals do not involve the removal of any potential habitats, we do not consider that there is a requirement for Biodiversity Net Gain (BNG) information to be submitted as the development impacts less than 25sq.m of on-site habitats. Despite this being the case, the applicant, if required by the LPAs ecologist, is happy to discuss this during the determination process.

The Requirements of Class Q1

The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 3 - Class Q - buildings on agricultural units and former agricultural buildings to dwellinghouses (revision 21/05/2024) sets out the criteria for Class Q permitted development:

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Q. Development consisting of—

(a) a change of use of—

(i) a building that is part of an established agricultural unit and any land within that building's curtilage, or

(ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage into a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,

(b) development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or

(c) development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building.

Development not permitted by Class Q1 if:	Comments
(a) in the case of a site that is part of an established agricultural unit, the site was not part of the established agricultural unit— (i) on 24th July 2023, or (ii) where the site became part of the established agricultural unit after 24th July 2023, for a period of at least 10 years before the date development under Class Q begins,	The site was part of an established agricultural unit on 24th July 2023
(b) in the case of a site that was (but is no longer) part of an established agricultural unit— (i) the site was part of an established agricultural unit on 24th July 2023, (ii) where the site ceased to be part of an established agricultural unit after 24th July 2023, the site has not been part of the established agricultural unit for a period of at least 10 years before the date development under Class Q begins, or (iii) since ceasing to be part of an established agricultural unit, the site has been used for any non-agricultural purpose,	The site fully accords with these points. The building was last used for agriculture and has not been used for any other purpose.
(c) the floor space of any dwellinghouse developed under Class Q having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeds 150 square metres,	The floor area does not exceed 150 square metres.

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<i>(d)the development under Class Q, together with any previous development under Class Q, within the original limits of an established agricultural unit (see paragraph Q.3(2) of this Part) would result in—</i> <i>(i)the cumulative number of separate dwellinghouses having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeding 10, or</i> <i>(ii)the cumulative floor space of dwellinghouses having a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order exceeding 1,000 square metres,</i>	There have been no other proposals for Class Q on the site.
<i>(e)the site is occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained,</i>	There is no agricultural tenancy.
<i>(f)less than 1 year before the date development begins—</i> <i>(i)an agricultural tenancy over the site has been terminated, and</i> <i>(ii)the termination was for the purpose of carrying out development under Class Q,</i> <i>unless both the landlord and the tenant have agreed in writing that the site is no longer required for agricultural use,</i>	As above, the site is not occupied under agricultural tenancy.
<i>(g)development under Class A(a) or Class B(a) of Part 6 of this Schedule (agricultural buildings and operations) has been carried out on the established agricultural unit during the period which is 10 years before the date development under Class Q begins,</i>	No development under Class A(a) or Class B(b) has been carried out.
<i>(h)the development would result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point, other than—</i> <i>(i)extension of the building allowed by paragraph Q.1(i);</i> <i>(ii)protrusions of up to 0.2 metres to accommodate building operations allowed by paragraph Q.1(j)(i),</i>	The external dimensions will not exceed those allowed.
<i>(i)the development under Class Q(b) would result in an extension that—</i> <i>(i)has more than one storey,</i>	The proposal does not include any extensions. There have been no additions to

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<i>(ii) is sited anywhere other than to the rear of the existing building,</i> <i>(iii) extends beyond the rear wall of the existing building by more than 4 metres,</i> <i>(iv) has eaves the height of which exceed the height of the eaves of the existing building,</i> <i>(v) is higher than whichever is the lower of—</i> <i>(aa) the highest part of the roof of the existing building, or</i> <i>(bb) a height of 4 metres above the ground,</i> <i>(vi) extends beyond a wall that forms a side or principal elevation of the existing building, or</i> <i>(vii) would be sited on land that, before the development under Class Q(b), is not covered by a hard surface that was provided on the land by virtue of any development, and—</i> <i>(aa) the hard surface was not provided on the land on or before 24th July 2023, or</i> <i>(bb) where the hard surface was provided on the land after 24th July 2023, the hard surface has not been situated on the land for a period of at least 10 years before the date development under Class Q(b) begins,</i>	the hard surface area. The eaves will remain the same height as found at present.
<i>(j) the development under Class Q(c) would consist of building operations other than—</i> <i>(i) the installation or replacement of—</i> <i>(aa) windows, doors, roofs, or exterior walls, or</i> <i>(bb) water, drainage, electricity, gas or other services,</i> <i>to the extent reasonably necessary for the building to function as a dwellinghouse, and</i> <i>(ii) partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(j)(i),</i>	The building operations only include those contained within (aa) and (bb). There is only partial demolition proposed.
<i>(k) the site is on article 2(3) land,</i>	The site is not on article 2 (3) land.
<i>(l) the site is, or forms part of—</i> <i>(i) a site of special scientific interest;</i> <i>(ii) a safety hazard area;</i> <i>(iii) a military explosives storage area,</i>	The site does not form part of any identified designations.
<i>(m) the site is, or contains, a scheduled monument,</i>	There are no scheduled monuments on the site.

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<i>(n)the building is a listed building,</i>	The building is <u>not</u> listed.
<i>(o)the existing building, excluding any proposed extension under Class Q(b) but including any proposed building operations under Class Q(c), would not be capable of complying with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015 as read with the notes dated 19th May 2016 which apply to it, or</i>	The dwelling would comply with nationally described space standards.
<i>(p)the building does not have suitable existing access to a public highway.</i>	There is a suitable existing access to the public highway.

The application building found on the site are used solely used for agricultural purposes, previously for sheep and most recently for general agricultural storage.

As mentioned above, on or before 24th July 2023, the building was in use solely for agricultural purposes as a general-purpose agricultural building. It has not been used for any other purpose other than for agricultural.

In relation to this requirement we have read Martin Goodall's book; A Practical Guide to Permitted Changes of Use in which it is noted (and I quote in places) that it *"is important to remember that the question is not whether the building is in an area used for agriculture, but whether the building itself was in agricultural use"* on or before 20th March 2013 (now 24th July 2023 - my insertion). This means that the building does not have to be on an existing agricultural holding or physically be used for agricultural purposes at the time of the application if it was in an agricultural use on a holding on or before 24th July 2023 and it has not been used for any other purpose since this time. It is part of the same agricultural unit. This is the case in this instance.

Martin Goodall goes on to say that *"No qualifying period is stipulated in respect of an agricultural use that commenced on or before that date (being 24th July 2023 - my addition). A relatively short period of agricultural use could potentially suffice to qualify the land as an established agricultural unit for the purpose of Class Q, even if the date on which it commenced was on or only a few days before 20 March 2023 (now 24th July 2023 - my insertion)."*

It is for the applicant to show that the building was part of an *"agricultural unit on 20 March 2023 (now 24th July 2023 - my insertion) or, if it was not in such a use on that date, that it was in such a use at a date prior to 20 March 2023*

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(now 24th July 2023 - my insertion), *and that this was its last use, since when it has not subsequently been used to any material extent for any other purpose.*"

The building was last in agricultural use and fully accords with this requirement of Class Q.

Alterations to the Building

This development will not include any extensions with the only works being to those elements listed above to make the building habitable as a dwelling. The blockwork walls will remain and be clad in timber and created within the existing frame as shown on the enclosed plans. The structure of the roof will remain, but the existing profiled steel sheet will be replaced with new pre-insulated corrugated sheeting which will meet Building Regulation requirements.

As the development involves the creation of 1no. dwelling, the walls will be insulated to meet Building Regulations standards, but this will be achieved by reducing the gross internal floor space accordingly and not by increasing the footprint of the building.

The applicant commissioned a structural appraisal of the application buildings. The completed structural survey has revealed that the building is structurally sound and can suitably converted into the proposed dwelling and this is confirmed in the attached structural survey prepared by DSA. For full details, we refer the officer to the enclosed structural appraisal which was prepared in April 2026 by DSA.

To ensure full compliance with the requirements of Class Q, none of the alterations proposed will be load bearing on the existing structure and none of the works will be structural in nature.

Part (j) of Class Q.1 allows for physical changes necessary to convert the building to a dwellinghouse:

(j) the development under Class Q(c) would consist of building operations other than—

(i) the installation or replacement of—

(aa) windows, doors, roofs, or exterior walls, or

(bb) water, drainage, electricity, gas or other services,

to the extent reasonably necessary for the building to function as a dwellinghouse, and

(ii) partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(j)(i)...

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As part of the conversion, the following alterations are proposed (as shown on the enclosed proposed plans and elevations):

North West Elevation

- A new cavity wall will be created consisting of a layer of Celotex insulation between new concrete block internal wall.
- The existing walls will be clad in timber.
- New windows will be created to the living room, bedroom 3/study and the master bedroom.

South East Elevation

- A new cavity wall will be created consisting of a layer of Celotex insulation between new concrete block internal wall.
- The existing walls will be clad in timber.
- A new door will be created to the utility room.
- Windows will be created to bedroom 2.

North East Elevation

- A new cavity wall will be created consisting of a layer of Celotex insulation between new concrete block internal wall.
- The existing walls will be clad in timber.

South West Elevation

- A new cavity wall will be created consisting of a layer of Celotex insulation between new concrete block internal wall.
- The existing walls will be clad in timber.
- A windows and bi-fold doors will be create to the kitchen and dining area.

Roof

- The existing profiled steel sheet will be replaced with new pre-insulated corrugated sheeting.

In the main, it is the intention to try to retain all the existing materials with them.

In accordance with the latest amendment to Part 2 (g) of the Class Q regulations, the number of windows included as part of this proposal have been designed to ensure that there is an adequate provision of natural light in all the habitable rooms.

The materials will be created within the limits of the footprint of the existing building to create a cavity wall. We invite the planning officer to discuss any

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elements of the proposed scheme and materials during the determination process.

As part of the application, a section of curtilage has been included adjacent to the building. This will provide private amenity space (garden, parking and turning areas) which will be within the size of the footprint of the existing building.

In accordance with Class Q of The Town and Country Planning (General Permitted Development) (England) Order 2015 the building can easily be converted without the need for any structural intervention.

The structural report shows that the building is structurally sound and suitable for conversion and it is the intention for the building to be converted as found on the site. However, we would like to note the relevant points of *A Practical Guide to Permitted Changes of Use* as written by Martin Goodall, Alistair Mills and David Evans.

This book looks at structural alterations and what is and is not deemed as being suitable in terms of the regulations. The book states that *"There is nothing in the wording of Class Q (b), or in the restrictions on permission building operations set out in paragraph Q.1 (I) that distinguishes in any way between structural and non-structural works. These provisions made no distinction between various types of building operations depending on whether the relevant works are structural or not"*. The book goes on to note that furthermore *"it is significant that there is no longer any reference in the Planning Policy Guidance to a prohibition on the construction of new structural elements for the building. Nor is it any longer asserted that it is only where the existing building is structurally strong enough to take the loading associated with the external works to adapt the building for residential use that certain building operations will be considered to come within Class Q(b). Thus internal structural strengthening of the building is not ruled out, although the prohibition on the external dimensions of the converted building extending beyond the external dimensions of the existing building at any given point prevents any such strengthening from extending outside the pre-existing envelope of the building."*

The building fully accords with the requirements of Class Q, and this extract of the book further supports this. Internal works are acceptable where they do not affect the building's ability to bear the load of any external works required to provide for the residential use. Neither would it make the building structurally sound or otherwise enhance its structural integrity. The required alterations are compliant with the relevant parts of the Order.

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It is quite clear that the building is structurally sound and capable of being converted in full accordance with the guidelines.

The works will include internal and external alterations, with only partial demolition proposed for reasons already discussed. This will enable maximum insulation and sound proofing to be incorporated. We consider that as most of the materials will be re-used, and the development will not involve, in the main, the replacement of any of the existing materials that the proposal must be considered to be a conversion of the existing agricultural building into a dwelling and *not* a re-build. This has already been discussed in 'The Application' section of this statement. Full details of the proposal can be seen on the accompanying plans.

Conditions

Having demonstrated that the proposed development is in accordance with the limitations of Q.1. It must also be shown that Prior Approval is not required regarding the conditional considerations at Q.2 (a) to (g), summarised below.

(a) transport and highways impact of the development

Comment: The proposals are not considered to have any unacceptable impact on highways.

There is an existing safe access to the site and the buildings found on the site with excellent visibility splays in both directions when leaving the site onto the B4069, Main Road.

Considering the building was last in an agricultural use where related traffic movements were expected on a daily basis, we do not consider that replacing them with residential vehicle movements will significantly increase the volumes of traffic on the local highway and will not impact highway safety in any way. The proposed change of use of the site will not adversely impact upon the local highway network or wider transport infrastructure. Larger farm vehicles would, without issue, access the site to use the building when it was used for agricultural purposes and as such the limited rise in traffic generation will not increase vehicle movements above those that could already occur and have already occurred.

There is adequate turning space and provision for ample parking on the site which will allow all vehicles to park clear from the highway, turn on the site and leave in a forward gear. This further ensures that highway safety is preserved.

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The application site is also surrounded by dwellings and is found in between settlements which are provided with numerous services and facilities as well as a local bus service.

Being an existing access means that agricultural vehicles can and do already access this part of the site and the application buildings with no restrictions. This means that the impact on the highways will not be severe in accordance with paragraph 116 of the NPPF which 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.*" The development will not have an unacceptable impact on highway safety.

(b) noise impacts of the development

Comment: The application site is/was last in an agricultural use on an agricultural unit. The site is also found alongside the B4069; Main Road where there is a moderate level of traffic noise most of the time. It is not considered that proposed use within the buildings will be likely to generate an unacceptable level of noise.

Although a few dwellings are found along the road, the barn is also surrounded by agricultural land whereby there are not considered to be any significant noise impacts on the proposal. The development will be of a use, that is in keeping with the character and appearance of the surrounding land uses and dwellings.

If anything, by removing the agricultural use of the building and reducing the agricultural vehicle movements and uses within the building, by creating the proposed dwelling, will reduce the levels of noise created from the site and be seen as being beneficial.

As mentioned earlier in this statement, the proposed Class Q residential use and concurrent, flexible commercial use of the existing building will be occupied as a live-work unit. This ensures that the proposed Class E will not have any adverse impacts upon the residential use and the levels of amenity experienced by the occupants of the proposed dwelling will not be impacted. The applicant is happy to sign a legal agreement if required by the LPA. It must also be considered that the site is surrounded by residential uses which were permitted by the LPA and considered to be suitable in this location.

(c) contamination risks on the site

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Christian Malford Farmhouse, Main Rd, Christian Malford, Chippenham SN15 4DF

Comment: The building has previously been used for agricultural storage and to, occasionally, accommodate sheep. Contamination is unlikely to be an issue in connection with the proposed use of the premises.

(d) flooding risks on the site

Comment: According to the Environment Agency's flood risk maps the site is found in Flood Zone 1 and is not at risk from flooding or surface water flooding.

Furthermore, the proposed residential use of the building will not increase the risk of flooding elsewhere in the locality.

A sewage treatment plant will be installed for the waste drainage. A system has not yet been agreed but we consider that this could be agreed by a suitable condition. If, however, you would like a system to be agreed prior to determination then the applicant would be happy to discuss this.

(e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order

Comment: The location of the site provides an ideal setting for the residential use, with access to local facilities nearby with dwellings already surrounding the site. The main thrust of current Government policy regarding sustainable development is contained within the National Planning Policy Framework (NPPF).

By introducing Class Q development, Central Government have recognised the key role agricultural buildings can play in helping to provide a means of delivering additional rural homes. Indeed, PPG advises that new rural housing should play an important role in maintaining the viability of smaller rural settlements.

In this instance, the re-use of the site will result in the creation of 1no. functional and desirable dwelling that will certainly enhance the appearance of the site from its present condition without detracting from the overall rural character of the area. Other dwellings are also present in the vicinity and as such the development will not appear out of place in the context of the current street scene.

It is important that LPAs have a 5-year supply of housing land and the NPPF requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years supply housing against their housing requirements plus contingency dependent on past rates of delivery.

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The Council also has a significant shortfall in housing land, and they are currently in a position where they cannot demonstrate a 5-year housing land supply. The Council has acknowledged that it has only **2.42** years of housing land supply.

Small sites, predominantly rural areas, can make up a significant element of overall supply and should therefore be given significant weight. I note that there is no minimum threshold in the application of the relevant paragraphs and footnotes of the NPPF; it applies equally to an application for 1 house or for 100 houses.

(f) the design or external appearance of the building

The scheme has been designed to retain, where possible, the existing external materials and the functional agricultural appearance of existing building and, importantly be in keeping with the surrounding area and the wider area in general.

As mentioned, most of the proposed alterations will be internal and none of the proposed alterations will harm the character of the surrounding area to ensure that the proposal does not adversely affect the existing dwellings and landscape in the area. All the internal and external alterations are completely within the scope of Class Q. The dwelling will retain a rural/agricultural appearance.

The full details and design of the proposed dwelling can be viewed on the enclosed plans, especially those showing the existing and proposed elevations numbered ZM-JH-04.

Suitable landscaping could also be included if necessary and requested by the Council and the applicant is happy to discuss this during the determination process.

(g) The provision of adequate natural light in all habitable rooms of the dwellinghouses

The design ensures that the proposal is provided with adequate natural light in all habitable rooms.

Ecology

As the proposals only involve the conversion of an existing agricultural building to a residential dwelling and they do not involve the creation of any structures

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or the removal of any habitats or important natural features, we do not consider that a Preliminary Ecological Assessment (PEA) or BNG Metric and Report is required in this instance.

To re-iterate; the proposals do not involve the removal of any potential habitats, we do not consider that there is a requirement for Biodiversity Net Gain information to be submitted as the development impacts less than 25sq.m of on-site habitats. Despite this being the case, the applicant, if required by the LPAs ecologist, is happy to discuss this during the determination process.

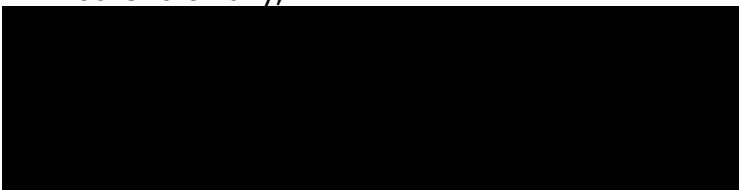
Of course, we are happy to discuss this with the officer during the determination process.

Conclusion

In light of the above, it is considered that the Site is a suitable location for 1no. new dwelling and is in full compliance with the criteria specified by Class Q of The Town and Country Planning (General Permitted Development) (England) Order 2015.

I trust that you have all the necessary information required to register and favourably determine this application and I look forward to hearing from you in due course.

Yours faithfully,



Stuart Anderson BA (Hons) BTP MTP MRTPI