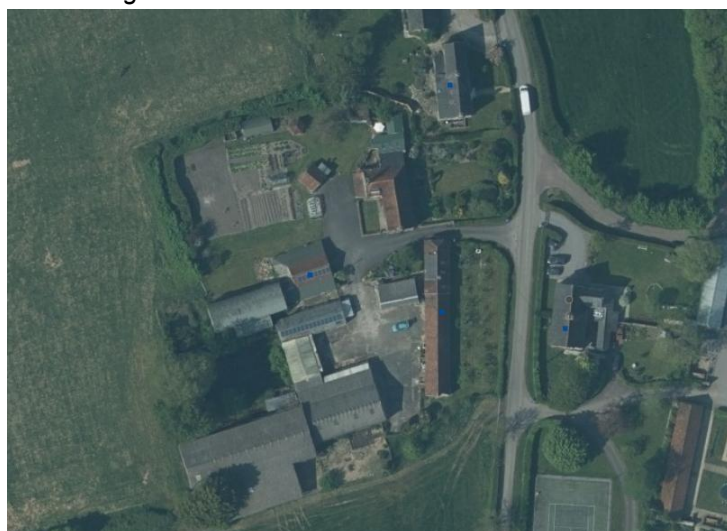


APPLICATION FOR PRIOR NOTIFICATION – PART 3 CLASS Q CASE OFFICER REPORT

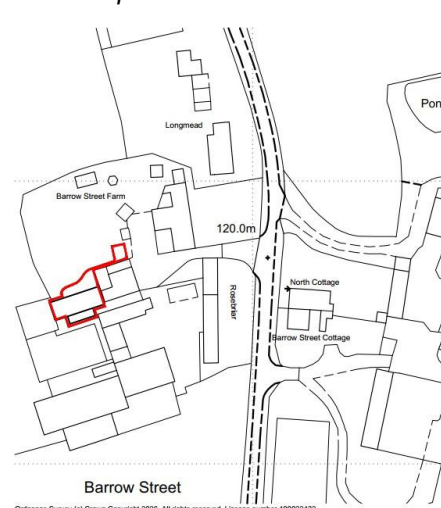
APPLICATION REFERENCE:	PL/2026/02961
APPLICATION TYPE:	Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses
SITE ADDRESS:	Barrow Street Farm, Barrow Street, Mere, Warminster, BA12 6AB
DEVELOPMENT DESCRIPTION:	Application for prior approval under Class Q of the GPDO 2015 as amended for change of use of agricultural building into a single residential dwellinghouse (Class C3) with associated operational development.
RECOMMENDATION:	That Prior Approval is REFUSED

SITE DESCRIPTION/CONTEXT

Aerial image



Location plan



The application site relates to an existing agricultural building within Barrow Street Farm. Barrow Street Farm is located on west side of Pimperleaze Road within the hamlet of Barrow Street and is located approximately 2 miles southeast of Mere. The site is outside of any defined settlement boundary, as defined by Wiltshire Core Strategy (WCS) core policies 1 (Settlement Strategy), 2 (Delivery Strategy) and 17 (Spatial Strategy for the Mere Community Area); and as such, the site is considered to be within designated countryside.

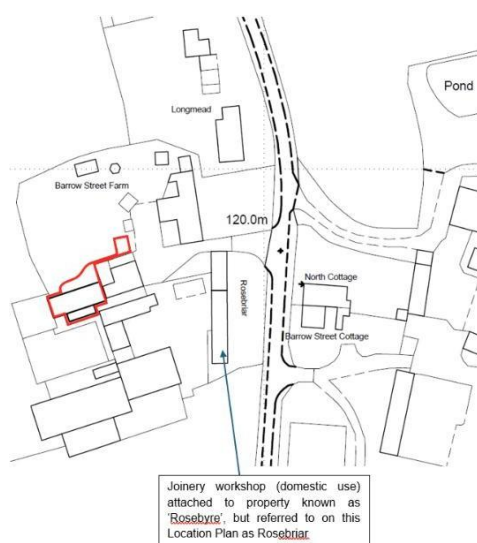
Barrow Farm is an agricultural holding comprising approximately 20 hectares of permanent pasture, from which fodder crops are taken. The agent has confirmed that there is no livestock kept on the farm. The adjacent farm buildings are used for agricultural storage and a joinery workshop used by the applicant. There is a former slurry pit to the immediate south of the agricultural barn that the agent states was emptied 30 years ago and is now filled with rainwater.

The agricultural building is located to the west of the private garden to Barrow Street Farmhouse. The area immediately outside of the agricultural building forms part of the private garden for this

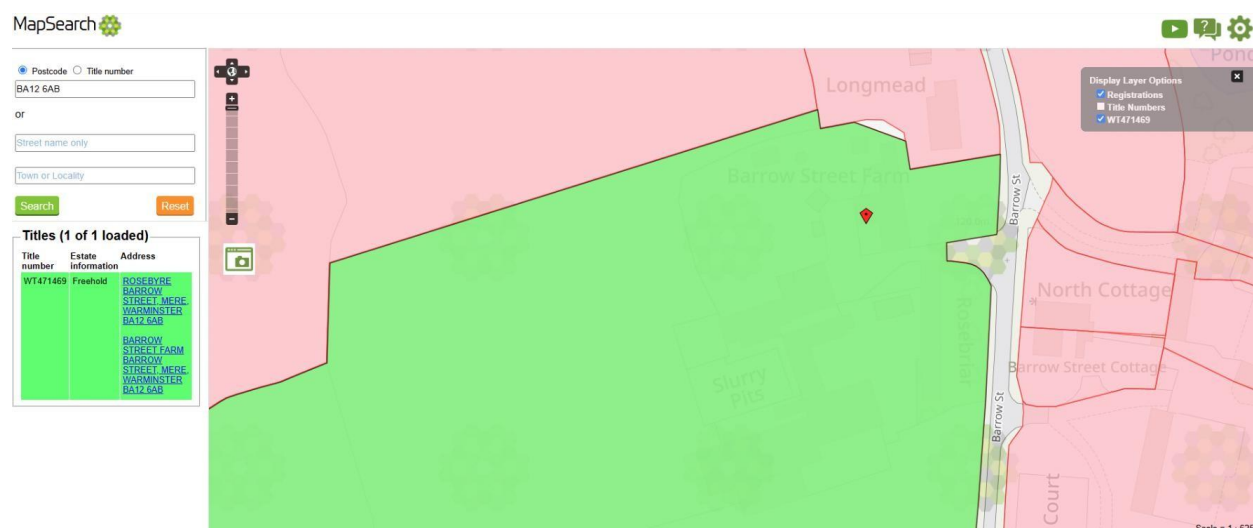
dwelling. The 'farmyard' lies to the south of the application site, the buildings within the yard are currently used for storage and have a more domestic character to it, due to part of the former stables being in residential use. The stables were granted permission as application (S/1986/0067) and the agent has confirmed that this property 'Rosebriar' is within the same ownership as the farm house and the farm yard and buildings. The remaining half of the stables is used as a wood workshop. One of the barns to the south of the application site has previously been used as a youth club (S/2004/2150).

Access to the site is shared with Barrow Street Farmhouse, the farm yard and 'Rose Briar' via a gravel driveway from Pimperleaze Road.

Snip from agent email confirming located of joinery workshop



Snip from agent confirming ownership



Barrow Street Farmhouse is a Grade II listed property. The listing for Barrow Street Farmhouse is as follows:

ST 83 SW MERE BARROW STREET (west side)

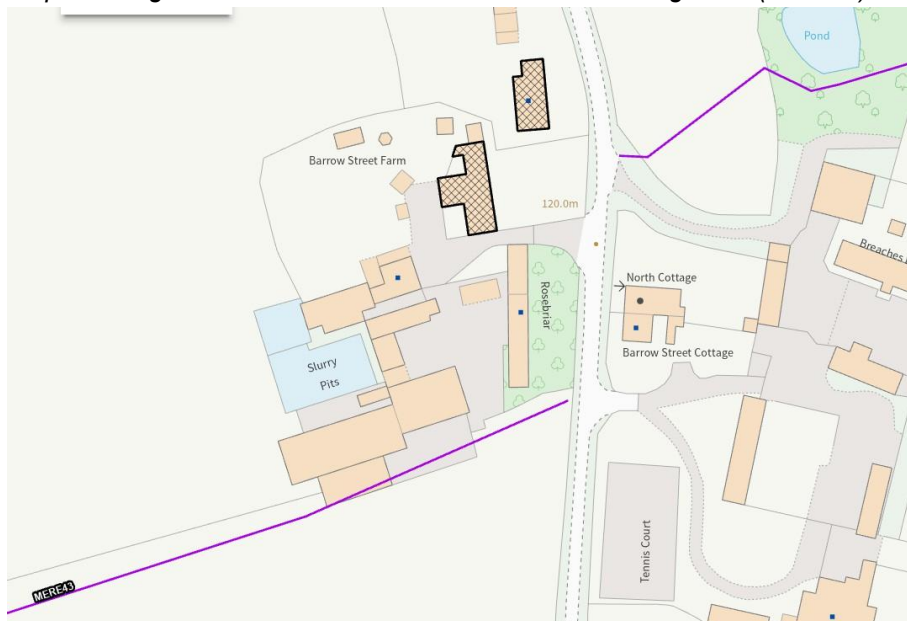
2/7 Barrow Street Farmhouse

GV II

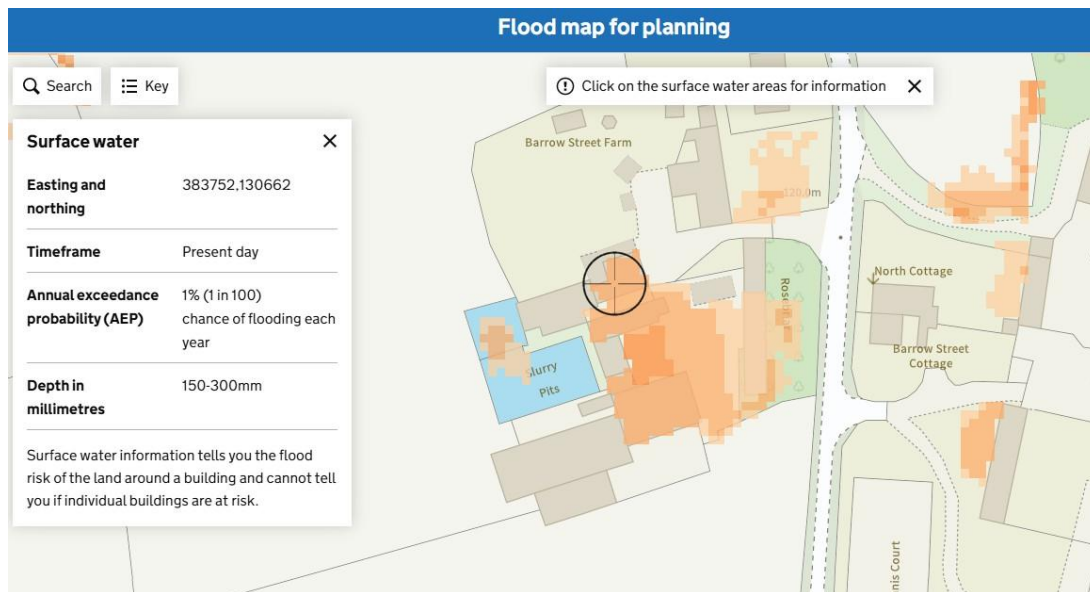
Farmhouse. C17 and C18; a date of 1611 on stack may be relevant to some internal fabric. Coursed and squared limestone rubble plain tile roof, ashlar stacks raised in brick. In L-plan form with gabled outer- arms and hipped return; may originally have been thatched as coped gables, to kneelers, stand well proud of roof surface. Plan not easy to decipher, later stair probably not original location. Front to road is two storeys, 3 windows, all 3-light case- ments with leading except top left, 2-light small-paned; all to wood lintels. Lean-to to right. Plain gable return left. Back has short wing with C20 flat dormer and 3-light leaded casement at ground and first floor; lean-to at gable, small single light to attic above. Main body has two 3-light leaded casements and one 2-light with glazing bars. Left is C20 door and gabled porch. Interior retains many good plank early doors, chamfered stopped spine beam and two good beams at south end. Lateral stair has splat baulsters and screen with moulded muntin rail; upper flight includes winders. One large bressumer fireplace in short wing. There is window now internal at the upper floor, north end. A good farmhouse less modified than most.

Listing NGR: ST8375230665

Snip showing Grade II listed Barrow Farmhouse and Longmead (hatched)

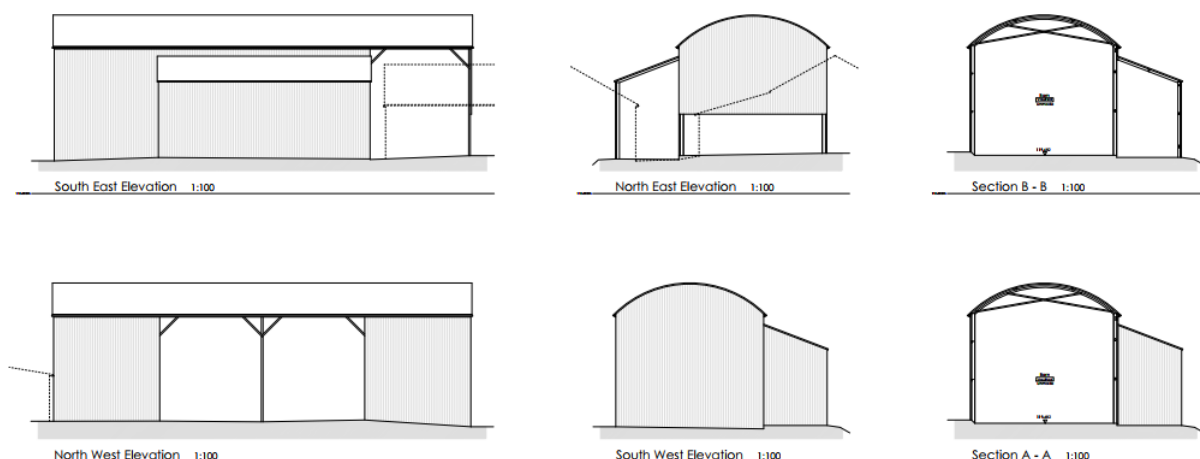


The application site is the Blackmore Vale and Vale of Wardour Countryside Character Area; within the designated Special Landscape Area, as defined by saved Salisbury District Local Plan policy C6; and Flood Zone 1. It is adjacent to an area of surface water flooding.

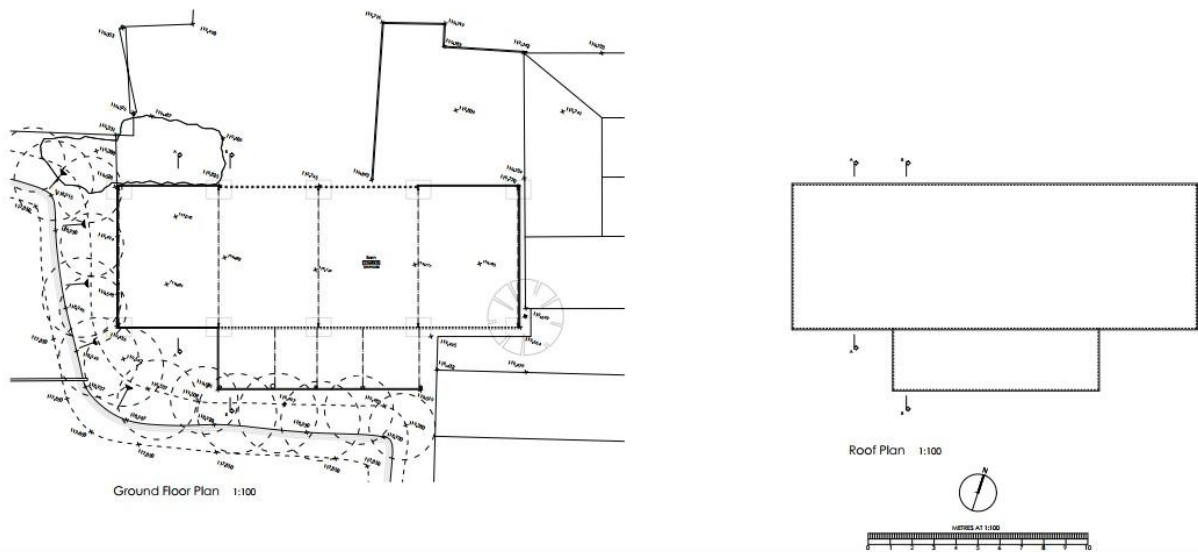


The existing agricultural building is a steel frame Dutch barn, partially clad in corrugated metal sheeting used for agricultural storage. During a site visit it was noted that the access is via the garden of Barrow Street Farmhouse (not through the yard) and it is currently used to store cut wood. It has open areas on the north east, north west and south west elevations and is in a state of disrepair. It does not benefit from a concrete base. There is a lean-to structure on the southeast elevation but this was not easily visible during the Officer site visit.

Existing barn elevations



Existing site plan



Officer photo of agricultural barn



Photos showing relationship of agricultural building to listed farmhouse



Photo showing slurry pit immediately to the south of agricultural building



PROPOSAL

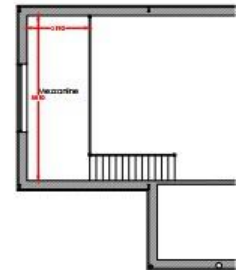
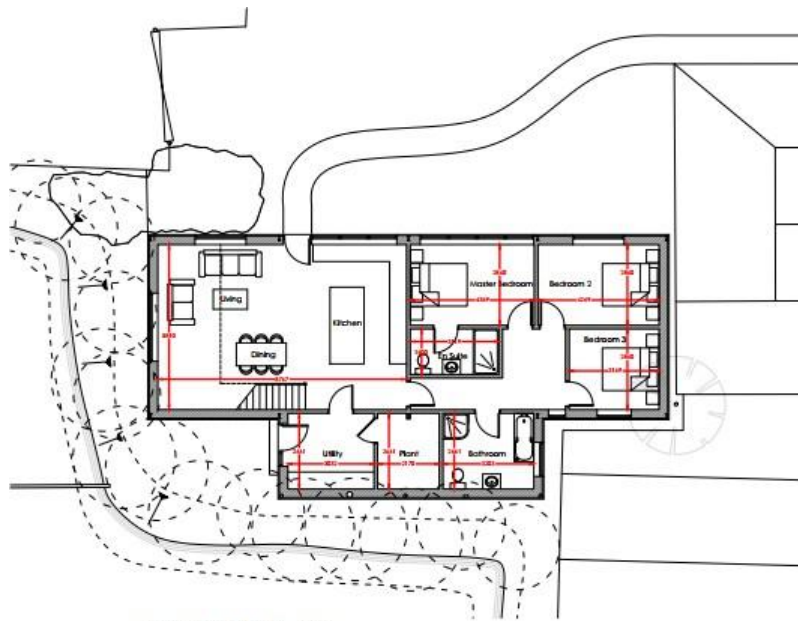
The application is notification for Prior Approval under Class Q of the General Permitted Development Order (as amended) for the change of use of an agricultural building into a single C3 dwellinghouse.

The proposal is to convert the existing building and lean-to structure to the south into a three-bedroom dwelling with first floor mezzanine above the living space. Total proposed floor area is 149m² (136m² + 13m² mezzanine). The accommodation would comprise three bedrooms, two bathrooms, a kitchen/dining/living area, utility and plant room. A mezzanine level is proposed above the living area.

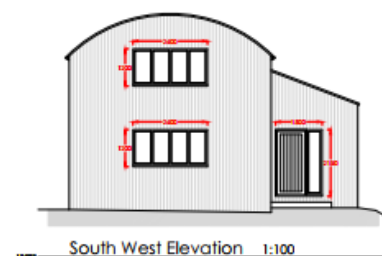
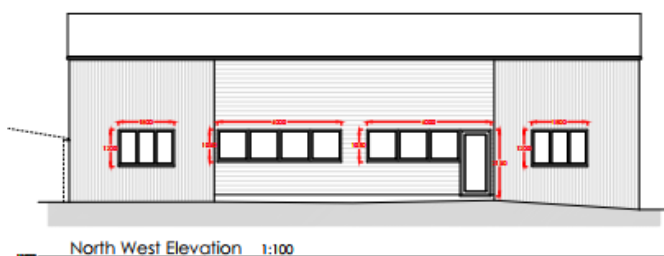
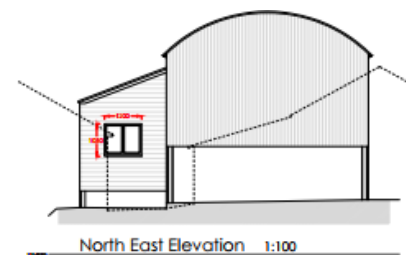
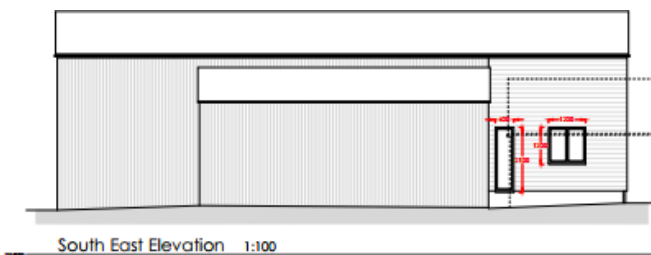
A new floor slab is proposed and the construction of insulated infill walls within the envelope to support the mezzanine and insulated ceiling of the whole building. The current open areas of the barn are proposed to be infilled with timber cladding. The existing metal cladding is proposed to be retained, although it is noted that the wall cladding is in a poor condition, and the structural report recommends that this is 'due for an overhaul'. New windows are proposed on the southeast, northwest and southwest elevations with a window for the bathroom on the northeast elevation.

The barn would be accessed via the main access into Barrow Street Farm and served by two existing gravel parking spaces. The curtilage would include a path from the parking area to the building and a small area of amenity space to the north.

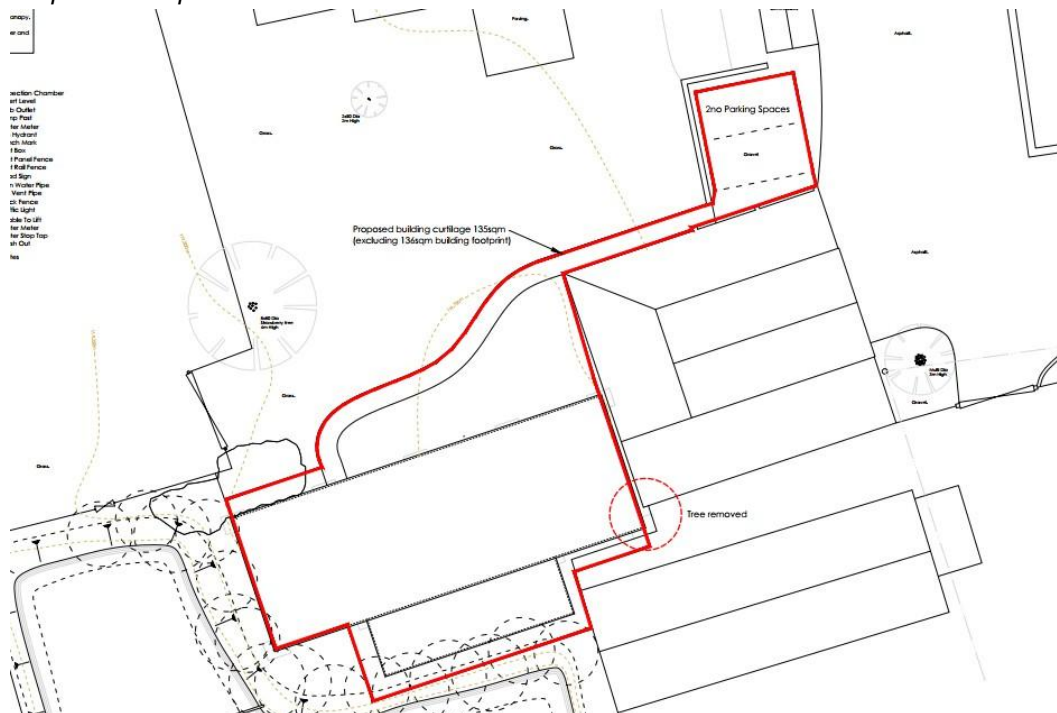
Proposed plans



Proposed elevations



Proposed site plan



The application is accompanied by a Planning Statement and a Structural Condition Report.

RELEVANT LEGISLATION, POLICY AND GUIDANCE

This application is assessed under Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), which grants planning permission for certain types of development described in Schedule 2 of the Order. The grant of permission is subject to the limitations, conditions, and provisions set out within the relevant Classes of permitted development.

Under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), certain changes of use and associated operations may be permitted subject to prior approval from the Local Planning Authority.

RELEVANT PLANNING HISTORY

Proposal / Summary
S/1986/0067 - Full planning permission Decision - Approve with Conditions Date: 19/3/1986 – CONVERSION OF FARM BUILDINGS TO DWELLING
S/2004/2150 - Full planning permission Decision - Approve with Conditions Date: 14/12/2004 – CHANGE OF USE OF BARN TO YOUTH CLUB WITH PORTAKABIN (RETROSPECTIVE)
20/01945/LBC - Listed building consent Decision - Approve with Conditions Date: 27/4/2020 – Replace 16 no. single glazed timber windows with new double glazed timber windows

CONSULTATIONS

Wiltshire Council Highways Officer: No objection

Introduction and Proposal

I refer to the above application for prior approval to determine whether approval is required for the proposed change of use of a Dutch barn to a dwelling.

The proposal would result in a 3-bedroom dwelling with two on-site parking spaces accessed via the existing farm access serving Barrow Street Farm.

Scope of Assessment

Whilst the site is located in a rural area with limited access to services and public transport, sustainability is not a matter for consideration under this prior approval application.

The remit of Highways Development Management is limited to assessing whether the proposal would result in an unacceptable impact on highway safety, or a severe residual cumulative impact on the highway network.

Access and Impact on the Highway Network

The application site is served via an existing shared access with Barrow Street Farm, which is currently used for agricultural purposes.

This access has historically accommodated agricultural vehicle movements, including larger and more intensive traffic associated with the lawful use of the site. The proposed change of use to a single residential dwelling would be expected to generate a materially lower level of vehicle movements.

There is no evidence to suggest that the existing access arrangement has resulted in highway safety concerns.

On this basis, it is considered that the use of the existing access to serve a single dwelling would not result in an unacceptable impact on highway safety, nor would it give rise to a severe impact on the local highway network.

Internal Layout, Turning and Parking

The submitted details indicate that adequate space is available within the site for vehicle parking and manoeuvring.

Two off-street parking spaces are proposed, which accords with the Council's parking standards for a 3-bedroom dwelling.

The layout provides sufficient space to enable vehicles to enter and leave the site in a forward gear, thereby avoiding the need to reverse onto the public highway.

Summary and Recommendation

The proposed development utilises an existing lawful access and would result in a reduction in vehicle movements compared to the established agricultural use.

Adequate provision is made for parking and turning within the site, and there is no evidence of existing highway safety issues associated with the access.

It is therefore considered that the proposal would not have an unacceptable impact on highway safety, nor would it result in a severe residual cumulative impact on the road network.

Accordingly, there are no highway grounds on which to object to this application.

Wiltshire Council Public Protection Officer: Comment

As requested, I have considered whether this application is likely to result in adverse noise impacts and/or contamination risks. Please find my comments below:

1. Noise:

The proposal seeks the conversion of a Dutch barn into a dwelling-house. The dwelling will be sited on a working farm in a rural area of Mere.

Whilst I do not anticipate that use of the dwelling itself would give rise to adverse noise effects on existing noise-sensitive receptors, there is potential for on-site agricultural activities to adversely affect future occupants of the dwelling, particularly as agricultural activities can occur at unsociable hours.

At present, it is not clear what agricultural activities are carried out on site, or what the surrounding buildings are used for. As such, it is not possible to fully assess the likely noise impact on future occupiers. Please could this information be provided.

2. Contaminated Land:

I understand that the Dutch barn subject to this application has previously been used for agricultural storage. As the barn is now intended to be used for residential, I recommend the following condition is attached should you be minded to approve this application:

Any contamination that is found during the course of construction of the development hereby approved that was not previously identified shall be reported immediately to the local planning authority. Development on the part of the site affected shall be suspended until a risk assessment has been carried out and submitted to and approved in writing by the local planning authority. Where unacceptable risks are found, the development [or relevant phase of development] shall not resume or continue until remediation and verification schemes have been carried out in accordance with details that shall first have been submitted to and approved in writing by the local planning authority.

Reason: To ensure compliance with Core Policy 56 and to reduce the risks associated with land contamination.

3. Other Matters:

Whilst the matters on which I am formally able to comment are limited, our mapping system indicates that slurry pits may be located adjacent to the Dutch barn.

It is important to note that slurry pits can generate strong odours. Consideration should therefore be given as to whether the location and siting of the barn is suitable for the proposed residential use.

Additional comments following confirmation of use of adjacent buildings: Objection

Having reviewed the information provided, I remain concerned that future occupants of the proposed dwelling-house could be exposed to noise from the nearby buildings. While I understand that these buildings are currently used for agricultural storage, I am not aware of any planning controls that would prevent them from being used for other agricultural activities in the future. Such changes could result in increased noise levels, which may give rise to adverse noise impacts.

In light of this, we recommend that the application be refused unless occupation of the proposed dwelling-house is tied to the agricultural business in perpetuity.

Wiltshire Council Conservation Officer: Comment

Assessment and advice:

I understand that one of the prior approval requires covers 'design and external appearance'.

In my professional opinion, the existing building detracts from the setting of the farmhouse and the area, in view of its form and materials. Furthermore, the standard 'dutch barn' appearance is not locally distinctive and as such does not contribute to the character of the area.

I note the agent says:

'The proposed development will achieve a good design by responding to local character creating a visually attractive form of development and adding to the overall quality of the area. The suitability of the building for conversion and the robustness of the structure is confirmed in the structural appraisal prepared by Nigel Challis Ltd and is included within the application documents.'

I do not agree that the proposal will achieve a 'good design' that responds to the local character.

Mere Town Council: Support

ASSESSMENT

This application seeks prior approval under Class Q, which sets out the provisions, limitations and conditions for the permitted development right to change the use of "buildings on agricultural units and former agricultural buildings to dwellinghouses" as follows:

Q. Development consisting of—

(a) a change of use of—

- (i) a building that is part of an established agricultural unit and any land within that building's curtilage, or*
- (ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage,*

to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,

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

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

For the purposes of the PD right, the building's curtilage is defined by para. Q.3 as being:

(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;

Does the Proposal Qualify as Permitted Development?

Development under Class Q is subject to a number of conditions and limitations. Development is not permitted by this class if any of the specified restrictions apply. These are set out at Appendix 1. Subject to compliance with these criteria and any limitations or conditions specified within the Order, the proposed development may be considered permitted development.

Having completed the detailed assessment checklist at Appendix 1 of this report, it is concluded that the proposed development **does not qualify as permitted development** (Q.1 criterion j), and therefore planning permission would be required for the proposed works.

In relation to the limitations set out in criterion j of Paragraph Q.1 of the GPDO, case law has established that certain proposals may exceed the scope of a "change of use" and instead constitute the construction of a new dwelling. In such instances, the development would fall outside the permitted development rights granted under Class Q. Therefore, it is necessary to assess whether the proposed works amount to a genuine "conversion" of the existing agricultural building, or whether they effectively result in a "replacement building." The Planning Practice Guidance (PPG) provides helpful clarification on this point, emphasising that the structural integrity and extent of building operations must be considered when determining whether a proposal qualifies as a conversion under Class Q. More specifically the PPG¹ provides the following guidance in this regard:

¹ Planning Practice Guidance - Paragraph: 105 Reference ID: 13-105-20180615 (revision date 15/06/2018).

“The right allows either the change of use (a), or the change of use together with reasonably necessary building operations (b). Building works are allowed under the right permitting agricultural buildings to change to residential use...

However, the right assumes that the agricultural building is capable of functioning as a dwelling. The right permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. 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...

Internal works are not generally development. For the building to function as a dwelling it may be appropriate to undertake internal structural works, including to allow for a floor, the insertion of a mezzanine or upper floors within the overall residential floor space permitted, or internal walls, which are not prohibited by Class Q.”

The existing agricultural building has a skeletal metal frame, partially clad with corrugated metal panels. The barn has open areas on the north east, north west and south west elevations and lacks sufficient enclosure to be considered capable of conversion. There are no blockwork or brick external walls or any sort of plinth. The building also does not benefit from a concrete base and is currently installed on a grass base. It is evident that the building has clearly been designed and used for agricultural storage and is a fairly lightweight structure.

The application is supported by a ‘Current Structural Condition Report’, prepared by Nigel Challis Ltd, which describes the construction of the barn. The walls of the barn are metal corrugated sheeting, supported on steel angles, supported on steel columns. The roof is formed from corrugated metal sheets, resting on steel angle purlins, spanning the length of the building, supported by steel cross scissor trusses, which are supported on steel columns. The floor is rammed earth/stone/chalk.

The report concludes:

6.0 Recommendations & Method Statement

The proposals for conversion of the building are shown on Brimble Lea Drawing 26022 – 4.

The conversion proposals for the building comprise of the construction of an insulated infill, inside the existing walls to conform to the requirements of The Building Regulations.

This is because the walls and roof of the current building are not currently insulated.

It is also proposed to also insert a small new mezzanine floor and insulated ceiling in the building, supported off the new external lining walls.

Where the loads from the new proposals, as outlined above, which may be slightly greater than those applied by the existing fabric; we consider that the existing building is structurally adequate, and able to safely resist this very small degree of additional loading.

The existing ground floor will also be required to be brought up to a higher level of thermal performance and moisture resistance, by overlaying with new concrete slab d.p.m, new slab and insulation and new floor screed – all within the ‘works’ permitted by the Part Q regulations.

In my opinion, I consider the following can be safely stated;

1. Conversion of the building can be carried out.
2. I consider that the existing principle structural elements of the building are in a satisfactory condition.

The ‘Planning Statement’ says that the building can be converted using the existing building fabric:

- 4.13 On the planning drawings, our detailed plans show how the building can be converted using all the existing fabric of the building, walls and roof, whilst also utilising the

position of existing window and door openings, with some new or enlarged ones also proposed in line with Class Q provisions.

- 4.14 The fabric of the existing building, comprising the walls and roof covering, will be retained as part of the change of use, with insulation taking place inside the structure (see site photographs and structural appraisal provided).

However, the Structural Report states that “the general wall corrugated sheeting is due for an overhaul” and that new “external lining walls” would support the mezzanine level and insulation

required to the ceiling. It is clear that virtually any structure can be made habitable/convertible, but it is the level of works required to make the building habitable that is the key consideration for this type of application. Whilst Q.1 criterion j is quite permissive, allowing the installation or replacement of new windows, door, roofs or exterior walls; the PPG confirms that this is not to enable a complete rebuild in order to achieve this and the starting premise is that the building is capable of functioning as a dwelling.

In this instance, it is considered that the required overhaul of all of the corrugated sheeting cladding; combined with the infilling of a large parts of each elevation; and the introduction of 'external lining walls' and a new concrete slab would all constitute significant alteration. In addition, the structural report, (in the 4th paragraph of section 6) suggests that the new mezzanine floor and roof insulation is going to be supported off new 'external lining walls', which suggests that the existing frame is not sufficient on its own to support this additional floor/weight. From a site visit, it is also considered that the supporting frame, whilst it has been found to be in good order, is of lightweight construction with thin supporting beams giving an overall flimsy and temporary appearance to the building. Overall, it is the Local Planning Authority's (LPA) view that the level of works identified in order to enable the conversion of the building to habitable accommodation would therefore go beyond the provisions of Class Q criterion j.

The proposed level of works identified are considered to exceed the scope of those permitted under Class Q of the GPDO. The extent of the proposed alterations, including structural interventions or rebuilding, goes beyond what can reasonably be considered as a conversion. As such, the development does not comply with the limitations set out in paragraph Q.1 and is not considered to constitute permitted development under Class Q and planning permission would be required for the proposed works.

Is Prior Approval Required?

Notwithstanding that the Local Planning Authority has found that the proposals **do not** constitute permitted development under the limitations set out in paragraph Q.1, the applicant has applied to the Local Planning Authority for confirmation that prior approval is not required for the proposed works. It is therefore considered to be appropriate for the Council to still assess the proposal against all the provisions limitations set out under Class Q of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to appraise whether the proposals would have been accepted in this regard were the works to be found to satisfy the permitted development criteria outlined above.

In respect of this proposal, the following considerations must be assessed as part of the prior approval process as set out by Q.2.

Where the development proposed is development under Class Q(a) together with development under Class Q(c), development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority 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 Schedule 1 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,*

and the provisions of paragraph W (prior approval) of this Part apply in relation to that application.

Paragraph W sets out a number of requirements for both the developer (in terms of the application submission) and the LPA (relating to consultations and advertisement of the application). Paragraph W(10) states that:

The local planning authority must, when determining an application—

(a) take into account any representations made to them as a result of any consultation under sub-paragraphs (5) or (6) and any notice given under sub-paragraph (8);

(b) have regard to the National Planning Policy Framework issued by the Ministry of Housing, Communities and Local Government in February 2019 July 2021, so far as relevant to the subject matter of the prior approval, as if the application were a planning application; and

(c) in relation to the contamination risks on the site—

(i) determine whether, as a result of the proposed change of use, taking into account any proposed mitigation, the site will be contaminated land as described in Part 2A of the Environmental Protection Act 1990, and in doing so have regard to the Contaminated Land Statutory Guidance issued by the Secretary of State for the Environment, Food and Rural Affairs in April 2012, and

(ii) if they determine that the site will be contaminated land, refuse to give prior approval

Para. W(13) allows LPAs to grant prior approval unconditionally or subject to conditions reasonably related to the subject matter of the prior approval.

Transport and highways impacts of the development

Policy Context

Paragraph 115 of the National Planning Policy Framework (NPPF) emphasises the importance of promoting sustainable transport modes, ensuring safe and suitable access for all users, and designing development in accordance with national guidance. It also requires that any significant impacts on the transport network—whether in terms of capacity, congestion, or highway safety—can be mitigated in a cost-effective manner.

Paragraph 116 of the NPPF further clarifies that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network, following mitigation, would be severe.

In terms of locational sustainability, the explanatory PPG and GPDO accept that this is not something that would warrant a reason for refusal under this criterion of Class Q for this type of application, as most former agricultural barns are situated in countryside. The LPA is not therefore

able to assess whether the site's location in open countryside is sustainable in relation to access to services, employment, or facilities. Accordingly, the key matter for assessment for this criterion is the impact of the proposal on highway safety, particularly in relation to the site access and the surrounding local highway network.

Access to the site would be via the existing driveway from Pimperleaze Road, shared with Barrow Street Farmhouse, the farm yard and 'Rose Byre'. There is no evidence of existing highway safety issues associated with this access, which has historically accommodated agricultural vehicle movements, the Highways Officer has commented that the use of the existing access to serve a single dwelling would not result in an unacceptable impact on highway safety, nor would it give rise to a severe impact on the local highway network.

Two off-road parking spaces are proposed and the layout provides sufficient space to enable vehicles to turn within the site. No Highways objection has been raised.

Conclusion

Prior approval in relation to traffic matters would not have been required.

Noise impacts

Paragraph 187(e) of the National Planning Policy Framework (NPPF) requires that planning decisions contribute to and enhance the natural and local environment by ensuring that new and existing development does not contribute to, or is not exposed to, unacceptable levels of noise pollution. This includes preventing development from being put at risk or adversely affected by such impacts.

Further to this, Paragraph 198(a) advises that new development should be appropriate for its location, taking into account the likely effects, including cumulative impacts, of pollution on health, living conditions, and the natural environment. It emphasises the need to mitigate potential adverse impacts arising from noise and to avoid noise that could result in significant harm to health or quality of life.

In the context of this proposal, the key consideration is whether the development would result in, or be exposed to, unacceptable levels of noise, and whether any such impacts can be appropriately mitigated to ensure a suitable living environment.

The change of use of the existing agricultural building into a residential dwelling would not result in adverse noise effects on existing noise-sensitive receptors.

The Council's Public Protection Officer has, however, raised an objection to the likely noise impacts 'for' the future occupiers of this development. These will be discussed in more detail below, within the consideration of the siting and location of the development (criterion (e)).

Conclusion

Prior approval in relation to noise matters would not have been required.

Contamination risks

Policy Context

Paragraph 196 of the National Planning Policy Framework (NPPF) sets out the expectations for planning decisions in relation to land quality and safety. It states that:

- a) Sites must be suitable for their proposed use, taking into account ground conditions and any risks arising from land instability or contamination. This includes risks from natural hazards or former activities such as mining, and any proposed mitigation measures, including land remediation and its potential environmental impacts.
- b) Following any necessary remediation, land should not be capable of being determined as contaminated under Part IIA of the Environmental Protection Act 1990.
- c) Adequate site investigation information, prepared by a competent person, must be available to inform the assessment of these risks.

In the context of this proposal, the Local Planning Authority must be satisfied that the site is not subject to contamination or instability that would render it unsuitable for the proposed use, and that any necessary investigations or mitigation measures have been appropriately considered.

Assessment

Given the previous use of the agricultural barn for agricultural storage, there is potential for some land contamination. The Public Protection Officer has commented that such a matter could however be dealt with by a condition on any decision (if prior approval were to be granted for the development).

Conclusion

Prior approval in relation to potential contamination matters would have been required but could have been dealt with by condition(s) and therefore this matter would not form an additional reason for refusal of this scheme in this instance.

Flooding risks

Policy Context

The NPPF makes clear that inappropriate development in areas at risk of flooding should be avoided by steering development towards areas with the lowest risk, whether that risk is current or future. Where development is necessary in areas at risk, it must be demonstrated that the development can be made safe for its lifetime without increasing flood risk elsewhere.

Assessment

The site is located in Flood Zone 1. It is not therefore considered that there any significant flooding risks at this site and therefore, the proposal satisfies this part of the prior approval assessment.

Conclusion

Prior approval in relation to flood risk matters would not have been required.

Location (impractical or undesirable)

Policy Context

The PPG advises that LPAs should apply a reasonable approach to the assessment of the location being “impractical or undesirable”². It goes on to advise that:

² Planning Practice Guidance - Paragraph: 109 Reference ID: 13-109-20150305, Revision date: 05/03/2015.

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.

Applications should only be refused if there may be circumstances where adverse impacts cannot be mitigated. Impractical or undesirable are not defined in the regulations, but the PPG confirms that Local Planning Authorities 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”.*’ Examples given by the PPG, when looking at location, include an agricultural building on the top of a hill with no road access, power source or other services being impractical; and the location of a 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.

Assessment

In this case, impractical or undesirable relates to the proximity of the proposed dwelling to existing agricultural buildings and adjacent to a slurry pit.

Comments from Public Protection raise concerns about the slurry pit that lies directly to the south of the agricultural building, *“It is important to note that slurry pits can generate strong odours. Consideration should therefore be given as to whether the location and siting of the barn is suitable for the proposed residential use.”.*

The agent has confirmed that the slurry pit is not in active use and has not been for 30 years, when the applicant stopped keeping livestock on the farm. *However*, it is noted that whilst the existing enterprise is an arable farm holding, planning permission would not be required to change some/all of the existing buildings in this farm yard, in very close proximity to the proposed dwellings, from storage to grain storage/drying uses or to be used for the accommodation of livestock and the slurry pit reinstated in the future. Such a use of any of these buildings would further add significant undesirable amenity issues for future occupants in terms of noise and odour.

The Council’s Public Protection Officer has also commented that “there is potential for on-site agricultural activities to adversely affect future occupants of the dwelling, particularly as agricultural activities can occur at unsociable hours.” Clarification was sought from the agent regarding the use of the adjacent barns/farmyard:

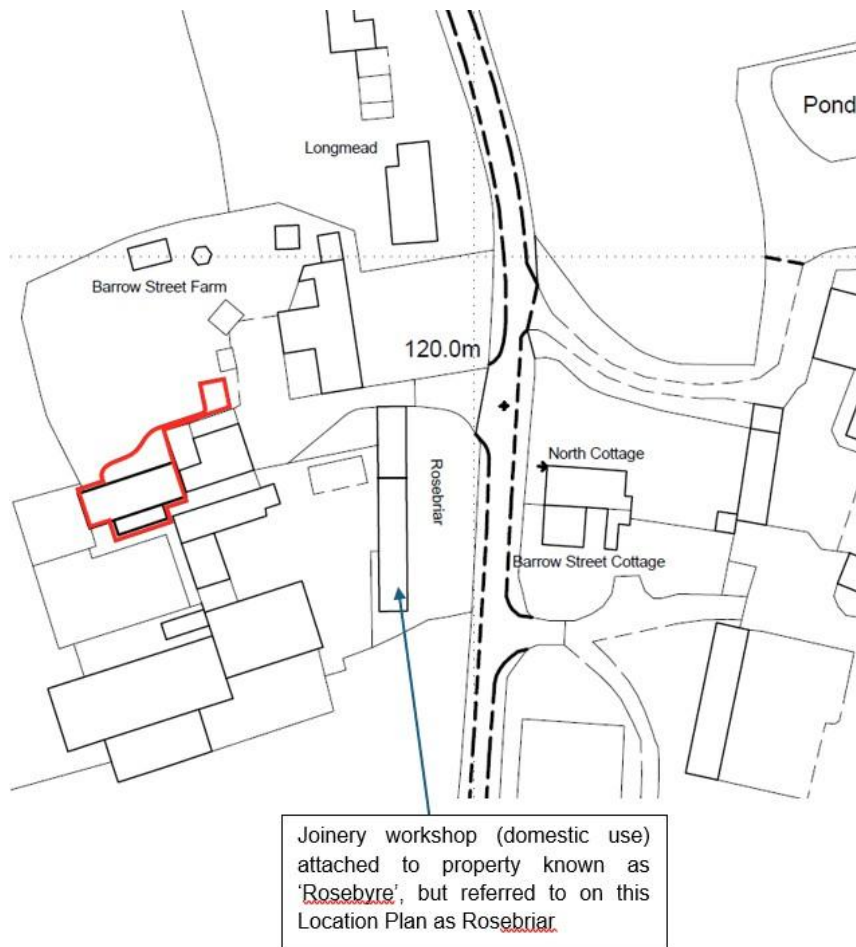
Extract from email 16.06.2026

The agricultural holding extends to approximately 50 acres/ 20+ hectares of permanent pasture, from which fodder crops are taken. There is no livestock kept on the farm (which has been the case for 30 years).

The adjacent farm buildings are used for agricultural storage purposes only, apart from one which is a joinery workshop used by the client.

I believe you also spoke on site about the adjoining former slurry pit, which we would re-emphasise was emptied 30 years ago (when the client stopped keeping livestock on the farm), and is now filled with rainwater harvested from the buildings, so is now in effect a freshwater pond. As such there will be no residential amenity conflicts with the proposed dwelling, in terms of any associated smells, odours etc..

Marked up plan received 22.06.2026



The Public Protection Officer was re-consulted and commented as follows:

Having reviewed the information provided, I remain concerned that future occupants of the proposed dwelling-house could be exposed to noise from the nearby buildings. While I understand that these buildings are currently used for agricultural storage, I am not aware of any planning controls that would prevent them from being used for other agricultural activities in the future. Such changes could result in increased noise levels, which may give rise to adverse noise impacts.

In light of this, we recommend that the application be refused unless occupation of the proposed dwelling-house is tied to the agricultural business in perpetuity.

Therefore, whilst the current operations of the farm holding are noted, it is clear that the buildings/immediately adjacent pond are suitable for livestock use, as they indeed were originally used for such a purpose. There is also no planning mechanism that could restrict the type of farming activities that could take place in the remaining farm buildings/on the site; that could limit the use of the existing buildings to storage only; or that could limit the use of the adjacent pond for freshwater only; or prevent its reinstatement for slurry use; or that could prevent livestock being brought onto the site either intensively or for overwintering in the future; or indeed that would prevent the adjacent buildings being used more intensively for the storage of grain or other agricultural requirements that could result in significant noise, odour and incompatible activity in the immediate vicinity of the proposed residential use. Given the existing building's siting in the middle of an existing farm yard and sharing an access with some of the remaining agricultural

barns, it is therefore considered that this potential future incompatibility of such uses is a significant concern regarding the potential noise impact and practicality and desirability of the site's location.

Whilst conditions restricting occupation of the dwellings to be tied to the agricultural business are sometimes accepted, it is not a standard practice and should only be used in exceptional circumstances on a case-by-case basis. In this instance, the description of the proposed development does not describe the dwelling to be created as an agricultural worker's dwelling, nor does the submitted information propose that such provision is necessary for the functional operation of the agricultural business. It is also noted that the converted stables 'Rosebriar' remains in the same ownership as the agricultural building so could be used for an agricultural worker if such a need was justified

Given its position on such a working farm, the LPA is not satisfied that the proposed use of this building as a residential use would be desirable; and is likely to result in unacceptable living conditions for the future occupants of the dwelling with regards to noise impact, odours, and incompatible activities given the proximity of the adjacent retained agricultural buildings and slurry pit.

Conclusion

The site is considered to be in an undesirable location meaning that prior approval in relation to location matters would have been required and would have been refused on this basis.

Design or external appearance of the building

Policy Context

Paragraph 131 of the National Planning Policy Framework (NPPF) highlights that good design is a fundamental aspect of sustainable development, helping to create better places in which people live and work, and making development more acceptable to communities.

Relevant to this application type, Paragraph 135 sets out key principles to ensure that new development:

- a) Functions well and contributes positively to the overall quality of the area, not just in the short term but over the lifetime of the development;
- b) Is visually attractive through high-quality architecture, thoughtful layout, and effective landscaping;
- c) Is sympathetic to local character and history, including the surrounding built environment and landscape setting;
- d) Creates places that are safe, inclusive, and accessible, promoting health and well-being and providing a high standard of amenity for both existing and future users.

The NPPF also encourages Local Planning Authorities to make appropriate use of design tools and processes to assess and improve the quality of development proposals. This includes reference to national guidance such as the National Design Guide and assessment frameworks like Building for a Healthy Life, which support the delivery of well-designed, contextually appropriate development.

The agricultural building is sited approx. 26m southwest of Grade II Listed Barrow Street Farmhouse. The north elevation faces onto the garden of the farmhouse and whilst not curtilage listed (due to its age), does form part of the setting of the listed building.

The application site lies also within the Special Landscape Area defined by Saved Policy C6 of the Salisbury Local Plan 2011. Within the Special Landscape Area, proposals for development in the countryside will be considered having particular regard to the high quality of the landscape. Where proposals which would not have an adverse effect on the quality on the landscape are acceptable, they will be subject to the following criteria; (i) the siting and scale of development to be sympathetic with the landscape; and (ii) high standards of landscaping and design, using materials which are appropriate to the locality and reflect the character of the area.

An objection has been received from the Conservation Officer, with comments as follows:

In my professional opinion, the existing building detracts from the setting of the farmhouse and the area, in view of its form and materials. Furthermore, the standard 'dutch barn' appearance is not locally distinctive and as such does not contribute to the character of the area.

I note the agent says:

'The proposed development will achieve a good design by responding to local character creating a visually attractive form of development and adding to the overall quality of the area. The suitability of the building for conversion and the robustness of the structure is confirmed in the structural appraisal prepared by Nigel Challis Ltd and is included within the application documents.'

I do not agree that the proposal will achieve a 'good design' that responds to the local character.

It is acknowledged that the prior approval process only allows limited alterations to take place to the building to enable the conversion works and it is therefore likely that the resultant building/dwelling will look little different once converted to the existing/original agricultural building. However, the inclusion of this criterion in the prior approval assessment process suggests that the Local Planning Authority is still able to consider and may still object to the finished appearance and design of the resultant dwelling.

The existing building is in a poor condition and is characterised by low-quality corrugated metal sheet cladding and large open areas in its elevations. The proposal seeks to infill these openings with horizontal timber cladding and introduce domestically scaled doors and windows.

The existing Dutch barn makes no positive contribution to the character of the area and the setting of the adjacent listed building. The proposed design, finish and external appearance of the building as a dwelling are also considered to be of poor quality. The scale and proportions of the structure do not reflect those typically associated with a domestic dwelling, particularly within the countryside and this designated Special Landscape Area.

Fundamentally, the proposal involves the conversion of a building of industrial scale and functional design, constructed using materials typically associated with temporary or agricultural uses. It's insubstantial design and structure was never envisaged, nor is it well-suited, for its long term retention or conversion to permanent residential accommodation. Consequently, the resulting form, scale and materiality are not considered to be compatible with, or reflective of, a high-quality residential use.

Overall, the proposal represents the conversion of a functional agricultural structure not designed for residential use, resulting in a poor-quality form of development, not appropriate to this Special Landscape Area or its sensitive context, which includes the setting of a listed building. The proposal therefore does not satisfy the relevant criterion of the prior approval assessment.

Conclusion

Prior approval in relation to design matters would have been required and would have been refused on this basis.

Provision of Natural Light

Policy Context

The prior approval matter to be assessed under para. Q.2(1)(g) relates to the provision of natural light into habitable rooms of the proposed dwelling.

For the purposes of the Part 3 (change of use) PD rights, para. X of the GPDO defines "habitable rooms" as:

...any rooms used or intended to be used for sleeping or living which are not solely used for cooking purposes, but does not include bath or toilet facilities, service rooms, corridors, laundry rooms, hallways or utility rooms.

Assessment

The proposals show that all habitable rooms are to be served by windows to enable natural light to enter the building. It is therefore considered that the proposal makes provision for adequate natural light in all habitable rooms and thus satisfies this requirement of the prior approval assessment.

Conclusion

Prior approval in relation to natural light matters would not have been required.

CONCLUSION

For the reasons as outlined within this report, the proposed development is considered not to comply with criteria (j) set out in Class Q, paragraph 1 of the GPDO thereby making it development that does not benefit from permitted development rights.

It is also considered that the proposal does not satisfy the requirements of Class Q, paragraph 2 of the GPDO thereby confirming that prior approval of the Local Planning Authority would have been required and would subsequently have been refused.

This is because it is considered that the proposed location and siting of the existing building on an existing active farm; adjacent to agricultural buildings that are and/or could be brought back into intensive agricultural uses; and adjacent to a former slurry pit that could also be brought back into use without further permissions being necessary, is likely to result in significant detrimental harm for the amenities of any future occupiers of the proposed dwelling. The siting and location of the site/building is therefore considered to be impractical and undesirable for a new dwelling. The proposals are therefore considered to be contrary to the provisions of criterion (e) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the GPDO.

The proposals also do not represent an acceptable design or external appearance when viewed within the context of the listed building and Special Landscape Area; and are also therefore contrary to the provisions of criterion (f) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the GPDO.

It is therefore recommended that this prior notification application should be refused; and should the applicant wish to pursue the proposed works, a full planning application would need to be submitted for assessment accordingly.

RECOMMENDATION:

That prior approval be REFUSED.

1. The level of works identified in the submitted plans and documents in order to facilitate the 'conversion' of the former agricultural building to a residential dwelling are considered to go beyond the scope and allowances of criteria (j) of Paragraph Q.1 of Class Q of Part 3 of Schedule 2 to the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended). The proposals are not therefore considered to satisfy all of the criteria of the Class Q provision and do not benefit from the provisions of this change of use permitted development right. Planning permission would instead be required for the proposed works.
2. If the proposals were deemed to be permitted development, by virtue of the building's location on an existing active farm; adjacent to other agricultural buildings and a former slurry pit that could be brought back into intensive agricultural use without any further permissions, the proposed development is likely to result in significant detrimental harm for the amenities of any future occupiers of the proposed dwelling in terms of noise, odour and incompatible activities. The site/building is therefore considered to be in an impractical and undesirable location for a new dwelling and the proposals are therefore contrary to the provisions of criterion (e) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended); the provisions of the National Planning Policy Framework; the National Design Guide; and Wiltshire Core Strategy policy CP57 (Ensuring High Quality Design & Space Shaping).
3. If the proposals were deemed to be permitted development, the proposed design and external appearance of the resultant residential conversion of the existing agricultural barn is not considered to represent a good quality, nor well designed home and will result in a poor-quality form of development, not appropriate to this Special Landscape Area or its sensitive context, which includes the setting of a listed building. The proposals are therefore contrary to the provisions of criterion (f) of Paragraph Q.2 of Class Q of Part 3 of Schedule 2 to the Town & Country Planning (General Permitted Development) (England)

Order 2015 (as amended); the provisions of the National Planning Policy Framework; the National Design Guide; Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990; Wiltshire Core Strategy policies CP57 (Ensuring High Quality Design & Space Shaping) and CP58 (Ensuring the Conservation of the Historic Environment); and saved Salisbury District Local Plan policy C6 - Special Landscape Area of the Salisbury Local Plan 2011.

INFORMATIVE

The documents and plans considered in reaching the above decision are as follows:

Application form, received 07.05.2026

26022-4B - Proposed Plans and Elevations, received 14.05.2026

Barrow Street Farm Barn Structural Appraisal by Nigel Challis Ltd, received 07.05.2026

26022-3 – Proposed Site plan, received 07.05.2026

Covering Letter (26022), received 07.05.2026

Site Photographs (26022), received 07.05.2026

26022-5 – Location Plan, received 07.05.2026

26022-2 – Existing Plans Elevations and Sections, received 07.05.2026

Planning Statement (26022), received 07.05.2026

26022-1 – Existing Site Survey, received 07.05.2026

APPENDIX 1 – PERMITTED DEVELOPMENT CHECKLIST CLASS Q

Class Q – agricultural buildings to dwellinghouses

		Yes / No
Q.	Permitted Development Note: <i>If the answer is "Yes" to any, proceed to assessment under Q.1. If the answer is "No" to all, the proposal does not qualify as permitted development under this class.</i>	
(a)	Does the development consist of change of use of: (i) a building and any land within its curtilage from use as an agricultural building, or (ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage? to a use falling within Class C3 (dwellinghouses)?	Yes
(b)	Does it include development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or	No extension proposed
(c)	Does it include development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building?	Yes
Q.1	Development is not permitted by Class Q if - Note: <i>If the answer to any of the questions below is "Yes", the proposed development would not constitute permitted development under this class</i>	
(a)	Was the site not part of the established agricultural unit: (i) on 24th July 2023, or (ii) where the site became part of the established agricultural unit after 24th July 2023, for a period of at least 10 years before the date development under Class Q begins?	No. The site was in agricultural use before 2023.
(b)	Is the site no longer part of an established agricultural unit and either: (i) Was not part of one on 24 July 2023, (ii) Has not been part of one for at least 10 years before development begins, or (iii) Has been used for any non-agricultural purpose since leaving the unit?	No it is still in agricultural use
(c)	Does any proposed dwelling exceed 150 square metres in floor space?	No, proposed floor space 149m ²

(d)(i)	Would the total number of dwellings on the agricultural unit (including previous Class Q developments) exceed 10?	No, one proposed
(d)(ii)	Would the total cumulative floor space of all dwellings on the unit exceed 1,000 square metres?	No, 149m ²
(e)	Is the site occupied under an agricultural tenancy without written consent from both landlord and tenant?	No
(f)	Was an agricultural tenancy terminated less than 1 year before development begins for the purpose of Class Q development, without written agreement that the site is no longer needed for agriculture?	No
(g)	Has development under Class A(a) or B(a) of Part 6 (agricultural buildings/operations) occurred on the unit within the last 10 years?	No
(h)	Would the development extend the building beyond its existing external dimensions, except for: (i) Extensions allowed under Q.1(i), or (ii) Protrusions up to 0.2m allowed under Q.1(j)(i)?	No
(i)	Would the proposed extension: (i) Have more than one storey? (ii) Be sited anywhere other than the rear? (iii) Extend more than 4m beyond the rear wall? (iv) Have eaves higher than the existing building? (v) Be taller than the highest part of the roof or 4m above ground? (vi) Extend beyond a side or principal elevation? (vii) Be sited on land not covered by a hard surface installed before 24 July 2023 or not in place for at least 10 years?	N/A
(j)	Would the building operations include anything other than: (i) Installation/replacement of windows, doors, roofs, exterior walls, or services, or (ii) Partial demolition reasonably necessary for those operations?	Yes – see report above
(k)	Is the site located on article 2(3) land (e.g., National Parks, AONBs, conservation areas)?	No
(l)	Is the site or any part of it: (i) A Site of Special Scientific Interest? (ii) A safety hazard area? (iii) A military explosives storage area?	No
(m)	Is the site or any part of it a scheduled monument?	No

(n)	Is the building a listed building?	No – within curtilage of a listed building.
(o)	Would the converted building (excluding extensions) fail to meet the nationally described space standard?	No, the NDSS require 3 bed, 2 person, single storey units to be at least 95m ² in size
(p)	Does the building lack suitable existing access to a public highway?	No