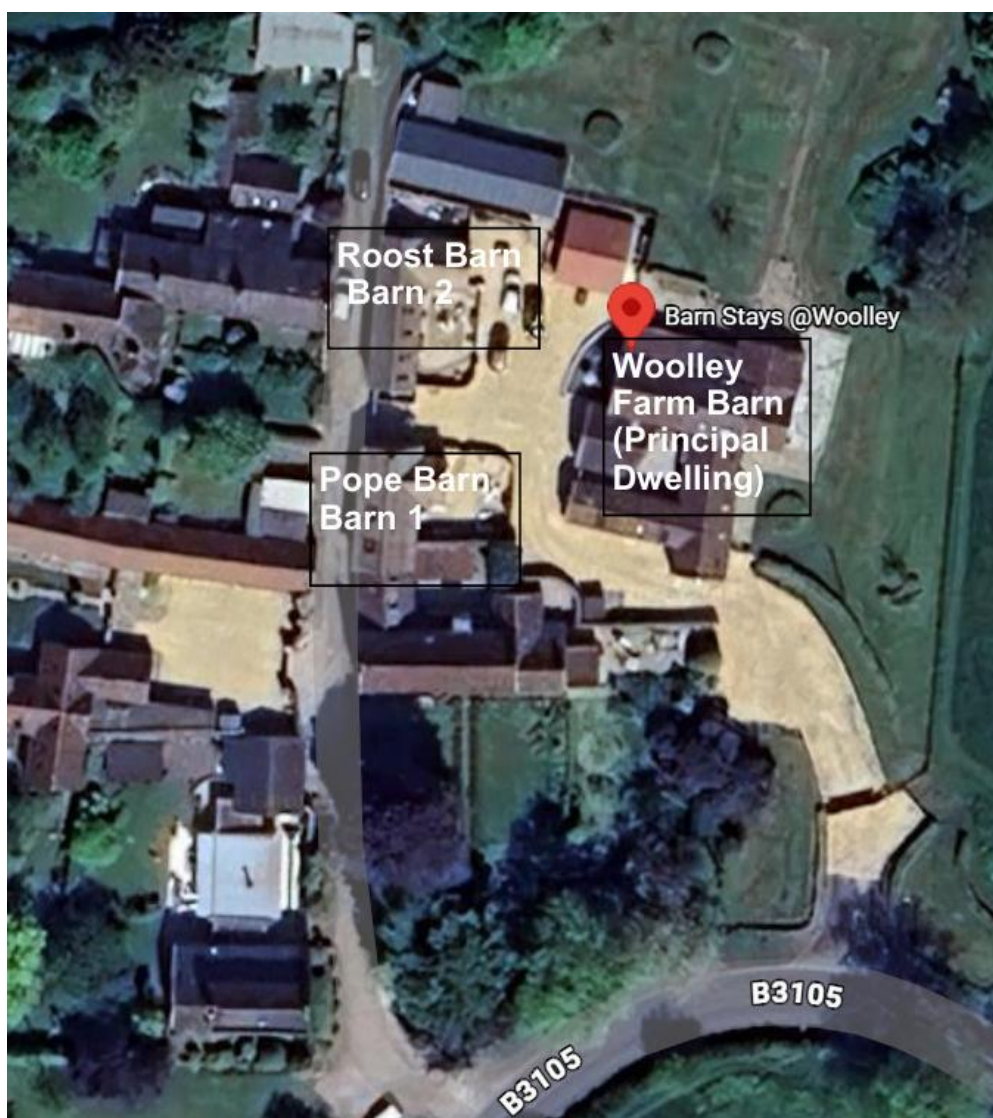

Planning Design and Access Statement

Applicant: Mr K Potter

Date: May 2026

Site: Land at Woolley Barn Farm, Woolley Green, Bradford-on-Avon BA15 1TZ

Full Planning Application: Change of use from 2 No. holiday-lets with occupation controlled by conditions 3 and 4 of planning permission 14/02659/FUL to 2 No. residential dwellings (Class C3) (retrospective).



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NB. See separately submitted Annotated Photosheet

1.0 Introduction

- 1.1 PlanningSphere act for Mr K Potter, the freehold owner of Woolley Barn Farm, Woolley Green, Bradford-on-Avon.
- 1.2 The application site comprises the Pope and Roost Barns and associated curtilages, parking areas and the shared access, which also serves the principal dwelling, Woolley Barn Farm.
- 1.3 The enclosed full planning permission is sought for the change of use from 2 No. short-stay holiday-let residential units (the Pope and Roost Barns) to 2 No. residential dwellings (Class C3) without occupancy restriction (retrospective). No operational development is proposed under this application.
- 1.4 The enclosed full planning application comprises the following:
 - Planning application fee: £1,220.00 including Planning Portal admin fee of £91.00
 - Application Forms and Ownership Certificates: PlanningSphere
 - Site Location Plan: A Harlow & Son
 - Existing and Proposed Floor Plans: A Harlow & Son
 - Existing and Proposed Block Plans: A Harlow & Son
 - Planning, Design and Access Statement: PlanningSphere
 - Photosheet: PlanningSphere

2.0 Relevant Background Information

(i) Site Description

- 2.1 The application site as outlined in Figure 1 below comprises 2 No. barn conversions (The Pope and Roost Barns) that have consent for residential holiday-let accommodation pursuant to planning permission 14/02659/FUL (refer to planning history below).
- 2.2 The stone barns known as Pope Barn (Barn 1) and Roost Barn (Barn 2) lie within a group of existing dwellings comprising the Woolley Green hamlet situated just outside of Bradford on Avon (approximately 1.5km to the north east of the town). Refer to the enclosed annotated Photosheet for further site context.
- 2.3 The site lies within a location that has reasonable non-car accessibility (cycle and walking) to existing services, employment opportunities and community facilities.

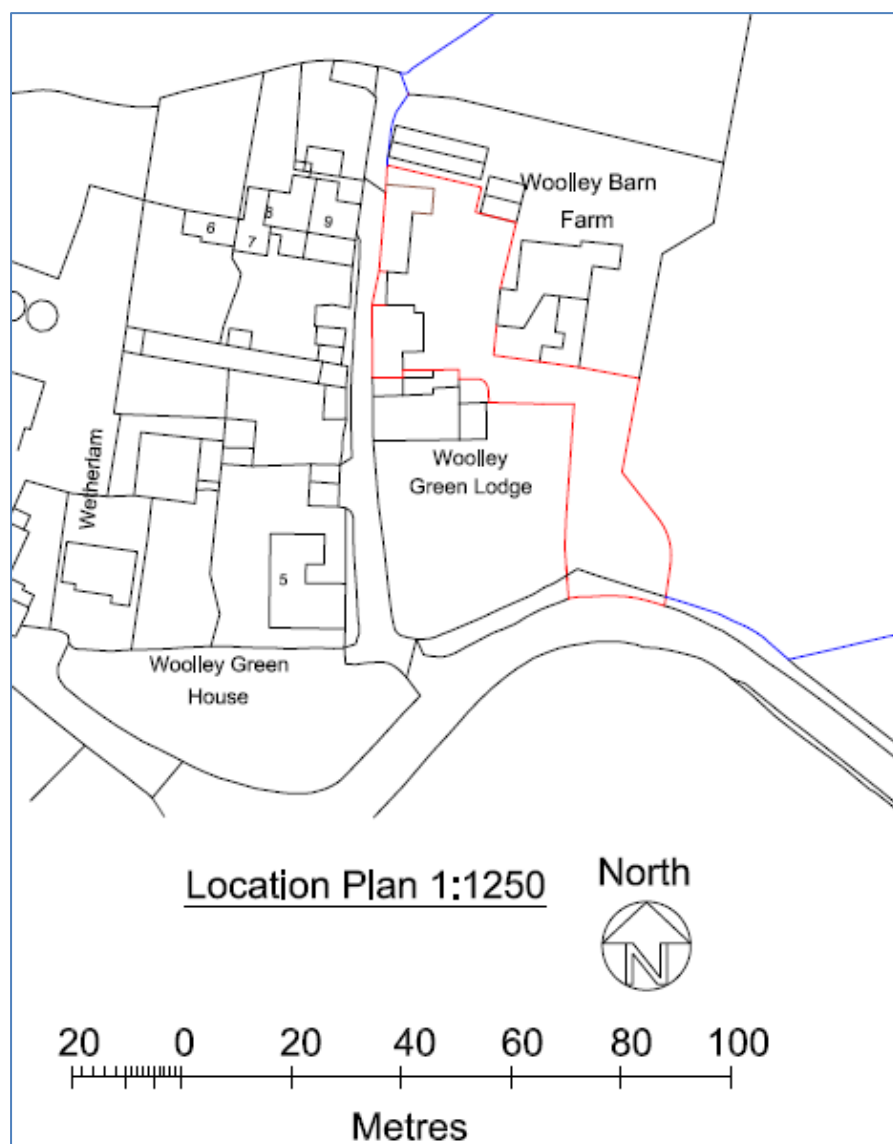


Figure 1. Extract from the Site Location Plan

(ii) Planning history

2.3 Relevant planning history for Woolley Barn Farm is summarised in the table below.

Reference	Description	Decision
15/02188/CLP	Erection of detached garage (Certificate of Lawfulness for Proposed Use).	Permitted 29.04.2015
15/00024/FUL	Proposed extensions and new access.	Permitted with conditions 04.03.2015
14/02659/FUL	Construction of replacement dwelling (following demolition of existing dwelling) and the conversion of two existing outbuildings to form separate holiday lets.	Permitted with conditions 16.07.2014

2.4 Planning permission 14/02659/FUL includes the following restrictive occupancy planning conditions that are applicable to the Pope and Roost Barns:

- 3 *Notwithstanding Class C3 of the Schedule to the Town and Country (Use Classes) Order 1987 (as amended) (or any order which revokes and re-enacts that Order with or without modification), the accommodation in Barns 1 and 2 hereby permitted shall be used to provide holiday accommodation only, which shall not be occupied as permanent, unrestricted accommodation or be used as the primary place of residence. In addition, an up to date register of names and main home addresses of all occupiers shall be maintained and shall be made available at all reasonable times to the Local Planning Authority.*

REASON: This site is in a position where the Local Planning Authority, having regard to the reasonable standards of residential amenity, access, and planning policies pertaining to the area, would not permit permanent residential accommodation.

- 4 *No person shall occupy the holiday accommodation hereby permitted for a continuous period of more than 28 days in any calendar year and it shall not be reoccupied by the same person/s within 28 days following the end of that period.*

REASON: This site is in a position where the Local Planning Authority, having regard to the reasonable standards of residential amenity, access, and planning policies pertaining to the area, would not permit permanent residential accommodation.

2.5 Other relevant planning history relating to nearby land is summarised in the table below.

Reference	Description	Decision
PL/2024/04643 Woolley Byre and Barns, Woolley Green, BA15 1TY	Change of use from permitted live-work unit with supplemental floor space (as permitted under planning permission 18/01156/FUL) to single dwelling with ancillary residential annexe (retrospective).	Permitted 17.07.2024
PL/2023/07554 Woolley Green Farm, Bradford On Avon, BA15 1TY	Redevelopment of former farmyard with three detached dwellings and associated works	Permitted 15.02.2024
PL/2024/11561 Former nursery, Northleigh,	Outline application with some matters reserved for erection of 1 No. custom-build dwelling and associated access works. (access and layout only)	Permitted 08.09.2025

Bradford on Avon		
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- 2.6 The above precedent decisions for residential development were supported at officer level and were judged to be acceptable locations for residential development in terms of accessibility.

(iii) Relevant Background Information

- 2.7 Planning permission 14/02659/FUL enabled the conversion of the 2 No. existing stone outbuildings at Woolley Barn Farm to form separate short-stay holiday lets. Conversion works to form the Pope and Roost Barns started in 2017. However, it should be noted that the permission has not been fully implemented as the existing principal dwelling, Woolley Barn Farm has been retained and extended along with the installation of a new vehicular access, which was permitted under planning permission 15/00024/FUL.
- 2.8 Following the completion of the conversion works in June 2019, the Pope and Roost Barns were let out as short-term holiday lets from July 2019. Both properties were managed by the applicants who at that time were living in the adjacent Woolley Barn Farm. The applicants managed the letting process, coordinated support services (cleaning and maintenance) and were on hand to deal with guest queries. A part time support member of staff assisted with the cleaning and laundry.
- 2.9 In 2024 the applicants moved to Sidmouth for family health reasons. Woolley Barn Farm was subsequently let on an Assured Shorthold Tenancy (AST). NB. following the enactment of the Renters Right Act the AST has now transitioned to an Assured Periodic Tenancy (APT).
- 2.10 Following the applicant's relocation to Sidmouth, the management of Pope and Roost Barns, for short-term letting became increasingly onerous for the applicants. The additional cost of procuring additional third-party support services to replace the onsite owner management and operation, resulted in the holiday-let business becoming unviable.
- 2.11 Consequently, the applicant made a decision to commence letting of both the Pope and Rooster barns for longer term residential occupation under ASTs (now APTs) from June 2024. It is acknowledged that both barns are presently occupied in breach of condition 4 of planning permission 14/02659/FUL.

(iv) The Current Application

- 2.12 The enclosed full planning application seeks to regularise the use of the Pope and Roost Barns as unrestricted residential dwellings (Class C3). The proposals are summarised in Section 3.0 of this Report.

3.0 Description of the Proposals

3.1 This section of the PDAS has been prepared having regard to the Design Council best practice guide 'Design and Access Statements: How to write, read and use them'. As such it explains the evolution and design thinking that has developed the application proposals into the submission scheme.

3.2 National Planning Practice Guidance advises that:

"...a Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users".

3.3 The NPG goes on to state that:

"...the level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long".

(i) Proposals

3.4 The application proposals seek full planning permission for the change of use from 2 No. short-stay holiday-let residential units (Class C1) to 2 No. residential dwellings (Class C3) (retrospective).

(ii) Use

3.5 The proposal seeks a new full planning permission to enable the permitted holiday-let units to be lawfully occupied as 2 No. unrestricted residential dwelling (Class C3).

(iii) Layout, Scale and Appearance

3.6 The application is supported by a block plan and existing/proposed ground and first floor plans for information. No operational development is proposed as part of this application proposal.

3.7 Each of the 2-bedroom dwellings will have its own dedicated private courtyard garden and parking. The existing design compliments the mixed built form and rural setting of the area.

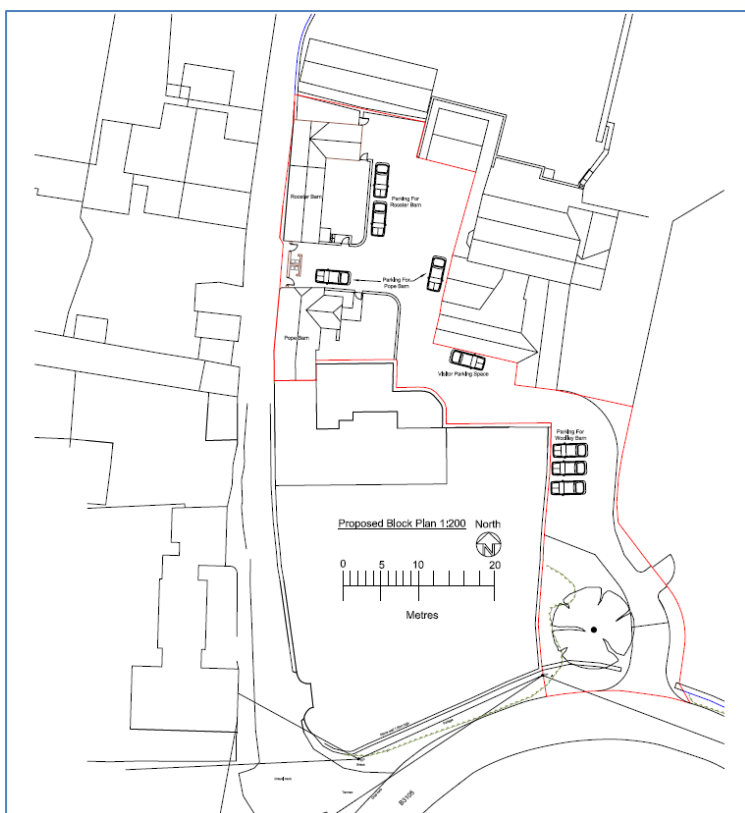


Figure 2: Extract of Proposed Block Plan

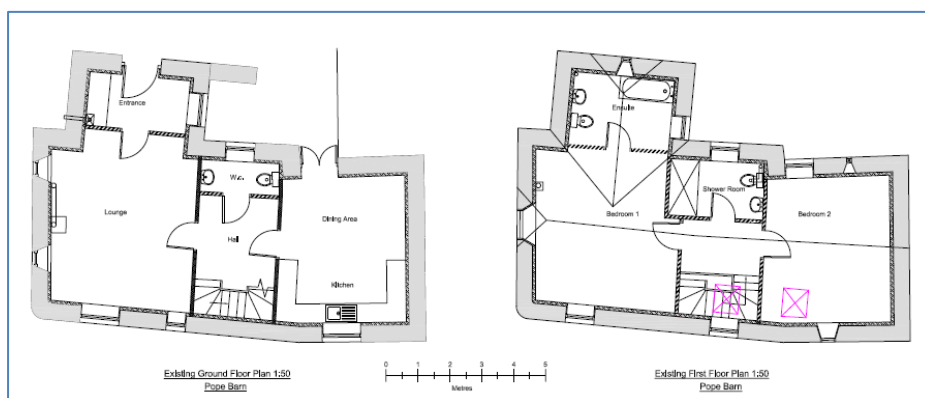


Figure 3: Extract of Existing and Proposed Ground Floor and First Floor Plans: Pope Barn (Barn 1)

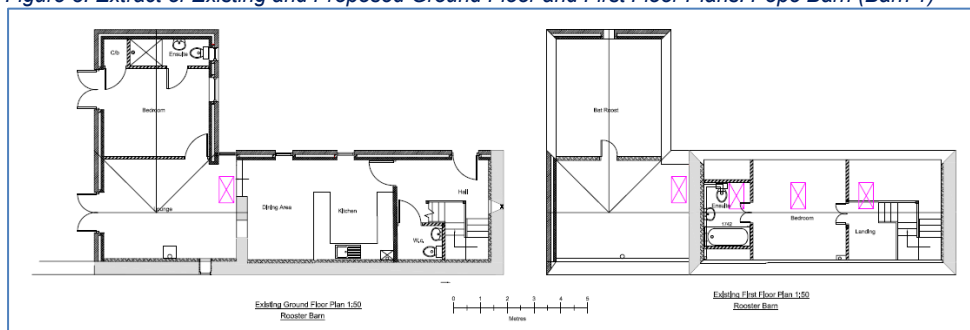


Figure 4: Extract of Existing and Proposed Ground Floor and First Floor Plans: Roost Barn (Barn 2)

(iii) Access and Parking

- 3.8 The 2 No. Barns share an existing bellmouth access from the B1035 which also provides an internal access to the principal dwelling, Woolley Farm Barn. The shared access is also suitable for pedestrians with both pedestrian and vehicular access via a controlled gate. There is a separate shared pedestrian access from the unadopted private lane to the west as shown on in Photo 4 of the photosheet.
- 3.9 Off-street parking spaces are provided for each dwelling in line with Wiltshire's adopted parking requirements: 2 No. surface parking spaces are allocated to Pope Barn (Barn 1) and 2 No. tandem surface parking spaces are allocated to the Roost Barn (Barn 2). Refer to the Photosheet (Photos 9-11) and Proposed Block Plan. There are existing bin storage facilities.

(iv) Drainage Strategy

- 3.10 The permitted drainage strategy will operate as existing. The 2 No. barns are situated within Flood Zone 1 and therefore at low risk of flooding. Foul water drainage is connected to the existing services.

(v) Ecology and Biodiversity Net Gain

- 3.11 Given that the proposal comprises a simple change of use of the existing buildings and there is no operational development, the application is exempt from formal BNG requirements. The original conversion scheme incorporated a bat roost in the renovated Barn 2 above the extension. This is illustrated on the floor plans.

(vi) Landscaping

- 3.12 Each Barn is landscaped and provided with a private courtyard garden and a parking area for 2 No. cars (as existing). The existing design retains the historic arrangement of the buildings which are located within a farmyard setting. It has been established that there is no impact on the nearby grade II listed Woolley Green Lodge to the south. Refer to the annotated Photosheet for details of existing boundary treatments.

4.0 Planning Policy Context

(i) Statutory Development Plan

- 4.1 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with the Development Plan unless material planning considerations indicate otherwise.
- 4.2 The statutory development plan comprises: Wiltshire Core Strategy (2015); the Wiltshire Housing Site Allocation Plan (2020); and the Bradford on Avon Neighbourhood Plan (2017).

(ii) Applicable designations

- 4.3 Woolley Green and the application site lie outside of any defined settlement boundary and are over-washed by the Green Belt. The planning policy map indicates that the site is situated within a policy zone relating to Advertisement Control and an Impact Zone for Bat Species. Nearby, to the south Woolley Green Lodge is a Grade II listed building.
- 4.4 The Environment Agency's indicative flood map shows that the site is located within Flood Zone 1 i.e. outside the defined flood plain and flooding is not a planning consideration.

(iii) Wiltshire Core Strategy (WCS)

- 4.5 The following Policies from the Wiltshire Core Strategy Composite Plan are relevant to the proposals:
- CP1: Settlement Strategy
 - CP2: Delivery Strategy
 - CP7: Spatial Strategy: Bradford on Avon Community Area
 - CP50: Biodiversity and Geodiversity
 - CP57: Ensuring High Quality Design and Place Shaping
 - CP61: Transport and New Development
 - CP67: Flood Risk
- 4.6 There are no relevant policies in the Wiltshire Housing Land Allocations Plan.

(iv) Bradford on Avon Neighbourhood Plan 2013-2026

- 4.7 The Bradford-on-Avon Neighbourhood Plan was 'made' in October 2017 and is now time expired. The Neighbourhood Plan is at an early stage of review.

(v) National Planning Policy Framework (NPPF)

- 4.8 National planning policy is set out in the NPPF (last updated in February 2025) and web-based guidance in the NPPG (from 2014). A summary of the applicable NPPF policies is set out below:
- Achieving sustainable development: 7-10
 - The presumption in favour of sustainable development: 11-14
 - Decision making: 39, 48-51

- Delivering a sufficient supply of homes: 61, 73, 83
- Promoting healthy and safe communities: 96
- Promoting sustainable transport: 109, 115
- Making effective use of land: 124, 125
- Achieving well-designed places: 131, 135
- Protecting Green Belt land: 142, 143, 153, 154, 155
- Meeting the challenge of climate change, flooding and coastal change: 161
- Conserving and enhancing the natural environment: 187
- Conserving and enhancing the historic environment: 202
- Annex 1: Implementation: 231-233

- 4.9 Of particular relevance to this proposal are: Paragraph 11d ii (i.e. engagement of the Framework's 'tilted balance'); Paras 39, 61 and 89, 155:

39. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

61. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

155. The development of homes... in the Green Belt should also not be regarded as inappropriate where: b) There is a demonstrable unmet need for the type of development proposed.

(vi) National Planning Practice Guidance (NPPG)

- 4.10 National Planning Policy Guidance (NPPG) in the form of web-based information was published on 6th March 2014. The relevant guidance linked to the NPPF policy referred to above has been reviewed.

(vii) Wiltshire Local Plan Review

- 4.11 A Regulation 19 iteration of the Wiltshire Local Plan Review (ELP) was submitted to the Secretary of State for Housing Communities and Local Government for examination on 28th November 2024. Following fundamental concerns raised by planning inspectors in respect of the spatial strategy, plan period and insufficient consideration of reasonable alternatives, the Council issued a Notice of Withdrawal of ELP pursuant to section 22 of the Planning and Compulsory Purchase Act 2024 on 22nd May 2026.
- 4.12 Work will now commence on a new replacement plan in accordance with the regulations introduced under the Levelling-up and Regeneration Act 2023 which came into force on 25th March 2026. The new local plan regulations mandate a faster 30-month digital-first plan-making system. Accordingly, no weight can be ascribed to the development management policies and allocations contained within the now withdrawn ELP.

(viii) Wiltshire Housing Land Supply

- 4.13 Following publication of the December 2024 iteration of the NPPF, Wiltshire Council's annual housing requirement has been significantly increased from 1,917 to 3,525 dwellings per annum. At the time of writing, Wiltshire Council can only demonstrate 2.42 years of housing land supply. This level of housing land supply has been acknowledged in recently published committee reports⁴ and appeal decisions and constitutes a severe shortfall in housing land supply.

(ix) Other Legislation

- 4.14 The following legislation is also relevant:
- Town and Country Planning Act 1990, as amended
 - Environment Act 2021

5.0 Planning Assessment

(i) Principle of Development

- 5.1 Consideration was given to regularising the use of the 2 No. application barns via a section 73 variation application proposing the deletion of conditions 3 and 4 of planning permission 14/02659/FUL. However, because the permitted holiday lets are referenced in the description of development, and the subsequent permission to extend the principal house and create a new vehicular access has been implemented pursuant to planning permission 15/00024/FUL, it has been decided to regularise the proposed unrestricted use of the two barns as residential dwellings via a standalone full planning application. The benefit of this approach is that if permitted on this basis the decisions will provide greater clarity in respect of the lawful use status of both barns and will also define their respective residential curtilages and vehicular access separately from the principal house.

(ii) Principle of Development

- 5.2 In planning policy terms, the application site lies in open countryside and Woolley Green lies outside the defined settlement limits of Bradford on Avon.
- 5.3 WCS Policies 1, 2 and 7 seek, amongst other things, to direct housing development to sustainable locations within defined settlement limits and infill sites in small villages. However, the weight attached to the WCS's spatial strategy is reduced following the application of the NPPF's 'titled' balance on account of the Council's present and persistent inability to demonstrate a 5-year housing land supply, as noted in Section 4.0 above.
- 5.4 It is notable that the site lies in an established residential area that lies 1.5km from Bradford on Avon's town centre. Officers have taken a pragmatic approach in determination of residential proposals on sites proximate to the application site – refer to the 3 No. precedent cases referenced in Section 2.0 above (PL/2024/04643, PL/2021/08204 and PL/2024/11561) – all of which were judged by officers to be acceptable locations for residential development having regard to the engagement of the 'titled balance'.
- 5.5 Although Woolley Green is in an area over washed by Green Belt, there would be no impact on the openness of the Green Belt, given that the application proposal comprises a change of use only with no operational development.
- 5.6 It is concluded that the proposed change of use proposal is sustainable and would meet the Framework's three-dimensional tests for 'sustainable development' (NPPF: 7-10) whilst making a small but important contribution to housing supply which in the context of the Council's severe and persistent undersupply should be given significant weight as a benefit to the scheme.
- 5.7 The importance of providing a consistent supply of homes is strongly recognised in the NPPF and in recent appeal precedents where the Planning Inspectorate has taken a pragmatic approach when Councils are faced with major shortfalls, recognising that sites of all sizes are needed to help make up the housing land supply deficit.
- 5.8 Socio-economic benefits of housing are also recognised by Inspectors in appeal decisions and there is a clear political commitment to solving the housing crisis, with council's having a

role in addressing this through positive decision making. The economic benefits of new housing are vitally important and should be viewed as a crucial component of the planning balance. The application proposal for a change of use to permanent dwellings will add new social vitality to Woolley Green and contribute to the Council's housing shortfall.

(ii) Design and access considerations

- 5.9 There will be no change to design or appearance of the application barns.
- 5.10 The proposal carries forward the vehicular access implemented under planning permission 15/00024/FUL, which provides a safe and functional point of vehicular access which benefits from a full standard of exit visibility in both directions along the B3105.
- 5.11 The internal access provides sufficient turning to allow all vehicles to enter and leave the site in a forward gear. 2 No. parking spaces are allocated to each dwelling in accordance with the Council's parking standards. i.e. 2 No. off-street parking spaces per 2-bed dwelling. On this basis the proposal is considered to be compliant with WCS Policies CP57 and CP61.

(iii) Ecology and Biodiversity Net Gain

- 5.12 The change of use proposal is exempt from biodiversity net gain requirements and will not impact on ecology as no operational development is proposed.

(iv) Flooding and Drainage

- 5.13 The application site is located within Flood Zone 1 for which flooding is not a consideration. The consented surface water drainage strategy and foul drainage will remain as implemented. On this basis the proposals would meet the requirements of WCS Policy

(v) Residential Amenity

- 5.14 Both barns benefit from a good dual aspect outlook and a private areas with external amenity space enclosed by stone walls – refer to the annotated photosheet.
- 5.15 The main habitable outlook, and private external amenity area allocated to the principal dwelling, Woolley Barn Farm, faces east across the paddock with only bedroom windows facing the barns facing the shared internal courtyard. There is a high stone boundary wall on the shared southern boundary of the Pope Barn.
- 5.16 On this basis, the amenity and privacy of the proposed and existing surrounding dwellings will be preserved in compliance with WCS Policy 57.

6.0 Planning Balance and Conclusion

- 6.1 The proposal seeks full planning permission for a change of use from 2 No. short-stay holiday-let residential units to 2 No. residential dwellings (Class C3) (retrospective) at Land at Woolley Barn Farm, Woolley Green, Bradford on Avon.
- 6.2 The principle of residential accommodation has been established on the site through the extant permission for residential holiday-lets (LPA Ref. 14/02659/FUL). The proposed use as permanent residential dwellings is considered to be acceptable in spatial planning terms having regard to the location of site, the application of the NPPF's 'titled balance', and recent precedent decisions (PL/2024/04643, PL/2021/08204 and PL/2024/11561).
- 6.4 There are no technical constraints that would prevent the use of the application barns as permanent residential dwellings.
- 6.5 The planning benefits of the proposal, which form part of the overall planning balance, are summarised as follows:
- The provision of 2 No. high quality permanent dwellings that will contribute to housing supply in the Bradford on Avon Community Area and make a modest contribution to the significant and persistent housing land supply deficit in the Wiltshire.
 - Permanent residential occupation will contribute to the social vitality of the hamlet.
 - Provision of Council Tax revenue.
- 6.6 In accordance with Paragraph 11d of the NPPF, and on the basis that the proposal is demonstrable compliant with applicable development management policies and legislation, the Council is respectfully requested to grant full planning permission.