

13<sup>th</sup> August 2026

Our Ref: SWLC.LPC237

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

Dear Sir/Madam

**Town and Country Planning (General Permitted Development) (England)**  
**Order 2015 (as amended) – Part 3, Class Q –**  
**Conversion of existing buildings at Lower Hook Farm, Hook,**  
**Royal Wootton Bassett, SN4 8EF, to create 6No dwellings**

Please find enclosed a duly completed application made pursuant to the above permitted rights, so as to convert the existing buildings to provide 6No new dwellings. The farm site shown in the aerial photograph extract below includes two previously approved office diversification conversions in the south eastern corner of the built grouping and to the west of that there are 2No holiday lets, that have also reused existing farm buildings. The enclosed application seeks to convert two other farm buildings and remove three separate buildings to improve the space for the residential conversions proposed, and to the rear of the existing holiday lets.



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Specifically, the application is made pursuant to Class Q (a), (i) and (c). The buildings in question are 'part of an established agricultural unit', and the change of use includes the 'building operations reasonably necessary to convert the building'.

The fundamental change made by Statutory Instrument 2024 No 579 is that it is no longer necessary to demonstrate an established, active or historic agricultural use of the application buildings. The principle of redeveloping the buildings, on this well-established agricultural unit, therefore falls full square within the Class Q permitted tolerances.

The application comprises the following listed plans, together with a structural assessment (prepared by Structures 2) of the buildings' robustness and suitability for reuse within the tolerances of Class Q

- LPC 237 EX 01 - Location Plan
- LPC 237 EX 12 – Existing Barns B Plan
- LPC 237 EX 13 – Existing Barns B Elevations
- LPC 237 EX 14 – Existing Barns E Plan and Elevations
- LPC 237 EX 101 – Existing Site Plan
- LPC 237 PR 01 – Proposed Site Plan
- LPC 237 PR 11 – Proposed Barns B Plan
- LPC 237 PR 12 – Proposed Barns B Elevations

Moving on, as you will be aware the Prior Approval application enclosed requires assessment in principle against those matters at Q.1 (a) to (p), that determine if it is permitted development. The Prior Approval is then required to satisfy those conditions at Q.2 (a) to (g).

Accordingly, examining the permitted development provisos first, it is the case for the applicant that the existing buildings have clearly been present as part of an established agricultural unit (**Holding Number 0345 050 1234**) so that Q.1 (a) (i) is satisfied, and (b) is not applicable.

The most recent planning history on the site involved the refusal for the reuse of the building towards the north eastern corner of the built grouping, pursuant to the then applicable Class M rights to the above Order, regarding the introduction of a commercial use. Application 14/04510/PNCOU was refused on the basis insufficient highway information had been submitted but the decision report helpfully noted that the building had been in an agricultural storage use since 3<sup>rd</sup> July 2012, being the relevant trigger date to Class M. It is material though that it has continued to be so used and still is and the Class Q relevant trigger date is of course 24<sup>th</sup> July 2023.

In this regard I have inserted on the following page an extract from the farm accounts (in the name of Mr and Mrs J B Hick since 1<sup>st</sup> October 2022 to 31<sup>st</sup> March 2024 and then to 31<sup>st</sup> March 2025, being the last set available) which shows the listed sources of income (although for privacy I have removed the actual figures). Nevertheless, the formatted income confirms that the buildings as one group are not only clearly physically part of the farm unit but also remain part of the single operation, providing

revenue, for the part rental of a storage space, in addition to the functional use for farm storage, thus satisfying the above test.

**Detailed Profit and Loss Account  
for the Period 1st October 2022 to 31st March 2024**

|                        | Period<br>1/10/22 to 31/3/24 |       | Year ended<br>30/9/22 |       |
|------------------------|------------------------------|-------|-----------------------|-------|
|                        | £                            | £     | £                     | £     |
| <b>Income</b>          |                              |       |                       |       |
| Contract work          |                              |       |                       |       |
| Share farming          |                              |       |                       |       |
| Grasskeep              |                              |       |                       |       |
|                        |                              | _____ |                       | _____ |
| Basic payment scheme   |                              |       |                       |       |
|                        |                              | _____ |                       | _____ |
| <b>GROSS OUTPUT</b>    |                              |       |                       |       |
| <b>Other income</b>    |                              |       |                       |       |
| Wayleave               |                              |       |                       |       |
| Rent and storage       |                              |       |                       |       |
| Bank interest received |                              |       |                       |       |
|                        | _____                        | _____ | _____                 | _____ |
| Carried forward        |                              |       |                       |       |

**Detailed Profit and Loss Account  
for the Period 1st October 2022 to 31st March 2024**

|                        | Period<br>1/10/22 to 31/3/24 |       | Year ended<br>30/9/22 |       |
|------------------------|------------------------------|-------|-----------------------|-------|
|                        | £                            | £     | £                     | £     |
| <b>Income</b>          |                              |       |                       |       |
| Contract work          |                              |       |                       |       |
| Share farming          |                              |       |                       |       |
| Grasskeep              |                              |       |                       |       |
|                        |                              | _____ |                       | _____ |
| Basic payment scheme   |                              |       |                       |       |
|                        |                              | _____ |                       | _____ |
| <b>GROSS OUTPUT</b>    |                              |       |                       |       |
| <b>Other income</b>    |                              |       |                       |       |
| Wayleave               |                              |       |                       |       |
| Rent and storage       |                              |       |                       |       |
| Bank interest received |                              |       |                       |       |
|                        | _____                        | _____ | _____                 | _____ |
| Carried forward        |                              |       |                       |       |

The floor spaces of the new dwellings proposed do not exceed 150m<sup>2</sup> (the differing areas are shown on the following page for each unit), thus satisfying Q.1 (c). No other Class Q development has been executed on the unit so the cumulative figures at Q.1 (d) (i) and (ii) are not exceeded either (total floor space for all 6 units 706m<sup>2</sup>).

| (m <sup>2</sup> ) | GIA | Footprint | Curtilage |
|-------------------|-----|-----------|-----------|
| Unit 1            | 115 | 136       | 136       |
| Unit 2            | 115 | 133.4     | 133       |
| Unit 3            | 116 | 138       | 136.7     |
| Unit 4            | 120 | 98.25     | 98.2      |
| Unit 5            | 120 | 93.9      | 67        |
| Unit 6            | 120 | 96        | 94.6      |

Drawing No LPC 237 PR 11 enclosed includes the floor plan and built footprint dimensions together with the associated block plan (LPC 237 PR 01) which shows the associated curtilage areas relative to the unit's footprint sizes, satisfying the relevant provisions at Q.3. Parking is shown outside the identified curtilage areas but as you will be aware this is typical and there is no requirement within the terms of the Prior Approval application that indicate this is not acceptable and the parking must be within the defined new curtilage. Its provision can of course be conditionally controlled, utilising as it does the existing communal yard areas.

Q1 (e) requires that the site is not occupied under an agricultural tenancy, unless the express consent of both the landlord and the tenant has been obtained. That is not applicable though as no tenancy agreement exists. Q1 (f) is not applicable either as no tenancy agreement has existed 'less than 1 year before the date development begins'.

Q1 (g), regarding development under Class A(a) or Class B(a) of Part 6 of this Schedule (agricultural buildings and operations) is not relevant as no such Prior Approval development has been carried out on the established agricultural unit during the period which is 10 years before the date development under this proposed Class Q will begin.

Q1 (h) requires that the development should not result in the external dimensions of the building extending beyond the external dimensions of the existing building at any given point, other than—

- (i) extension of the building allowed by paragraph Q.1(i);
- (ii) protrusions of up to 0.2 metres to accommodate building operations allowed by paragraph Q.1(j)(i).

The submitted plans and related commentary following help to confirm these relevant physical changes are not exceeded.

Q1 (i) indicates that the development under Class Q(b) should not result in an extension that—

- (i) has more than one storey,
- (ii) is sited anywhere other than to the rear of the existing building,
- (iii) extends beyond the rear wall of the existing building by more than 4 metres,
- (iv) has eaves the height of which exceed the height of the eaves of the existing building,
- (v) is higher than whichever is the lower of—
  - (aa) the highest part of the roof of the existing building, or
  - (bb) a height of 4 metres above the ground,

- (vi) extends beyond a wall that forms a side or principal elevation of the existing building, or
- (vii) would be sited on land that, before the development under Class Q(b), is not covered by a hard surface that was provided on the land by virtue of any development, and—
  - (aa) the hard surface was not provided on the land on or before 24th July 2023, or
  - (bb) where the hard surface was provided on the land after 24th July 2023, the hard surface has not been situated on the land for a period of at least 10 years before the date development under Class Q(b) begins.

There are no extensions proposed and therefore this item (i) is not applicable.

Q1 (j) defines the building operations permitted and, in that regard, I trust the photographs inserted with the structural engineer's report clearly evidence the building's permanent and substantial construction, confirming that the buildings are capable of taking the loads necessary to facilitate the changes proposed and the development therefore constitutes the buildings' conversions and do not exceed the scope of works permitted by Q.1 (j). The buildings are obviously of robust construction still being in use. The buildings are therefore maintained to be clearly capable of being converted as proposed.

In that regard I have summarised a brief and indicative conversion methodology to explain the nature of the works that could be proposed, and I believe these works are typical of many comparable conversion schemes approved elsewhere, and more specifically, do not go beyond what is functionally, and thus reasonably necessary for the buildings to function as a dwellings.

The floors throughout the buildings are sealed concrete and are in good condition. The conversion works will involve only modest internal changes to assist with the longevity of the existing damp-proof course, adding new damp-proof membranes (DPM) on top of the existing slabs to prevent rising moisture. A rigid insulation board (e.g. 100mm PIR) can be laid over the DPM to meet floor insulation requirements.

With regard to the building's walling, it is constructed from concrete blockwork in the main parts. These will be augmented inside the building with a timber or metal stud frame over the block walls where they do not extend full height. The insulation required will be achieved by leaving a 50-100mm cavity between the block wall and the new frame to avoid moisture transfer. Thereafter insulation will be installed to include rigid insulation boards (e.g., PIR or phenolic foam) or mineral wool between the studs. A U-value as per home insulation standards will be aimed for. Adding a vapour control layer (VCL) on the warm side of the insulation will help to prevent moisture ingress.

Internal new walling will involve the erection of stud walls to divide the internal space as per the design layout. Using timber or light-gauge steel studs and insulation to the partitions will enhance acoustic separation between rooms/properties. The walls will then be plaster boarded and finished, including skimming and painting, as required.

Regarding the roof, added insulation can be provided between the roof joists/frames while maintaining proper ventilation above the insulation. This will require installing vents in the roof sheeting to prevent condensation. Regarding vapour control it will be necessary to ensure a control layer is applied before installing plasterboard on the internal roof side, or more likely boarding, to avoid cracking. However, and also for aesthetic reasons typical of many similar conversions a standing seamed sheeted and insulated new roof covering will be applied reusing the existing structure.

All proposed windows and doors can accommodate double or triple-glazed units with high thermal performance ( $U\text{-value} \leq 1.4 \text{ W/m}^2\text{K}$ ). This will significantly improve the overall energy efficiency of the new properties. The new openings, as part of the existing structure, will be cut through the existing walls and allow the joinery to be rebated from the face of the building bridging the cavity walling within its individual framing.

The intended external timber boarded finishing will be applied as a uniform weather screen without changing the current shell form and as indicated earlier it will not exceed the permitted 20cm change allowed, achieving an enhanced overall group aesthetic.

The majority of the changes are therefore internal, and do not constitute development and thus also fall outside those permitted changes listed at Q.1 (j) and the scope of this application.

In that regard I would also draw your attention to the Government's online Planning Practice Guidance (PPG) at paragraph 105, which reads as follows; '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 internal works do propose to add a new floor and are therefore clearly acceptable in principle. The structural assessment provided confirms how this will be achieved without requiring new structural changes. It is of course understood that the Hibbitt case has clarified the difference between a conversion of an agricultural building which does not require planning permission and the rebuilding of one which does, which is a matter of planning judgement. The Hibbitt case though of course hasn't changed the relevant principles, works that amount to substantial demolition and reconstruction or replacement of existing fabric continue to go beyond what is permitted, and more specifically, don't apply in this case.

The PPG advice at paragraph 104 also makes it clear in these regards that the building must be capable of functioning as a dwelling. There is obviously no requirement to demonstrate compliance with the relevant Building Regulations, involving the provision of habitable accommodation for instance, as it stands, but rather, by reference to the Hibbitt case, where it has walls etc. that the building is therefore capable of providing the necessary shelter anticipated as the first

functional step for a future residential use, resulting from the conversion, thus ensuring that as converted it can function as a dwelling. More specifically it states;

*'It is not the intention of the permitted development right to include the construction of new structural elements for the building. Therefore, it is only where the existing building is structurally strong enough to take the loading which comes from the external works to provide for residential use that the building would be considered to have the permitted right'.*

Those works proposed sit full square with the scope of works listed at Q.1 (j) and are reasonably necessary in all regards and where they do not constitute development as internal changes/repairs, could be undertaken anytime.

The application buildings are therefore clearly capable of functioning as a number of dwellings, both in architectural terms and by structural analysis. The permitted rights allow building operations which are reasonably necessary to convert a building, which may include those works which would affect the external appearance of the building as indicated at Q.1 (j) as well as (i). Consequently, the application satisfies and does not exceed the terms of the works permitted, and as listed thereat.

Q1 (k) which requires that the site is not on article 2(3) land, and Q1 (l) indicates the site should not be, or form part of; (i) a site of special scientific interest; (ii) a safety hazard area; (iii) a military explosives storage area. All such locational considerations are satisfied.

Regarding Q1 (m) the site does not contain a scheduled monument, and in accordance with Q1 (n) is not a listed building.

Q1 (o) requires that the existing building, excluding any proposed extension under Class Q(b), but including any proposed building operations under Class Q(c), should be capable of complying with the nationally described space standard issued by the Department for Communities and Local Government on 27th March 2015 as read with the notes dated 19th May 2016 which apply to it. The table below from the national space standards shows that the existing building areas as subdivided exceed the one bedroom space threshold, and of will comfortably accommodate the bedrooms proposed on the submitted plans.

Table 1 - Minimum gross internal floor areas and storage (m<sup>2</sup>)

| Number of bedrooms(b) | Number of bed spaces (persons) | 1 storey dwellings | 2 storey dwellings | 3 storey dwellings | Built-in storage |
|-----------------------|--------------------------------|--------------------|--------------------|--------------------|------------------|
| 1b                    | 1p                             | 39 (37) *          |                    |                    | 1.0              |
|                       | 2p                             | 50                 | 58                 |                    | 1.5              |
| 2b                    | 3p                             | 61                 | 70                 |                    | 2.0              |
|                       | 4p                             | 70                 | 79                 |                    |                  |
| 3b                    | 4p                             | 74                 | 84                 | 90                 | 2.5              |
|                       | 5p                             | 86                 | 93                 | 99                 |                  |
|                       | 6p                             | 95                 | 102                | 108                |                  |
| 4b                    | 5p                             | 90                 | 97                 | 103                | 3.0              |
|                       | 6p                             | 99                 | 106                | 112                |                  |
|                       | 7p                             | 108                | 115                | 121                |                  |
|                       | 8p                             | 117                | 124                | 130                |                  |
| 5b                    | 6p                             | 103                | 110                | 116                | 3.5              |
|                       | 7p                             | 112                | 119                | 125                |                  |
|                       | 8p                             | 121                | 128                | 134                |                  |
| 6b                    | 7p                             | 116                | 123                | 129                | 4.0              |
|                       | 8p                             | 125                | 132                | 138                |                  |

Q1 (p) requires that the building has a suitable existing access to a public highway. The access in question serves both the application buildings and the adjacent barns as well as the farmhouse and has done for many years in a suitable manner. The reduced spread of buildings further reduces the benchmarked position and intensity of use.

Consequently, it is considered the development complies with all the above criteria.

Having demonstrated that the proposed development is therefore permitted in accordance with the limitations at Q.1 it is of course acknowledged that it must also be shown that your Council's Prior Approval is not required, with regard to those conditional considerations at Q.2 (a) to (g).

For ease of reference, I have therefore used the conditional wording at (a) to (g) below as sub-headings, together with a brief commentary to explain why your Council's Prior Approval is not required.

#### (a) Transport and Highway Impacts of the Development

Access to the application property is by an established and operationally suitable arrangement, that has served the farm's more intensive previous uses as a whole, involving movements greater than is currently present or particularly would be generated by the 6 new dwellings proposed. As indicated, farming activities have diminished over the years and of course the enclosed application demolishes those adjacent buildings reducing the residual potential usage. To all intents and purposes therefore the new chapter of use will simply replace the building's established uses and given the potential scale of the farm operations as a whole, will not lead to the material intensification of the use of the existing access. It is of course an unrestricted access arrangement in any regards. The existing farm access will therefore be used to serve the new dwellings, accessing the properties by the shortest, and most convenient existing safe route.

Separately, there is ample space to park and turn on the land associated with the buildings and closely related to the new group of properties and the submitted block plan indicates the deliverability on the areas of land previously associated with the building's use for parking, manoeuvring and deliveries. Parking does not of course have to be positioned within the area of the defined curtilage, which is shown to match the footprint of the building in accordance with Q.3.

#### (b) Noise Impacts of the Development

The application is not a noisy development, and neither is this a noisy environment. There is a residential caravan park immediately behind the site. The barns will be freestanding as it is proposed to remove the remaining agricultural storage buildings shown previously in the aerial photograph. The new development will be satisfactorily subsumed as part of the quiet rural location in which it is sited, and where there are no peculiarities which would prevent its reasonable residential use.

The communal car parking area utilises the existing parking areas and there are paths around the site to access each unit on foot and with sufficient space from each unit to ensure a quiet environment for the existing house and each new dwelling house.

(c) Contamination Risks on the Site

The application buildings have only been used for general plant, hay and fodder storage, and in part as a commercial store, so that any contamination risks would therefore clearly be very low. The buildings by reason of their general design and built form do not appear to have offered any secure storage for chemicals or fuel etc. and there are no reasons to believe that those modest works necessary to achieve the conversion will therefore disturb contaminated ground where the sealed flooring is not retained.

(d) Flooding Risks on the Site

The site does not lie within an area at risk of flooding.

(e) Whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from an agricultural use to a use falling within Class C3 (Dwellinghouses) of the Schedule to the Use Classes Order

The online PPG, Paragraph: 109 assists to define what is meant by impractical or undesirable for the change to residential use, and is reproduced in part below.

‘Impractical or undesirable are not defined in the regulations, and the local planning authority 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”. In practice it reflects the location and siting where it would not be sensible or realistic to allow residential use and where the notion of undesirability indicates that it would be ‘harmful or objectionable’ to allow the use.

‘When considering whether it is appropriate for the change of use to take place in a particular location, the 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.’

In this instance there are no reasons to consider the application site so remote or inaccessible that its servicing is impractical. Moreover, there are no locational or neighbouring land uses (as indicated with regard to (b) above) which make the use undesirable either.

(f) The design and external appearance of the building

(g) the provision of adequate natural light in all habitable rooms of the dwellinghouse

Finally, the plan extract inserted below shows that a small part of the application site falls within the North Meadow Zone of Recreational Influence (outer zone). Under the Council's related strategy, financial contributions are required towards Strategic Access Management and Monitoring (SAMM). The latest rates are set out on the Council's website under North Meadow and Clattinger Farm SAC and it is understood that such payments (which are reclaimable in the event permission is not forthcoming) can be made under section 111. The zone below includes 4 of the proposed dwellings so that the payment to be made amounts to £1424 (4x£356). If you could confirm this is agreed as soon as possible, I will endeavour to make the appropriate payment.



In conclusion, I hope that the application and information enclosed is sufficient to ensure your support. I would of course be delighted to discuss any matters arising to ensure your prompt approval.

Yours faithfully



Simon Chambers  
Director

Enc.

Cc Mr and Mrs Matthews