

17th July 2026

Our Ref: SWLC.LPC6391

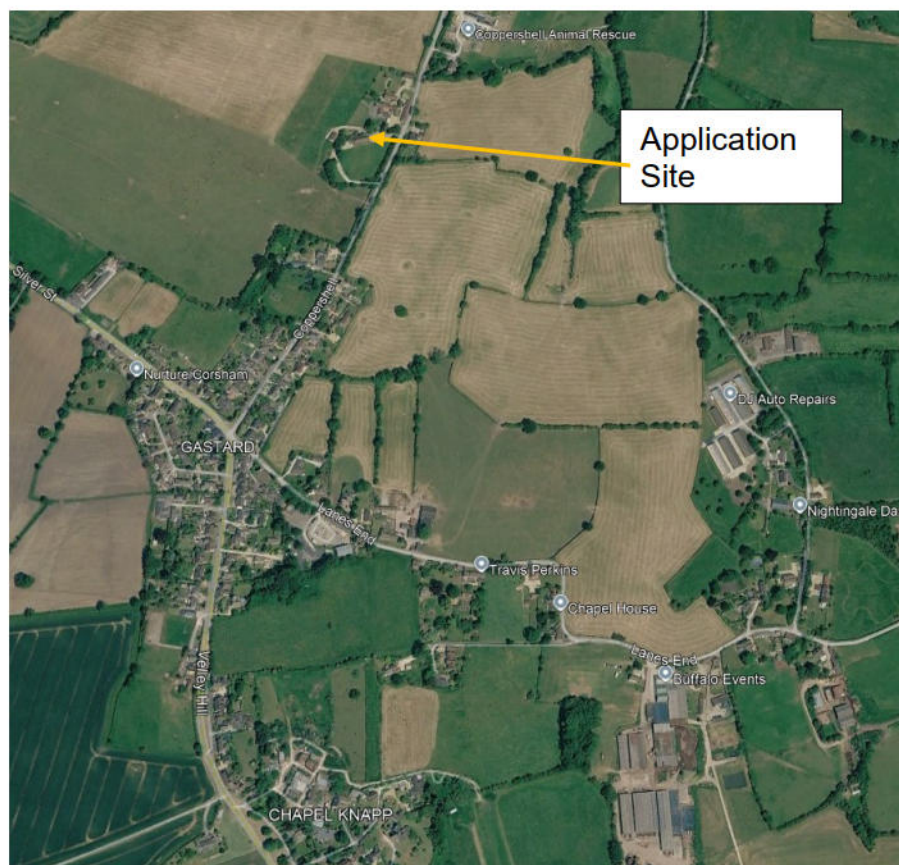
Development Services – North
Wiltshire Council
Monkton Park
Chippenham
Wiltshire
SN15 1ER

Dear Sir/Madam

Town and Country Planning Act 1990
Re: The Old Stables, Gastard, Corsham, SN13 9PZ –
Use of premises as self-contained dwelling

Please find enclosed a duly completed planning application intended to authorise the change of use of the existing holiday let (Class C3), as an unrestricted dwelling, which is of course in the same Use Class.

The property in question is known as The Old Stables, Catherine Court Farm, Coppershell, Gastard, Corsham, Wiltshire, SN13 9PZ. Its location is shown on the aerial photograph inserted below.



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GLOS, GL8 8SQ
Tel: 01285 841433
www.lpctrull.com

Your Council's planning records will of course show that a similar proposal was withdrawn by application 16/11121/FUL and was in fact refused previously by application 14/07060/FUL¹, which was dismissed at appeal.

After the withdrawal of the above mentioned application a further submission was presented (17/05852/FUL) but was also resisted. The key issue was that insufficient evidence was said to have been presented indicating that sequentially uses were not practical propositions.

It is the purpose of the enclosed application to reflect the more recent material change in circumstances that mean the single holiday let, which is closely related to my client's house, and therefore is not practical to manage by another remotely is not viable, as she reasonably wishes to retire.

Moreover, there has been an ever-increasing reduction in bookings, as competition has grown in recent years. Accordingly, the premises are an underused residential resource, which, given the substantial shortfall in local housing supply, would be best used for open market accommodation.

The above mentioned appeal decision succinctly described the application as

'...a rural building that has previously been converted into holiday accommodation. ... The site is located a short walk outside of the small village of Gastard and is a relatively short drive from the larger town of Corsham'.

The well-appointed nature of the existing accommodation is shown by the following sample photographs extracted from the related webpage particulars.

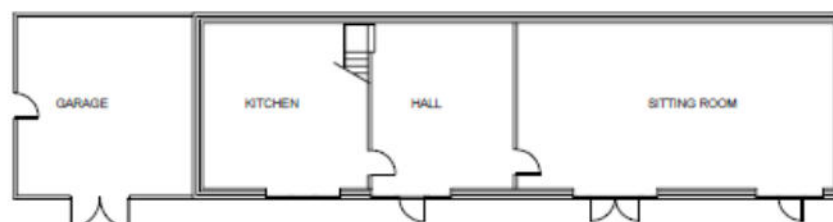


¹ Appendix 1 - 14/07060/FUL

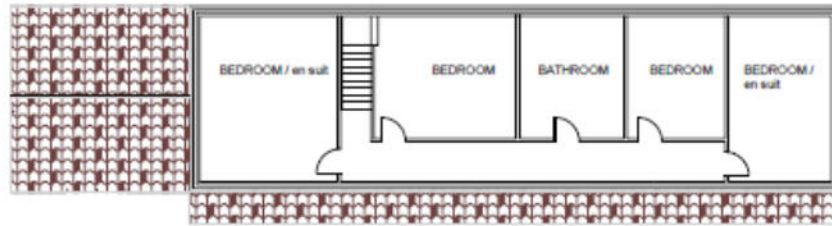


The premises are advertised online using the well-used/known Rural Retreats webpage/agency.

The plan extracts below shows that the property is a three bedroomed unit and provides a suitable residential floor space to adequately serve the proposed independent use proposed.



GROUND FLOR PLAN



FIRST FLOOR PLAN

More recently, permission was again refused by application 20/09979/FUL² to change the holiday use and for completeness I have inserted the two reasons for refusal provided at that time, and which are believed to reflect the relevant planning policy framework to be addressed by this new application, showing those material considerations that weigh against the same applicability.

1.

The proposed development, by reason of its remote location in the open countryside and in the absence of robust evidence indicating that sequentially preferable uses are not practical propositions, would represent an unsustainable form of new residential development. As such, the proposals are contrary to Core Policies 1, 2, 11 and 48 of the adopted Wiltshire Core Strategy (Jan 2015), Saved Policy H4 of the North Wiltshire Local Plan (June 2006) and Paragraphs 11, 38 and 79 of the National Planning Policy Framework.

2.

The proposal, located remote from a range of services, employment opportunities and being unlikely to be well served by public transport, is contrary to the key aims of local and national sustainable transport policy guidance which seeks to reduce growth in the length and number of motorised journeys. New development should be located and designed to reduce the need to travel by private car and should encourage the use of sustainable transport alternatives. The proposal is contrary to Core Policies 60 and 61 of the adopted Wiltshire Core Strategy (Jan 2015) and Paragraphs 102, 103, 108 and 110 of the National Planning Policy Framework (June 2019).

There is common ground that the proposed residential curtilage is modest in size and associated residential paraphernalia is therefore unlikely to have a more adverse effect on the rural character of the area, by comparison with the existing use.

Furthermore, the proposal would not result in harm to neighbouring amenity at the adjoining farmhouse, and there would be adequate amenity for The Old Stables. The site is also capable of providing adequate access, parking and turning facilities.

What of course has not been agreed to date is that the original grant of permission for the building's holiday let use by application 05/03266/COU is no longer practical,

² Appendix 2 - 20/09979/FUL

and that the current planning policy framework, that sequentially favours commercial, tourism and community uses should not be strictly applied.

The application site is of course to all intents and purposes a 'brownfield' site, and the premises are in a C3 use, albeit conditionally restricted for holiday let use (see 09/00752/S73A). The proposed residential use should therefore be assessed in terms of its sustainable contribution to boosting your Council's long established poor housing supply.

I have had reason to explore these same arguments elsewhere in Wiltshire and would like to set the scene so to speak by reviewing the matters considered on these comparable occasions.

By applications PL/2025/04687³ and PL/2025/04688⁴ The Dairy, Walnut Tree Cottage and Oak Tree Cottage, Church Farm, Broughton Gifford were all approved as unrestricted residential properties, having previously been limited as holiday lets.

The officer's combined decision report identified some conflict with policy CP2 to the Wiltshire Core Strategy (WCS), however, the officer said although, 'It is relevant to consider that the buildings have already been converted' it was also considered that, 'arguably the proposal is a form of 'reuse' making CP48 relevant. This policy is considered to be a relevant material consideration providing a context for how reuse of rural buildings ought to be considered as an exemption to the settlement and delivery strategy for new housing under CP1 and CP2, whereas set out above there is conflict.'

The report noted the continued compliance with the assessment criteria to policy CP48 and made the following conclusion, which is believed to be directly applicable to the enclosed application.

'In summary it is considered that this is a form of development that does not neatly fit within the development plan policy considerations. As set out above, there is some principal conflict with CP1, CP2, CP15 and CP48 of the development plan in relation to the provision of 3 new open market homes reusing rural buildings that are currently holiday lets. However, the detailed criteria within CP2 and CP48 have been given some consideration and in these terms, there is little if any demonstrable harm.'

Furthermore, in assessing that 'harm' the report gave weight as is obviously necessary to all material considerations and I've therefore reproduced in full the reference to the five year housing supply.

'It is important to note that the proposals would provide 3 dwellingshouses with unrestricted occupation. This would be positive in terms of meeting the clearly established need for more housing within Wiltshire. There is currently a housing land supply of 2.42 years. This is less than the required 5 years and this means that the development policies are out of date with regard to paragraph 11d of the NPPF. Whilst the site is within a

³ Appendix 3 – PL/2025/04687

⁴ Appendix 4 – PL/2025/04688

designated heritage asset (CA) and the setting of a Grade I listed building I have identified that no harm to these assets would occur. Indeed some minor enhancement would be achieved. Given this and that no other strong reason for refusing the development has been found having regard to “protected areas or assets of particular importance” then the tilted balance of paragraph 11d is engaged.

Planning benefits:

The proposals would result in a number of planning benefits including:

- the provision of unrestricted housing within a county that has an identified need;
- the proposals would provide a range of accommodation including 1- and 2-bedroom housing;
- provision of additional occupation in the village that can help to support local rural services and facilities;
- provision of income from taxes including items such as Council Tax receipts;
- enhancements to the character and appearance of the CA;
- modest enhancements to the setting of a Grade I listed building;
- provision of additional employment through the construction period;
- modest enhancements to on-site drainage;
- making an effective use of the land; and
- supporting an established agricultural activity which has invested in a holiday let diversification project and finds it is no longer commercially beneficial.

The lack of any objections to any of the 3 applications is material to the application.

Many of these benefits would be proportionate to the limited scale of development (3 homes) and this means that they attract only modest weight in favour of granting planning approval.

The harms that have been identified are a technical principle conflict with the development plan at CP1, CP2, CP15, CP48, CP60 and CP61 in relation to the creation of new dwellings in a small village or open countryside location where there will be a reliance on the private car for most journeys. However, the harm and weight that is afforded to this is diminished because the dwellings are existing albeit with restricted occupation.

Therefore, in conclusion it is assessed that there are no protected areas or assets of particular importance that provide a strong reason for refusing the proposed development. Furthermore, there are various benefits that weigh in favour of granting consent based on the specific circumstances of this particular set of 3 planning applications. The harms that have been identified against the development plan do not significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF taken as a whole.’

Obviously, the application proposal is already there and as a holiday let is car dependant, arguably involving greater daily movements by the visitors, who could have travelled from anywhere across the UK. There is no evidence that suggests a single residential use would be any more car dependant.

More recently permission has been granted for three other properties, that are more rurally based than the Broughton Gifford site removing their previous holiday let limitations at Nables Farm, Scotland Hill, Upper Seagry, SN15 5HB. The property names and planning references are listed below

- PL/2025/04856-The Anchorage⁵
- PL/2026/01155-Woodman Cottage⁶
- PL/2026/01154-Oxen Cottage⁷

Drawing on the officer's decision reports in respect of all three applications noted that the neighbouring properties are located outside of any defined settlement limits, in open countryside.

Regarding application PL/2025/04856 it is important to note that the holiday restriction was imposed relatively recently by application PL/2023/06342 and the officer's report under the heading 'benefits and harm' said.

'This scheme relates to housing development and, whilst for one dwelling only and consequently representing only a very minor benefit to the housing supply for Wiltshire, granting permission would result in a net increase to the number of residential units should the development be completed which would consequently bring about some benefit to the housing supply for Wiltshire.

Different to when application PL/2023/06342 was determined, the current HLS position is such that great weight must be attached to the overall benefit that any proposed new dwelling would have on the HLS for Wiltshire.

Potential harm has, however, been identified by virtue of the site being in an unsustainable location and planning balance must be applied to determine whether the scheme is acceptable'.

That planning balance concluded, 'No other adverse impacts (which cannot reasonably be conditioned in order to fully mitigate the harm) have been identified as part of assessing this application, however. On (sic) this occasion, taking fully into account the titled balance, the benefit to the HLS for Wiltshire that a single dwelling would bring (whilst understandably only modest) would outweigh the identified harm.'

The history for the Old Stables is similarly from a different era, before the tilted balance.

Oxen Cottage and Woodman cottage were determined at the same time. It was agreed again that the sites' locations, being within the countryside and remote from any defined settlement did not align with the spatial strategy of the development plan. The policy assessment from the officer's decision report for Oxen Cottage is inserted below in full.

⁵ Appendix 5 – PL/2025/04856

⁶ Appendix 6 – PL/2026/01154

⁷ Appendix 7 – PL/2026/01155

‘Assessment

The site location being within the countryside and remote from any defined settlement does not align with the spatial strategy of the development plan, should new housing development be proposed. The WCS includes Core Policy 39 that relates to tourism development, including accommodation. However, CP39 does not aim to protect holiday accommodation and broadly aims to direct new tourist accommodation to the larger settlements.

However, in this case, as the building is an existing former rural building the LPA considers that Core Policy 48 and the policy advice of the NPPF are most relevant.

It is not considered there is any conflict with the aims of criteria i, ii or iii of CP48 and criterion v is not relevant. Criteria iv, whether future occupiers would have “reasonable access to local services” requires some consideration as does the justification for allowing the holiday accommodation use to be lost.

The CP48 policy requirement to provide “reasonable access to local services” is considered to be less stringent than the policy requirements set out within CP1 and CP2 in relation to entirely new housing development. The advice of para. 83 of the NPPF is also relevant to this application:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

Firstly, the nearest local services to the site would be within the small village of Upper Seagry that has a pub/restaurant, recreation grounds, primary school and a community hall. The site is located approximately 1.2km from the village accessed via unlit, rural lanes with no footpaths. As such, it is highly likely to be the case that private motor vehicles would be relied upon to access the village from the site. There would also be a requirement for future occupiers to travel further afield to Chippenham or potentially Malmesbury to access healthcare, secondary schools and larger shopping and employment areas.

However, whilst not a suitable location for new housing the LPA considers that “reasonable access” would exist to future occupiers in line with the requirements of CP48 that does not intend to only permit the conversion of rural buildings within sustainable settlements. The LPA must also consider the proposal in line with the aims of NPPF para. 11d. The provision of one dwelling (two when considering the adjacent application for Woodmans Cottage), would still result in a small net increase to the number of residential units which would consequently bring about some benefit to the housing land supply (HLS) for Wiltshire. The permanent occupation of the site would also reasonably be considered to provide some support to the local services within the nearby village of Upper Seagry.

Turning to the loss of the holiday accommodation, it is of note that the 2023 removal of condition application was refused as insufficient information had been provided to justify

the loss of the holiday accommodation use (as well as due to the location and inability of the s.73 application to be able to alter the description of the development). At the time of that refusal, the council was able to demonstrate up-to-date housing policies (4yrHLS due to the NPPF policies at the time of that determination). However, given that the HLS position is now closer to 2.4yrHLS the weight given to the WCS new housing policies is diminished. As such, the LPA considers that greater weight should be applied to the housing that would be delivered and it is not considered there is sufficient reason or policy justification for the LPA to resist the loss of the holiday let use.

Conclusion

Whilst not compliant with the aims of CP1 or 2 of the WCS, the site location is considered to comply with the aims of CP48 and the benefits of the housing development to the council's HLS and support to the local rural community and services outweigh any minor harm due to the site location. The LPA is therefore able to support the principle of the development at this time.'

The change in circumstances over time are clearly directly applicable to the assessment of the enclosed application and also like the above properties it should be stressed that the proposal complies with the aims of Core Policies 60, 61, 62 and 64 of the WCS insofar as the development would not adversely impact upon the safety or the operation of the public highway in the locality of the site. The site already has an established use that generates traffic and requires refuse collection etc and the available parking can be conditionally retained.

The housing supply position is, I believe undisputed, however in the interests of completeness I would highlight that the NPPF states it is important that a sufficient amount and variety of land can come forward where it is needed to support the Government's objective of significantly boosting the supply of homes" (paragraph 61). The level of need identified within the development plan should not be seen an upper limit, and new development that is otherwise sustainable should not automatically be refused, in particular in the context of the NPPF updates and the Council's housing land supply position.

The Council's most up to date Housing Land Supply Statement (Base Date: April 2026 / Published: June 2026) details that it has 2.8 years of deliverable housing land supply. The intention of the emerging Wiltshire Local Plan (WLP) was to identify future levels of need for new homes and employment land over the period 2020-2038, however, the evidence that underpins the draft WLP was prepared in accordance with the now superseded December 2023 version of the NPPF, and critically it has been found to be unsound and will not proceed beyond the Examination process.

The Council will not therefore be able to demonstrate a five year Housing Land Supply position for years to come and therefore its previous Briefing Note (No.24-20 – December 2024)⁸, which set out the implications of the new NPPF and revisions to the standard methodology on its housing land supply position, comes

⁸ Appendix 8 – Council Briefing Note 2024

into greater focus and carries even greater weight when considering applications for residential development. It explains that due to the change to the standard methodology, which is used to calculate local housing need, the number of homes the Council must plan for on an annual basis has increased from 1,917 to 3,525 (the annual Local Housing Need figure), an increase of 84%.

The Briefing Note explains that “the changes to the NPPF now require Wiltshire to demonstrate a five-year housing land supply, including a 5% buffer, and must apply the revised Local Housing Need for decision-taking immediately”. When the revised Local Housing Need figure is considered against the Council’s Housing Land Supply figures which can be delivered within five years, it resulted in a 2.03 years supply (now 2.8 years supply).

The Council therefore confirms that the tilted balance should be applied to housing applications and highlights that “the magnitude of the shortfall in supply is now substantial and the weight to be given to improving housing supply greater compared to when the council had a more marginal supply” The Council also advises within the Briefing Note that the application of the presumption in favour of sustainable development should be considered within the national aim of radically boosting the supply of housing.

The Director of Planning clearly advises within the Briefing Note that “To meet this increased buffer, the council will need to continue to approve planning applications to ensure a sufficient housing land supply can continue to be met at, and beyond, this date” (emphasis added).

The Spatial Strategy of the WCS is now out of date and the Council has a significant housing land supply shortfall. The Council’s Housing Land Supply position and the weight to be attributed to the Spatial Strategy of the WCS was under focus at the Glenmore Farm appeal mentioned above (reference 3345598). The Council did not defend the appeal due to its Housing Land Supply Position, and the Inspector stated the following within the decision notice dated 21 January 2025:-

‘41. Aside from the emerging Local Plan, which has only just been submitted for Examination, there is no other obvious remedy to the shortfall in the short or medium term. This overall position indicates that the development plan is failing to meet its strategic challenges. Thus, its settlement strategy and limits of development are not working effectively. These policies are therefore of limited weight, as is the conflict with them.’

The weight to be attributed to the Local Plan has further diminished following the withdrawal of the draft Wiltshire Local Plan from the Examination process. A recent appeal (3374421)⁹ for a residential scheme in Melksham highlighted the perilous position the Council finds itself in and the extreme need to support and deliver new housing schemes. The Inspector noted the following about the housing need position:

⁹ Appendix 9 – 3374421 – Appeal Decision

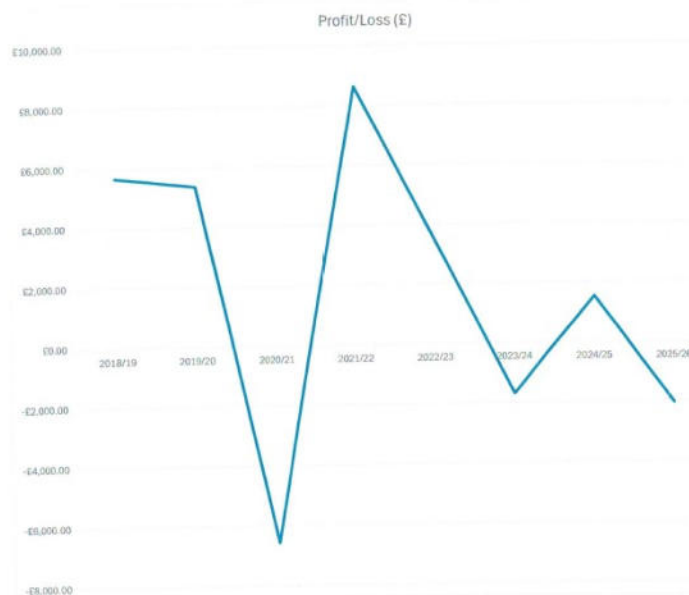
'12 ... the minimum housing target expressed in the CS of 42,000 homes over the plan period was not met, with a shortfall of around 1000 homes. Exacerbating this is the Council's five-year housing land supply shortfall of over 9,500 dwellings and a separate affordable housing need of over 1,200. It is inevitable and accepted by the Council, that permission for housing will need to be granted on unallocated greenfield sites even though that will conflict with CS Policies CP2 and CP15.'

The Inspector went on to outline the implications of the withdrawal of the draft Wiltshire Local Plan from Examination:

'14. The implication of this is that there will not be a strategic plan in place to lead development in Wiltshire for the foreseeable future. Importantly there will be no plan led mechanism to rectify the housing land supply shortfall, thus making it ever more pressing that housing continues to come forward in a timely manner in sustainable locations such as Melksham. The appeal site is well related to the existing built-up area and would form a logical extension to this part of the town.'

In light of the above, due to the age of the WCS and the substantial shortfall in housing land supply, it is considered that limited weight should be attributed to any possible perceived conflict with the Spatial Strategy of the WCS, which as noted above it is not working effectively and is failing to deliver housing in a strategic planned way. This is of course supported by the comparable planning decisions I have outlined.

As you will see the viability of the sequentially preferential uses outlined in policy CP48 is no longer determinative and is of course not supported in the NPPF. It is a fact though that the catalyst for the making of this new application, setting aside the planning history, is because the holiday let is no longer a financially attractive commercial operation and as my client, who runs the business from the adjacent property, so as to be on hand as needed and can manage a turnaround without having to travel from afar, reasonably wishes to retire.



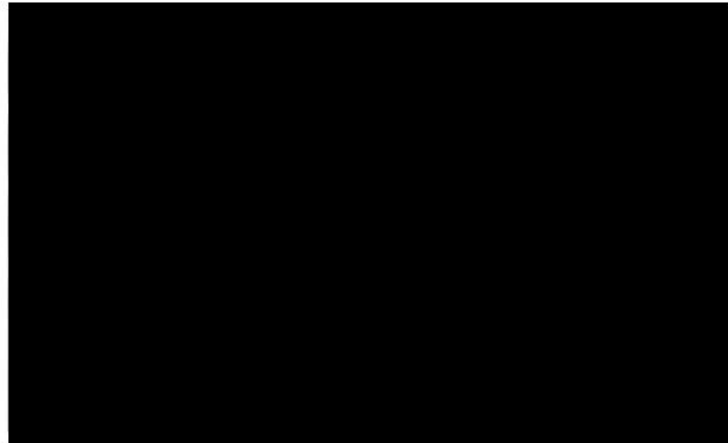
The graphed profits and loss chart on the previous page, taking out the Covid bounce back and of course government support payments during that period, shows a progressive reduction in viability.

The following chart provides the financial breakdown as plotted on the previous page and further to which I would respectfully request that the figures are redacted when placed online. The profit, being my client's takings and before tax and any new investment needed for the coming year are very modest and not sufficient to justify the time commitment and need to be on hand at many unsociable hours.

Susan Tunbridge
The Old Stables - holiday home
Profit & loss Account
Rental Income

Agents commission
Welcome Pack
Turnaround cleaning & laundry
Repairs and renewals
Utilities - light & heat
Sewage & environmental
Garden maintenance
Insurance
Subscriptions
Accountancy
Mileage
Mortgage interest

Profit/Loss



The reality of the nature of the change of the business is believed to derive from the increased competition and the number of annual bookings recorded between April to March as listed below highlights the significant reducing trend.

Days Booked

2018/19 - 132
2019/20 - 123
2020/21 - 54
2021/22 - 107
2022/23 - 100
2023/24 - 75
2024/25 - 97
2025/26 - 72

As already said, and particularly regarding the Nables Farm assessment it makes it clear that the sequential preference for tourist accommodation is not determinative, as the need for new housing carries substantial weight, and as the application premises is not considered to conflict with the aims of criteria i, ii or iii of CP48 and criterion v is not relevant. Criteria iv, whether future occupiers would have "reasonable access to local services" underpins the sustainability balance. In that regard of course it must be stress that visitors to the area not only travel great distances to the property but will undoubtedly drive out for different excursions and for food and drink etc.

The nearest local services to the site would be within the small village of Gastard that has a pub/restaurant, Village Hall, Church and garage. The site is located

approximately 480m from the village on Coppershell, which has a footpath over half the length, and is built up on either side. There is a reasonable prospect of some trips to the village being on foot or cycle. There would be a requirement for future occupiers to travel further afield to Chippenham or Corsham to access healthcare, schools and larger shopping and employment areas. In the main this would be car dependant, although there is an advertised bus service available, and within a reasonable walking distance.

Key Bus Services in Gastard:Service

69: This service directly links Gastard (with stops at the Harp and Crown and Village Hall) to Corsham, Melksham, Bradford-on-Avon, and Trowbridge Service

555: A school and localized route linking Bowerhill to the Corsham School, running through Gastard Service

10: Operates as a local link through Corsham and occasionally serves Gastard depending on specific routing updates.

The 69¹⁰ service runs Mondays to Saturdays leaving Gastard at 07.19 during the week and returning 18.08. On Saturdays the service runs from 09.40 to 18.33. This is a reasonable service and offers a true alternative to the private car.

Overall, the site is not isolated, and it is strongly maintained that “reasonable access” would exist to future occupiers in line with the requirements of CP48 that does not intend to only permit the conversion of rural buildings within sustainable settlements.

I would restate therefore that your Council must consequently consider the proposal in line with the aims of NPPF para. 11d. The provision of one dwelling would still result in a small net increase to the number of residential units which would consequently bring about some benefit to the housing land supply (HLS) for Wiltshire. The permanent occupation of the site would also reasonably be considered to provide some support to the local services within the nearby village of Gastard, and as noted at paragraph 83 to the NPPF, ‘Where there are groups of smaller settlements, development in one village may support services in a village nearby’, in this case including Lacock and the villages south of Corsham’s growth areas.

Overall, in conclusion whilst it is acknowledged that new built housing would not be compliant with the aims of CP1 or 2 of the WCS, the site’s location is considered to comply with the aims of CP48 and the benefits of the housing development to the council’s HLS and support to the local rural community and services outweighing any minor harm due to the site location. The Council is therefore strongly encouraged to assess this proposal afresh, distinct from the history and inline to the comparable examples highlighted so as to support the principle of the development at this time, wholly in accord with the tilted balance outlined earlier.

¹⁰ Appendix 10 – Service 69 Bus Timetable

I believe the case made has been fully explained however if there are any questions to ensure your support, please do not hesitate to contact me direct.

Yours faithfully



Simon Chambers
Director

Enc.

Cc Mrs S Tunbridge