

Written Statement of the Local Planning Authority - Wiltshire Council

Pursuant to application reference: PL/2025/08747 for the Erection of a
Self-Build Dwelling with Hard and Soft Landscaping, Parking, and
Associated Works Following Demolition of the Existing Agricultural Barn at
Land at Elms Farm, Elms Cross, BA15 2AL

Appeal reference: 6009225

Date: June 2026

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1. INTRODUCTION

1.1 Background, Site Description, Constraints and the Proposal

1.1.1 This statement has been prepared by Wiltshire Council (the 'Council') as the Local Planning Authority (LPA) pursuant to the refusal to grant planning permission for the erection of a new self-build dwelling under delegated powers at Land at Elms Farm, Elms Cross, BA15 2AL on 19 February 2026.

1.1.2 The reasons for refusal are detailed in Appendix A, but for completeness, the refusal notice included 3 reasons for refusal, which are copied below:

1. *The proposed development would result in the creation of a new dwelling in the open countryside outside any defined settlement boundary. Although part of the site benefits from an extant Class Q prior approval for converting the existing agricultural building, this proposal is materially different to the Class Q fallback position, as it seeks to extend the site area and introduce a larger new dwelling with a larger curtilage, altered siting, footprint, scale and built form. This would result in a significantly greater visual impact on the site and surrounding landscape than the approved fallback. The development therefore conflicts with Core Policies 1 and 2 of the adopted Wiltshire Core Strategy (WCS), which direct new housing to sustainable, plan-led locations, and it does not fall within any of the exception categories in paragraph 4.25 of the WCS that would justify a dwelling in this location. As the proposal is not justified by the reuse of an existing building, does not occupy previously developed land, and offers no betterment over the approved Class Q conversion scheme, it is contrary to the overarching aims of sustainability embodied in the National Planning Policy Framework.*
2. *The proposed demolition of the existing agricultural building and construction of a new two-storey dwelling constitutes inappropriate development in the Green Belt by reason of the increased site area, altered siting, and proposed bulk, mass and height of the proposed dwelling and the resulting domestication of the site. Such development would result in demonstrable harm to and the diminution of the openness of the Green Belt, to a significantly greater extent compared to that which would result from the implementation of the approved Class Q scheme for the conversion of the existing building. In the absence of any very special circumstances, this proposal is not considered to represent appropriate development in the Green Belt and is therefore contrary to paragraphs 142, 153, 154 and 187 of the National Planning Policy Framework, as well as CP51 and CP57 of the adopted Wiltshire Core Strategy through the increased visual impact the proposed dwelling would have when compared to the Class Q fallback.*

Furthermore, in accordance with National Planning Policy Framework paragraph 11(d)(i), the identified Green Belt harm provides a clear reason for refusal and the tilted balance does not apply. The benefits arising from the new dwelling carry little weight, as these could be achieved through the extant Class Q prior approval to convert the existing building.

3. *The application site is located within an area identified on the Council's Strategic Flood Risk Assessment as being at high risk of groundwater flooding. No site-specific Flood Risk Assessment has been submitted to demonstrate that the development would be safe over its lifetime, and would not increase flood risk elsewhere, and would incorporate suitable mitigation measures. The proposal therefore conflicts with Core Policy 67 of the Wiltshire*

Core Strategy and the requirements of the National Planning Policy Framework.

1.1.3 The appeal site relates to an area of open countryside located outside the limits of development for Westwood, with the wider site comprising dog day care use, equestrian and agricultural use. Further information relating to the site's context and constraints is detailed within the associated delegated officer's report in Appendix B.

1.1.4 The appealed development seeks to demolish the existing agricultural barn (which has Class Q prior approval to change the use to a C3 use under PL/2024/02742) and construct a new self-build dwelling with associated hard and soft landscaping. The appealed proposal would be sited in a different location on the site, to the north of where the existing agricultural barn is currently located.

1.1.5 The appealed development would comprise a two-storey building with a rear projecting gable, which would, with reference to the completed application form, be completed by rubble stone, under a slate and clay roof.

1.1.6 The appeal site is located within Flood Zone 1 and is not shown to be within an area at risk of surface water flooding, but is at high-risk of groundwater flooding with reference to the Council's Strategic Flood Risk Assessment (SFRA). The subject site is also within the Green Belt and within various core roost buffer zones associated with the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

1.1.7 The officer's report in Appendix B includes a summary of the relevant planning history, policies, consultation responses, third-party representations and full appraisal of the appealed development. Therefore, such details shall not be reiterated in full detail within this statement, as this statement focuses primarily on the reasons the original application was refused and the particular matters raised within the appellant's Statement of Case.

2. COUNCIL'S STATEMENT OF CASE

1.2 Principle of the Development and Housing Land Supply

1.2.1 As stated above, the appeal site lies at Elms Cross, outside the defined settlement boundary of Westwood, and is therefore in open countryside for policy purposes. In assessing the appealed development against the spatial strategy set out within the adopted Wiltshire Core Strategy (WCS), CP1 'Settlement Strategy' and CP2 'Delivery Strategy' of the adopted WCS outline the Council's settlement hierarchy and identify the settlements where sustainable residential development should take place. Policies CP1 and CP2 of the adopted WCS direct housing to defined settlements, with strictly controlled development in the countryside.

1.2.2 The appeal site lies outside any settlement boundary, where new residential development is generally unacceptable unless it falls within specific exceptions listed under paragraph 4.25 of the supporting policy text for CP2. In this instance, the proposal is not considered to comply with these policies, and therefore, the appealed proposal represents unjustified new residential development in the open countryside, fundamentally conflicting with the spatial strategy.

1.2.3 Whilst the Council acknowledges that the fallback position (the Class Q conversion – refer to Appendices C-E) is a material consideration, the appeal proposal is materially different

from the fallback because the proposal seeks to demolish the existing building and introduce a larger two-storey dwelling that would occupy a different siting, and seeks to extend the residential use onto additional land outside the previously permitted curtilage.

1.2.4 The fallback position of the Class Q establishes residential use on the site, but only within the existing building envelope through the conversion of the existing building and with associated limited curtilage that does not encroach significantly across the wider site.

1.2.5 As set out within the officer's report in Appendix B, the Council does not consider the appeal development to have the same impact as the fallback Class Q proposal, with the appealed development not delivering betterment when compared against the consented Class Q design, in terms of improving the layout, appearance or by broadly replicating the scale, footprint, and siting of the Class Q conversion. Therefore, the fact that there is a prior approval for the conversion of the existing agricultural building on the site does not justify the principle of the appealed development.

1.2.6 The appellant argues within their statement that substantial weight should be given to the extant Class Q fallback position, arguing that it establishes the principle of residential use on the site and must be afforded significant weight in the decision-making process. The appellant contends that the proposal does not introduce an isolated dwelling but rather represents a higher-quality form of development than the approved Class Q conversion. The appellant further argues that the site is sustainably located, with good connectivity to nearby settlements, and relies on the Council's acknowledged shortfall in housing land supply to support the principle of development.

1.2.7 The appellant places significant reliance on the existence of an extant Class Q prior approval, arguing that it establishes the principle of residential use, and this should attract substantial weight. However, the Council considers that the prior approval Class Q permitted development rights represent a limited and specific exception to established planning policy, allowing the conversion of an existing agricultural building within its existing envelope, and therefore do not establish a broader or transferable principle that new-build residential development is acceptable across the site. The fallback position is explicitly tied to the conversion of the existing structure in its current location and does not justify the erection of a new dwelling in a different siting. The appealed development, therefore, represents a materially different form of development, involving new build rather than conversion, with distinct spatial and visual impacts, such that the two scenarios are not directly comparable.

1.2.8 Consequently, the Council submits that the Class Q fallback carries limited weight, and the appellant's assertion that the proposal represents a higher quality form of development does not override the policy considerations. As such, the Class Q prior approval does not substantiate the principle of a new dwelling in this alternative location.

1.2.9 At the time of determining the original application subject to this appeal in February, it was accepted that the Council could demonstrate only 2.42 years of housing land supply, and therefore paragraph 11(d) of the National Planning Policy Framework (NPPF) is engaged.

1.2.10 Since this application was determined, the Council has published a revised Housing Land Supply Statement (HLSS), which uses a base date of April 2025 and was published in June 2026, which confirms that the Council can demonstrate 2.8 years of deliverable supply, as illustrated in the extract below:

Table 2a: 5-year Housing Land Supply position for Wiltshire (using Local Housing Need)

Area	Annual Local Housing Need (LHN)	5-year housing requirement	5-year housing requirement plus buffer*	Deliverable supply 2025-2030	Number of years deliverable supply
Wiltshire	3,488	17,438	18,310	10,268	2.8

** The Council's 2023 Housing Delivery Test result indicates that there is a requirement to add a 5% buffer to the housing requirement (see section 4 above)*

1.2.11 Whilst the above shows an improvement to the previously reported HLS figure, this still falls below the required minimum five-year housing land supply. However, the site lies within the Green Belt, which is a footnote 7 designation, as set in paragraph 11 of the NPPF. Accordingly, the presumption in favour of sustainable development (paragraph 11(d) and the tilted balance) is not engaged. In this instance, the lack of compliance with Green Belt policy provides a strong reason for refusal, as discussed below and as set out in Appendix B.

1.2.12 The housing benefit that the appealed development would carry (one self-build dwelling) is limited because a dwelling could already be delivered under the Class Q fallback.

1.2.13 Lastly, whilst the appellant refers to the Department of Transport recently launched connectivity tool, this does not override the spatial strategy set out in the adopted WCS, which directs development to defined settlements.

1.3 Green Belt

1.3.1 The appeal site lies within the West Wiltshire Green Belt, where national policy attaches great importance to protecting openness. The NPPF makes clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight must be given to any harm to the Green Belt.

1.3.2 The appeal site contributes to the purposes of including land within the Green Belt, particularly safeguarding the countryside from encroachment (NPPF paragraph 143(c)) and preventing urban sprawl. The appealed development would erode this function through encroaching into previously undeveloped open countryside.

1.3.3 The appealed proposal seeks the demolition of an existing agricultural building and the erection of a new two-storey dwelling. This form of development does not fall within any of the exceptions listed under paragraph 154 of the NPPF. In particular, it cannot reasonably be regarded as a replacement building, as the existing lawful use of the building remains agricultural and the dwelling proposal subject to this appeal would be materially larger and located in a different position on the site compared to the Class Q scheme. As such, the proposal constitutes inappropriate development in the Green Belt.

1.3.4 In addition to the harm arising from inappropriateness, the appeal development would result in further harm to the openness of the Green Belt. Openness has both spatial and visual dimensions, and the proposed development would adversely affect both. The dwelling would be significantly larger in both scale and bulk than the existing building, with an increase in volume of approximately 46% and a substantial increase in height. This would result in a more prominent and intrusive built form within an otherwise open rural setting.

1.3.5 Moreover, the proposed siting differs from that of the existing building and would extend built development into previously undeveloped land to the north. This encroachment would erode the open character of the site and increase built form further into the Green Belt. The proposal also includes a materially larger residential curtilage, increasing the area of domesticated land by approximately 602m². This expansion would introduce additional domestic activity, boundary treatments and paraphernalia, all of which contribute to the urbanisation of the site and further diminish the openness of the Green Belt.

1.3.6 With the appeal proposal seeking to increase the built volume by approximately 46% and expand the residential curtilage by approximately 602m² compared to the Class Q fallback, the Council considers these differences to be material and would result in a significantly greater spatial and visual impact on Green Belt openness.

1.3.7 The Council has had regard to the fallback position created by the extant Class Q prior approval for the conversion of the existing agricultural building. While this establishes that a dwelling could be achieved on the site, that fallback would have a materially more limited impact compared to the appealed development. The fallback Class Q proposal would reuse the existing building envelope, maintain the established siting of the existing building and involve a significantly smaller curtilage. The fallback Class Q would also have a more agrarian appearance (refer to Appendix C) compared to the appealed development, which would be more appropriate in this rural location. In contrast, the appeal proposal would extend development beyond the existing agricultural building, both in terms of built form and the extent of residential use. Consequently, the appeal scheme would result in demonstrably greater harm to the openness of the Green Belt than the fallback position.

1.3.8 In their statement, the appellant has put forward several considerations which they contend amount to 'very special circumstances', including the fallback position, the quality of the design, sustainability credentials and the Council's housing land supply shortfall. However, these matters do not outweigh the identified harm. The fallback position of the Class Q already establishes the delivery of a dwelling on the appeal site without the additional harm arising from the appealed scheme, thereby limiting the weight that can be attributed to housing delivery benefits. Similarly, while design quality and landscaping are noted, they do not overcome the fundamental harm arising from the increased scale, encroachment in the open countryside and Green Belt, and the increased domestication of the site that the appealed development poses. Furthermore, although the Council cannot demonstrate a five-year housing land supply, national policy is clear that Green Belt protections are not overridden by that shortfall, and the tilted balance does not apply in this instance.

1.3.9 The appellant's position differs in that it is argued that the proposal would not materially increase harm to the Green Belt when compared with the fallback position. The appellant emphasises that the scheme has been carefully designed to sit comfortably within the site and that additional landscaping would mitigate visual effects and contain the residential use. It is also argued that the proposal would represent an improvement over the fallback Class Q

scheme in terms of design quality, sustainability, and control of the site layout, and that these factors, together with the housing land supply shortfall and the fallback position, amount to very special circumstances.

1.3.10 The Council submits that the fallback Class Q relates solely to the conversion of an existing building within its current footprint, which by its nature would preserve the existing spatial characteristics and openness of the Green Belt. In contrast, the proposed development subject to this appeal, comprises a new-build dwelling in a different location on the site, representing a materially different form of development that would introduce built form where none presently exists, thereby resulting in a greater erosion of openness and encroachment into the countryside. Furthermore, while the appellant emphasises design quality, landscaping, and sustainability improvements, such factors do not negate the fundamental policy harm arising from inappropriate development in the Green Belt. Landscaping in particular cannot mitigate harm to openness, which is a spatial and not purely visual concept.

1.3.11 The Council therefore maintains that the appealed development would result in inappropriate development in the Green Belt, cause harm to its openness by virtue of increased scale, altered siting and extended curtilage, leading to the increased domestication and urbanisation of the site. The proposal is therefore contrary to the NPPF and should be dismissed on this basis.

1.4 Design and Visual Impact

1.4.1 Policy CP57 of the adopted WCS requires a "high standard of design" for all new developments and for developments *"to create a strong sense of place through drawing on the local context and being complementary to the locality"*.

1.4.2 Policy CP51 required developments to *"protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measure"*.

1.4.3 In respect of visual impact and character, the Council submits that the proposal would introduce a more prominent and visually intrusive built form into the open countryside. Although the footprint is not significantly greater than the existing building, the increased height, bulk and domestic character of the dwelling would result in a more pronounced presence within the landscape. The extended curtilage and associated domestic features relating to this increase in curtilage would further erode the rural character of the site. As such, the proposal is considered to conflict with CP51 and CP57 of the adopted WCS, which seek to protect landscape character and ensure high-quality design that responds positively to its context.

1.4.4 The appellant, however, submits that the proposal has been designed to reflect the character of rural dwellings in the area and would utilise appropriate materials and an articulated form to reduce its visual impact. It is also argued that the site is already influenced by existing built development and nearby dwellings, and that views of the site are limited. The appellant maintains that any increase in visual impact compared with the fallback scheme would be modest and localised, and would diminish over time as landscaping matures.

1.4.5 The Council disagrees with the appellant's conclusion on this matter, as whilst there is

existing residential use in the wider vicinity of the site, existing dwellings are predominantly found within the existing Conservation Area boundary and within the defined settlement boundary for Westwood to the west of the appeal site. The appeal site is rural in character and appearance, and the appealed proposal would be introducing a new dwelling with an overly domesticated appearance and would have a greater height and volume compared to the Class Q scheme. The erection of a new dwelling in a different location on the site, thereby introducing built development into an area that is presently open, would result in a materially different and greater impact on the openness of the Green Belt and open countryside. While the use of appropriate materials and additional landscaping may reduce visual prominence to some degree, such measures do not overcome the fundamental distinction that the proposal represents new built form and encroachment in the Green Belt and open countryside, rather than the re-use of an existing structure.

1.4.6 Also, whilst the proposed landscaping would provide some screening of the new dwelling, this is not considered to outweigh the harm the Council has identified within this statement or in the associated officers' report in Appendix B.

1.5 Flood Risk and Drainage

1.5.1 Policy CP67 of the adopted WCS and NPPF paragraphs 170-182 require the avoidance of increased flood risk, the use of appropriate mitigation measures and for Sustainable Drainage Systems (SuDS) to be used where possible to manage runoff, improve water quality and support biodiversity and amenity.

1.5.2 In relation to flood risk, the Council's position at the time of determination was that the application site is identified as being at high risk of groundwater flooding and that no site-specific Flood Risk Assessment (FRA) was submitted with the application. In the absence of such information, the Council could not be satisfied that the development would be safe over its lifetime, would not increase flood risk elsewhere, or would incorporate appropriate mitigation measures. The proposal was therefore found to conflict with CP67 and national policy requirements relating to flood risk.

1.5.3 The appellant has subsequently sought to address this issue through the submission of an FRA as part of this appeal, which demonstrates that the site is not at risk from flooding and that the development can be made safe for its lifetime. On this basis, the appellant considers that the flood risk reason for refusal has been overcome.

1.5.4 The Council's drainage department has been consulted on the submitted FRA and has offered the following comments, copied verbatim:

"We have reviewed the applicant's submitted FRA with regards to the groundwater flood risk at the development.

Elevating FFL 300mm above surrounding ground is an appropriate mitigation measure for the scale of the development.

Noting that the proposed works would be unlikely to displace groundwater and increase risk elsewhere, this is acceptable".

1.5.5 Based on the above, it is considered that the third reason for refusal has now been satisfactorily addressed, and the Council has included a condition in Section 4 below relating to compliance with the FRA if the appointed Inspector is minded to grant this appeal. However,

whilst the Council acknowledges that the flood risk reason for refusal has been satisfactorily addressed through the submission of a site-specific FRA, this matter only attracts neutral weight in the overall planning balance.

1.6 Planning Balance

1.6.1 The Council acknowledges that it is unable to demonstrate a five-year supply of deliverable housing sites. However, it considers that this does not alter the outcome in this case, as the site lies within the Green Belt and national policy confirms that the presumption in favour of sustainable development does not apply where specific policies, including Green Belt policies, provide a clear reason for refusal.

1.6.2 The Council considers that the proposal gives rise to significant harm by virtue of its inappropriateness in the Green Belt, its impact on openness, and its conflict with the spatial strategy. These harms attract substantial weight. The benefits of the proposal are limited, particularly given that a dwelling could already be delivered under the fallback position. The Council therefore concludes that the adverse impacts of the development significantly outweigh its benefits, and in the absence of very special circumstances, the proposal is contrary to the development plan and the National Planning Policy Framework

1.6.3 The appealed development would provide a limited level of benefit through the provision of a new dwelling at a time when the Council has a shortfall in housing land supply, in addition to providing an additional dwelling for the self-build register. However, such benefits are not considered to outweigh the harm and conflict identified in this statement and within the officer's report found in Appendix B, especially as a new dwelling can be provided on the appeal site through the fallback Class Q scheme.

3. WILTSHIRE COUNCIL'S RECOMMENDATION TO THE APPOINTED PLANNING INSPECTOR

3.1.1 For the above reasons in this statement and with reference to the associated appendices, the appointed Inspector is respectfully requested to dismiss the appeal.

3.1.2 It is noted that the application is seeking permission for a self-built dwelling, and the appealed development is therefore exempt from providing mandatory Biodiversity Net Gain (BNG) and as such, no BNG information (including a baseline) has been provided. However, a site-specific planning obligation (a Unilateral Undertaking) to secure the dwelling for this specific purpose has not been provided, which the Council considers to be the appropriate mechanism to ensure the appeal development would meet the requirements of the Self-Build and Custom Housebuilding Act 2015, the statutory framework for BNG and the NPPF. As such, an appropriate mechanism to secure the self-build aspect of the appealed development would need to be considered if the appeal is allowed.

4. LIST OF SUGGESTED CONDITIONS

Should this appeal be allowed, the Council would request that the following conditions be included on any permission granted:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Site Location Plan, Drawing No. 841 E001 B, received on 14 November 2025
Proposed Landscape Site Plan, Drawing No. 841 P003 D, received on 5 November 2025
Existing South and North Elevations, Drawing No. 841 E110 A, received on 3 November 2025
Proposed Side Elevation 1, Drawing No. 841 P112, received on 3 November 2025
Proposed Front Elevation, Drawing No. 841 P110, received on 3 November 2025
Existing East and West Elevations, Drawing No. 841 E111 A, received on 3 November 2025
Existing Block Plan, Drawing No. 841 E002 A, received on 3 November 2025
Existing Landscape Site Plan, Drawing No. 841 E003 A, received on 3 November 2025
Proposed First Floor Plan, Drawing No. 841 P101, received on 3 November 2025
Proposed Rear Elevation, Drawing No. 841 P111, received on 3 November 2025
Proposed Ground Floor Plan, Drawing No. 841 P100, received on 3 November 2025
Proposed Sections, Drawing No. 841 P120, received on 3 November 2025
Existing Ground Floor Plan, Drawing No. 841 E100 A, received on 3 November 2025
Proposed Coloured Front Elevation, Drawing No. 841 P114, received on 3 November 2025
Proposed Block Plan, Drawing No. 841 P002 A, received on 3 November 2025
Proposed Side Elevation 2, Drawing No. 841 P113, received on 3 November 2025

REASON: For the avoidance of doubt and in the interests of proper planning.

3. The development hereby permitted shall be carried out in strict accordance with the following documents:

- Section 5.3 of the Preliminary Ecological Appraisal, produced by Pro Vision Ecology, dated May 2025, reference Ecology 8810 Version 01
- Proposed Landscape Site Plan, drawing no. 24/841/P003 Rev D, dated January 2025
- Tree Survey and Protection, produced by Wadey Trees, dated 7 July 2025, reference WT 038-25 AIA ltr

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

4. The development hereby permitted shall be carried out in accordance with the submitted Flood Risk Assessment, as received on 6 May 2026.

REASON: To reduce the risk of flooding to the proposed development and future occupants.

5. The construction of the dwelling hereby permitted shall not commence on-site until the agricultural barn shown on the existing site block plan drawing (reference 25 / 841 / E001 Rev A) has been permanently demolished in its entirety and all the demolition materials and debris resulting there from has been removed from the site.

REASON: In the interests of the character and appearance of the area and the Green Belt.

6. No development shall commence on-site (including any vegetation removal or works to existing structures) until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent to the site, with particular reference to bats, nesting birds, herpetofauna, dormice, and the bordering habitats. The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

7. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of enhancements for wildlife, including bat roosts and nesting opportunities for birds (e.g. bat and bird bricks), wildlife-friendly plantings and bee bricks, as recommended in Section 5.15 of Preliminary Ecological Appraisal (produced by Pro Vision Ecology dated May 2025) shall be submitted to the Local Planning Authority for approval. The approved details shall be implemented before the occupation of the dwelling hereby permitted.

REASON: To provide mitigation/enhancement for biodiversity.

8. No development shall commence above ground floor slab level until the exact details of the materials to be used for the external walls and roofs have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

REASON: In order that the development is undertaken in an acceptable manner, in the interests of visual amenity and the character and appearance of the area.

9. No development shall commence above ground floor slab level until a scheme of all hard and soft landscaping has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include:

- a detailed planting specification showing all plant species, supply and planting sizes and planting densities;
- finished levels and contours;
- all means of enclosure;
- car park layouts;
- other vehicle and pedestrian access and circulation areas;
- all hard and soft surfacing materials

REASON: In order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

10. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the dwelling or the completion of the development whichever is the sooner; All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock.

Any trees or plants which, within a period of five years, die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

11. No development shall commence on the site until an Arboricultural Method Statement, prepared in accordance with British Standard 5837 (2012): "Trees in Relation to Design, Demolition and Construction" has been approved in writing by the Local Planning Authority, and all works shall be carried out in accordance with the approved statement.

REASON: In order that the development is undertaken in an acceptable manner, to ensure the protection of trees on/off the site in the interests of visual amenity.

12. No external lighting shall be installed on-site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals in their publication "The Reduction of Obtrusive Light" Guidance Note 01/21 (reference GN01/21), have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall also demonstrate how the proposed lighting would impact bat habitat compared to the existing situation and comply with the Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The approved lighting shall be installed and maintained in accordance with the approved details, and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site and to protect light sensitive species.

13. No demolition, site clearance, or construction works shall take place except between the hours of 08:00 to 18:00 Mondays to Fridays, and 08:00 to 13:00 on Saturdays. No such works shall take place on Sundays or Public/Bank Holidays.

REASON: In the interests of protecting the amenity of nearby residents.

14. In the event that contamination is encountered at any time when carrying out the approved development, the Local Planning Authority must be advised of the steps that will be taken by an appropriate contractor; to deal with contamination and provide a written remedial statement to be followed by a written verification report that confirms what works that have been undertaken to render the development suitable for use.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

15. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended by the Town and Country Planning (General Permitted Development) (Amendment) (No.3) (England) Order 2020 (or any Order revoking or re-enacting or amending those Orders with or without modification), no development within Schedule 2, Part 1, Class A shall take place on the dwellinghouse(s) hereby permitted or within their curtilage.

REASON: In the interests of the amenity of the area and to enable the Local Planning Authority to consider individually whether planning permission should be granted for additions, extensions or enlargements.

APPENDIX A – DECISION NOTICE FOR
PL/2025/08747



The Town and Country Planning Act 1990
Refusal of Full Planning Permission
Application Reference Number: PL/2025/08747
Decision Date: 19/02/2026

Applicant:	Ms Bea Schofield C/O Agent - Atlas Planning Group, Bodenham House Barn, Bodenham, Salisbury, Wiltshire, United Kingdom, SP5 4EN
Particulars of Development:	Erection of a self-build dwelling with hard and soft landscaping, parking and associated works following demolition of the existing agricultural barn.
At:	Land at Elms Farm, Elms Cross, BA15 2AL

In accordance with paragraph 39 of the National Planning Policy Framework (NPPF), this planning application has been processed in a proactive way. However, due to technical objections or the proposal's failure to comply with the development plan and/or the NPPF as a matter of principle, the local planning authority has had no alternative other than to refuse planning permission.

In pursuance of their powers under the above Act, the Council hereby **REFUSE TO GRANT PERMISSION** for the development referred to in the above application and plans submitted by you, for the following reason(s):

Refusal Reason

- 1 The proposed development would result in the creation of a new dwelling in the open countryside outside any defined settlement boundary. Although part of the site benefits from an extant Class Q prior approval for converting the existing agricultural building, this proposal is materially different to the Class Q fallback position, as it seeks to extend the site area and introduce a larger new dwelling with a larger curtilage, altered siting, footprint, scale and built form. This would result in a significantly greater visual impact on the site and surrounding landscape than the approved fallback. The development therefore conflicts with Core Policies 1 and 2 of the adopted Wiltshire Core Strategy (WCS), which direct new housing to sustainable, plan-led locations, and it does not fall within any of the exception categories in paragraph 4.25 of the WCS that would justify a dwelling in this location. As the proposal is not justified by the reuse of an existing building, does

not occupy previously developed land, and offers no betterment over the approved Class Q conversion scheme, it is contrary to the overarching aims of sustainability embodied in the National Planning Policy Framework.

Refusal Reason

- 2 The proposed demolition of the existing agricultural building and construction of a new two-storey dwelling constitutes inappropriate development in the Green Belt by reason of the increased site area, altered siting, and proposed bulk, mass and height of the proposed dwelling and the resulting domestication of the site. Such development would result in demonstrable harm to and the diminution of the openness of the Green Belt, to a significantly greater extent compared to that which would result from the implementation of the approved Class Q scheme for the conversion of the existing building.

In the absence of any very special circumstances, this proposal is not considered to represent appropriate development in the Green Belt and is therefore contrary to paragraphs 142, 153, 154 and 187 of the National Planning Policy Framework, as well as CP51 and CP57 of the adopted Wiltshire Core Strategy through the increased visual impact the proposed dwelling would have when compared to the Class Q fallback.

Furthermore, in accordance with National Planning Policy Framework paragraph 11(d)(i), the identified Green Belt harm provides a clear reason for refusal and the tilted balance does not apply. The benefits arising from the new dwelling carry little weight, as these could be achieved through the extant Class Q prior approval to convert the existing building.

Refusal Reason

- 3 The application site is located within an area identified on the Council's Strategic Flood Risk Assessment as being at high risk of groundwater flooding. No site-specific Flood Risk Assessment has been submitted to demonstrate that the development would be safe over its lifetime, and would not increase flood risk elsewhere, and would incorporate suitable mitigation measures. The proposal therefore conflicts with Core Policy 67 of the Wiltshire Core Strategy and the requirements of the National Planning Policy Framework.

Nic Thomas - Director of Planning, Economy and Regeneration

NOTES

1. **Appeals.** If the applicant is aggrieved by the decision of the local planning authority to refuse permission, they may appeal to the Secretary of State for the Environment in accordance with Section 78(1) of the Town and Country Planning Act 1990 within six months of the date of this decision. (Information and forms relating to the appeals process can be found at the Planning Portal - [Appeal a planning decision: Overview - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/appeal-a-planning-decision-overview)).

APPENDIX B – DELEGATED OFFICERS
REPORT FOR PL/2025/08747

APPLICATION FOR FULL - PLANNING PERMISSION

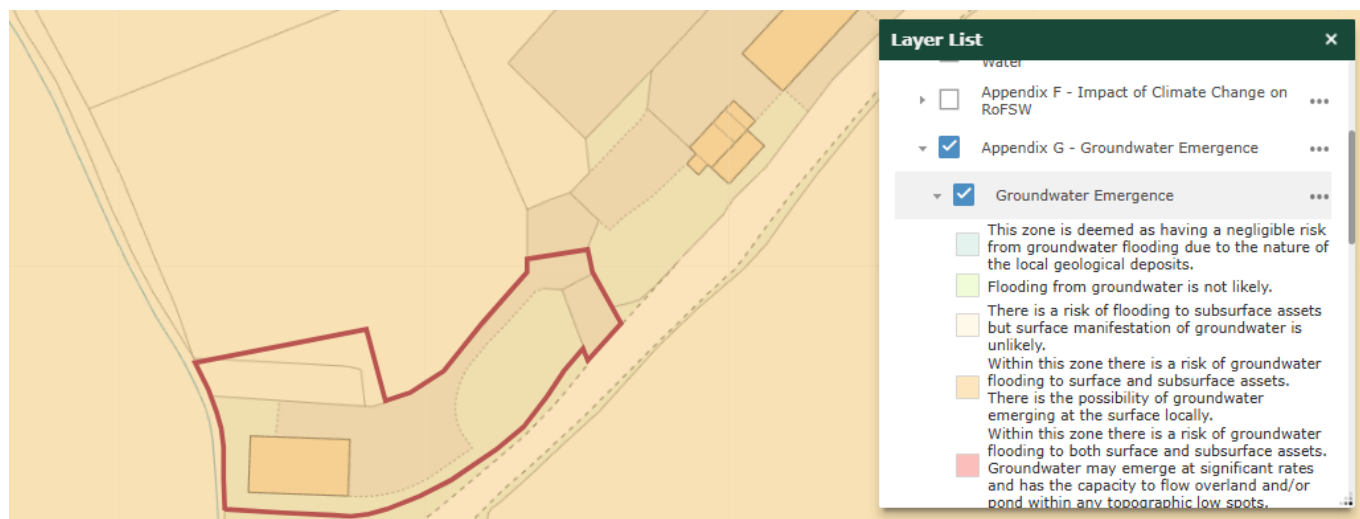
CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/08747
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	Land at Elms Farm, Elms Cross, BA15 2AL
DEVELOPMENT DESCRIPTION:	Erection of a self-build dwelling with hard and soft landscaping, parking and associated works following demolition of the existing agricultural barn.
RECOMMENDATION:	REFUSE

SITE DESCRIPTION/CONTEXT: The application site is located at Elms Cross, Westwood. The wider existing site comprises a dog day care use (subject to regulation under application reference PL/2025/09768), and historic equestrian and agricultural use. The site is in open countryside and located outside the defined limits of development for Westwood.

The subject site is located within the Green Belt and within various core roost buffer zones associated with the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

The application site is not shown to be at risk of surface water flooding and is entirely within Flood Zone 1 according to the Environment Agency's Flood Map for Planning. However, with reference to the Council's Strategic Flood Risk Assessment (SFRA), the site is shown to be at high risk of groundwater flood risk, as shown in the extract provided below. The areas at risk of high groundwater flooding are depicted by the dark orange and red shading. As shown below, the entire site is washed over by dark orange, confirming that the site is within an area at risk of groundwater flood risk:



The building that is subject to demolition is located within the south-west corner of the site and has been formerly used for agricultural storage.

PROPOSAL: This application is seeking planning permission for the demolition of the existing agricultural barn and the construction of one self-build dwelling with associated hard and soft landscaping and on-site car parking provision. With reference to the completed application form, the proposed dwelling would be completed in rubble stone, under a slate and clay roof.

Extracts of the proposed elevations for the new dwelling are provided below:

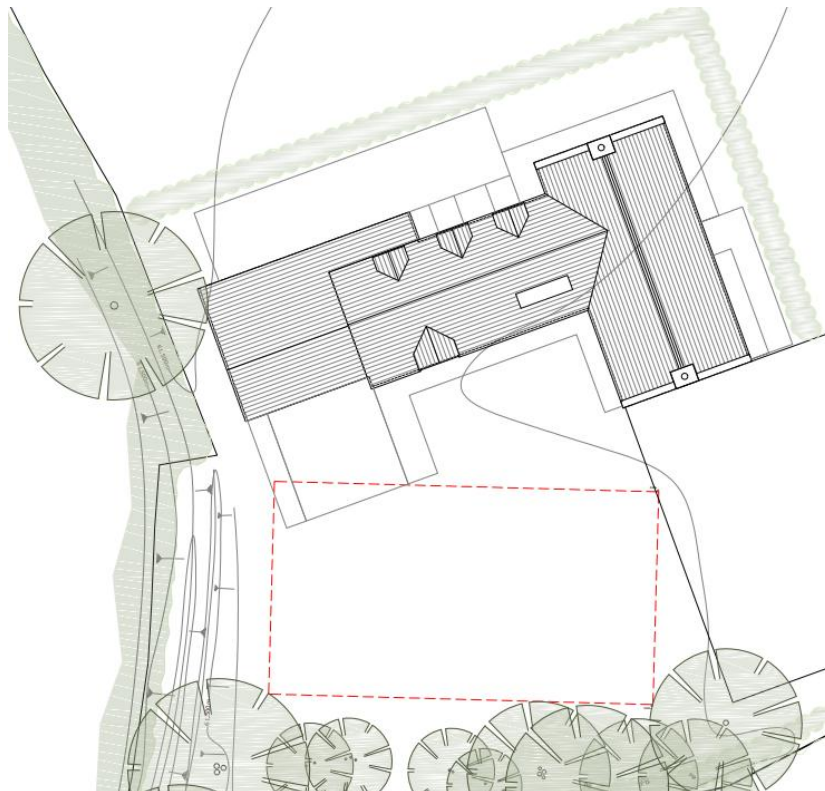


Proposed south and north elevations



Proposed front (west) and rear (east) elevations

The agricultural building that is to be demolished as part of this application was subject to a Class Q Prior Approval application (reference PL/2024/02742) for the change of use of the existing agricultural building to a dwellinghouse, which was granted in September 2024. The proposed dwelling would be sited to the north of where the current agricultural building is located.



Proposed landscaping plan – the red dashed line represents the footprint of the agricultural building to be demolished as part of this application

RELEVANT PLANNING HISTORY

PL/2024/02742 - Class Q change of use of 1 no. agricultural building to a use class C3 (dwellinghouse) together with building operations reasonably necessary to convert the building - Prior Approval Granted

PL/2021/09419 - Variation of condition 1 on W/11/02028/FUL to allow for some livestock to be housed in building - Approved with conditions

W/11/02028/FUL - Retrospective application for an agricultural building for the storage of animal fodder and farm machinery – Approved with conditions

W/02/00237/FUL - Proposed erection of stables and haystore/tack room - Approved with conditions

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

National Planning Policy: National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG); National Design Guide

Development Plan: The development plan for Wiltshire comprises the Wiltshire Core Strategy (WCS) (*adopted January 2015*) and any made neighbourhood plans, which remain the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted Wiltshire Core Strategy (WCS), with particular regard to: CP1 - Settlement Strategy; CP2 - Delivery Strategy; CP7 - Spatial Strategy: Bradford on Avon Community Area; CP50 - Biodiversity and Geodiversity; CP51 – Landscape; CP57 - Ensuring High Quality Design and Place Shaping; CP60 - Sustainable Transport; CP61 - Transport and New Development; CP64 - Demand Management; CP67 - Flood Risk

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (at Regulation 24 Stage) – The Council's draft Local Plan has reached Regulation 24 stage, although at the time of writing this report, the examination has been paused by the examining inspectors and the hearing sessions postponed.

Emerging Policies:

Policy 1 – Settlement strategy

Policy 2 – Delivery strategy

Policy 4 – Addressing climate change

Policy 70 – Sustainable transport

Policy 71 – Transport and new development

Policy 73 – Demand management

Policy 78 – Meeting Wiltshire's housing needs

Policy 82 – Housing in the countryside

Policy 85 – Sustainable construction and low carbon energy

Policy 88 – Biodiversity and geodiversity

Policy 89 – Biodiversity net gain

Policy 91 – Conserving and enhancing Wiltshire's landscapes

Policy 95 – Flood risk

Policy 98 – Ensuring high quality design and place shaping

Policy 99 – Ensuring the conservation and enhancement of the historic environment

Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide, adopted April 2024

- Wiltshire Local Transport Plan 2011-2026 (LTP3), adopted 2015 and includes the Car Parking Strategy and Cycling Strategy, adopted 2015
- Wiltshire Local Transport Plan 4 2025-2038 (LTP4), endorsed at Full Council on 11 March 2025

ISSUES: The main issues that need to be addressed in this case include: principle of the development; principle of the development in the Green Belt; impact on the openness of the Green Belt; visual impact; neighbour amenity; ecology issues; highways; drainage.

CONSULTATION RESPONSES

Councillor Nigel White: Submitted a call-in request if officers are minded to recommend the application for approval due to the visual impact and design of the proposal. The Councillor also cited the following reason for their call-in request:

“The applicant cites a Class Q fallback position, but this is misleading. The approved fallback (PL/2024/02742) was for a single storey barn conversion whereas this proposal is for a two-storey, four-bedroom house with a different footprint, scale and design.”

Westwood Parish Council: Object – “Westwood parish Council strongly objects on grounds of Scale of Design, Overdevelopment, Application on green belt, inaccuracies in the application and if linked to Class Q plans do not replace the current footprint”.

Wiltshire Council Arboricultural Officer: No objection, subject to conditions

Wiltshire Council Ecology: No objection, subject to conditions. An Appropriate Assessment was carried out which had a positive conclusion, which Natural England agreed with.

Wiltshire Council Highways: No objection

Wiltshire Council Public Protection: No objection subject to conditions

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties; and
- A site notice displayed near the site;

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

A total of 7 third-party representations have been received, with 6 raising objections to the proposal and one letter in support. A summary of the received objections and concerns is provided below:

- The proposal does not utilise the existing footprint of the agricultural building
- Demolishing the existing building
- New footprint for dwelling
- Class Q consent would not be a fallback
- The proposal would be greater in terms of footprint, siting, volume, height and a different design to what was approved under the Class Q
- Other Class Q dwellings in the area
- Represents a change of use

- New dwelling in the open countryside
- Out of scale
- Fails to comply with Green Belt policy, representing inappropriate development
- A substantial, visually prominent two-storey dwelling is now proposed
- Urbanising impact
- Increase in visual and landscape impact
- Ecology impacts
- Noise impacts from dog day care use
- Light spill

The letter of support considers that the positioning of the new dwelling would be further from the road and hedgerows, which would reduce potential ecological impacts. The proposed siting would have limited visibility from Westwood Road and only partial visibility from a distant footpath until landscaping matures.

ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of Development: This application follows a Class Q prior approval, which sought to change the use and convert an existing agricultural building into one dwelling (reference PL/2024/02742). The Class Q sought to convert the existing building into a three-bed single-storey dwelling. A structural report was submitted as part of the Class Q submission, which concluded that the barn was structurally sound enough to be converted in accordance with the proposed plans submitted as part of the prior approval without requiring major rebuilding.



Proposed elevation drawing pursuant to PL/2024/02742 to show the agricultural building in its converted form

This application seeks to demolish the existing agricultural building and construct a replacement two-storey dwelling to the north of where the existing building is currently located.

Policy CP1 of the adopted WCS establishes a hierarchy of settlements to guide where development should be focused. The policy prioritises growth in:

- Principal Settlements (e.g., Salisbury, Chippenham, Trowbridge) – main focus for strategic growth.

- Market Towns – support local services and employment; suitable for sustainable development.
- Local Service Centres – smaller towns and villages with a range of services; limited development supported.
- Large and Small Villages – development should be limited and respond to local needs.
- Outside the defined settlements – development is strictly controlled and generally not supported unless exceptional circumstances apply.

Policy CP2 of the WCS sets out how development will be distributed and delivered across Wiltshire. The policy emphasises:

- Sustainable patterns of growth, reducing the need to travel and supporting local services.
- Development should be plan-led, aligning with the settlement strategy and supported by infrastructure.
- Windfall development (not allocated in plans) must still comply with the principles of sustainable development.
- Development outside settlement boundaries is generally not permitted, unless it meets specific policy exceptions (as set out in paragraph 4.25 of the WCS).

Together, CP1 and CP2 ensure that new development is strategically located, sustainable, and supports the character and function of Wiltshire's communities.

Whilst Westwood is listed in CP7 as a 'large village', which does have a defined settlement boundary, the application site is located entirely outside of this and in planning policy terms is located in open countryside, where there is a presumption against new residential developments outside the defined limits of development as directed by CP1 and CP2 of the adopted WCS, unless one of the 'exception policies' listed in paragraph 4.25 of the supporting text of CP2 applies. The proposed dwelling is not considered to satisfy any of the 'exception policies' listed in paragraph 4.25, which comprise of:

- Additional employment land (CP34)
- Military establishments (CP37)
- Development related to tourism (CP39 and CP40)
- Rural exception sites (CP44)
- Specialist accommodation provision (CP46 and CP47); and, development that
- Supports rural life (CP48)

The construction of a new dwelling in this location would be deemed unacceptable in principle, due to the above-identified conflict with the spatial policies of the adopted WCS.

In this case, an extant prior approval exists, following assessment against Schedule 2, Part 2, Class Q of the Town and Country Planning (General Permitted Development) Order 2015 (GPDO) for the conversion of the existing agricultural barn to create one dwelling (reference PL/2024/02742).

It was considered in the determination of PL/2024/02742 that the existing agricultural barn would be capable of being converted to a residential dwelling. It has been generally accepted elsewhere (through case law/appeal decisions – some examples have been referenced in the applicant's Planning Statement) that the existence of a prior approval under Class Q of the GDPO, where the subject building is considered capable of being converted, is a valid fall-back position.

It is acknowledged that the submitted Planning Statement identifies the extant Class Q as a material consideration in the determination of this full planning application. However, the Class Q is fundamentally different from what is being proposed as part of this application. The Class Q was seeking prior approval for the conversion of the existing agricultural building into a single-storey dwelling, whereas this application is seeking to demolish the existing building and construct a new two-storey dwelling elsewhere within the site. Not only would the proposed dwelling occupy a different siting/footprint, but the new dwelling would fail to retain an agrarian appearance and is shown on the submitted plans to have a greater height and volume compared to the Class Q scheme.

Case law and established appeal precedent confirms that a fallback position is a material planning consideration when assessing proposals for full planning permission and in this case that would extend to the 2024 consented Class Q approval.

In *Mansell v Tonbridge and Malling BC* [2017] EWCA Civ 1314, the Court of Appeal held that a fallback can be given weight where:

- (i) there is a realistic prospect of it being implemented, and
- (ii) the alternative development proposed is judged against the baseline impacts of that fallback.

In this case, the approved Class Q scheme established that a residential property could be created on the site under permitted development provisions as established through the prior approval assessment (referenced earlier in this report), and there is no evidence to suggest that the fallback is not realistically capable of being delivered, and consequently when tested against *Mansell*, criterion i) is satisfied.

As such, it is appropriate to consider whether the proposed dwelling under this fresh application would result in impacts that are neutral or beneficial when compared with the prior approval Class Q scheme.

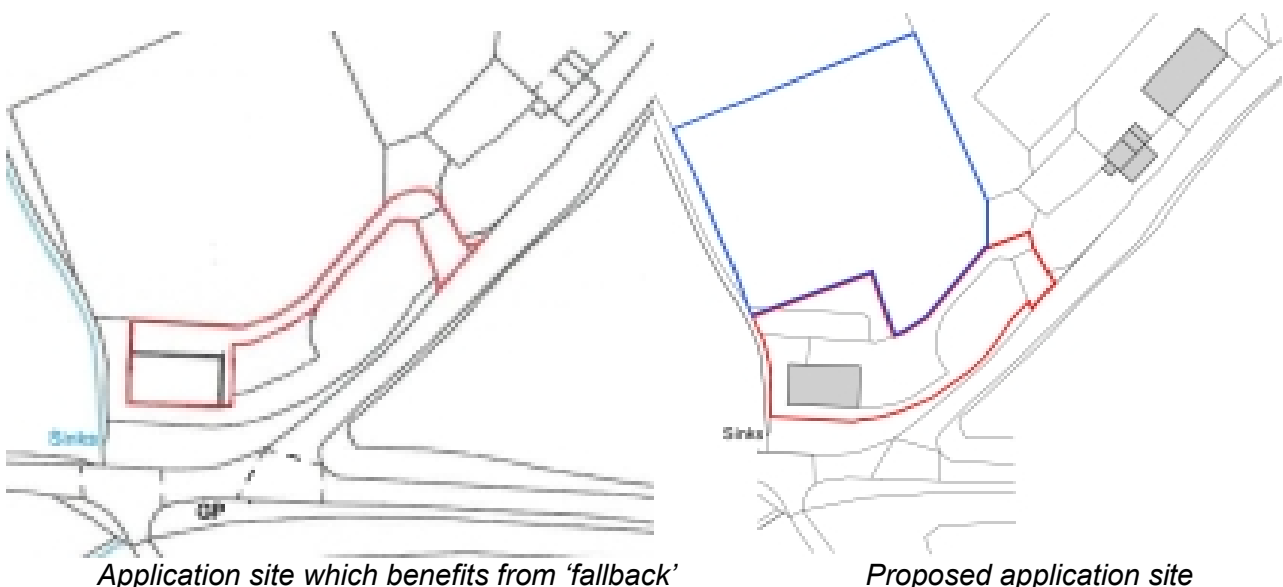
It is widely accepted that the fallback position would in principle be found to be acceptable in cases where the proposed development would constitute a betterment when compared against a consented Class Q design, and/or by improving the layout, appearance, or energy performance of the proposed dwelling, or where it broadly replicates the scale, footprint, and siting of the Class Q conversion such that the external impacts, particularly in respect of landscape character, highway safety, and ecological considerations, do not exceed those established by the fallback.

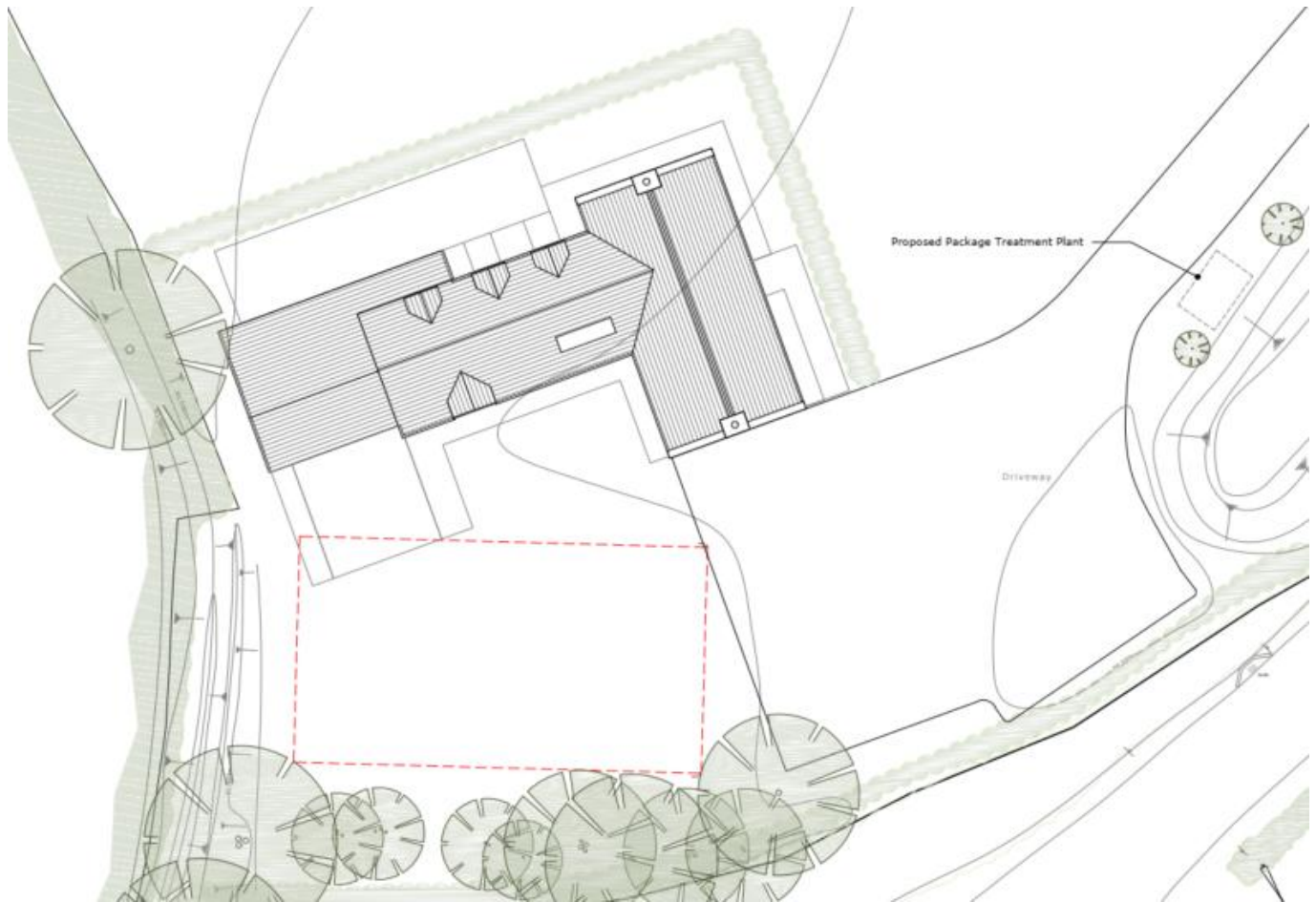
Where the proposal largely retains the defining parameters of the Class Q scheme, and demonstrably avoids materially greater effects, it can be reasonable in planning terms to support full applications notwithstanding a policy conflict due to the overriding weight of an extant fallback.

Accordingly, while the development conflicts with the spatial strategy of the development plan, the existence of a credible Class Q fallback is a significant material consideration.

However, this proposal seeks to demolish the existing building that was subject to the Class Q prior approval and construct a replacement dwelling in a different location within the site. This includes land which is located outside of the curtilage of the consented Class Q dwelling, where the principle of residential use has not been previously established.

The extracts below of the submitted site location plans and proposed landscape site plan demonstrate that much of the footprint of the proposed dwelling is sited on agricultural land to which the fallback permission for residential use does not apply.





Proposed landscaping site plan

As this application seeks to demolish the building that benefits from Class Q permitted development rights and to construct a replacement dwelling elsewhere on the site, the proposal must be assessed solely on its own planning merits in accordance with the development plan and the NPPF. The acceptability of the proposal, therefore, turns on whether the impacts of the new dwelling and enlargement of the site area (as proposed under this fresh application) would be comparable to, or constitute an improvement over, when compared against the permitted Class Q development. In this case, officers consider the principle of a new dwelling in the open countryside, which as outlined above, would not be considered acceptable in principle as a result of the fundamental differences to the fallback conversion scheme for the reasons set out below.

5 Year Housing Land Supply: The Wiltshire Housing Land Supply Statement (published in June 2025) provides the latest position on the Council's ability to demonstrate a five-year supply of deliverable housing land, which is a material consideration in the determination of planning applications.

The NPPF was revised in December 2024. This has reintroduced the requirement to meet five years' worth of deliverable sites and a buffer to be applied to the five-year housing requirement in all circumstances and has revised the Local Housing Need calculation to establish the five-year housing requirement. These factors have resulted in a substantial increase in the five-year housing requirement to be met from the previous calculation. When this is assessed against the housing land supply which can be delivered within five years, the recalculation shows a significant reduction in the number of years' supply. The resulting position shows that the Council can currently demonstrate a 2.42 years housing land supply at a unitary authority level. This is considered to be a substantial shortfall.

The absence of a five-year housing land supply is a material consideration in the determination of this application. In accordance with Paragraphs 78 and 11(d) of the NPPF, for applications involving the provision of housing, where there is a shortfall in the supply of deliverable housing sites, the most important

policies for determining the application should be considered out of date. The current housing land supply shortfall is a factor that must be considered in the planning balance, and in this case, as a five-year housing land supply cannot be demonstrated, the weight that can be applied to the most important policies for determining this application should be assessed and altered in the light of the shortage in housing land supply.

As set out in paragraph 11d) of the NPPF, planning permission should be granted for new housing unless i) the application of policies in the Framework that protect areas or assets of particular importance detailed in Footnote 7 provides a strong reason for refusing the development proposed or ii) any adverse impacts of doing so would *"significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination"*.

Therefore, whilst the presumption in favour of sustainable development may apply, this is not definitive and can be disengaged if a site falls within an area or asset protected by policies listed in Footnote 7 of the NPPF, which includes the Green Belt.

In this instance, the application site is located within the Green Belt, and thus the tilted balance does not apply, and as set out in the section below, the application must be assessed against relevant Green Belt policy, which seeks to avoid inappropriate development, unless *"very special circumstances"* can be demonstrated.

Additionally, the benefits of the scheme towards housing land supply are met by the dwelling which benefits from extant Class Q conversion. As this scheme is for the demolition of the existing building and construction of a single dwelling, there is no additional benefit or weight to be attributed to the provision of a single dwelling since that is already established.

Principle of the Development in the Green Belt: The entire application site is located within the West Wiltshire Green Belt. As the Council does not have a specific Green Belt policy within the adopted WCS, regard must be given to Chapter 13 of the NPPF.

Paragraph 153 of the NPPF establishes that inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in 'very special circumstances.'

Paragraph 153 also states that 'substantial weight' should be afforded to any harm to the Green Belt, including harm to its openness, and that 'very special circumstances' would not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Subject to a number of exceptions, as listed in Paragraph 154, the NPPF is clear that the construction of new buildings should be regarded as 'inappropriate' in the Green Belt.

As this proposal is seeking planning permission for the construction of a new dwelling, the exception listed under (d) in Paragraph 154 is not relevant, as it covers the replacement of a building *"provided the new building is in the same use and not materially larger than the one it replaces"*. In this instance, the Class Q has not been implemented, and the existing building is still in agricultural use (at the time of the case officer's site visit in December 2025). Moreover, even if the residential use of the agricultural building had been established through the grant of the Class Q permission for its conversion and subsequent occupation of the building, the proposed dwelling is materially larger, and in a different location, to the building it would replace.

The Class Q proposal would convert the existing building into a single-storey dwelling, occupying a volume of c.779m³, a height of 4.7m, and a footprint of 190m², as measured from the submitted plans. The proposed dwelling would have a volume of c.1135m³, a height at its highest point of 8.2m, and a footprint of 196m², demonstrating that the proposed new development would be materially larger, by c.46%,

compared to the building to be demolished. As a matter of fact and degree, the proposal cannot be understood as a replacement of the existing building.

It is not considered that any of the other exceptions listed in Paragraph 154 apply to this proposal, and there are no other considerations to outweigh this harm; thus, the development would represent inappropriate development in the Green Belt, contrary to the NPPF.

In terms of the Green Belt considerations, the proposed siting of the new dwelling would be on undeveloped land in the open countryside, and therefore the application site does not represent or comprise of previously developed land.



Site photo taken from the existing access serving the agricultural building subject to this application to the left of the image – the proposed dwelling would be sited to the right of this

The NPPF does not support unrestricted new housing in the open countryside and, similar to the WCS, new housing is to be directed to sustainable locations until an exception applies; none are considered to be relevant to this application.

Impact on the Openness of the Green Belt: The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. Development within the Green Belt is generally considered inappropriate unless it falls within specific exceptions set out in the NPPF Chapter 13. Any proposal that constitutes inappropriate development must demonstrate very special circumstances, which clearly outweigh the harm to the Green Belt and any other harm resulting from the proposal.

In assessing the impact of a proposal on the openness of a Green Belt, this must include both a spatial and visual aspect, as Planning Inspectorates have previously identified that an adverse impact to either can harm the openness of the Green Belt as a whole.

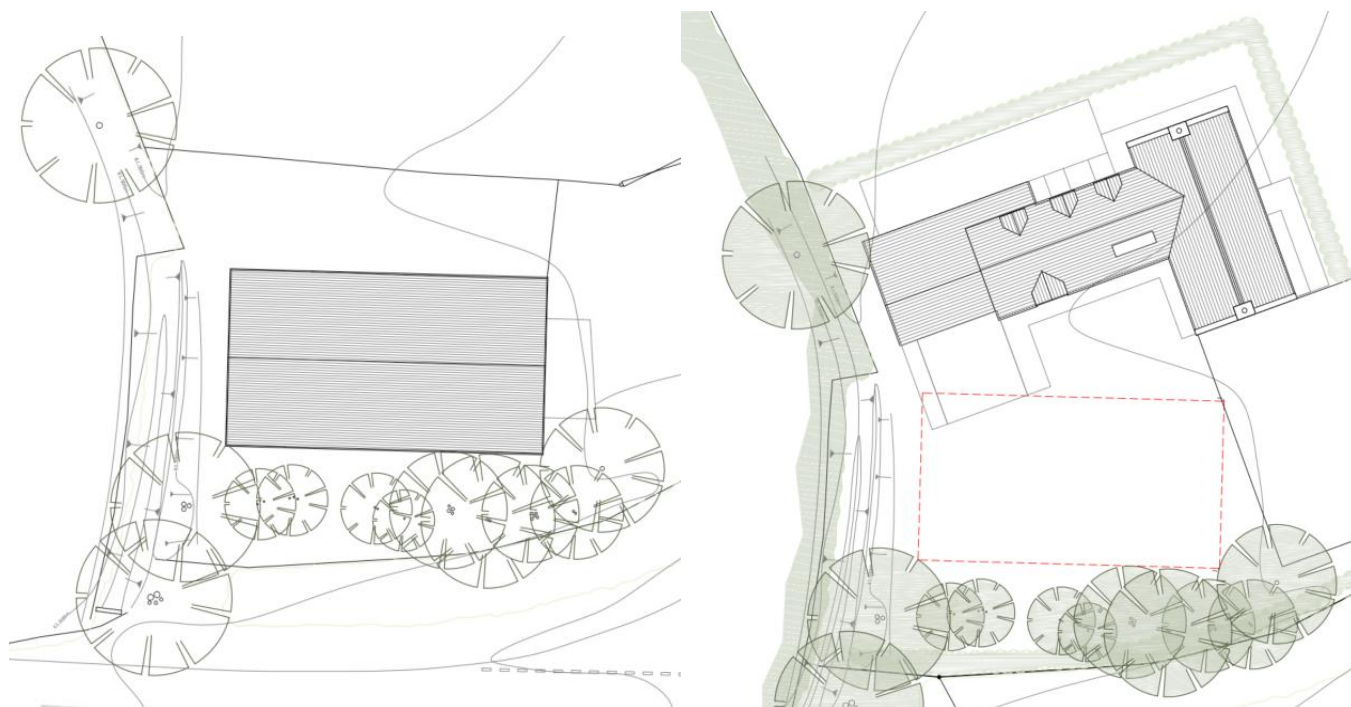
The introduction of a new two-storey dwelling on this site, together with the associated boundary treatments and domestic paraphernalia generally commonplace with residential uses, would adversely impact the spatial and visual aspects of openness.

The proposed altered siting and increase in the curtilage compared to the Class Q scheme would contribute to an urbanising impact of the open countryside.

Paragraph 153 of the NPPF is clear that any harm to the Green Belt should be given substantial weight, and in this instance, the proposal would result in the diminution of the openness of the Green Belt, thus representing inappropriate development, which is by definition harmful.

In addition to the built form being both materially larger and taller than the existing building, the proposed new dwelling would introduce a larger amenity space and revised siting, which differs from the Class Q scheme. With the proposed dwelling being sited to the north of the existing agricultural building, the

proposal would be encroaching within previously undeveloped land, representing a material diminution of the openness of the Green Belt and wider domestication of the site, which would represent inappropriate development that would, by definition, be harmful to the Green Belt. It is therefore considered that the development would have a greater impact on the openness of the Green Belt when compared to the Class Q prior approval.



Existing layout and landscaping left and proposed layout and landscaping to the right

Based on the submitted landscape site plans, the area surrounding the existing agricultural building that is subject to the extant Class Q measures c.305m², compared to the area around the proposed new dwelling, which measures 907m², representing an increase of 602m² residential use and encroachment into the Green Belt.

In this case, it is not considered that 'very special circumstances' exist to justify the unwarranted erosion and encroachment into the Green Belt. Whilst the Council acknowledges its current housing land supply shortfall and recognises the need to consider speculative proposals to address this, it does not mean that all housing developments should be accepted without appropriate scrutiny and appraisal, particularly where the contribution to housing land supply can be achieved without such harm through the conversion of the existing built form.

To conclude, the introduction of a new dwelling in this location, together with the increase in residential curtilage and associated domestic paraphernalia in open countryside, does not outweigh the harm posed to the Green Belt. Therefore, the proposal constitutes inappropriate development, contrary to the NPPF.

Design and Impact on the Character and Appearance of the Area and Visual Impact: Policy CP57 of the adopted WCS requires a "*high standard of design*" for all new developments and for developments "*to create a strong sense of place through drawing on the local context and being complementary to the locality*".

Policy CP51 required developments to "*protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measure*".

In addition to the above, the NPPF has a focus on delivering high-quality design and sets out in paragraph 131 that the "*creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*".

Paragraph 135 moreover sets out a series of six criteria including ensuring development is of high quality over the lifetime of the development, is visually attractive and sympathetic to the local character and history and creates a strong sense of place.

Furthermore, NPPF paragraph 187 requires planning policies and decisions to protect and enhance the natural and local environment by safeguarding valued landscapes, biodiversity sites, geodiversity and soils; recognising the intrinsic character and beauty of the countryside and the wider benefits of natural capital, including high-quality agricultural land, trees and woodland; maintaining the character of undeveloped coastlines where relevant; securing biodiversity net gains through resilient ecological networks and features that support priority species; preventing development from causing or being exposed to unacceptable pollution or land instability while seeking improvements to local environmental conditions; and, where appropriate, remediating degraded, derelict or contaminated land.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Building for a Healthy Life Framework promotes healthy, inclusive, and sustainable places. The document encourages:

- Walkability.
- Access to green space.
- Active design principles for well-being.

With reference to the submitted Planning Statement, the design of the proposed dwelling would be of a style to reflect existing dwellings found within the wider area and would be completed in complementary materials such as stone, timber for the wall materials and clay and slate for the roof.

Whilst it is appreciated that the proposed dwelling would be of a design and appearance that would be sympathetic to other residential buildings within the wider area, the construction of a new dwelling on this site of the design and siting proposed would introduce a residential built form in the open countryside, which does not reflect the existing agrarian character.

The proposed dwelling would measure 3.5m greater in height (as measured from its highest point) compared to the existing agricultural barn to be demolished. The proposed dwelling would comprise a variety of ridge heights (the lowest ridge height would measure 6.4m) that would contribute towards reducing its visual impact and in turn break-up the mass of the proposed dwelling to ensure the proposed dwelling does not have a bulky appearance, but this does not alter that the dwelling is significantly more prominent in its setting.

Whilst the actual footprint of the proposed new dwelling would not be significantly different compared to the existing agricultural building, the proposed dwelling would have a greater height and overall volume (as previously discussed) compared to the Class Q fallback. The proposal also seeks a significant increase in the curtilage and therefore residential use of the site when compared to the prior approval scheme. Despite the proposal incorporating a landscaped belt along the north and east boundaries, the proposal would result in an increased visual impact compared to the Class Q fallback, which is contrary to CP51 and CP57 of the WCS and NPPF paragraph 187, which require proposals to relate positively to its landscape setting and to not have a harmful impact on landscape character or the intrinsic character and beauty of the countryside.

As above, it is appreciated that the proposal would also introduce additional planting along the northern and eastern boundaries of the proposed dwelling, which would provide some screening of the proposed dwelling, and the Council's arboricultural officer has raised no objection to the proposal. However, this would not outweigh the harm that the proposed dwelling would have to the wider openness of the Green Belt (as discussed above) or the increased visual impacts of the height of the dwelling, and this is not considered to outweigh the identified harm. It is also considered likely that such landscaping measures

would be utilised to enclose and screen the curtilage to the approved conversion scheme if implemented. The landscaping is considered a neutral factor in the proposal.

Amenity: Criterion vii of CP57 of the adopted WCS requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents.

Criterion f) of paragraph 135 of the NPPF meanwhile, requires the creation of “*places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users*”.

With due regard to the separation distance between a proposed dwelling and existing properties within the facility of the site, it is not considered that the proposal would result in any adverse impacts upon neighbouring amenity to warrant refusal of this application.

In terms of the living conditions for the future occupiers of the dwelling, the submitted floor plans show all habitable rooms to be served by windows, with the submitted plans showing the proposed dwelling to have a private garden to the south. The proposed garden would be enclosed and would be of a size that would exceed the requirements of the Wiltshire Design Guide (WDG), which requires, as a minimum, for garden areas for all houses to be equivalent to the footprint of the house. Also, section 9.2 of the WDG requires south-facing gardens such as this to be a minimum of 10m deep, which is also met.

Officers are aware that the proposed dwelling would be sited in close proximity to a dog day care business. Whilst the planning application to regularise the continued use of part of the site for such a use remains undetermined (pursuant to application reference PL/2025/09768), this is a material consideration.

The Council's Public Protection department was consulted on the application and initially raised concerns with the impact of noise on future occupiers of the dwelling. The applicant provided a copy of a noise report (produced by MACH Acoustics Ltd, reference 2069 Rev03, dated November 2025) associated with the current dog day care application (reference PL/2025/09768), which included proposed mitigation, as specified in section 5.5 of the noise impact assessment provided.

The proposed mitigation measures include the erection of a 2.2m high acoustic fence along the western boundary and 2m high acoustic fence for a 10m section along part of the northern boundary. Also, the noise report has recommended that no more than 5 dogs are permitted within the external exercise area at any one time and for the dogs to remain within the indoor shelter between the hours of 07:00 and 09:00.

Subject to the identified mitigation measures being incorporated and completed prior to occupation of the proposed development, no objection is raised, as it is considered that the proposed mitigation measures put forward within the noise report would ensure the predicted noise levels would be equal to or lower than the existing background noise level. Such measures, however, are contingent on a separate permission, and the occupancy of the dwelling cannot be conditioned as such.

Highways Impacts and Parking: Transport implications are a key factor in assessing planning applications, especially for larger developments. Proposals must demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, and those with mobility impairments.
- No severe residual impacts on the surrounding highway network.
- Promotion of sustainable travel, reducing reliance on private vehicles.
- Adequate parking and cycle provision, in line with adopted standards.
- Protection and enhancement of public rights of way and active travel routes.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

The proposal would utilise the existing access to the site via the Elm Cross road and include the provision of on-site car parking spaces. As such, the development is not anticipated to give rise to any notable impacts on the local highway network, and the level of vehicle movements generated would be comparable to those associated with the extant Class Q scheme.

The Council's highways department were consulted on the application and have raised no highway objections to the proposal.

Ecology and Biodiversity: The ecological impact of development is a key planning consideration. Proposals must assess and address potential effects on:

- Protected species
- Priority habitats
- Ecological networks
- Green and blue infrastructure

Core Policy 50 of the Wiltshire Core Strategy requires development to:

- Avoid harm to ecological assets.
- Deliver measurable Biodiversity Net Gain (BNG), in line with the Environment Act 2021.
- Support habitat restoration and connectivity.
- Integrate biodiversity into site design.

The Green & Blue Infrastructure Strategy (2022–2030) promotes nature recovery, ecosystem services, and habitat connectivity through development.

The application has been submitted with a Preliminary Ecological Appraisal (produced by Pro Vision, reference 8810 Version 1, dated May 2025), which concludes that the site comprises primarily modified grazed grassland with scattered scrub, a tree belt, and the subject agricultural building, all of which have limited ecological value.

The agricultural building to be removed has been assessed as having 'negligible potential' to support roosting bats, although the surrounding boundary vegetation does offer some low-value foraging and commuting habitat. Appropriate lighting design measures would ensure that this habitat remains functional and protected for bat species.

The tree line and scrub on site offer suitable nesting opportunities for common bird species, and vegetation clearance would therefore be timed to avoid the breeding season unless inspected by an ecologist prior to the commencement of works.

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC): The application site lies within various buffer zones associated with the Bath and Bradford-on-Avon Bats SAC. The proposed new dwelling, therefore, has the potential to result in a significant adverse impact on the special features of that site. An Appropriate Assessment (AA) under Section 63 of the Habitats Regulations must be carried out by the relevant Competent Authority (in this instance, the Council as the local planning authority (LPA)) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

The completed AA concludes that the proposed development would have no adverse effects on the SAC site, subject to mitigation measures being secured and implemented.

Protected species: The Council's ecologist has confirmed that the existing agricultural building would have a negligible potential to host roosting bats as it is open-fronted, with corrugated metal sides and roof, which contains skylights.

The submitted ecology report acknowledges that there would be a minor loss of foraging habitat, which has been described as "sub-optimal". The loss of grassland is considered further within the associated AA.

Subject to a sensitive lighting scheme, biodiversity enhancement condition (including wildlife-friendly plantings and habitat creation) and Construction Method Statement (CMS), if officers are minded to recommend the application for approval, the Council's ecologist has raised no bat-related objections.

The Council's ecologist has commented to say that there *"are two historical records of Great Crested Newts (GCN) within 1km of the site. A ditch is present at the western site boundary, but noted to be dry, likely permanently. Approximately 210m east is a small pond. Considering this as well as the habitats present, and using Natural England's rapid risk assessment tool, the risk posed to GCN is considered to be low"*.

It is considered that the grassland to be lost could be of some value to reptiles. However, the site is considered to be frequently disturbed, given the use of the wider site for agricultural/equestrian, with the existing grassland grazed by horses, and therefore is maintained as short. The Council's ecologist has commented that there *"are sufficient habitats surrounding for reptiles to disperse into, if present, given a precautionary working method is adhered to, as suggested in Section 5.8 of the ecology report. The ecology report also recommends precautions for dormice, which might be present in the wider landscape. As such, precautionary measures for reptiles, amphibians, nesting birds, bats and dormice should be included within the CMS"*.

The applicant's ecology report includes enhancement measures from section 5.14, which include the planting of trees and shrubs, the inclusion of a wildflower grassland area, and integrated bat, swift and bee bricks. The Council's ecologist welcomes such measures and considers these to be in line with the NPPF and CP50.

Biodiversity Net Gain: From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available, the biodiversity gain planning condition is not considered to apply to this application, as it is for self-build development.

Based on the above assessment, it is considered that the proposal would comply with CP50 and the requirements of the NPPF.

Flood Risk and Drainage: Core Policy 67 of the Wiltshire Core Strategy and NPPF paragraphs 170–182 require:

- Avoidance of increased flood risk.
- Use of appropriate mitigation measures.
- Application of the sequential and exception tests for developments in Flood Zones 2 or 3.

Sustainable Drainage Systems (SuDS) are required for all major developments and must:

- Manage runoff near its source.
- Improve water quality.
- Support biodiversity and amenity.
- Be integrated into the site layout and green infrastructure.

As detailed above, the application site is located in an area at high risk of groundwater flooding, a constraint that was picked up as part of the extant Class Q prior approval application. However, this application has not been supported by a site-specific Flood Risk Assessment, and on that basis, it cannot be determined that the development would be safe over its lifetime, would not increase flood risk elsewhere, and would incorporate suitable mitigation measures.

The absence of the FRA conflicts with CP67 of the WCS and paragraph 181 of the NPPF, which requires applications to be supported by a site-specific flood-risk assessment where the site is subject to flood risk from all sources of flooding and where development would introduce a more vulnerable use. This would form a reason for refusing the application.

PLANNING BALANCE AND CONCLUSION: At the heart of the NPPF there is a presumption in favour of sustainable development requiring local planning authorities to approve development proposals that accord with an up-to-date development plan without delay; and where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless (taken from paragraph 11d of the NPPF):

- The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination;

The proposed development lies outside any defined settlement boundary, where new residential development is strictly controlled, as set out in CP1 and CP2 of the adopted WCS. The application site does not constitute infill or any form of acceptable countryside development listed within the exception policies in paragraph 4.25 of the WCS.

The proposal involves the demolition of the existing agricultural building previously subject to Class Q approval (reference PL/2024/02742) for conversion to a dwelling and the erection of a larger, taller replacement of that dwelling in a different position and on a larger site which extends beyond the approved residential curtilage that was considered under the extant Class Q scheme. The fallback position establishes the principle of a dwelling on only part of the application site and is a material consideration in the consideration of the principle of development. By virtue of the increased site area, its increased bulk, height, massing, revised siting, associated domestic paraphernalia, and larger garden area, the development would result in a material loss of openness and the urbanisation of this part of the Green Belt.

The development, therefore, constitutes inappropriate development in the Green Belt, which is by definition, harmful as directed by NPPF paragraph 153. No very special circumstances have been demonstrated which would outweigh the harm to the openness and purposes of the Green Belt. The proposal is therefore contrary to the NPPF.

In accordance with paragraph 11 of the NPPF, the presumption in favour of sustainable development is disengaged where Footnote 7 applies. As the site lies within the Green Belt, Footnote 7 is triggered, and the tilted balance does not apply. The proposal is inappropriate development in the Green Belt and the harm to the openness of the Green Belt provides a strong reason for refusal and the development therefore, remains unacceptable in principle and conflicts with CP1 and CP2 of the WCS and the sustainable development aims of the NPPF having regard to the location of new development.

Additionally, the application site is identified within the Council's Strategic Flood Risk Assessment as being at high risk of groundwater flooding. No site-specific FRA has been submitted, contrary to the requirements of national policy.

In the absence of an FRA, the Council cannot be satisfied that the development would be safe for its lifetime, would not increase flood risk elsewhere, or would incorporate appropriate mitigation measures. The proposal, therefore, conflicts with CP 67 and the requirements of NPPF.

It is acknowledged that this proposal is for the construction of a self-build dwelling, which, as set out above, would make the proposal exempt from mandatory BNG requirements. Whilst this proposal would provide one self-build unit that would contribute towards the unmet need on the Council's self-build register, a suitable mechanism to secure the self-build element has not been agreed and therefore the contribution towards the provision of self-build dwellings is a neutral factor in the planning balance. The identified conflict with the WCS and the NPPF in terms of the principle of the development and Green Belt harm is not outweighed by the benefit of one additional dwelling, particularly since such benefits would be achieved by the extant scheme for conversion of the existing building without such harm.

RECOMMENDATION: REFUSE

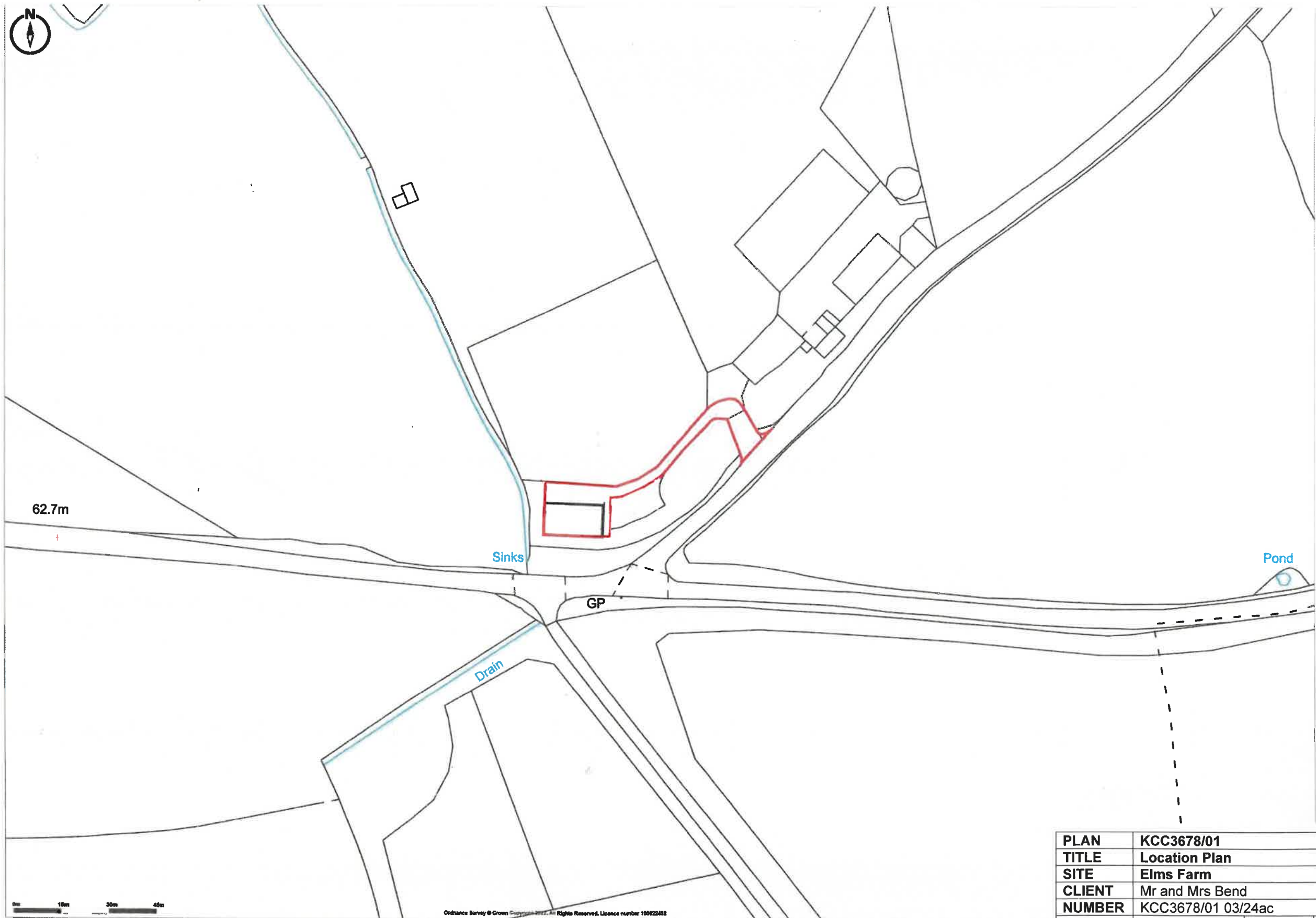
1. The proposed development would result in the creation of a new dwelling in the open countryside outside any defined settlement boundary. Although part of the site benefits from an extant Class Q prior approval for converting the existing agricultural building, this proposal is materially different to the Class Q fallback position, as it seeks to extend the site area and introduce a larger new dwelling with a larger curtilage, altered siting, footprint, scale and built form. This would result in a significantly greater visual impact on the site and surrounding landscape than the approved fallback. The development therefore conflicts with Core Policies 1 and 2 of the adopted Wiltshire Core Strategy (WCS), which direct new housing to sustainable, plan-led locations, and it does not fall within any of the exception categories in paragraph 4.25 of the WCS that would justify a dwelling in this location. As the proposal is not justified by the reuse of an existing building, does not occupy previously developed land, and offers no betterment over the approved Class Q conversion scheme, it is contrary to the overarching aims of sustainability embodied in the National Planning Policy Framework.
2. The proposed demolition of the existing agricultural building and construction of a new two-storey dwelling constitutes inappropriate development in the Green Belt by reason of the increased site area, altered siting, and proposed bulk, mass and height of the proposed dwelling and the resulting domestication of the site. Such development would result in demonstrable harm to and the diminution of the openness of the Green Belt, to a significantly greater extent compared to that which would result from the implementation of the approved Class Q scheme for the conversion of the existing building.

In the absence of any very special circumstances, this proposal is not considered to represent appropriate development in the Green Belt and is therefore contrary to paragraphs 142, 153, 154 and 187 of the National Planning Policy Framework, as well as CP51 and CP57 of the adopted Wiltshire Core Strategy through the increased visual impact the proposed dwelling would have when compared to the Class Q fallback.

Furthermore, in accordance with National Planning Policy Framework paragraph 11(d)(i), the identified Green Belt harm provides a clear reason for refusal and the tilted balance does not apply. The benefits arising from the new dwelling carry little weight, as these could be achieved through the extant Class Q prior approval to convert the existing building.

3. The application site is located within an area identified on the Council's Strategic Flood Risk Assessment as being at high risk of groundwater flooding. No site-specific Flood Risk Assessment has been submitted to demonstrate that the development would be safe over its lifetime, and would not increase flood risk elsewhere, and would incorporate suitable mitigation measures. The proposal therefore conflicts with Core Policy 67 of the Wiltshire Core Strategy and the requirements of the National Planning Policy Framework.

APPENDIX C – DRAWINGS ASSOCIATED WITH
CLASS Q PL/2024/02742



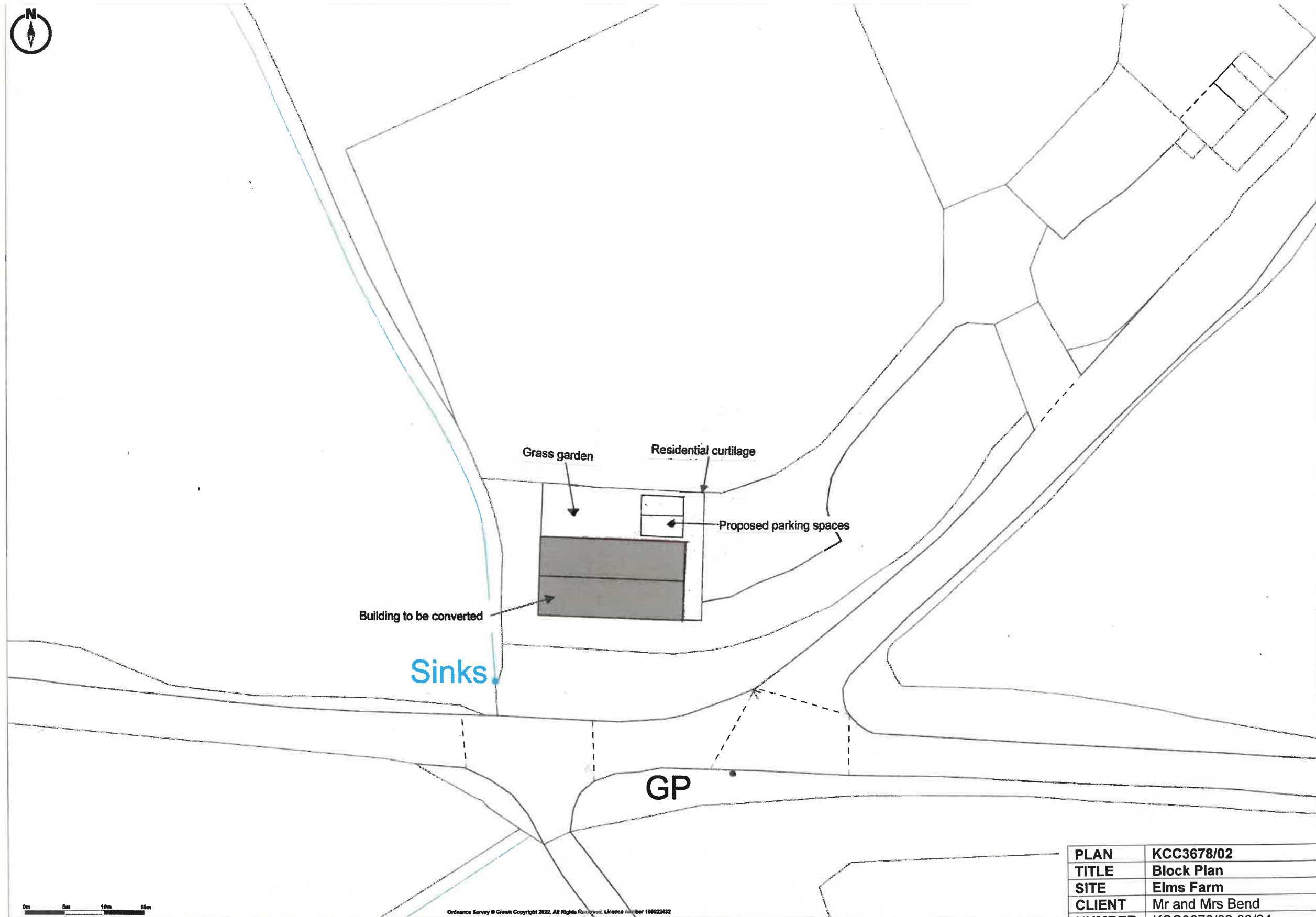
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PLAN	KCC3678/01		
TITLE	Location Plan		
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CLIENT	Mr and Mrs Bend		
NUMBER	KCC3678/01 03/24ac		
DATE	March 2024	SCALE	1:1250 at A3

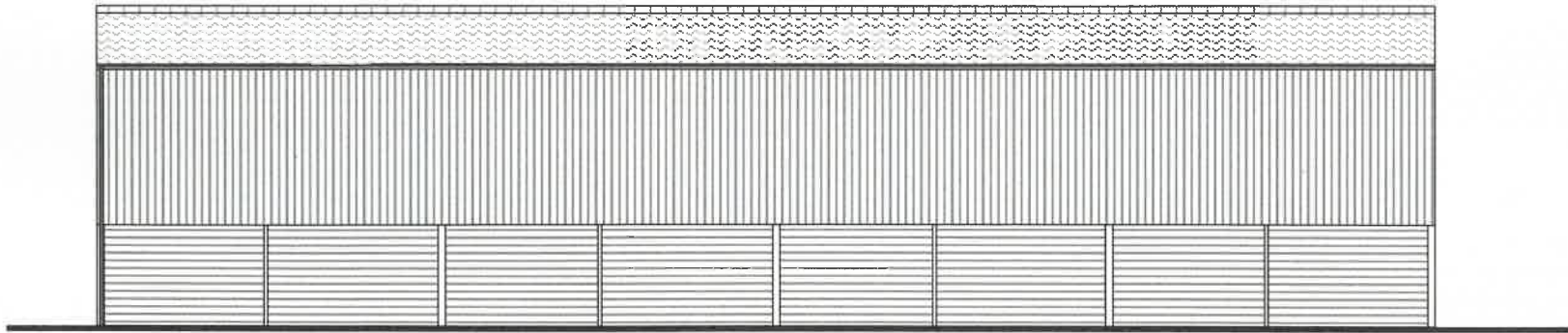
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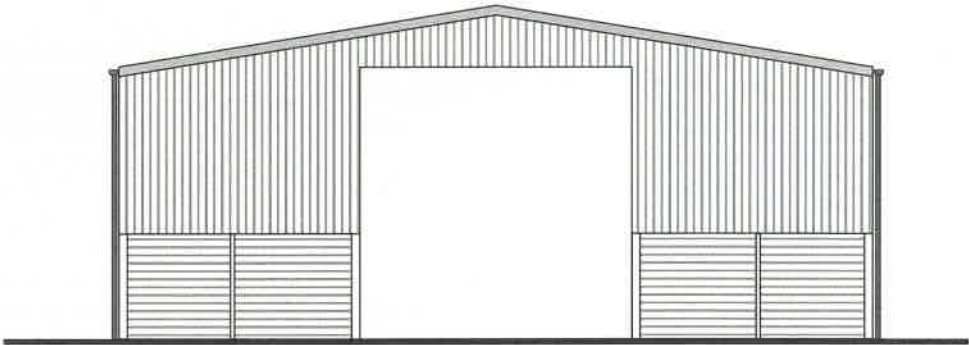
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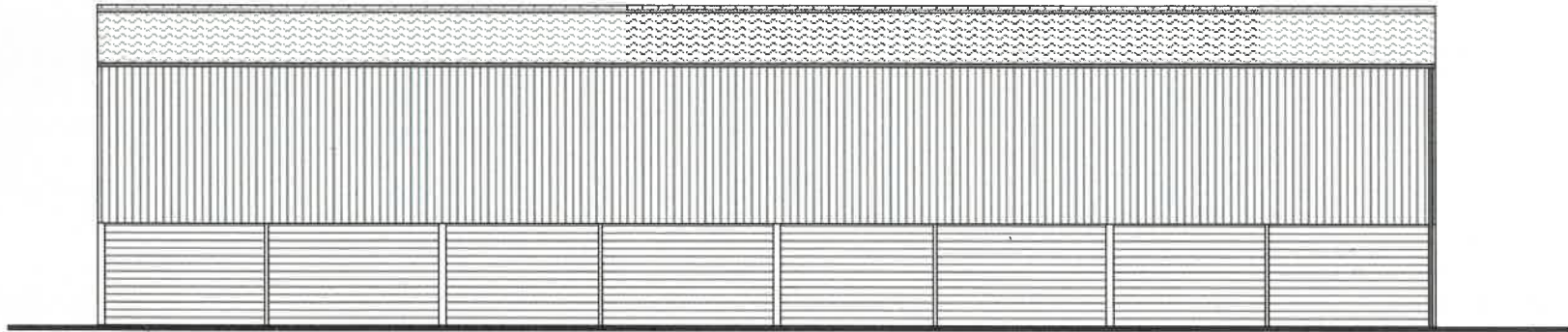
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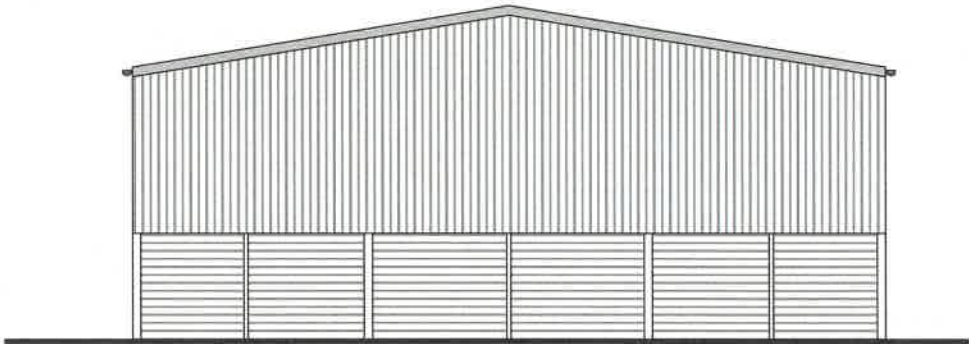
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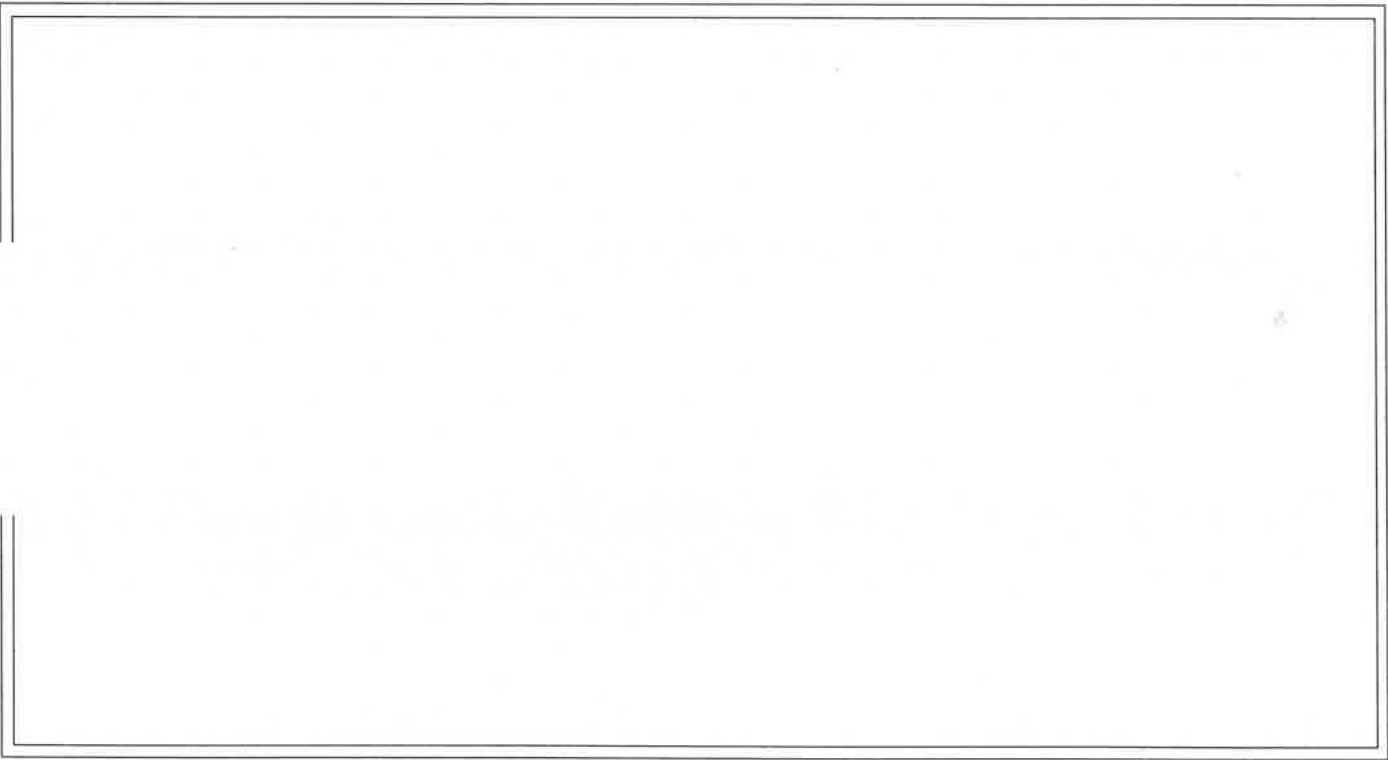
EAST ELEVATION



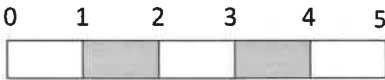
SOUTH ELEVATION



WEST ELEVATION

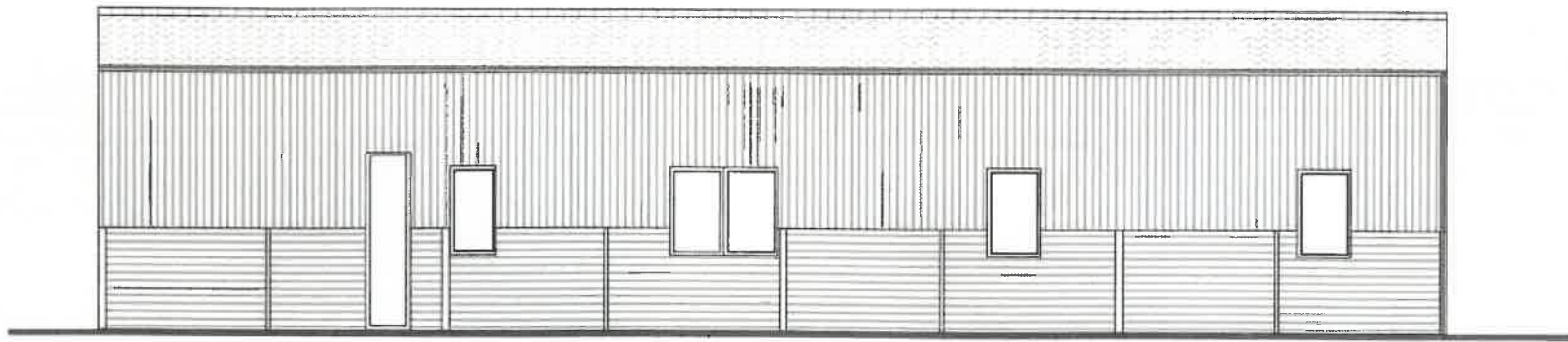


SOUTH ELEVATION

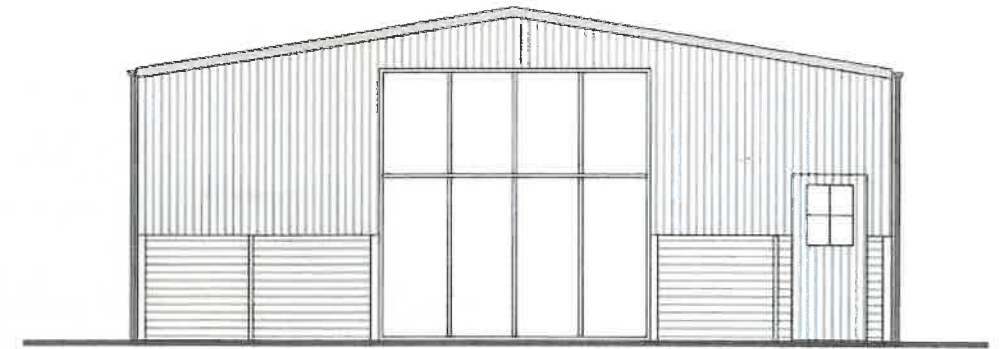


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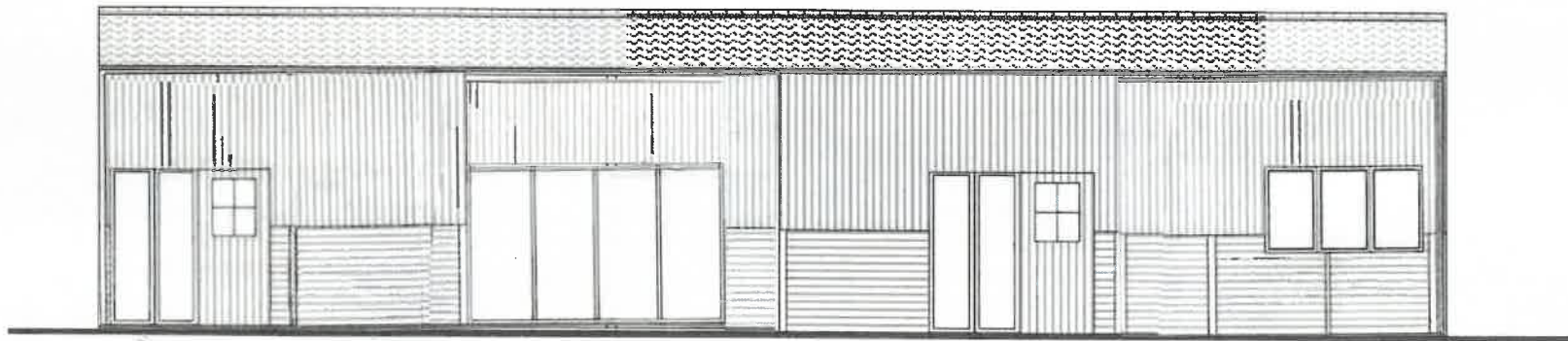
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TITLE	Existing Elevations and Floor Plan		
SITE	Elms Farm		
CLIENT	Mr and Mrs Bend		
NUMBER	KCC3678/03 03/24ac		
DATE	March 2024	SCALE	1:100 at A3
KERNON COUNTRYSIDE CONSULTANTS LTD Greenacres Barn, Purton Stoke, Swindon SN5 4LL Tel 01793 771333 Email info@kernon.co.uk			



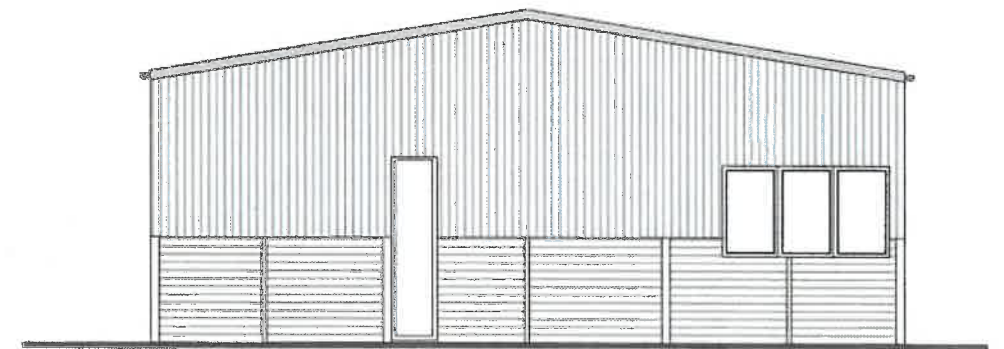
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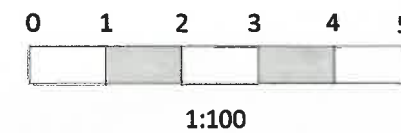
EAST ELEVATION



NORTH ELEVATION



WEST ELEVATION



PLAN	KCC3678/04 (Rev.C)		
TITLE	Proposed Elevations and Floor Plan		
SITE	Elms Farm		
CLIENT	Mr and Mrs Bend		
NUMBER	KCC3678/04C 06/24ac		
DATE	June 2024	SCALE	1:100 at A3
KERNON COUNTRYSIDE CONSULTANTS LTD Greenacres Barn, Purton Stoke, Swindon SN5 4LL Tel 01793 771333 Email info@kernon.co.uk			

APPENDIX D – COPY OF THE OFFICER
REPORT ASSOCIATED WITH CLASS Q
PL/2024/02742

CASE OFFICER'S REPORT

Application Reference: PL/2024/02742
Application Type: Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses
Site Inspection:
Consultation ends: 08 August 2024
Case officer: Verity Giles-Franklin

Site Address: Elms Farm, Westwood, Bradford on Avon , BA15 2AL
Proposal: Class Q change of use of 1 no. agricultural building to a use class C3 (dwellinghouse) together with building operations reasonably necessary to convert the building.
Recommendation: Prior Approval Granted

Proposal and Site Description: This application is seeking prior approval under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (the GPDO) for the conversion of an existing agricultural building to form 1 larger dwellinghouse.

The subject building is located on a parcel of land at the junction of Elms Cross and Westwood Road in Westwood and was previously known as The Yard, but is now referred to as Elms Farm. With reference to the submitted Planning Statement dated March 2024 (reference KCC3678 PS Mar 24 Final) the subject building "*has been in agricultural use since it was first permitted*" originally to store animal fodder and machinery but more recently to store hay-making equipment and to house livestock.

The subject site is located within the 4km core roost buffers for Greater Horseshoe bats, the 4km buffer zone associated with the Bath & Bradford on Avon Bat Special Area of Conservation, and within the 2km core roost buffers for Lesser Horseshoe bats. The site is also located on land designated as Green Belt.

As detailed below, officers were initially concerned that the existing agricultural building would not be capable of conversion without requiring major rebuilding. Upon the applicant being informed that this prior approval application would be refused on this basis, a Visual Structural Inspection report (produced by David Smith Associates) was submitted on 17 May 2024 in an attempt to address this concern, in addition to an email sent to the case officer directly on 3 June 2024 stating that the "*barn is of suitable size and condition to be converted to a residential dwelling there is absolutely no need to consider demolition. This barn is in fact ideal structurally for conversion under the requirements of Class Q(b) and Q(1) (i)(i)(aa) for the change of use from an agricultural building to a residential dwelling*".

The applicant was also informed of concerns officers had about the site being in an area susceptible to groundwater flooding and with the proposed conversion to habitable use increasing the vulnerability classification of the building. The applicant submitted a Flood Risk Assessment on 9 May 2024 for officers review. Furthermore, concerns were raised regarding the design of the proposed conversion works, resulting in the appearance of the building having an overly

domesticated appearance. The applicant wished to address this concern by reducing the extent of glazing, particularly on the northern elevation. Revised plans were submitted before the determination of this prior approval, with the most recent iteration of the revised elevation drawings submitted on 3 June 2024.

In addition to the above, the applicant wanted to provide supplementary information in response to the officer's concerns regarding the condition of the existing agricultural barn and whether the works would amount to substantial rebuilding to convert the barn into a dwelling. The applicant provided a Visual Structural Inspector report (produced by David Smith Associates LLP, dated May 2024, reference 24/55551), an email from David Smith Associates dated 3 June 2024 stating that the existing *"portal steel frame within the above barn is of suitable size and condition to be converted to a residential dwelling there is absolutely no need to consider demolition. This barn is in fact ideal structurally for conversion under the requirements of Class Q(b) and Q(1) (i)(i)(aa) for the change of use from an agricultural building to a residential dwelling"* and a letter from Kernon Countryside Consultants Limited dated 10 June 2024 (reference KCC3678/hr).

Policies: The only consideration in the determination of this application is whether the proposed development conforms to the requirements and limitations of Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (GPDO).

It is important to mention that this prior approval application was submitted before changes to Class Q were released which came into effect on 21 May 2024. On this basis, as this application was submitted before 21 May 2024, this prior approval submission has been assessed against the previous iteration of the legislation. As set out below.

Subject to satisfying a number of conditions and restrictions, Class Q of the GPDO permits the conversion of agricultural buildings to dwellinghouses (C3) where the development consists of:

- (a) a change of use of a building and any land within its curtilage from a use as an agricultural building to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order;*
- or*
- (b) development referred to in paragraph (a) together with building operations reasonably necessary to convert the building referred to in paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule.*

Class Q of the GPDO continues, setting out a series of restrictions listed in Q.1 (a)-(m) and conditions in Q.2 (1)-(3).

The 'Procedure for applications for prior approval under Part 3' section of the GPDO (Part 3 W.) states in W.10b that when determining an application, regard must be given to the National Planning Policy Framework (the NPPF) *"so far as relevant to the subject matter of the prior approval, as if the application were a planning application"*.

Regard should also be given to the relevant paragraphs of the Planning Practice Guidance (PPG).

Relevant Planning History

PL/2021/09419 - Variation of condition 1 on W/11/02028/FUL to allow for some livestock to be housed in building - Approved with conditions

20/03842/CLE - Certificate of lawfulness for the existing erection of two poles measuring 4m high and affixation of 3 floodlights abutting the existing stable building at The Yard - Approved

18/11885/FUL - Change of use from agricultural (equestrian) to mixed use - equestrian and dog day care facility for maximum 20 dogs - Temporary planning permission was approved for two years from the date when the use commenced to establish whether the use could continue on a permanent basis without causing an unacceptable level of disturbance to nearby residential properties.

Note: The above temporary permisison lapsed on 26 September 2022.

W/11/02028/FUL - Retrospective application for an agricultural building for the storage of animal fodder and farm machinery - Approved

W/02/00237/FUL - Proposed erection of stables and haystore/tack room - Approved with conditions

Consultation Responses

Westwood Parish Council: No comment

Wiltshire Council Drainage: No objection

Wiltshire Council Highways: No objection and offered the following comments, copied verbatim: *"The proposed development is served via an existing established access, therefore, if you are satisfied that this development can be determined under PNCOU, no highway objection is raised".*

Wiltshire Council Public Protection: Following the submission of an Environmental Noise Assessment Report (produced by Mach Group, dated 9 July 2024) no objections were raised subject to a condition ensuing that the following noise criteria are met with windows open:

- a. bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A) and an LMax,F of 45dB*
- b. living rooms and dining rooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)*

Representations

Third-party representations: Four letters of objection have been received raising the following summarised concerns:

- The site is equestrian not agricultural and the land has never been farmed
- Lack of evidence that the building has been in agricultural use since 2013
- Noise impacts from neighbouring dog day care site

- The existing barn sits within the Special Area of Conservation (SAC) for the Bath and Bradford on Avon Bat SAC
- Floods after heavy rain

Planning Considerations and Assessment

This application has been accompanied by existing and proposed drawings; a Planning Statement; a Flood Risk Assessment (FRA); and a Visual Structural Inspection report.

The proposals set out in the submitted plans and statements have been assessed against the requirements of Class Q of the GPDO (in accordance to the legislation before the May 2024 changes) below.

Assessment against the Requirements and Limitations of Class Q: In considering Part 3, Class Q of the GPDO (as amended) the Local Planning Authority (LPA) have to be convinced that the former agricultural building was used solely for agricultural use, as part of an established agricultural unit on 20th March 2013 or within 10 years before exercising the change to residential use as set out in Q.1.(a)(i-iii) of Class Q.

With reference to the submitted Planning Statement (produced by Kernon Countryside Consultants Ltd) the applicant has stated in paragraph 1.5 that the *"building subject of this application has been in agricultural use since it was first permitted. Originally it was used to store animal fodder and machinery used for making hay. More recently it has been used just to store hay making equipment however its use for housing livestock has recently been given"*.

It is noted from the submitted representations that concern has been raised regarding whether this building has indeed been used solely for agricultural use. It is duly noted that the wider site has been previously granted planning permission to be used for equestrian use (as permitted under application reference W/02/00237/FUL) and with part of the site and one of the existing buildings being used as a dog day care facility for up to 20 dogs (as permitted under 18/11885/FUL on a temporary two-year basis - with the permission lapsing in late September 2022).

It is however important to mention that the subject building for this Class Q submission falls outside the red line boundaries associated with these previous planning applications under application references 18/11885/FUL, 20/03842/CLE and PL/2021/03320 and was labelled on the block layout plan drawing associated with 18/11885/FUL as an agricultural building.

It was evident at the time of the case officer's site visit that horses were grazing on the fields to the north of the building subject to this application. However, the grazing of horses does not always necessitate a change of use from agriculture to equestrian use. Also at the time of the case officer's site visit (which was unannounced), the building subject to this application, was being used for agricultural storage purposes, as detailed in the below extract taken at the time of the case officer's site visit:



From the available information, and from site visits undertaken by the case officer, it has been concluded that the building pursuant to this Class Q application is considered to satisfy parts Q.1(a)(i)-(iii), as no substantive evidence or proof has been provided to robustly support claims within the submitted third party representations that the subject building has been used for any non-agricultural purposes.

It is also noted from the case officer's review of the planning history for this particular building that the latest application (under reference PL/2021/09419) sought to permit the use of the building for the housing of livestock, to support its agricultural use, which was approved.

With regards to part Q.1(b) and (ba) this submission is seeking to convert an existing agricultural building into one larger dwelling. Class Q permits:

(b) in the case of—

(i) a larger dwellinghouse, within an established agricultural unit—

(aa) the cumulative number of separate larger dwellinghouses developed under Class Q exceeds 3; or

(bb) the cumulative floor space of the existing building or buildings changing use to a larger dwellinghouse or dwellinghouses under Class Q exceeds 465 square metres

(ba) the floor space of any dwellinghouse developed under Class Q having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order exceeds 465 square metres

In this instance, only one larger dwellinghouse is proposed and the floorspace of the building subject to change would not exceed 465m². As measured from the submitted plans, the floor space of the proposed larger dwellinghouse would be 183m². Therefore, the proposal would not exceed the maximum number of dwellings nor exceed the floor space sizes stipulated in Q.1(b) and (ba).

Paragraph Q.1(c) of Class Q does not apply to this application as no smaller dwellinghouses are proposed as part of this submission.

Turning to Q.1(d) development is not permitted under Class Q if: *(i) a larger dwellinghouse or larger dwellinghouses having more than 465 square metres of floor space having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order; (ii) the cumulative number of separate dwellinghouses having a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order exceeding 5.* In this instance, the proposed larger dwelling would not exceed 465m² in floor space and less than 5 dwellings are proposed. Furthermore, there are no other dwellings on this particular site that have been formed under Class Q of the GPDO.

The completed application form and submitted Planning Statement confirm that the site is not under an agricultural tenancy and no agricultural tenancy has been terminated within the last year. Therefore parts Q.1(e) and (f) of Class Q are not of relevance. The applicant's supporting statement also confirms that no permitted development under Class A(a) or Class B(a) of Part 6 of the GPDO (agricultural buildings and operations) have been carried out on the site since 20th March 2013 and therefore it is considered that parts Q.1(g)(i)-(ii) are satisfied.

In respect of Q.1(h), the drawings that have been submitted as part of this application do not show any extension to the existing footprint or roof plane of the existing agricultural building and as such the proposal is not seeking to extend beyond the external dimensions of the building.

With reference to the requirements set out in part (i), (i)(aa)-(bb) and (ii) the building operations, as detailed on the submitted drawings and within the Planning Statement, are considered to extend beyond that permitted by Class Q and what is deemed reasonably necessary for the building to function as a dwelling for the reasons set out below.

Class Q.1(i) permits the following:

- (i) the development under Class Q(b) 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(i)(i);*

The existing agricultural building comprises a steel portal frame measuring 18.3m in length, 10m in width and 4.4m in height with a concrete slab floor. The existing walls of the agricultural building are clad with a combination of steel cladding and Yorkshire boarding above horizontal timber boards, with the eastern elevation being partially open with a metal bar gate.

Paragraph: 105 Reference ID: 13-105-20180615 of the PPG makes it clear that *“It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right”*.

The advice provided within the PPG relies upon an existing agricultural building (for Class Q purposes) being capable of functioning as a dwelling and therefore Class Q only permits building operations which are 'reasonably necessary' to facilitate the conversion of the the building to habitable use.

It is acceptable that such changes would affect the external appearance of the building to a degree.

The PPG is however clear that it is not the intention of Class Q to allow rebuilding work that would go beyond what is 'reasonably necessary' for the conversion of the building to residential use.

Based on the information that was originally submitted with this prior approval submission, officers were not convinced that the proposals fell within the realms of what could be considered to be 'reasonably necessary' under Q.1(i).

On raising these concerns, the applicant wanted the opportunity to submit additional information prior to the prior approval being determined.

The additional information included a visual structural assessment report (submitted on 17 May 2024) and two written letters from the applicant (dated 29 April 2024 and 10 June 2024).

Revised plans were also submitted for the elevations and floor plan illustrating how the building would be altered to convert this building into habitable use - supported also by detail being included within section 3 of the submitted Planning Statement, in addition to a letter from the applicant dated 29 June 2024.



Existing and proposed elevation drawings

f



Proposed floor plan



Case officer's site photos of the existing barn

The existing building shown above would be converted to form a single-storey three-bed dwelling with a study, kitchen/dining/living room, and utility room.

The proposed works to convert this building into habitable use would comprise: weatherproofing the existing walls including infilling the gaps of the Yorkshire boarding and closing the opening on the eastern elevation with glazing; adding glazing on all four elevations; and insulating the building from the inside. Internal partitioning would also be provided to form the rooms, and the necessary utilities would be required for the building to function as a dwelling.

The original proposal sought to replace the roof with new anthracite corrugated sheeting, but the applicant is now seeking to retain the existing roof and insulate from the inside, as detailed in the applicant's letter dated 10 June 2024 (reference KCC3678/hr).

As stated in the applicant's letter dated 10 June 2024 *"these works, which would retain the roof sheets in their entirety, are works of conversion. The works are internal and reasonably necessary for the building to function as a dwellinghouse"*.

The existing building in its current form comprises open Yorkshire boarding on one elevation with a single layer of metal sheeting for the other three elevations and a steel sheet roof, with a large opening occupying the majority of the eastern elevation. The building represents a typical agricultural building and is a fairly simple structure. To achieve the proposals illustrated on the submitted drawings, the applicant has confirmed that they would be insulating the building from the inside and no new shell would be built.

For the walls, a wooden framework would be constructed from the inside, insulated and then plasterboarded over to form the internal walls of the proposed dwelling - within the provision set out under Class Q.

The northern elevation which currently have Yorkshire boarding would be covered internally with timber and then insulated, to close up the ventilation gaps. The existing roof could also be insulated from the inside without requiring any removal of the existing steel sheeting. With regards to new openings (windows and doors), these are permitted under Class Q in part (i)(i)(aa). It is therefore considered that the extent of the proposed building operations would be *"reasonably necessary for the building to function as a dwelling house"* and would comply with (i)(i) of Class Q.

This application was not originally submitted with a structural survey and upon raising concerns with the applicant about whether the existing barn would be suitable for conversion, a Visual Structural Inspection report was submitted on 17 May 2024 for officers review.

This report confirms that the barn is constructed from a combination of open-boarded timber and profile steel sheeting, with timber sleepers along the lowest sections of the walls, under a cementitious fibre roof covering. It states in section 2.7 of the structural report that no evidence of *"differential settlement or subsidence"* of the columns or roof structure was observed, indicating that the existing foundations are satisfactory.

The Visual Structural Inspection report concludes that the barn has withstood significant storm periods and snow loads over its life *"without any undue deformation or distortion. In addition to this,*

there were no signs of any significant misalignment, deformation, or deflection of the frame as a result of being subjected to this loading" and therefore considers the barn to be "*structurally strong enough to take the likely loading*" from the proposals to convert the existing barn to residential use (sections 3.1 and 3.2).

As the applicant has confirmed in their submitted Planning Statement and response letter dated 10 June 2024 that all the works needed to convert the existing barn into a habitable state could be carried out internally and as officers have no evidence before them to suggest otherwise, it is considered the conversion works could be carried out without requiring any substantive rebuilding that would extend beyond the permitted parameters set by Class Q and following the Hibbitt tests.

In light of the above, the works required for the existing building to function as a dwelling appear to fall within the scope of a 'conversion' and accordingly, the proposed works satisfy the requirements of Class Q.1(i).

The site does not fall on land designated as article 2(3) and does not form part of a site of special scientific interest, a safety hazard area or a military explosives storage area, nor does the site contain a scheduled monument and the building is not considered to be a listed building. Therefore, Q.1 (j), (k), (l) and (m) are satisfied.

Assessment against the Conditions Q.2: Paragraph Q.2 of Class Q of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) states that the conversion of an agricultural building to residential is considered permitted development subject to the condition that before beginning the development, the developer shall apply to the LPA for a determination as to whether the prior approval of the authority will be required as to:

- (a) transport and highways impacts of the development,
- (b) noise impacts of the development,
- (c) contamination risks on the site,
- (d) flooding risks on the site,
- (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
- (f) the design or external appearance of the building, and
- (g) the provision of adequate natural light in all habitable rooms of the dwellinghouses

Each of the above criteria has been assessed below:

a. Transport and Highways Impacts: Paragraph: 108 Reference ID: 13-108-20150305 of the PPG states that the "*permitted development right does not apply a test in relation to sustainability of location. This is deliberate as the right recognises that many agricultural buildings will not be in village settlements and may not be able to rely on public transport for their daily needs. Instead, the local planning authority can consider whether the location and siting of the building would make it impractical or undesirable to change the use to residential*". This clarifies that the sustainability of a building's location is not a test that applies to this permitted development right.

The submitted block plan drawing (reference KCC3678/02) illustrates that the proposed dwelling would be served by an existing access and two on-site car parking spaces would be provided for the new dwelling, which would satisfy the council's adopted car parking standards for residential use. As such, there is no highway objection to the proposal.

b. Noise Impacts: The area is predominantly characterised by agricultural use, with some equestrian use. There are existing residential dwellings in the wider vicinity of the site, but these are located over 100m away to the west of the subject building. From officers' review of the planning history of the site, a previous prior approval application has been approved under application reference PL/2021/10880 and a subsequent full planning application has been approved under reference PL/2022/04384 for the erection of a replacement dwelling to the north-east of the application site.

It is appreciated that existing agricultural buildings are likely to be located in open countryside and that not all agricultural buildings are located within a cluster of existing buildings. In this instance, the subject building is located within open countryside, with stabling and a dog day care business located to the north-east.

The council's public protection department originally objected to the proposal, due to the proximity of the existing agricultural building subject to conversion with the existing dog day care business (known as 'WestWoofs'), raising concerns that the conversion of the existing building to residential use would not provide an acceptable level of amenity for the future occupiers.

In response to the above, the applicant submitted an Environmental Noise Assessment Report (produced by Mach Group, reference Rev01, dated 9 July 2024) which covered the proposed Class Q dwelling to the south-west of the dog day care site. The building subject to this Class Q application is located 80m from the closest building associated with the dog day care use, which was granted temporary planning permission under application reference 18/11885/FUL and is subject to a current undetermined application to continue this use. The previous temporary planning permission that was granted for the dog day care use included a number of restrictive conditions including the number of dogs to be on-site at any one time; the kennelling of dogs; and the hours of operation, with the use not to operate after 6pm on weekdays. The dog day care use is not permitted to operate over weekends or on Bank/Public Holidays.

The Council's Public Protection team were consulted on the noise assessment and commented that the report *"provides noise monitoring information that considers the building in question for this application as a nearest sensitive receptor for the Westwoofs business. In a separate planning application for permanent permissions and the addition of a dog grooming pod, the business has proposed acoustic mitigation that reduces the impact by 3dB, this still leaves the building with an impact of 6dB above the measured background noise level."*

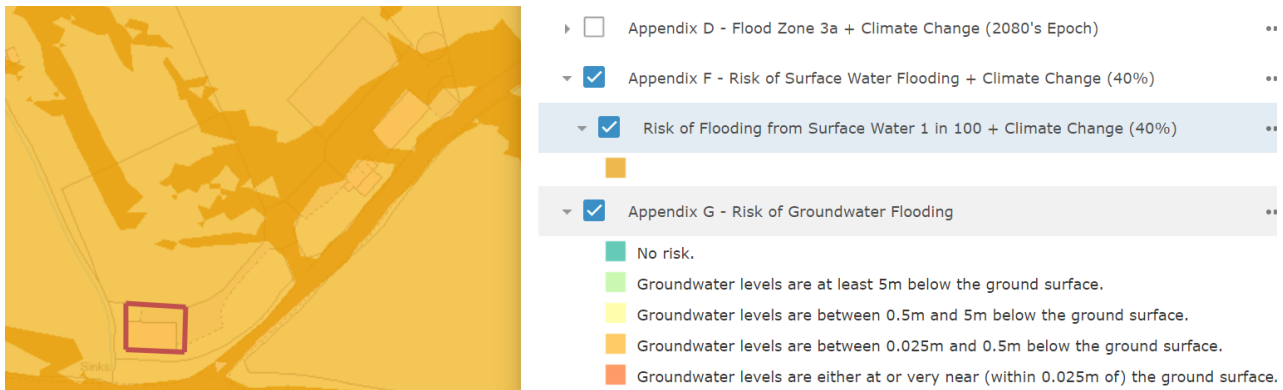
Should this conversion of agricultural building to dwellinghouse be approved, the Acoustic Consultant has predicted that the attenuation provided by the building envelope will ensure BS8233:2014 internal noise level guidance limits for residential dwellings will be met" and has therefore not raised an objection subject to a condition being imposed ensuring that the bedrooms and living and dining rooms meet the required noise levels as detailed below in the interests of preserving the amenity of future occupiers:

- a. bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A) and an L_{Amax,F} of 45dB
- b. living rooms and dining rooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)

On this basis, and with an appreciation of the position of the subject building to the dog day care use, with both the previous temporary permission and current undetermined application for the dog day care business not including the overnight kennelling of dogs and no weekend use, the likely impact of this use on the future amenity of occupiers of the converted agricultural building is unlikely to be so harmful to warrant a reason to refuse this prior approval application.

c. Contamination Risks: The council's mapping does not show the site to be located on a historic landfill and with reference to the submitted Planning Statement, there is no reason to suspect that there is any contamination risk within the building. Therefore, there is no evidence to suspect that there is any contamination risk on the subject site.

d. Flooding Risks: The site is located entirely in Flood Zone 1 with reference to the Environment Agency's flood map for planning but the subject building and part of its access is shown to be located in an area at high risk of future surface water and groundwater flooding with reference to the council's Strategic Flood Risk Assessment map, as illustrated by the areas washed over in orange below:



The original prior approval submission was not accompanied by a site-specific flood risk assessment (FRA) which covered flood risk from all sources of flooding, and the submitted Planning Statement fails to assess groundwater flooding on the site and is limited to a short appraisal of fluvial and pluvial flood risk only.

The applicant submitted a Flood Risk Assessment (produced by Kernon Countryside Consultants) on 9 May 2024 which concludes in section 6 that the *"conversion will be designed so that groundwater cannot penetrate up through the floor, because there will be a damp proof course. There will be a lip so that any surface water, or if groundwater got to the surface any water coming up from below, will not be able to get into the dwelling"* and that the subject *"building is near to a ditch and a stream. High groundwater will drain away in any event"* resulting in there being *"no flood risk"*.

The council's drainage department were consulted on the submitted FRA and raised no objection to the proposed conversion citing that the proposed works are *"minor in nature and will not result in a significant increase in impermeable area or corresponding flood risk when compared to the existing baseline scenario"*. As such the proposals are considered to satisfy this part.

e. Would the location or siting of building make it otherwise impractical or undesirable to be used as a dwelling: Paragraph: 109 Reference ID: 13-109-20150305 of the PPG confirms that the terms 'impractical or undesirable' are not defined in the regulations and as such the LPA "*should apply a reasonable ordinary dictionary meaning in making any judgment. Impractical reflects that the location and siting would "not be sensible or realistic", and undesirable reflects that it would be "harmful or objectionable"*".

The PPG continues in Paragraph 109 stating that:

When considering whether it is appropriate for the change of use to take place in a particular location, a local planning authority should start from the premise that the permitted development right grants planning permission, subject to the prior approval requirements. That an agricultural building is in a location where the local planning authority would not normally grant planning permission for a new dwelling is not a sufficient reason for refusing prior approval.

There may, however, be circumstances where the impact cannot be mitigated. Therefore, when looking at location, local planning authorities may, for example, consider that because an agricultural building on the top of a hill with no road access, power source or other services its conversion is impractical. Additionally the location of the building whose use would change may be undesirable if it is adjacent to other uses such as intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals.

The existing use of the site comprises agricultural, equestrian and a dog day care business. The existing building is located to the south-west of the site, some 80m from the closest building associated with the dog day care use. It is therefore considered that some separation would exist between the existing stables and dog day care use. On this basis, it is considered that the location and siting of the building is acceptable, and the location/siting of the building is not impractical or undesirable.

f. Design or External Appearance of the Building: Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) only permits the conversion of existing agricultural buildings and not their 'rebuilding' and on this basis any external alterations and new openings should be kept to a minimum and be sympathetic to and respect the rural character of their setting.

Officers acknowledge that the proposed change of use of the agricultural building to a dwellinghouse would alter the appearance of the building. Whilst it is appreciated that openings would be required to facilitate the conversion works to ensure natural light can be gained within habitable rooms, the proposed extent of glazing illustrated on the drawings that were originally submitted, especially on the northern elevation, was concerned too great and thus failed to retain an acceptable agrarian appearance.

It is generally considered that existing openings should be utilised as part of the conversion works with the number of new openings kept as a minimum. Where new openings are required these should be in keeping with the existing rural character and appearance of the area.

On raising the above concerns with the applicant, revised proposed drawings were submitted for officers' review, showing a reduction to the extent of proposed glazing on the northern elevation.

The proposed introduction of tall narrow openings and smaller casement windows is considered acceptable and the infilling of the existing opening on the eastern elevation with glazing would respect the existing design of the agricultural building. As such, the revised proposed elevation drawings are considered acceptable, as the building is now shown to maintain an agrarian appearance compared to the original plans.

g. Provision of Adequate Natural Light in all Habitable Rooms: The submitted elevation and floor plan drawings demonstrate that every bedroom and main living space would be served by openings and therefore it is considered that adequate light would be provided to the habitable rooms.

Interpretation of Part 3 - Paragraph X “Curtilage”: Curtilage is defined in the Town and Country Planning (General Permitted Development) (England) Order 2015 as: *“curtilage” means, for the purposes of Class Q, R or S only—*

(a) the piece of land, whether 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,

whichever is the lesser;

The curtilage for the proposed dwelling has been illustrated on the submitted proposed block plan drawing (drawing no. KCC3678/02) and is shown to be immediately adjacent to the proposed dwelling to the north, with car parking provision for the dwelling to be provided to the east of this area. The size of the proposed curtilage area would not exceed the area of land occupied by the existing building. Therefore, it is considered that the proposed curtilage would be of a size that would satisfy the requirements of Class Q.

Note on Ecology: The subject site is located within various buffer zones associated with a number of bat species. Whilst it is acknowledged that protected species are not specifically referred to in the Town and Country Planning (General Permitted Development) (England) Order 2015, regulation 9 of the Conservation of Habitats and Species Regulations 2017 still applies. This states that a *“competent authority must exercise their functions which are relevant to nature conservation, including marine conservation, so as to secure compliance with the requirements of the Directives”*. Accordingly, competent authorities must consider this directive in making decisions relating to any of their planning functions.

This means that the development proposed as part of this application cannot be lawfully commenced until an Appropriate Assessment of the implications for the European site(s) under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (Habitat Regulations) and has confirmed that the proposals would not adversely affect the integrity of the site(s).

CONCLUSION: Prior approval required

Conditions: (3)

- 1 Development under Class Q is permitted development subject to Condition Q.2(3) being met, which requires that the development must be completed within a period of 3 years starting with the prior approval date.

REASON: To comply with the full limitations, requirements and conditions of Class Q, Schedule 2, Part 3, of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

KCC3678/01, Location Plan, received 14 March 2024;
KCC3678/02, Block Plan, as received 14 March 2024;
KCC3678/03, Existing Elevations and Floor Plan, as received 14 March 2024;
KCC3678/04(Rev C), Proposed Elevations and Floor Plan, as received on 3 June 2024;
Environmental Noise Assessment Report, produced by Mach Group, reference Rev01, dated 9 July 2024

REASON: For the avoidance of doubt and in the interests of proper planning.

- 3 The conversion of the existing building to a dwellinghouse shall ensure that the following noise criteria is met with windows open:

- a. bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A) and an LAmax,F of 45dB
- b. living rooms and dining rooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)

REASON: To safeguard the amenity of future occupiers

Informatives: (1)

- 4 This prior approval cannot be lawfully commenced until an Appropriate Assessment has been completed under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (Habitat Regulations) and has confirmed that the proposals would not adversely affect the integrity of the site(s). The applicant therefore must submit a Regulation 77 application to Wiltshire Council prior to any works. Further

information is available on the council's website at: Planning permission - Wiltshire Council

APPENDIX E – COPY OF THE DECISION
NOTICE ASSOCIATED WITH CLASS Q
PL/2024/02742

**The Town and Country Planning (General Permitted Development)
(England) Order 2015 (as amended)**

**Prior approval Part 3 Class Q: Agricultural buildings to
dwellinghouses - Prior Approval Granted**

Application Reference Number: PL/2024/02742

Decision Date: 26 September 2024

Applicant: Mr and Mrs Bend
22 Fairways, Lansdown , Bath , BA1 9DH

Particulars of Development: Class Q change of use of 1 no. agricultural building to a use class C3 (dwellinghouse) together with building operations reasonably necessary to convert the building.

At: Elms Farm, Westwood, Bradford on Avon , BA15 2AL

The local planning authority has determined in this case that its prior approval is required and that this prior approval is **GRANTED** subject to the following condition(s):

Conditions:

- 1 Development under Class Q is permitted development subject to Condition Q.2(3) being met, which requires that the development must be completed within a period of 3 years starting with the prior approval date.

REASON: To comply with the full limitations, requirements and conditions of Class Q, Schedule 2, Part 3, of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

KCC3678/01, Location Plan, received 14 March 2024;
KCC3678/02, Block Plan, as received 14 March 2024;
KCC3678/03, Existing Elevations and Floor Plan, as received 14 March 2024;
KCC3678/04(RC), Proposed Elevations and Floor Plan, as received on 3 June 2024;
Environmental Noise Assessment Report, produced by Mach Group, reference Rev01, dated 9 July 2024

REASON: For the avoidance of doubt and in the interests of proper planning.

3

The conversion of the existing building to a dwellinghouse shall ensure that the following noise criteria is met with windows open:

- a. bedrooms shall achieve an 8-hour LAeq (23:00 to 07:00) of 30dB(A) and an LAmax,F of 45dB
- b. living rooms and dining rooms shall achieve a 16-hour LAeq (07:00 to 23:00) of 35dB(A)

REASON: To safeguard the amenity of future occupiers

Informatives: (1)

This prior approval cannot be lawfully commenced until an Appropriate Assessment has been completed under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (Habitat Regulations) and has confirmed that the proposals would not adversely affect the integrity of the site(s). The applicant therefore must submit a Regulation 77 application to Wiltshire Council prior to any works. Further information is available on the council's website at: [Planning permission - Wiltshire Council](#)

Parvis Khansari - Corporate Director, Place

APPENDIX F – EXTRACTS OF CP1 AND CP2 FROM THE WILTSHIRE CORE STRATEGY

economy, appropriate levels of housing and the careful use of natural resources. If a development proposal does not accord with the Core Strategy it is deemed unsustainable and will not be supported.

- 4.8 The Spatial Strategy recognises the importance of delivering new jobs and infrastructure alongside future housing delivery. This will be achieved by ensuring that strategic sites, which are fundamental to the delivery of the strategic objectives, are brought forward through 'masterplans' which are comprehensive and joined up. The council will also use legal agreements to ensure the appropriate timing of infrastructure to support homes and employment.

Core Policy 1: Settlement strategy

The Settlement Strategy

- 4.9 The main settlements in Wiltshire have seen their role as employment and service providers undergo gradual change. There is less reliance on traditional business sectors, which has altered the employment base across the county. In addition, easy access to larger settlements outside of Wiltshire, such as Bath and Swindon, together with a willingness to travel further to employment opportunities have led to an increase in net out-commuting. The provision and retention of services and facilities have been affected not only by the proximity to larger centres outside of Wiltshire but also changes in habits through growth in internet use for retail and service provision. Nevertheless, a number of settlements retain buoyant employment, retail and service economies.
- 4.10 Wiltshire is a predominantly rural area and its rural communities have also seen significant change. Although the high demand for new homes due to Wiltshire's attractive environment has led to development taking place, at the same time there has been a decline in employment opportunities, facilities and services in small towns and villages. Again this has been brought about by the ease of travel to larger centres for employment and other purposes.
- 4.11 The Settlement Strategy identifies four tiers of settlements, namely:
- Principal Settlements
 - Market Towns
 - Local Service Centres
 - Large and Small Villages.

- 4.12 Wiltshire's Market Towns and Principal Settlements serve different strategic roles. These strategic roles have been identified through an assessment of their individual characteristics and functional relationships with their surrounding area. The results of this classification are set out in the Settlement Strategy (Core Policy 1) and then Core Policy 2 presents the way these settlements will develop in the future.
- 4.13 The settlement boundaries of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, as defined by former District Local Plans, will be carried into this strategy and retained. These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.
- 4.14 The level of development at Local Service Centres will be closely linked to their current and future role of providing for a significant rural hinterland. This will consist of less development than that at the Principal Settlements and Market Towns. Developments at Local Service Centres, in accordance with the Settlement Strategy, should provide for local employment opportunities, improved communities facilities and/or affordable housing provision. This will safeguard the role of these settlements and support the more rural communities of Wiltshire.
- 4.15 At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. These settlement boundaries will also be reviewed as part of the Housing Sites Allocations DPD as set out in the council's Local Development Scheme, in order to ensure that they remain up to date and properly reflect building that has happened since they were first established. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community. In turn this could bring forward benefits to the local community such as improvements to the economy through the identification of land for employment purposes.

- 4.16 Any existing settlement boundaries for Small Villages and other small settlements not identified in the settlement strategy will be removed (these are listed in Appendix F), and there is a general presumption against development outside the defined limits of development of the Principal Settlements, Market Towns, Local Service Centres and Large Villages. However, some very modest development may be appropriate at Small Villages, to respond to local needs and to contribute to the vitality of rural communities. Any development at Small Villages will be carefully managed by Core Policy 2 and the other relevant policies of this plan.
- 4.17 Proposals for improved local employment opportunities, housing growth (over and above that allowed by this Core Strategy) and/or new services and facilities outside the defined limits of development will not be supported unless they arise through community-led planning documents, such as neighbourhood plans, which are endorsed by the local community and accord with the provision of this plan. In such circumstances small villages may be able to become more sustainable and their status may change to that of 'Large Villages' as a result in subsequent reviews of the settlement strategy. The strategy does allow for carefully managed development outside of settlement boundaries in specific cases, such as new employment investment where there is an overriding strategic interest, or for other local circumstances such as providing affordable housing, allowing new tourist accommodation or supporting diversification of the rural economy (a full list of exception policies is set out in paragraph 4.25).

Core Policy 1

Settlement Strategy

The Settlement Strategy identifies the settlements where sustainable development will take place to improve the lives of all those who live and work in Wiltshire.

The area strategies in Chapter 5 list the specific settlements which fall within each category.

Principal Settlements

Wiltshire's Principal Settlements are strategically important centres and the primary focus for development. This will safeguard and enhance their strategic roles as employment and service centres.

They will provide significant levels of jobs and homes, together with supporting community facilities and infrastructure, meeting their economic potential in the most sustainable way to support better self containment.

The Principal Settlements are: Chippenham, Trowbridge and Salisbury.

Market Towns

Outside the Principal Settlements, Market Towns are defined as settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities.

Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities.

The Market Towns are: Amesbury, Bradford on Avon, Calne, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Tidworth and Ludgershall, Warminster, Westbury, and Royal Wootton Bassett.

Local Service Centres

Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that, together with improved local employment, provide the best opportunities outside the Market Towns for greater self containment.

Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing.

The Local Service Centres are: Pewsey, Market Lavington, Cricklade, Tisbury, Mere, Downton and Wilton.

Large and Small Villages

Large Villages are defined as settlements with a limited range of employment, services and facilities. Small Villages have a low level of services and facilities, and few employment opportunities.

Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.

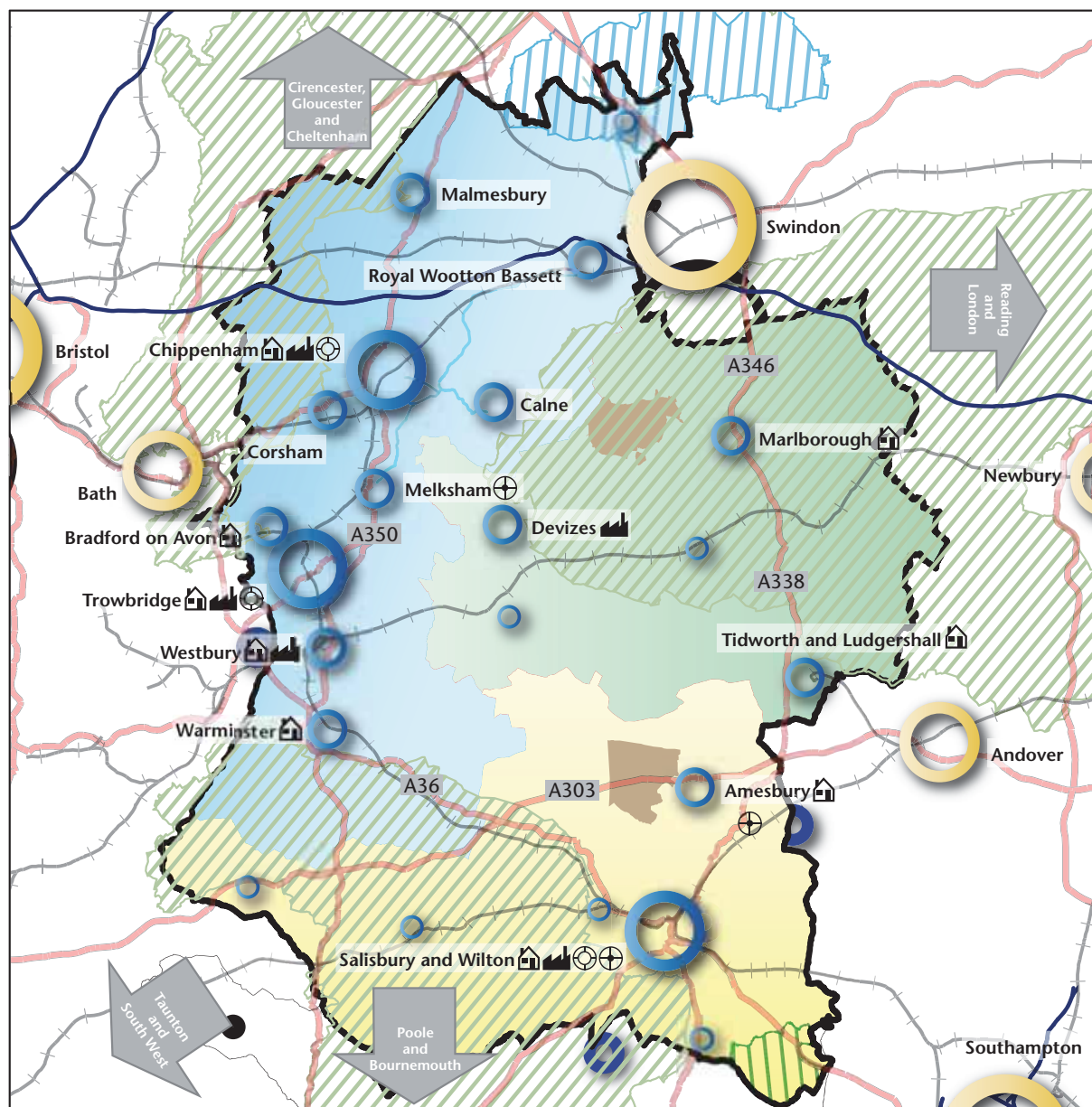
The Large and Small Villages are: see area strategies, Chapter 5.

Core Policy 2: Delivery strategy

The Delivery Strategy

- 4.18 The Delivery Strategy recognises that, in some settlements, new jobs have not necessarily been delivered alongside new homes. It therefore seeks to strengthen communities, wherever possible, by allowing appropriate growth to provide for the most sustainable pattern of development within Wiltshire which seeks to reduce the need to travel and help redress the imbalance between jobs and homes.
- 4.19 The underlying principles of the Delivery Strategy are to ensure that communities have a better balance of jobs, services and facilities and homes. This underlines the focus of the Settlement Strategy to support growth at the Principal Settlements of Chippenham, Trowbridge and Salisbury which provides the greatest opportunities within Wiltshire to deliver improved self containment and potential to generate job growth. The interrelationship between the Settlement Strategy (Core Policy 1) and the Delivery Strategy (Core Policy 2) is explained under paragraphs 4.13 to 4.17.
- 4.20 Wiltshire's proposed strategic housing requirement is set out against defined sub-county areas as identified within the Wiltshire Strategic Housing Market Assessment (SHMA). However, in order to support the most sustainable pattern of growth, in line with the principles defined in Core Policy 1, indicative requirements are provided for each Principal Settlement, Market Town and by Community Area within paragraph 4.26. The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan.

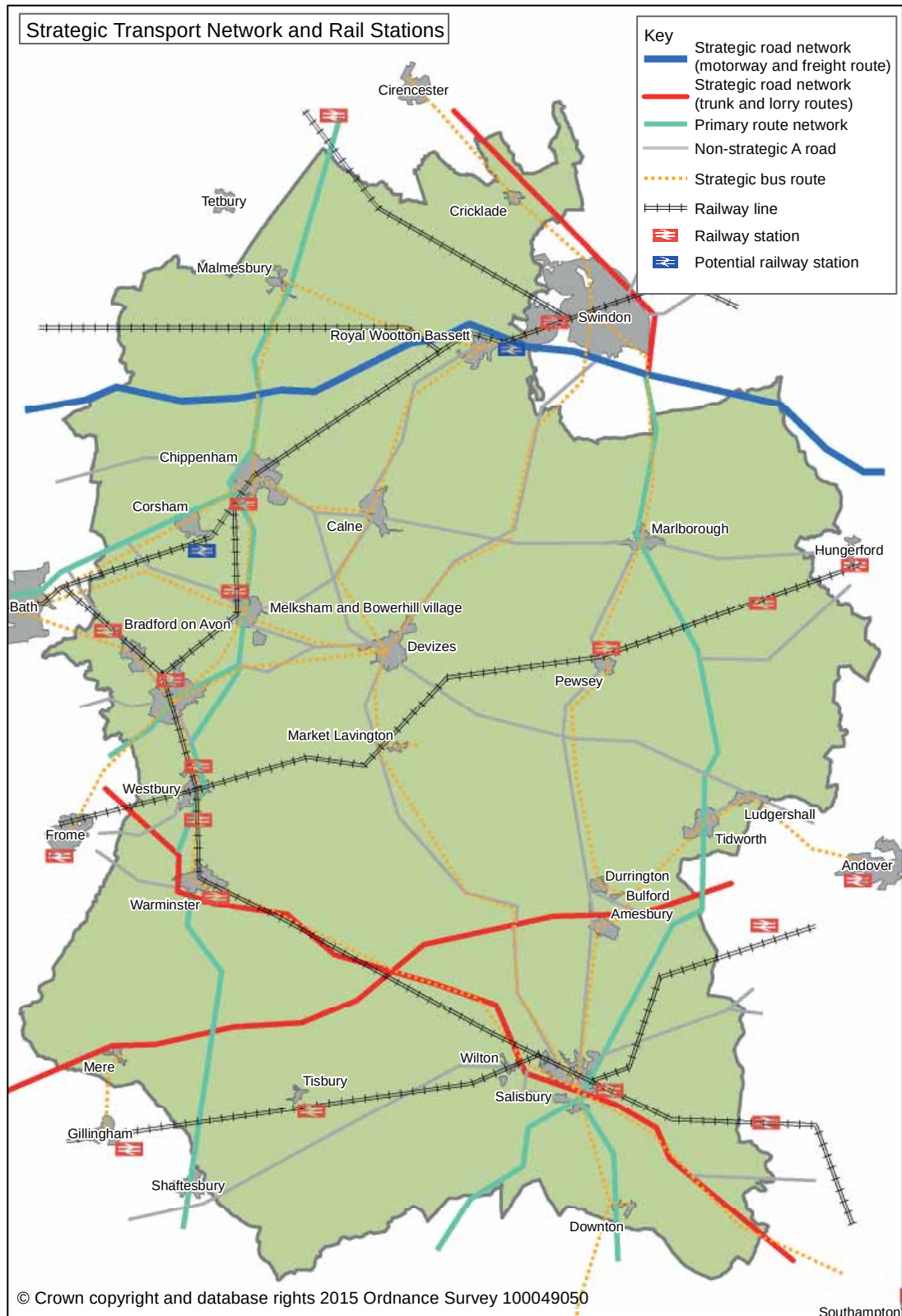
Figure 4.1 Wiltshire Key Diagram



Key:

CP2 Housing market areas	CP2 Strategic housing or mixed use site	CP1 Local service centres
West	CP2 Strategic employment site	CP1 Market towns
East	Central area strategies	CP1 Principal settlements
South	CP59 Stonehenge and Avebury World Heritage Site	Urban centres outside of Wiltshire
AONB	CP25 New Forest National Park	Urban centres not shown on map
CP54 Cotswold Water Park	CP9 Chippenham Central Areas of Opportunity	
Motorways	CP21 Maltings Central Car Park	
CP53 Wilts and Berks Canal	CP28 Trowbridge Central Areas of Opportunity	
Strategic transport routes	CP30 Trowbridge Low-Carbon, Renewable Energy Network	
Strategic rail routes	Site specific policies	
	CP5 Porton Down	
	CP16 Melksham Link Project	
	CP23 Old Sarum Airfield	

Figure 4.1a Wiltshire Key Diagram (Strategic Transport Network)



4.21 The Delivery Strategy identifies around 178ha of new strategic employment land²¹ to supplement that already built since 2006 (the base date of the plan) or with planning permission at date of submission, to provide a range of sites and choice of locations across Wiltshire. The new employment land allocated responds to the need to provide for new jobs to provide for investment choice and to assist in meeting job creation targets of the Swindon and Wiltshire Local Enterprise Partnership. The

allocation also allows the retention of existing jobs through facilitating the relocation of existing business to new sites within the locality and thereby allowing older, outdated employment stock to be redeveloped. This builds the necessary flexibility into the strategy.

4.22 The 178ha²² of new strategic employment land will be provided by a combination of the following types of sites:

- New strategic employment allocations
- Provision of employment land as part of mixed use urban extensions
- Retained Local/District Plan allocations for employment land.

4.23 At mixed use strategic sites there will be a focus on ensuring an appropriate phasing of development, so that jobs are provided in a timely manner alongside new homes. It is therefore a requirement that employment land will be delivered in the early stages of mixed use development proposals. This will be achieved through masterplanning and legal agreements, which will need to accord with the development template identified for each site in Appendix A.

4.24 In planning for new homes, a number of sources have been identified to ensure a continuous supply of housing across the plan period. These sources of supply are detailed within Appendix C and include:

- strategic allocations made within this plan
- retained Local Plan allocations
- existing commitments
- regeneration projects, for example, those in Chippenham, Trowbridge and Salisbury
- business expansion plans²³
- sites identified through DPDs and neighbourhood plans
- windfall sites in accordance with the delivery strategy.

4.25 The Core Strategy also includes 'exception policies' which seek to respond to local circumstance and national policy. In doing so these represent additional sources of supply to those detailed at paragraphs 4.22 and 4.24. These policies are listed overleaf:

- Additional employment land (Core Policy 34)

- Military establishments (Core Policy 37)
- Development related to tourism (Core Policies 39 and 40)
- Rural exception sites (Core Policy 44)
- Specialist accommodation provision (Core Policies 46 and 47)
- Supporting rural life (Core Policy 48)

4.26 In order to direct development at a strategic level to the most suitable, sustainable locations and at appropriate times, the area strategies contain an indicative housing requirement for each Community Area including the Principal Settlements and Market Towns and, in the South Wiltshire HMA, the Local Service Centres. This is shown in Table 1 below:

Table 1: Indicative Housing Requirements - Settlements and Community Areas

Area	Indicative requirement
Devizes town	2,010
Devizes remainder	490
Marlborough town	680
Marlborough remainder	240
Pewsey	600
Tidworth & Ludgershall	1,750
Tidworth remainder	170
East Wiltshire	5,940
Amesbury, Bulford & Durrington	2,440
Amesbury remainder	345
Mere town	235
Mere remainder	50
Salisbury City/Wilton town	6,060
Wilton remainder	255
Downton town	190
Southern Wiltshire remainder	425
Tisbury town	200

Tisbury remainder	220
South Wiltshire HMA	10,420
Bradford on Avon town	595
Bradford on Avon remainder	185
Calne town	1,440
Calne remainder	165
Chippenham town	4,510 ²⁴
Chippenham remainder	580
Corsham town	1,220
Corsham remainder	175
Malmesbury town	885
Malmesbury remainder	510
Melksham town	2,240
Melksham remainder	130
Royal Wootton Bassett town	1,070
Royal Wootton Bassett & Cricklade remainder	385
Trowbridge town	6,810
Trowbridge remainder	165
Warminster town	1,920
Warminster remainder	140
Westbury town	1,500
Westbury remainder	115
North and West Wiltshire HMA	24,740
West of Swindon	900
Wiltshire	42,000

- 4.27 The Core Strategy allocates sites and broad locations for growth that are strategically important for the delivery of the Plan for Wiltshire. Additional sites will also be identified through the Chippenham and Housing Site Allocations DPDs to ensure the delivery of housing land across the plan period in order to maintain a five year land supply at each HMA.



- 4.28 No allocations have been identified for Chippenham in Core Policy 2 and the scale of housing for the town is expressed as a minimum, which is an exception to the approach of indicative housing requirements and identification of sites for the other Principal Settlements. A pattern of development that can best realise the town's economic potential will be identified through a separate Development Plan Document for Chippenham town (The Chippenham Sites Allocation DPD), which will support the area strategy. It will focus on identifying land for mixed use development adjoining the built up area. Limited land opportunities within the urban area inhibit future development and this will need to be addressed urgently. Growth of the town needs to be underpinned by investment in new infrastructure and a more detailed framework will be prepared through the Chippenham Site Allocations DPD that co-ordinates growth and key infrastructure necessary to deliver the town a more resilient long term future.

- 4.29 Area strategies identify specific issues that must be considered when planning for these areas and these should be taken into account when assessments are carried out to identify specific sites for development in particular towns. Core Policy 2 provides a framework for parish and town councils to lead with neighbourhood plans. The council is also preparing a Housing Sites Allocation DPD in order to ensure a sufficient choice and supply of suitable sites over the period up to 2026.
- 4.30 The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council's intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.
- 4.31 Indicative housing land supply, based around trajectories for each of the HMAs, provides some detail on where the Housing Sites Allocation DPD should focus and by when it needs to have sites identified in order to sustain proposed rates and scales of housing development. This will make up the shortfall in delivery identified towards the end of the plan period. These trajectories provide an evidence basis for an implementation strategy for a full range of housing describing how the council will maintain delivery of a five-year supply of housing land.
- 4.32 The sources of supply have been assessed to ensure that there is a deliverable supply of housing, with additional contingency to comply with the National Planning Policy Framework (NPPF), relative to the targets for defined areas which are based on the housing market areas (HMAs). This is detailed in Appendix C – Housing Land Supply.
- 4.33 These housing market areas (HMAs) form the appropriate scale for disaggregation across Wiltshire, as they define areas within which the majority of household moves take place. It is against these HMA requirements that housing land supply will be assessed. This is in accordance with the methodology identified in the NPPF. However, in order to ensure an appropriate distribution of housing across Wiltshire that supports the most sustainable pattern of growth, indicative requirements are also provided at a Community Area and settlement level within the Core Strategy. These more localised indicative requirements, as set out within the Area Strategy Core Policies, are intended to prevent settlements receiving an unbalanced level of growth justified by under or over delivery elsewhere. They also address the ability



of each Community Area to accommodate housing because of the constraints and opportunities present in each. The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Sites Allocation DPD and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to maintaining a deliverable five year housing land supply and delivering the strategic objectives of the plan. Neighbourhood Plans should not be constrained by the specific housing requirements within the Core Strategy and additional growth may be appropriate and consistent with the Settlement Strategy (Core Policies 1 and 2). In addition sustainable development within the limits of development or at Small Villages should not be constrained just because requirements have been reached. For these reasons the overall housing requirement is shown as “at least,” while the area strategy figures are “indicative.”

- 4.34 Despite the Housing Market Areas being the appropriate scale for assessing land supply, the town and Community Area requirements should also be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy. So for example, whilst it is appropriate for supply in Trowbridge to provide for some of the requirement of Westbury, it would be wholly inappropriate for the entirety of Westbury’s requirement to be added to Trowbridge. The policy framework sets out the strategic pattern of growth, while allowing some flexibility to respond to future, spatially distinctive opportunities and constraints. Indeed, across the plan period, delivery should be in general conformity with the delivery strategy. Similarly, development that provides housing for the population of Swindon rather than that of Wiltshire should not be assessed against the housing requirements for the Wiltshire Housing Market Areas. Should any development beyond that already committed come forward in this location, this will be additional to the housing requirement for Wiltshire. A specific acknowledgement has been made for the existing commitment at Moredon Bridge and Ridgeway Farm²⁵ to the west of Swindon for 900 homes. Development in this area does not meet the requirement for the defined housing market areas. These 900 dwellings are an allowance rather than a requirement. As part of the planned early review of the Core Strategy, the council will clarify that its housing requirement will be met without relying upon the delivery of homes to the west of Swindon. The delivery strategy defines the level of growth appropriate within the built up area of small villages as infill. For the purposes of Core Policy 2, infill is defined as the filling of a small gap within the village that is only large enough for not

more than a few dwellings, generally only one dwelling. Exceptions to this approach will only be considered through the neighbourhood plan process or DPDs.

Core Policy 2

Delivery Strategy

In line with Core Policy 1, the delivery strategy seeks to deliver development in Wiltshire between 2006 and 2026 in the most sustainable manner by making provision for at least 178ha of new employment land and at least 42,000 homes distributed as follows:

	Minimum housing requirement (dwellings)
East Wiltshire HMA	5,940
North and West Wiltshire HMA	24,740
South Wiltshire HMA	10,420
West of Swindon ²⁶	900
Wiltshire	42,000

This will be delivered in a sustainable pattern in a way that prioritises the release of employment land and the re-use of previously developed land to deliver regeneration opportunities, and to limit the need for development on Greenfield sites, with approximately 35% of development taking place on previously developed land.

The 42,000 homes will be developed in sustainable locations in conformity with the distribution set out above, against which the land supply situation will be assessed. A more detailed distribution is set out in the Community Area Strategies. Development proposals should also be in general conformity with these.

Sites for development in line with the Area Strategies will be identified through subsequent Site Allocations DPDs and by supporting communities to identify sites through neighbourhood planning.

Within the defined limits of development

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.

Outside the defined limits of development

Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.

At the Small Villages development will be limited to infill within the existing built area. Proposals for development at the Small Villages will be supported where they seek to meet housing needs of settlements or provide employment, services and facilities provided that the development:

- i) Respects the existing character and form of the settlement
- ii) Does not elongate the village or impose development in sensitive landscape areas
- iii) Does not consolidate an existing sporadic loose knit areas of development related to the settlement.

Strategically important sites

Development will be supported at the following sites in accordance with the Area Strategies and requirements in the development templates at Appendix A.

Central Car Park, Salisbury

Up to 40,000 sqm retail and leisure floor space and 200 dwellings

Churchfields & Engine Sheds, Salisbury

5 ha of retained employment land and 1,100 dwellings

Drummond Park, Ludgershall

475 dwellings

Former Imerys Quarry, Salisbury

4 ha of employment land

Fugglestone Red, Salisbury

8 ha of employment land and 1,250 dwellings

Hampton Park, Salisbury

500 dwellings

Horton Road, Devizes

8.4 ha of employment land

Kings Gate, Amesbury

1,300 dwellings

Kingston Farm and Moulton Estate, Bradford on Avon

2-3 ha of employment land and 150 dwellings

Longhedge (Old Sarum), Salisbury

8 ha of employment land and 450 dwellings

Mill Lane, Hawkeridge, Westbury

14.7 ha of employment land

Salisbury Road, Marlborough

220 dwellings

Ashton Park, South East Trowbridge

15 ha of employment land and 2,600 dwellings

Station Road, Westbury

250 dwellings

UKLF, Wilton

3 ha of employment land and 450 dwellings

West of Warminster

6 ha of employment land and 900 dwellings

Masterplans will be developed for each strategically important site in partnership between the local community, local planning authority and the developer, to be approved by the council as part of the planning application process. At mixed use sites development will be phased to ensure employment land, and its appropriate infrastructure, is brought forward during the early stages of development.