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Design & Access Statement

Proposed Change of Use of Existing Two Bedroom Holiday Let into Dwelling at 6B Frome Road, Southwick, Wiltshire, BA14 9QD

This statement should be read in conjunction with submitted plans AH2026/69

1. Introduction

1.1 This Design and Access Statement has been prepared in support of a planning application for the change of use of an existing two-bedroom holiday let at 6B Frome Road, Southwick, Wiltshire, BA14 9QD ('the application site') to an independent, unrestricted residential dwelling.

1.2 The application relates solely to a change of planning use. No physical development, building works, extensions, alterations or changes to the layout, parking, turning or amenity areas of the site are proposed. The accompanying 'existing' and 'proposed' plans are, by design, identical, and are submitted to demonstrate that the physical fabric and layout of the site would remain entirely unchanged.

1.3 This statement should be read alongside the submitted plans (Drawing No. AH2026/69) and sets out the site and planning history, describes the proposal, and assesses it against relevant national and local planning policy, addressing design, access, residential amenity, highways, and ecology.

1.4 The application should consequently be considered in the context of an **existing building which is already in residential accommodation use**, with the Council having previously assessed and accepted the physical form, access, parking, amenity provision and relationship with neighbouring properties.

1.5 The principal issue is therefore whether there is any planning harm arising from allowing the existing accommodation to operate as an unrestricted permanent dwelling rather than remaining subject to a holiday-use restriction.

1.6 For the reasons set out below, it is considered that there is no material planning harm and that the proposal represents an efficient and sustainable opportunity to provide an additional dwelling through the continued use of an existing building, without requiring additional land, construction or alteration to the built environment.

2. Site and Surroundings

2.1 The application site forms part of the wider residential curtilage of 6B Frome Road, a stone-built dwelling fronting the A361 (Frome Road) in Southwick. The building the subject of this application was originally constructed as a triple garage (permitted under W/07/00381/FUL) and was subsequently converted and linked to the main dwelling (permitted under 14/04117/FUL), before being used as ancillary annexe accommodation and, since 2022, as an independent two-bedroom holiday let under planning permission PL/2022/07441.

2.2 The holiday let occupies part of the same residential plot as the main dwelling, 6B Frome Road. It benefits from its own private parking (2 spaces), its own private garden/amenity area enclosed from the main dwelling's grounds, and shares a driveway and turning area accessed from Frome Road. The main dwelling retains its own separate 3 parking spaces to the front, which were assessed and accepted by Wiltshire Council's Highways Department as satisfying highway standards at the time of the 2022 consent.

2.3 The existing accommodation is physically capable of functioning as a self-contained residential unit and already benefits from its own:

- two-bedroom accommodation;
- kitchen;
- living/dining accommodation;
- bathroom/ensuite facilities;
- dedicated parking;
- private garden/amenity space; and
- separately enclosed relationship with the main dwelling.

The submitted block plan confirms that the existing parking, garden and amenity arrangements are simply carried forward as the parking, garden and amenity arrangements for the proposed dwelling.

2.4 Southwick is identified in the Wiltshire Core Strategy as a Large Village. The application site lies within the built-up area of Southwick and, as confirmed in the Council's own case officer report for PL/2022/07441, the building itself is located within the defined settlement boundary.

3. Relevant Planning History

- W/07/00381/FUL - Erection of detached dwelling and triple garage together with construction of new vehicular access - Approved (2007).
- 14/04117/FUL - Single storey extension linking the garage building to the main dwelling - Approved (2014).
- PL/2022/07441 - Retrospective permission for use of the building as an annex and holiday let, and use of adjoining land for associated parking and amenity space to the holiday let - Approved, subject to conditions restricting the accommodation to holiday use only (Condition 2) and requiring it to be retained within the same planning unit and ownership as the host dwellinghouse (Condition 3).

3.1 In granting PL/2022/07441, Wiltshire Council's case officer concluded that the principle of the development was 'not objectionable', that there was no harm to the character and appearance of the area, no objection from Highways or Public Protection, and no objection from any neighbour, and that the site benefited from sufficient space for parking and manoeuvring for both the holiday unit and the main dwelling.

3.2 This application seeks only to remove the holiday-use restriction imposed by Condition 2 (and the tied-ownership restriction imposed by Condition 3) so that the accommodation can be occupied as a normal, independent dwelling; it does not seek to alter any of the physical matters that were assessed and accepted in 2022.

3.3 The present application should therefore be distinguished from an application seeking permission for a new dwelling involving construction, additional footprint, new access, new parking or a materially different relationship with neighbouring properties.

3.4 The physical development has already occurred and the planning application does not seek to intensify the built form of the site.

3.5 The proposal simply seeks to remove the restrictions preventing the existing self-contained accommodation from being occupied as an unrestricted dwelling.

4. The Proposal

4.1 The proposal is for a change of use of the existing two-bedroom holiday let into an independent residential dwelling, C3 use, with no increase in the number of bedrooms and no external works of any kind. The existing floor plans, elevations and block plan are reproduced as the 'proposed' drawings to demonstrate that the building, its footprint, scale, appearance, parking arrangement, turning area and private amenity space would remain exactly as existing.

4.2 The only change involved in this proposal is a change in planning use class restriction, from a holiday let occupied on a temporary/short-stay basis under a condition preventing permanent occupation, to an independent dwelling occupied on a permanent basis. There is no development, in the physical sense, associated with this application.

4.3 The proposal therefore represents a change in the planning status and occupancy of an existing residential accommodation unit, rather than physical development.

This is an important consideration when assessing the potential effects of the proposal.

5. Design

5.1 Amount, Layout, Scale and Landscaping

Not applicable / no change. As no building works are proposed, the amount of floorspace, the internal layout, the scale of the building and the site's landscaping would remain exactly as existing.

5.2 Appearance

Not applicable / no change. The external appearance of the building, including its two elevations facing the site, would be entirely unaffected by this proposal, as confirmed on the submitted 'Existing' and 'Proposed' Elevations (Drawing No. AH2026/69, Sheet 1 of 2), which are identical and marked 'No Changes Required'.

6. Access

6.1 No change to vehicular or pedestrian access is proposed. Access to the site continues to be taken directly from the A361 (Frome Road), as existing, with the newly changed dwelling retaining its own 2 dedicated parking spaces separate from the main dwelling's 3 spaces, and shared use of the existing driveway and turning area, which provides ample space for vehicles associated with both dwellings to enter and exit the site in forward gear. This arrangement was assessed and accepted by Wiltshire Council's Highways Department as part of PL/2022/07441 and is unaffected by this proposal.

6.2 It is therefore considered that the proposal would have **no material adverse impact upon highway safety**.

6.3 Importantly, the assessment should be based upon the physical characteristics of the access and parking arrangement, which remain unchanged.

There is no justification for imposing additional highway works or requiring the creation of additional parking where the number of bedrooms, physical arrangement and parking provision remain unchanged.

7. Planning Policy Context

7.1 National Planning Policy Framework (NPPF)

The NPPF establishes a presumption in favour of sustainable development. Where a local planning authority cannot demonstrate a five-year supply of deliverable housing land, the NPPF's 'tilted balance' applies, meaning that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

7.2 Wiltshire Council has, over a number of recent years, been unable to consistently demonstrate a five-year supply of deliverable housing land, and the position has continued to worsen. In an appeal decision dated 12 February 2026 relating to a 17-dwelling scheme on part of a former police station site in Chippenham, Wiltshire, the Planning Inspector (Hollie Nicholls) recorded that the Council itself was only able to demonstrate a 2.42-year supply of deliverable housing land, with the appellant contending an even lower figure of 2.03 years. The Inspector found that, regardless of the precise figure, the shortfall was 'considerable', engaging the NPPF presumption in favour of sustainable development and reducing the weight to be attached to the Council's housing supply policies. The Inspector allowed the appeal and, significantly, found that the Council had behaved unreasonably in refusing the scheme against officer advice, awarding the developer's full costs against the Council.

7.3 This mirrors an earlier appeal (relating to a scheme for up to 205 dwellings, determined in 2025) in which the Council's housing land supply was found to have fallen further still, to just 2.03 years. Taken together, these recent, tested appeal outcomes demonstrate that Wiltshire Council's housing land supply currently sits at little more than 2 years, against the NPPF's 5-year requirement, representing a shortfall of well over 50%. This is a matter of which the Council will be aware, and it is a material consideration which weighs heavily in favour of this proposal, which would deliver one additional, independent dwelling within an established residential curtilage in a sustainable, large village location, at nil cost in terms of new build or land take. The applicant reserves the right to rely on the Council's most up-to-date published Housing Land Supply Statement, and on any more recent appeal decisions, at the time of determination.

7.4 The position is particularly relevant to this proposal because the dwelling would be delivered in an exceptionally efficient manner.

The proposal would provide:

one additional dwelling + within a defined settlement + through the reuse of an existing building + without additional land take + without physical development + without highway works + without harm to character or amenity.

The proposal therefore represents precisely the type of modest, sustainable housing opportunity which can make a useful contribution to housing supply without giving rise to the environmental or infrastructure impacts associated with larger-scale development.

7.5 The Council's housing supply position should therefore be afforded significant weight in the planning balance. This is not an argument that housing supply overrides all other planning considerations. Rather, it reinforces the conclusion that where a proposal provides an additional dwelling in a sustainable settlement and no identifiable adverse impacts arise, there is a compelling reason to support the development.

7.3 Wiltshire Core Strategy (WCS)

Core Policy 1 (Settlement Strategy) and Core Policy 2 (Delivery Strategy) direct development towards defined settlements, including Large Villages such as Southwick, where the site is located within the settlement boundary. Core Policy 29 (Spatial Strategy for the Trowbridge Community Area) and Core Policy 57 (Ensuring High Quality

Design and Place Shaping) were both considered and satisfied in respect of this site at the time of PL/2022/07441 and remain unaffected, as no physical change is proposed. Core Policy 64 (Demand Management) relating to parking is similarly unaffected, as the existing parking provision (2 spaces for the newly changed dwelling and 3 spaces for the main dwelling) already meets adopted parking standards and would not change.

7.4 Southwick Neighbourhood Development Plan 2018-2036

The application site lies within the settlement boundary defined by the made Southwick Neighbourhood Plan. As a proposal for an additional independent dwelling within the existing residential curtilage of an established dwelling, and within the settlement boundary, the proposal is consistent with the strategy of directing housing to sustainable, defined settlement locations.

8. Planning Assessment

8.1 Principle of Development

The application site lies within the established residential curtilage of 6B Frome Road, and within the settlement boundary for Southwick. The principle of residential use on this site has already been established and accepted by the Council through the grant of PL/2022/07441. The only matter for consideration is the removal of the holiday-occupancy restriction so that the unit may be used as an independent dwelling. Given the site's location within the settlement boundary and existing residential curtilage, together with the Council's inability to consistently demonstrate a five-year housing land supply, the principle of an additional dwelling on this site is considered acceptable and attracts significant policy support.

The proposal is also consistent with the national objective of making effective use of land and buildings.

The National Planning Policy Framework expressly supports the development of under-utilised land and buildings, particularly where this assists in meeting identified housing needs in circumstances where housing land supply is constrained.

That principle has particular relevance here.

The application does not require:

- a greenfield site;
- the construction of a new building;
- the loss of agricultural land;
- a new highway;
- a new access;
- additional infrastructure; or
- additional land take.

Instead, it makes efficient use of an existing building which is already configured and occupied as self-contained residential accommodation.

The proposal should therefore be regarded as an inherently sustainable form of housing delivery.

It would provide one additional unrestricted dwelling without the environmental and construction impacts normally associated with the delivery of a new dwelling.

8.2 Character and Appearance

As no external works are proposed, the proposal would have no effect whatsoever on the character or appearance of the site or the wider area. The building would continue to appear exactly as it does today.

8.3 Residential Amenity

The proposal would have no effect on the amenity of neighbouring occupiers. The use of the building would be, in practical terms, indiscernible from its current lawful use as a holiday let: no additional bedrooms are proposed, so

there is no potential for a greater number of occupants than is already lawfully possible, and the building would continue to be used, to all outward appearances, exactly as it is used at present.

The newly changed dwelling and the main dwelling (6B Frome Road) each retain their own private, separately enclosed amenity space, entirely independent of one another, in the same manner as exists today, and as was found acceptable at the time of PL/2022/07441, when the Council concluded that there was no direct overlooking or loss of privacy to neighbouring properties and no objection from Public Protection or any neighbour.

The proposal should also be considered against the **lawful fallback position**.

The building is already authorised for use as a two-bedroom holiday let. The proposed use therefore does not introduce residential accommodation onto a site where none presently exists; rather, it would allow the existing accommodation to be occupied on an unrestricted basis.

Although the pattern of occupation could change from short-term holiday occupation to permanent occupation, there is no evidence that such a change would result in unacceptable harm to neighbouring residential amenity.

8.4 Highway Safety and Parking

The newly changed dwelling would retain its own 2 dedicated parking spaces, entirely separate from the 3 spaces serving the main dwelling, 6B Frome Road, both of which were found by Wiltshire Council's Highways Department to satisfy adopted parking standards. The shared driveway and turning area provides ample space for vehicles from both dwellings to enter and exit the site in forward gear, avoiding the need to reverse onto the A361. As no change to parking or access arrangements is proposed, there would be no adverse effect on highway safety.

In terms of vehicle movements, it is reasonable to conclude that the proposal would not result in any material intensification, and may in practice reduce activity associated with the site. Holiday lets typically experience a high turnover of occupiers and generate frequent trips associated with day visits to local tourist attractions; an independent dwelling in permanent residential use is likely to generate a more settled and, if anything, lower pattern of vehicle movements than the holiday let it would replace.

8.5 Ecology & Biodiversity Netgain

The proposal involves no development, excavation, demolition, or alteration to the building, hardstanding, boundary treatments or vegetation. As nothing would physically change on site, the proposal would have no effect on protected species, habitats or ecology; the change is a change of planning use only, separating the two units on paper rather than on the ground.

8.6 The application site, as it relates to this proposal, measures approximately 962m², which is well below the 0.2 hectare (2,000m²) threshold below which development is exempt from the mandatory Biodiversity Net Gain (BNG) requirements introduced under the Environment Act 2021. The proposal is therefore exempt from BNG on the grounds of site size alone. In any event, there are no priority habitats present on site, and, as set out above, no changes of any kind are proposed to the building, hardstanding, boundary treatments or any vegetated areas, so there would be no loss of, or effect on, any habitat or biodiversity feature as a result of this proposal.

8.7 A Bat scoping survey and nesting bird report is being submitted alongside this application. This has been provided on a precautionary basis given the age and nature of the building, and confirms that the proposal, being a change of use only with no external or internal building works, no demolition, no changes to the roof, walls or openings, and no alteration to lighting or the surrounding environment, would have no impact on bats or any bat roosting potential. On this basis, the proposal is considered acceptable in ecological terms and raises no matters that would warrant refusal.

8.6 Planning Balance

When assessed as a whole, the proposal has a particularly favourable planning balance.

The benefits are clear:

1. One additional unrestricted dwelling is provided.
2. The dwelling is located within an established settlement.
3. The proposal makes use of an existing building.
4. No additional land is required.
5. No physical construction is required.
6. No additional access is required.
7. Existing parking provision is retained.
8. Existing amenity space is retained.
9. There is no change to the appearance of the building.
10. There is no identified harm to neighbouring amenity.
11. There is no identified harm to ecology.
12. The proposal assists housing delivery at a time when Wiltshire has a substantial housing land supply shortfall.

8.7 Against these benefits, there are no corresponding material adverse impacts.

This is therefore not a case where the Council is being asked to accept environmental, highway, design or amenity harm in exchange for the provision of housing.

Instead, the proposal provides an additional dwelling **without materially changing the site at all**.

8.8 This is an important distinction.

The planning system is concerned with the effects of development. In this case, the physical effects of the proposal are effectively nil because the building, access, parking, garden, boundaries and appearance are all retained. The principal consequence is simply that the existing accommodation can be occupied as an unrestricted home rather than being restricted to holiday occupation.

9. Conclusion

9.1 This application seeks only to remove the holiday-occupancy restriction attached to an existing, lawfully approved annexe/holiday let, allowing it to be occupied as an independent dwelling. No physical works, extensions or alterations are proposed, and the existing and proposed plans are identical in every respect.

9.2 The site lies within the established residential curtilage of 6B Frome Road and within the defined settlement boundary for Southwick, where the principle of residential development is supported. Wiltshire Council's inability to consistently demonstrate a five-year supply of deliverable housing land engages the presumption in favour of sustainable development and lends further support to the proposal, which would deliver an additional dwelling without any land take, new build, or physical change whatsoever.

9.3 The proposal would have no adverse effect on the character or appearance of the area, no adverse effect on neighbouring amenity, no adverse effect on highway safety, and no adverse effect on ecology. Each dwelling retains its own separate, adequate parking and turning provision and its own private amenity space, entirely independent of the other, exactly as exists and has been found acceptable at present.

9.4 The proposal consequently represents a sustainable, proportionate and highly efficient means of delivering one additional dwelling, making use of an existing building within a defined settlement and without requiring any physical development.

In the absence of any material adverse planning impact, and having regard to the significant shortfall in Wiltshire's housing land supply and the NPPF's presumption in favour of sustainable development, it is respectfully submitted that there is no sound planning reason to retain the existing holiday-use restriction.

Planning permission should therefore be granted.