



PLANNING STATEMENT

Application: Conversion of rural building at Reybridge Farm into residential dwelling.

Property: Stables at Reybridge Farm, Reybridge, Lacock, SN15 2PF

Client: Mr Doel

Date: March 2023

Agent: Chris Cary MSc MRICS FAAV
Associate Partner
Rural Chartered Survey & Rural Planner



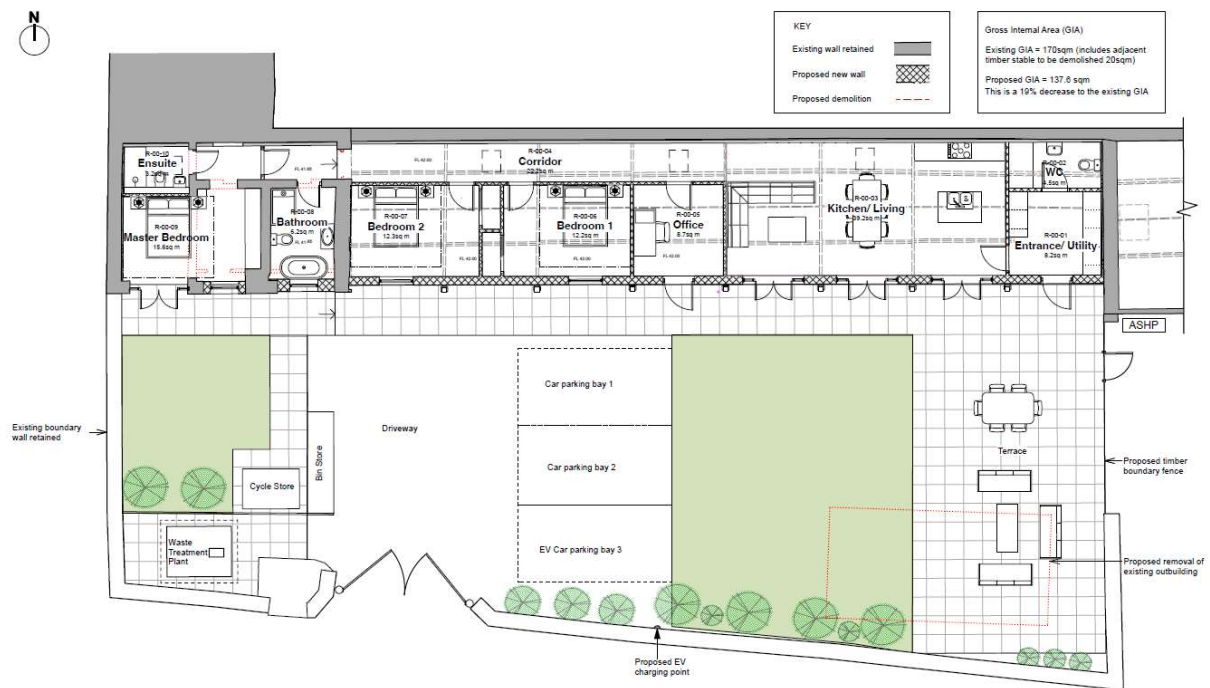
www.w-w.co.uk • planning@w-w.co.uk • 01672 515252

Neither the whole nor any part of this report nor any references to it should be included in any published document, circular or statement, nor published in any way without Woolley & Wallis having given prior written approval as to the form and context in which it may appear

4-5 Hughenden Yard, High Street, Marlborough, Wiltshire, SN8 1LT
01672 515252, marlborough@w-w.co.uk, w-w.co.uk

1 INTRODUCTION

- 1.1 Woolley & Wallis have been instructed by CMS Architects, on behalf of Mr Doel, to prepare this Planning Statement in support of a revised application for the change of use of the rural building at Reybridge to a single dwellinghouse.
- 1.2 This Planning Statement provides a summary overview of the proposed development together with an assessment of the proposal against the relevant Development Plan policies and other material planning considerations.
- 1.3 The proposal seeks the conversion of the existing building only, together with associated works including the demolition of the adjacent timber stable building.
- 1.4 The application has been prepared following the refusal of application reference PL/2024/04056 and the subsequent dismissal at appeal under Ref: APP/Y3940/W/25/3366545. The revised scheme has been specifically amended in response to the findings and conclusions of the Planning Inspector.



Neither the whole nor any part of this report nor any references to it should be included in any published document, circular or statement, nor published in any way without Woolley & Wallis having given prior written approval as to the form and context in which it may appear

2.0 BACKGROUND & APPEAL DECISION

- 2.1 Application reference PL/2024/04056 sought planning permission for the conversion of the existing rural building into a single dwellinghouse together with extensions to the eastern and western elevations. Associated listed building consent was sought under application reference PL/2024/04525.
- 2.2 The applications were refused by Wiltshire Council under delegated powers and subsequently dismissed at appeal under references APP/Y3940/W/25/3366545 and APP/Y3940/Y/25/3366544.
- 2.3 Importantly, within the appeal decision, the Planning Inspector accepted a number of key matters in principle. In particular, the Inspector concluded that:
- the building is structurally sound and capable of conversion without major rebuilding;
 - the proposed works could largely be categorised as maintenance works;
 - unrestricted residential occupation would represent the optimal viable use of the building;
 - the building constitutes a rural building for the purposes of Core Policy 48;
 - the proposal would not detract from the character and appearance of the landscape; and
 - the site benefits from adequate infrastructure and reasonable access to local services within its rural context.
- 2.4 The Inspector also accepted that employment, tourism, commercial and holiday let uses did not represent viable future uses for the building.
- 2.5 The principal concerns identified within the appeal decision related to the unnecessary western extension together with certain domestic alterations which were considered harmful to the character and significance of the listed building. The Inspector therefore concluded that the proposal conflicted with Core Policy 48 when taken as a whole.
- 2.6 This revised application has been prepared directly in response to the appeal decision. Importantly, all extensions have now been removed from the scheme and the proposal instead seeks the conversion of the existing building only, together with associated ancillary works including the demolition of the adjacent timber stable building. In turn, this has resulted in a number of design amendments which specifically address the Inspector's concerns, including the retention and continued visibility of the historic stonework.
- 2.7 The revised proposal therefore significantly reduces the impact of the development upon the character and significance of the heritage asset whilst retaining the key public benefits identified by the Planning Inspector, including the viable long term retention, repair and active use of the building.

PLANNING POLICY

- 2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (“NPPF”) is a material consideration that attracts significant weight in the decision making process.
- 2.2 This section identifies the relevant national and local planning policies that provide the planning policy framework for the determination of this application. In particular, regard has been had to the following:
- The National Planning Policy Framework (“NPPF”)
 - The Development Plan

National Planning Policy Framework (NPPF)

- 2.3 The National Planning Policy Framework (“NPPF”) sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF was most recently revised in December 2024 (updated Feb 2025).
- 2.4 Paragraph 2 explains that planning law requires applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 2.5 Paragraph 10 confirms that at the heart of the Framework is a presumption in favour of sustainable development.
- 2.6 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development with subsection (c) going onto state that for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.
- 2.7 Paragraph 82 deals with housing in the countryside providing support for development that would reuse redundant or disused buildings and enhance their immediate setting.
- 2.8 Paragraph 124 states that planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 2.9 Paragraph 125 sub section c) states that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained.
- 2.10 Paragraph 131 explains that good design is a key aspect of sustainable development.
- 2.11 Paragraph 187 details that development should enhance the natural environment by protecting and enhancing valued landscapes and biodiversity.
- 2.12 When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 203 states that great weight should be given to the asset’s conservation with the more important the asset the greater the weight to be afforded.

The Development Plan

- 2.13 The Development Plan covering the application site comprises the Wiltshire Council Core Strategy (adopted January 2015) together with the 'saved' policies of the North Wiltshire Local Plan 2011 (adopted June 2006).
- 2.14 The most relevant policies in the determination of this application are as follows:
- 2.15 Core Policy 48 ("Supporting Rural Life") deals specifically with the conversion and re use of rural buildings. The Policy confirms that proposals to convert and re use rural buildings for employment, tourism, cultural and community uses will be supported subject to a number of criteria, including that the building is structurally sound and capable of conversion without major rebuilding, would not detract from the character of the landscape or settlement, can be served by adequate access and infrastructure, and would safeguard heritage assets where relevant.
- 2.16 The Policy (CP48) further confirms that where there is clear evidence that such uses are not practical propositions, residential development may be appropriate where the relevant criteria are met. In isolated locations, the reuse of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances in line with national policy.

Assessment against Core Policy 48 is set out below under the heading 'Principle of Development'.

- 2.17 Core Policy 50 ("Biodiversity and Geodiversity") requires development proposals to protect features of nature conservation and geological value and to incorporate appropriate measures to avoid and reduce disturbance to sensitive habitats and species. The Policy also seeks opportunities for biodiversity enhancement.
- 2.18 Core Policy 51 ("Landscape") seeks to protect, conserve and where possible enhance landscape character.
- 2.19 Core Policy 57 ("Ensuring High Quality Design and Place Shaping") requires a high standard of design in all new development, including extensions and alterations to existing buildings. The Policy seeks development that responds positively to local character, reinforces local distinctiveness, and relates appropriately to its landscape setting and the existing pattern of development.
- 2.20 Core Policy 58 ("Ensuring the Conservation of the Historic Environment") requires development to protect, conserve and where possible enhance the historic environment. The Policy confirms that designated heritage assets and their settings should be conserved in a manner appropriate to their significance, including the special character and appearance of conservation areas. The Policy also seeks the conservation and enhancement of non designated heritage assets which contribute towards local character and identity.

3 PLANNING ASSESSMENT

Principle of Development

- 3.1 Core Policy 1 of the Wiltshire Core Strategy sets out the 'Settlement Strategy' for the county and identifies tiers of settlement – Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. Only the Principal Settlements, Market Towns, Local Service Centres and Large Villages have defined limits of development/settlement boundaries.
- 3.2 Core Policy 2 of the Wiltshire Core Strategy sets out the 'Delivery Strategy'. It identifies the scale of growth appropriate within each settlement tier, stating that within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages.
- 3.3 Core Policy 11 provides the community area-based policy in this instance. This is silent on the type of development covered by this application.
- 3.4 The application site does not lie within any settlement and as such is located in the 'open countryside' for the purposes of the WCS. Residential development would need to rely on one of the exception policies as detailed within Para 4.25 of Policy 2. In case, 'Supporting Rural Life' being CP48.
- 3.5 Wiltshire Core Policy 48 of the WCP as set out above, supports the conversion of rural buildings, with its conversion into "employment, tourism, cultural and community uses" being supported. Only when it is clear that these uses are not a practical propositions, residential development may be appropriate however the building is still required to meet the following criteria i – v as set out above.
- 3.6 "Employment, tourism, cultural and community uses" have been considered within the accompanying Viability Report. The report concludes that the afore mentioned uses are not viable future options.
- 3.7 The planning Inspector stated that 'an unrestricted residential occupation would be the *optimal viable use of the building*'.
- 3.8 The proposal is now assessed against the 5 criteria of CP48 as detailed above.
- 3.9 *Assessment against i. The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building.*
- a A full structural survey was commissioned for the application building and carried out by Giraffe Engineering Ltd, namely by Cath Parsons BEng (Hons) PgDip Deng MStructE and Approved by Ralph Pelly Meng (Hons) CEng MStructE both being fully qualified structural engineers.
- b The report concluded that "*The building is capable of conversion to residential use without major rebuild. Retention of the structure will be possible structurally, with only minor (maintenance) structural repairs. The existing building appears from our observations to be structurally sound and capable of complete retention*".

- c The issue of whether the building is capable of conversion was considered in detail by the Planning Inspector within the recent appeal decision. The Inspector concluded that the proposed works 'could be categorised as maintenance' and that 'a structurally unsound building would need major strengthening or rebuilding, which is not the case'. Significant weight was afforded to the expert structural evidence at appeal and it is considered that the same substantial weight should be afforded during the determination of this revised application.
 - d No extensions are proposed within this proposal.
 - e We therefore consider that the proposed development meets point i.
- 3.10 Assessment against - *ii. The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.*
- a The site does not lie within a National Landscape, Conservation Area or Green Belt. Furthermore, there are no Sites of Special Scientific Interest or Scheduled Monuments on or near the site.
 - b The building is largely retained in its existing form, scale and appearance.
 - c Importantly, within the recent appeal decision, the Planning Inspector did not disagree that the conversion of the building would not detract from the character and appearance of the landscape or settlement.
- 3.11 Assessment against – *iii. The building can be served by adequate access and infrastructure.*
- a The site is already connected to mains water and mains electricity. There is sufficient room to install a modern sewage treatment plant. The property can be accessed directly off the council-maintained highway.
- 3.12 Assessment against – *iv. The site has reasonable access to local services.*
- a The site has good access to local services with Lacock being less than one mile away and Chippenham 2.5 miles north providing all necessary services / local amenities. The section of the road network servicing the proposed dwelling is adequately connected to surrounding settlements.
 - b Paragraph 105 of the NPPF recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas and that this should be taken into account in decision-making and as such the application site is considered to have 'reasonable' access to local services given its distance to settlements.

- 3.13 Assessment against – *v. The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.*
- a The building itself is curtilage listed in association with Reybridge House. The only viable use of the building is residential.
 - b The Planning Inspector stated that *‘the appeal building is of sufficient significance to justify its retention. Retaining and repairing the building would therefore be a public benefit, especially as the Planning Practice Guidance (“PPG”) explains that, in general terms, the risk of a heritage asset decaying on account of neglect is best addressed by ensuring it remains in active use’*
 - c The proposal therefore secures the viable long term retention, repair and active use of the heritage asset in accordance with criterion v of Core Policy 48.
- 3.14 In summary, the proposal to convert the building in question satisfies all of the required criteria of Core Policy 48 and is therefore considered acceptable in principle. Importantly, the Planning Inspector similarly accepted that the building constituted a rural building for the purposes of Core Policy 48 and that the majority of the relevant criteria under the Policy were satisfied, with the previous concerns instead relating to the unnecessary extensions and associated heritage impacts.

4 DESIGN, HERITAGE & VISUAL IMPACT

- 4.1 The revised proposal seeks the conversion of the existing building only, with all extensions removed from the scheme. The proposal therefore retains the existing form, scale and agricultural character of the building to a far greater degree than the previously refused proposal.
- 4.2 Within the appeal decision, the Planning Inspector acknowledged that the building forms “an integral component of the historic farmstead” and that it “adds to the significance of the principal listed building”. The Inspector further confirmed that the building is “of sufficient significance to justify its retention”.
- 4.3 The Inspector accepted that many aspects of the original conversion scheme were sympathetic to the existing agricultural character of the building. In particular, the Inspector noted that the proposed timber boarding “would replace the unsightly blockwork”, that the materials and detailing “would respect the existing rural agricultural aesthetic”, and that the wider landscaping proposals would “echo an agricultural yard”.
- 4.4 However, the Inspector identified concerns with elements of the previous scheme, most notably the smaller western extension. The Inspector concluded that the extension would “conceal the historic stonework and the existing openings” and would represent “an incongruous element” within views of the listed building.
- 4.5 This revised application has been specifically amended in direct response to those concerns. Importantly, all extensions have now been removed from the scheme entirely. As such, the historic stonework and existing openings remain visible and the simple linear agricultural form of the building is preserved.
- 4.6 The revised proposal therefore significantly reduces the heritage impact of the development compared to the previously refused scheme whilst still securing the viable long term retention, repair and active use of the building.

- 4.7 Importantly, the Planning Inspector concluded that “retaining and repairing the building would therefore be a public benefit”, particularly given that the building would remain in active use. The current proposal secures those same public benefits through a significantly more sensitive form of development.
- 4.8 Avalon Heritage have produced a Heritage Statement to accompany this application. The statement concludes that the proposal has been carefully developed in response to the significance of the heritage asset and that the works would preserve, and in certain respects enhance, both the heritage asset and its setting. The report identifies that the removal of unsympathetic additions, together with the introduction of a thoughtful and sensitive design approach, would improve the overall legibility and architectural coherence of the building. Accordingly, the proposal should not be refused on heritage impact grounds.
- 4.8 It is therefore considered that the revised proposal preserves the character, appearance and significance of the heritage asset and its setting in accordance with Core Policies 57 and 58 of the Wiltshire Core Strategy together with the relevant provisions of the NPPF.

5 IMPACT ON HIGHWAY

- 5.1 The proposal utilises the existing access directly from the council maintained highway and does not involve any material intensification of vehicle movements. Adequate parking and turning provision is available within the site, enabling vehicles to enter and exit in a forward gear. An EV charging point is also proposed.
- 5.2 Paragraph 111 of the NPPF confirms that development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. Given the modest nature of the proposal, there are no grounds to suggest that either test is met in this instance.
- 5.3 Whilst the site is located within a rural location and is therefore reliant to a degree upon travel by private car, this is inherent to the nature of rural building conversions under Core Policy 48. Importantly, the Planning Inspector accepted that the site benefits from “adequate infrastructure and reasonable access to local services when accounting for the rural context”. The proposal is therefore considered compliant with Core Policies 61 and 64 of the Wiltshire Core Strategy together with the relevant provisions of the NPPF.

6 IMPACT ON NEIGHBOURING AMENITY

- 6.1 The proposed development relates to the conversion of an existing building and does not propose any extensions and seeks to demolish a timber stable block. The revised proposal therefore represents a materially reduced form of development compared to the previously refused scheme.
- 6.2 Given the scale and nature of the proposal, together with the existing relationship between the building and neighbouring properties, it is not considered that the development would result in any material adverse impact upon neighbouring

residential amenity by reason of overlooking, loss of privacy, overbearing impact, noise or disturbance.

- 6.3 Importantly, within the appeal decision, the Planning Inspector did not identify any substantive concerns relating to neighbouring residential amenity.
- 6.4 The proposal is therefore considered compliant with Core Policy 57 of the Wiltshire Core Strategy together with the relevant provisions of the NPPF.

7 IMPACT ON ECOLOGY

- 7.1 A full ecological survey of the building was undertaken which concluded that no bats were recorded emerging from the building and therefore the building is not considered to represent a bat roost. No further surveys were recommended.
- 7.2 The Preliminary Ecological Assessment (“PEA”) accompanying the application has similarly not identified any notable habitats or ecological constraints. Refer to the submitted reports for full details and recommendations.
- 7.3 The proposal falls below the statutory de minimis threshold for Biodiversity Net Gain and therefore mandatory BNG does not apply in this instance.
- 7.4 Subject to the recommendations contained within the submitted ecological reports, it is considered that the proposed development complies with Core Policy 50 of the Wiltshire Core Strategy.

8 PLANNING BALANCE & CONCLUSION

- 8.1 The revised proposal has been specifically amended in direct response to the findings of the Planning Inspector under appeal references APP/Y3940/W/25/3366545 and APP/Y3940/Y/25/3366544. Importantly, all extensions have now been removed from the scheme.
- 8.2 The Planning Inspector accepted that the building is structurally sound and capable of conversion without major rebuilding, that residential occupation represents the optimal viable use of the building, and that the proposal would not detract from the character and appearance of the landscape.
- 8.3 The revised proposal therefore represents a significantly more sensitive form of development which secures the viable long term retention, repair and active use of the building.
- 8.4 Accordingly, it is considered that the proposal complies with the relevant provisions of the Development Plan together with the National Planning Policy Framework and planning permission should therefore be granted