



WREYLAND
RURAL PLANNING CONSULTANTS

PLANNING, HERITAGE, DESIGN & ACCESS STATEMENT

Dodford Farm, Christian Malford, Chippenham, Wiltshire, SN15 4DE | August 2026

Change of use of redundant agricultural buildings at Dodford Farm from redundant agricultural use to B2 car repairs, car servicing and MOT testing in support of the relocation of Frankham Motor Services and the diversification of the existing farm enterprise at Dodford Farm



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1.0 Introduction

- 1.1 This Planning Statement is submitted in support of an application for planning permission for the change of use of approximately 683m² of redundant agricultural buildings at Dodford Farm, Dodford Lane, Christian Malford, Wiltshire, SN15 4DE, to a Class B2 (general industrial) use comprising car repairs, servicing and MOT testing, together with associated operational development.
- 1.2 The proposal would facilitate the relocation of Frankham Motor Services ('Frankhams'), an established local business, and would provide a diversified source of income to the farm enterprise operated by Mr and Mrs Ewart at Dodford Farm.
- 1.3 This application is submitted by Mr and Mrs J and R Ewart, the owners and operators of Dodford Farm, on behalf of themselves and in conjunction with Ian and Drena Frankham of Frankham Motor Services.
- 1.4 A linked application for listed building consent is submitted in parallel, addressing the proposed works to Building 3, which is treated for the purposes of this application as falling within the curtilage of, and being listed by virtue of its association with, the Grade II listed Dodford Farmhouse (List Entry 1022466). The basis for this position is set out at Section 6.0 below.
- 1.5 This application follows a formal pre-application enquiry to Wiltshire Council (ref: ENQ/2025/00435), determined on 21 March 2025, and the Council's substantive response of 23 June 2025 (the 'Pre-Application Response').
- 1.6 This Statement should be read alongside the application drawings, and the following technical reports submitted in support of the application: a Structural Report; a Preliminary Ecological Assessment with associated surveys, a Noise Survey and a Transport Statement.
- 1.7 This Statement has been prepared by Tim Barker BSc (Hons) MSc MRICS FAAV ASAG, Director of Wreyland Rural Planning, a rural planning consultancy specialising in agricultural diversification, rural enterprise and heritage-led development.

2.0 Frankham Motor Services

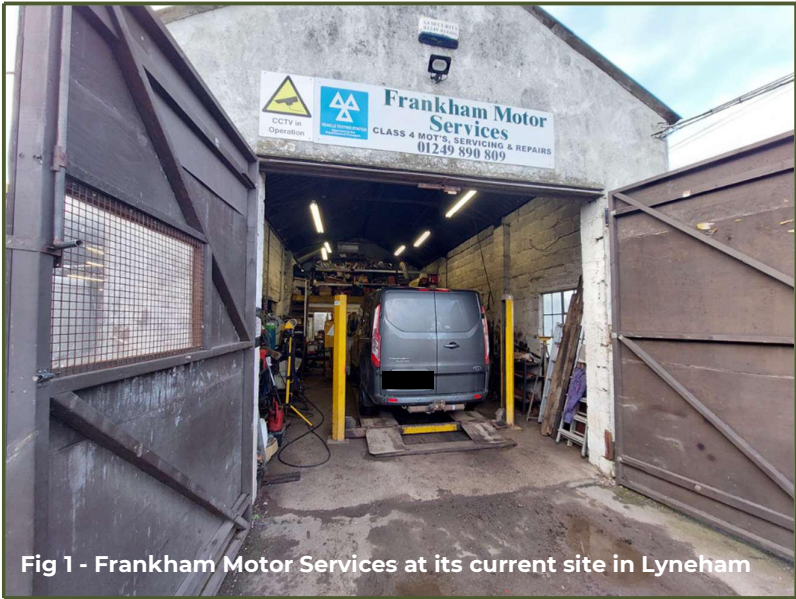


Fig 1 - Frankham Motor Services at its current site in Lyneham

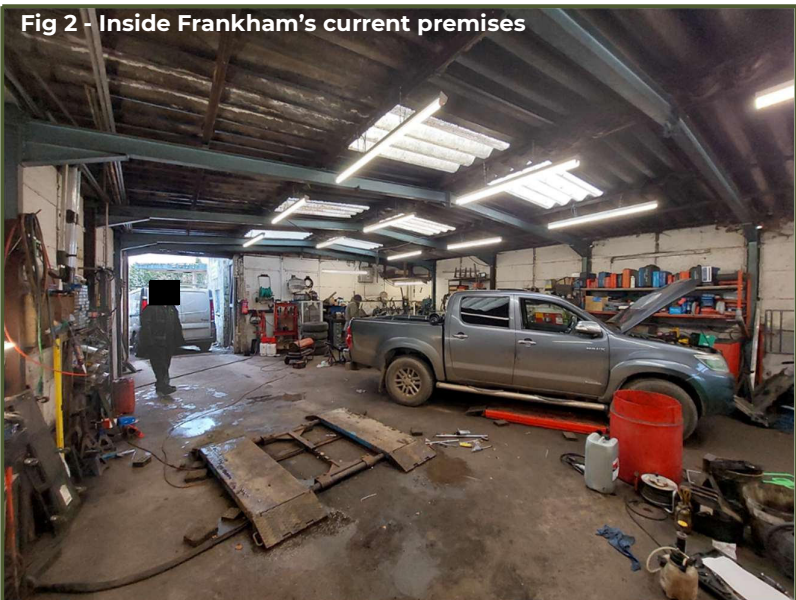


Fig 2 - Inside Frankham's current premises

- 2.1 Ian and Drena Frankham established Frankham Motor Services on 28th July 1988 and have operated ever since from their tenanted premises at Swindon Road Garage, Chippenham Road, Lyneham, SN15 4NX. Over the last 38 years, Frankhams has become an established brand with an excellent reputation and employ 6 members of staff (5 FTE, 1PTE) who are locally based. 75% of the enterprises's customers are from Lyneham and Bradenstoke together with outlying villages, Calne, Chippenham etc.
- 2.2 Frankhams is a working garage, dealing with all makes and models of cars with a particular specialism in classic cars. In addition to this, Frankhams places great emphasis upon the professional development of its employees, most of whom start with Frankhams as apprentices before becoming qualified through Swindon College and remaining with the company thereafter. Another former employee has moved on to start their own business.
- 2.3 In July 2024, Frankhams' existing landlord sold the premises to another business owner who, it is understood, wish to develop the site. As as a result of this, Frankhams are now seeking alternative, permanent premises from which to continue the business.
- 2.4 Frankhams are a longstanding fixture of Lyneham, offering a local, reliable service to their customers. It is imperative that suitable, alternative premises are sourced to ensure the continuance of Frankhams, both as a trusted local service and employer.

3.0 Dodford Farm

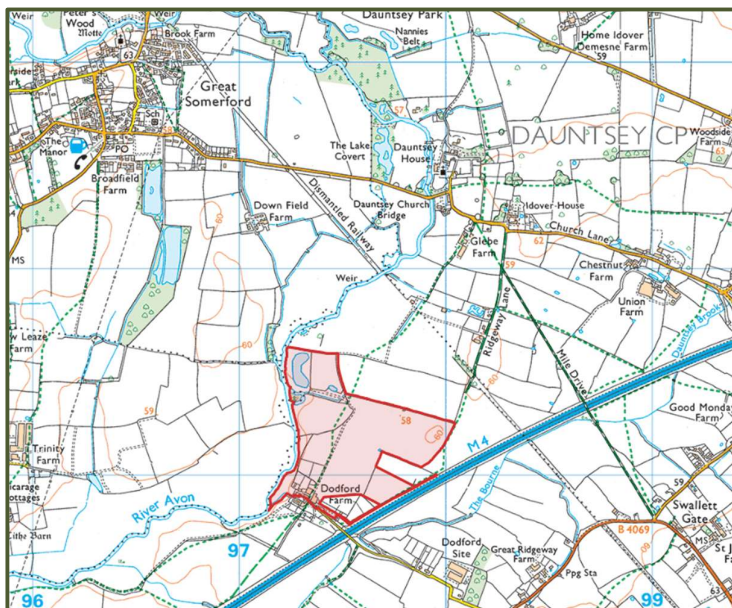


Fig 3 – OS extract showing extent of Dodford Farm



Fig 4 – The yard at Dodford Farm

- 3.1 Dodford Farm extends to approximately 36.22ha and is run by Mr and Mrs Ewart, who, in their late seventies, continue to manage a herd of 30 suckler cows with followers and a flock of 100 Oxford Down breeding ewes, selling progeny as stores or finished livestock via Cirencester Livestock Market.
- 3.2 The farm is Mr and Mrs Ewart's sole source of income. Following the withdrawal of farm subsidies however the enterprise now operates at an annual loss of approximately £20,000. An alternative source of income is accordingly required to secure the farm's continued viability.
- 3.6 The opportunity to integrate Frankhams into the yard at Dodford Farm, through the change of use of this redundant building group, therefore addresses both parties' circumstances directly: it secures suitable, local premises for an established business and workforce, and provides a diversified income stream capable of sustaining the economic viability of Dodford Farm.

4.0 Proposed development

- 4.1 Mr and Mrs Ewart and Mr and Mrs Frankham, who are long known to each other, have identified an opportunity to remedy their respective circumstances through integrating Frankhams into the yard at Dodford Farm through the change of use and associated operational development of a range of redundant agricultural buildings. Historically the subject range of buildings were associated with a dairy enterprise which was ceased some years ago with the removal of milk-quota and have long been underused with the farm's livestock, fodder and machinery being housed within more convenient existing buildings elsewhere within the yard rendering Buildings 1, 2 and 3 redundant to agricultural use.



Fig 5 – Range of mid-20th century farm buildings (buildings 1 & 2)



Fig 6 – Traditional building (building 3). The informal building 4 will be demolished

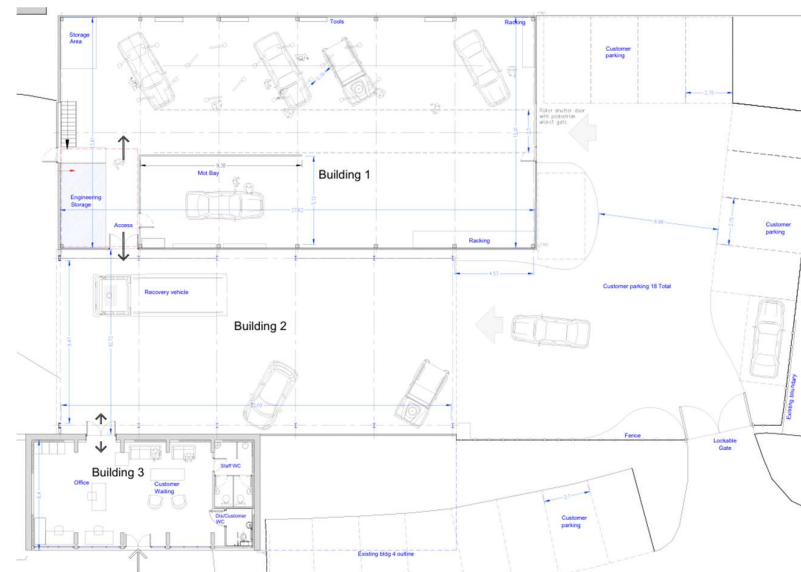
- 4.2 The application proposes the change of use of Buildings 1, 2 and 3, together with the use of existing hardstanding for parking, from agricultural use to a Class B2 use comprising car repairs, servicing and MOT testing.



Fig 7 – The proposed range of buildings from the south-west



Fig 8 – The proposed range of buildings from the south-east



- 4.3 Building 1, a mid-twentieth century concrete-framed 'Atcost'-type building with cement-fibre clad elevations and roof (400sqm gross floor area), will accommodate a dedicated MOT bay and a general repair and servicing work area, together with associated storage.
- 4.4 Building 2, a steel portal-frame agricultural lean-to with open elevations and a fibre-cement roof, will provide covered accommodation for the business's two recovery vehicles.
- 4.5 Building 3, a vernacular red-brick linhay/cartshed under a clay-tile roof (90sqm gross floor area), will be sensitively converted to provide an administrative office, customer waiting area and staff welfare facilities ancillary to the business.

- 4.6 The proposed works comprise the installation of glazing and horizontal timber cladding set back behind, and located between, Building 3's existing vertical structural supports, together with an insulated floor, roof insulation and internal wall insulation, and a single new door in the rear elevation to connect with Building 2.
- 4.7 Building 4, an informal twentieth-century lean-to abutting Building 3, will be demolished. Its removal will reveal the attractive red-brick elevation of Building 3 and the area will be reallocated to customer parking.
- 4.8 Provision is made for 18 formal customer and staff parking spaces, together with further informal parking within Building 2. This exceeds Wiltshire Council's standard of one space per 30sqm gross floor area for Class B2 uses (16 spaces), the modest excess reflecting the need for customer vehicles to be left on site for extended periods while repairs are undertaken. No extension to the existing built form is proposed, and there will be no vehicular movement through the wider farm yard associated with the proposed use.
- 4.9 The western (yard-facing) elevation of the building group will be permanently enclosed, removing any functional or acoustic connection between the proposed use and the farm's ongoing agricultural and residential uses.

5.0 Pre-advice received

- 5.1 A formal pre-application enquiry was submitted to Wiltshire Council (ref: ENQ/2025/00435), on 21st March 2025, and the Council's substantive written response was issued on 23rd June 2025 by the assigned case officer, following consultation with the Council's Highways, Rights of Way, Public Protection and Ecology teams. The advice received is summarised below.
- 5.2 The Case Officer confirmed that the principle of development is acceptable under Core Policy 48.
- 5.3 The Heritage Officer concluded that Building 3 is curtilage listed. The officer nonetheless considered that the proposed works would cause no demonstrable harm to the setting of Dodford Farmhouse and would secure Building 3's long-term viable use.
- 5.4 No highway objection was raised, either to the network impact or to the proposed parking provision, subject to the bridleway being kept free of obstruction.
- 5.5 In terms of residential amenity, the case officer concluded on balance that no harm was likely to residential properties.
- 5.6 The full report is submitted in support of this application.

6.0 Planning policy constraints and considerations

6.1 The farm's address is Dodford Farm, Dodford Lane, Christian Malford, Wiltshire, SN15 4DE, N:180889 E:397372.

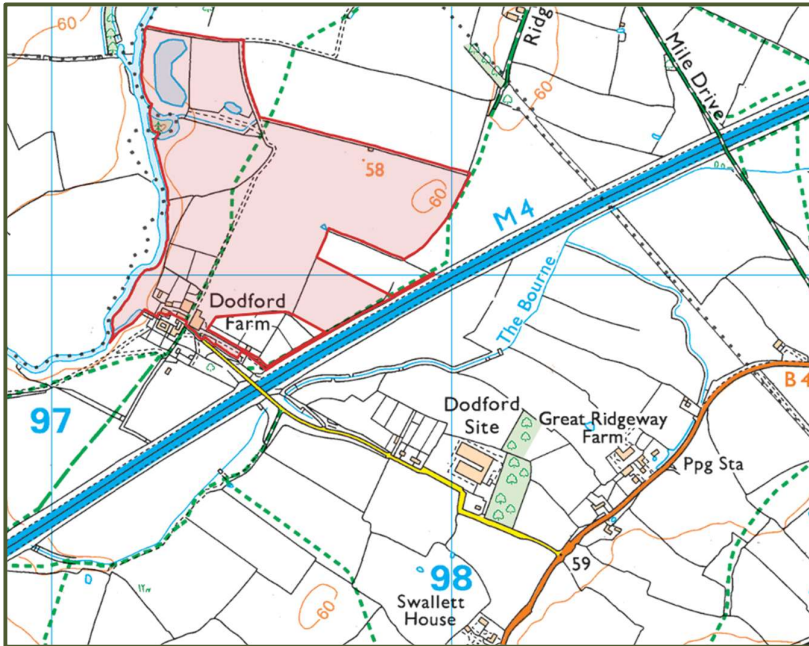


Fig 9 – OS extract – access is taken via the unclassified road leading to the B4069



Fig 10 – The whole site is located within Flood Zone 1 (clear)

6.2 Notwithstanding the site's open countryside location (discussed further below), it is otherwise unencumbered by other constraints. The site is not located within a protected landscape and there are no SACs, SSSI'S, Scheduled Monuments, Protected Trees or any other constraint located within close proximity which might have a bearing upon the proposal. The site is also located wholly within Flood Zone 1, (clear on the Environment Agency Flood Risk Map for Planning) and is within Soilscape Area 5 (freely draining lime-rich loamy soils).

6.3 It is acknowledged that there is a listed building within the locality. Heritage impacts will be considered further below in this statement.

- 6.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise. Therefore, in order to assess the acceptability of this proposal, it is necessary to assess it against the adopted development plan.
- 6.5 It is also necessary to consider any material considerations relevant to the development proposal, such as national planning policy contained within the National Planning Policy Framework (NPPF) and the national planning guidance contained within the Planning Practice Guidance (PPG), as well as any locally adopted supplementary planning guidance (SPG) and documents (SPD).
- 6.6 The development plan currently comprises the Wiltshire Core Strategy (WCS - adopted January 2015).
- 6.7 This application proposes the change of use of an existing redundant agricultural building to a Class B2 (general industrial) use. The site is located in the open countryside and must therefore be assessed against the spatial strategy set out in the adopted Wiltshire Core Strategy (WCS).
- 6.8 Core Policy 1 defines the settlement hierarchy within Wiltshire, categorising locations into Principal Settlements, Market Towns, Local Service Centres, and Large and Small Villages. The application site lies outside any defined settlement boundary, meaning it is considered to be in the open countryside and subject to policies restricting development in such locations.
- 6.9 Core Policy 2 outlines the council's approach to delivering new development, emphasising a presumption in favour of sustainable growth within defined settlement limits. Beyond these boundaries, development is generally not permitted unless it meets one of the exception policies listed in Paragraph 4.25 of the WCS. These exceptions account for specific local circumstances and national policy considerations and include:

Additional employment land (Core Policy 34)
Military establishments (Core Policy 37)
Development related to tourism (Core Policies 39 and 40)

Rural exception sites (Core Policy 44)
Specialist accommodation (Core Policies 46 & 47)
Development that supports rural life (Core Policy 48)

- 6.10 In this case, Core Policy 48 is particularly relevant, as it allows for the conversion and re-use of rural buildings for employment, tourism, cultural, or community purposes. Since the proposed Class B2 use falls within the category of employment use, the application must demonstrate compliance with the criteria set out in this policy.
- 6.11 To be considered acceptable, the proposal must show that the existing building is structurally sound and can be converted without extensive rebuilding. Any necessary modifications or extensions should be minimal and should not compromise the building's original character. Additionally, the development must not have an adverse impact on the surrounding landscape or neighbouring properties. The site should also have suitable access and infrastructure, ensuring it can operate effectively without placing undue pressure on local services. Where heritage assets are involved, the proposed conversion should contribute to their long-term preservation.
- 6.12 The criteria within CP48 can be addressed in turn in respect of the proposed scheme.
- i ***The buildings must be structurally capable of conversion without major rebuilding and with only necessary extension or modification which preserves the character of the original building***
- 6.13 Building 1 is a mid-twentieth century classic 'Atcost' building, constructed of a concrete frame and concrete block and cement fibre clad elevations. The roof is also cement-fibre.
- 6.14 Building 2 is a steel portal frame general purpose agricultural lean-to. The elevations are open. The roof is fibre-cement.
- 6.15 Building 3 is a vernacular linhay / cartshed building of red-brick elevations, open fronted and under a clay-tile roof. The regularity of the tiles indicates that these are also non-original, anticipated to be of mid-twentieth century provenance.
- 6.16 The structural integrity of the buildings has been confirmed within the accompanying Structural Report, prepared by Don Hughes, Chartered Engineer of MDHP Consulting Civil & Structural Engineers, following an inspection of all three buildings on 28th April 2026. Building 1 (estimated 60 years old) is found to be in a good structurally sound condition for its age, with only surface rust to steel connections and no evidence of significant movement or distortion to its concrete frames. Building 2 (estimated 50 years old) is similarly found to be structurally sound, its steel portal frames

exhibiting surface rust but no loss of section or sign of movement. Building 3 (estimated 125 years old) is found to be structurally sound, with minor cracking above a window opening attributable to a sagging timber lintel, to be replaced with brickwork, and some localised, stable rot to one roof truss repaired by a splice to the lower tie. The engineer concludes, in respect of each building, that they are in a good condition structurally and capable of conversion without major rebuilding.

ii ***The use would not detract from the character or appearance of the landscape or settlement and would not be detrimental to the amenities of residential areas.***

6.17 The range of buildings are currently redundant to agriculture. It would naturally follow that their regeneration for alternative, economically viable, uses would improve their immediate visual amenity. Though far-reaching views and public viewpoints are limited, the limited degree of operational requirement proposed would not have any significant impact upon their appearance in the landscape. To the casual passer-by they would look very similar to their current appearance, albeit better maintained as well as benefitting from the removal of unsightly Building 4. In terms of the amenity of residential areas, figure 11 below identifies the site's residential uses:



- Existing 3rd party dwelling
- Proposed site of Frankham Motor Services
- Existing livestock, fodder and farm machinery buildings
- Existing dwellings (with ancillary outbuildings / annexes)

Fig 11 – site uses (proposed)

- 6.18 The proposed scheme will require a minimal degree of operational development. There will be no additional windows or doors made to its western or southern elevations, indeed, its western (yard facing) elevation will be permanently enclosed. This will remove any nexus between the proposed scheme and the agricultural and domestic uses on site – there will be no vehicular movements past the building into the yard.
- 6.19 In terms of nearby residential amenity, the accompanying Noise Impact Assessment, prepared by Hepworth Acoustics, measured representative workshop noise levels (ramp use, grinding, welding and impact wrench operation) at Frankhams' existing premises, alongside baseline ambient noise levels at Dodford Farm, dominated by the M4 some distance to the south (existing background level of 54–55dB LA90).
- 6.20 Applying the BS4142:2014+A1:2019 methodology, the assessment predicts a rating level of 49dB LAr,Tr at the nearest residential receptor (16m to the west, with windows closed), some 6dB below the existing background level. This indicates a low impact, and the assessment concludes there is no acoustic reason why planning permission should be withheld. This is achieved on the basis that the workshop's western elevation, facing the nearest dwellings, remains permanently closed, with the (typically open) eastern elevation facing away from residential receptors.
- 6.21 The applicants will provide details of proposed hours of operation as part of the application, and have no objection to the imposition of appropriately worded conditions – including in respect of hours of operation, plant specification and the permanent enclosure of the western elevation – to safeguard residential amenity, consistent with the Public Protection team's stated priority of avoiding statutory nuisance

iii ***The building can be served by adequate access and infrastructure***

- 6.22 The separately submitted Transport Statement records a review of Personal Injury Collision data over the most recent five-year period, identifying no recorded accidents along Dodford Lane or at its junction with Main Road (B4069), and none at the point where Dodford Lane terminates at Dodford Farm across the entire 26 years of data held. Two minor, 'slight'-severity single-vehicle collisions are recorded on Main Road within 150m of the junction (2021 and 2023), both attributable to driver error and unrelated to movements to or from Dodford Lane. The Transport Statement concludes that there is no evidence of a road safety issue that the proposal would exacerbate.
- 6.23 A survey of trip activity at Frankhams' existing premises, undertaken over four days in July 2026, recorded an average of 58 two-way vehicle movements per weekday, with only 4 occurring within the typical AM network peak and 3 within the PM peak – equivalent to one additional

movement roughly every 15 minutes. As this level of activity already exists on the local highway network by virtue of Frankhams' current operation, and simply relocates rather than expands, the Transport Statement assesses the impact on the operation of the network as neutral and concludes the proposal will have a negligible effect on the highway network.

- 6.24 The Rights of Way Officer has confirmed that the access, taken via bridleway CMAL31, already forms the principal means of access to the farm and benefits from a sealed surface. The Transport Statement identifies that visibility at the junction is presently somewhat compromised by overgrown vegetation, and the proposal accordingly includes junction visibility improvements, with splays commensurate with a 30mph approach speed along Dodford Lane and a 20mph approach from the farm which is a betterment on the existing situation. The applicants will ensure the bridleway is kept clear of obstruction, including parked vehicles, at all times, with all customer and staff parking accommodated within the site.
- 6.25 Cycle parking, comprising one space for employees and two for visitors in accordance with Wiltshire's guidance, will be accommodated within Building 2. Servicing and refuse collection will integrate with the farm's existing arrangements, and a construction management plan, addressing hours and routing of construction traffic, is anticipated to be secured by condition.
- 6.26 The farm is already served by private drainage. Foul drainage will be accommodated through a new PTP or equivalent within the adjacent field to the north (which is within Dodford Farm's freehold). The buildings already benefit from a mains power supply. No additional infrastructure works are considered necessary to serve the proposed use. As the soil type is identified as freely draining and the site is not within a critical drainage area, it is considered that if necessary further drainage details can be secured by condition.

iv ***The site has reasonable access to local services***

- 6.27 Dodford Farm is situated within the open countryside, 3.5km from Christian Malford, 6.5km from Great Somerford and 6.5km from Lyneham.
- 6.28 The term 'reasonable access' is not qualified within the Core Strategy, and while there are no precedents in planning, it remains that consistency of decision making is an established principle as confirmed by the case of North Wiltshire District Council v Secretary of State for the Environment and Clover (1993) 65 P&CR 137, in which it was held that; *"consistency is self-evidently important to both developers and development control authorities. But it is also important for the purpose of securing public confidence in the operation of the development control system. I do not*

suggest, and it would be wrong to do so, that like cases must be decided alike. An inspector must always exercise his own judgment. He is therefore free upon consideration to disagree with the judgment of another but before doing so he ought to have regard to the importance of consistency and to give his reasons for departure from the previous decision.”

6.29 To qualify ‘reasonable access to local services,’ previous decision making can be considered to determine the council’s preferred approach.

6.30 In application reference PL/2021/11626, which was approved under Delegated Powers on 18th January 2022, the change of use of an unused covered silage store at Savernake Farm to B2 and B8 uses was held to have reasonable access to local services.

6.31 The proposed development was 5km from Marlborough, which was only accessible via the unlit and un-foot pathed A346. Notwithstanding this, the Planning Officer concluded that;

“With regards to criterion iv, the site is located in open countryside and outside any defined settlement boundary. However, the site is accessed via the A346, and located circa 2.5 miles to the settlement of Marlborough. The closet bus stop also lies circa 950m from the access point in ‘Cadley’ (albeit there is no public footpaths along the A346 that could be safely used). It is noted that there is not particular good access to local services, however by taking into account the mixed use of the site, the proposed Class B uses, and that the A346 is a main road into Marlborough, the access to local services is considered reasonable on balance, albeit users of the building would be expected to mainly use private vehicles.”



Fig 12 – B2 & B8 development at Savernake Farm in relation to nearest services at Marlborough

6.32 The proposed scheme at Dodford Farm is very similar in terms of both the proposed development as well as its countryside location to the permitted development at Savernake Farm and as it is more closely related to the services provided within Christian Malford (3.5km as opposed to 5km), it must follow that the proposed scheme falls within the tolerance of criterion iv.

6.33 Furthermore to this point, the National Planning Policy Framework is an important material consideration, which at paragraph 88 states that;
“planning policies and decisions should enable [inter alia];

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;

v **The conversion or re-use of a heritage asset would lead to its viable long term safeguarding.**

6.34 Dodford Farmhouse was listed on 25th November 1987 under List Entry Number 1022466. The building sits amidst a mix of domestic, agricultural and children's day nursery uses.

6.35 The listing description references the house only however it also stands to reason that the ancillary outbuildings located immediately adjacent to and within the yard of the farmhouse may (as highlighted within Fig 13 in purple) also be curtilage listed. These structures are in separate ownership.

6.36 While it does not follow that all heritage structures in the vicinity of a listed building will also be listed (as per the findings held within Attorney-General ex rel. Sutcliffe and Others v. Calderdale BC [1983] JPL 310, Debenhams PLC v Westminster CC (1986) and Egerton v Taunton Deane [2008] EWHC 2752 (Admin)), it is accepted, for the purposes of this application, that Building 3 may fall within the curtilage of Dodford Farmhouse and may therefore a curtilage-listed building for the purposes of the Planning (Listed Buildings and Conservation Areas) Act 1990.



Fig 13 – Grade II Listed Dodford Farmhouse & the proposed scheme site

- 6.37 Accordingly a linked application for listed building consent is submitted alongside this application.
- 6.38 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building, its setting, and any features of special architectural or historic interest which it possesses; the courts have confirmed that this duty requires considerable importance and weight to be given to the desirability of preserving that setting (*East Northamptonshire DC v Secretary of State for Communities and Local Government* [2014] EWCA Civ 137). Paragraph 205 of the NPPF requires great weight to be given to the asset's conservation irrespective of whether any identified harm is substantial, less than substantial, or amounts to total loss.
- 6.39 Building 3's significance derives principally from its evidential and group value as a surviving agricultural building historically associated with Dodford Farmhouse, illustrating the farmhouse's former function at the centre of a working farmstead; its own architectural interest, as an altered, mid-twentieth century-roofed, open-fronted linhay of vernacular but utilitarian form, is comparatively modest.
- 6.40 The proposed works, being limited to sensitive glazing and cladding set behind the existing structural bays, a single new door to the rear elevation, and the removal of the discordant Building 4 to reveal Building 3's red-brick elevation, would retain the building's form, structure and principal character, and would not sever its physical or historic relationship with the farmhouse. The case officer's own assessment, reached notwithstanding the officer's conclusion on curtilage listing, is that the proposed works 'would lead to the asset being safeguarded through finding a viable long-term use', and that neither the operational development nor the change of use "*would cause any demonstrable harm to the setting of the Grade II listed Dodford Farmhouse.*"
- 6.41 On this basis, it is submitted that any harm to the significance of Dodford Farmhouse, inclusive of curtilage-listed Building 3, would sit at the very lowest end of the less than substantial harm identified at paragraph 208 of the NPPF, being limited to the sensitive alteration and change of use of a building of modest individual significance whose principal value (its historic association with the farmhouse) is preserved rather than severed.
- 6.42 Any such harm, however modest, falls to be weighed against the public benefits of the proposal in accordance with paragraph 208 of the NPPF. In this instance, the proposal would secure suitable, local premises for an established business of 37 years' standing, retaining six jobs and Frankhams' long-standing apprenticeship pipeline, and maintaining continuity of service for a client base built up over three decades, including in Lyneham and the surrounding villages.

- 6.43 The proposal would provide Dodford Farm with a diversified source of income, addressing the farm's current annual operating loss of approximately £20,000 following the withdrawal of farm subsidies, and securing the continued viability of the wider agricultural holding. It would also beneficially re-use a curtilage listed building.
- 6.44 These benefits are directly consistent with paragraph 88 of the NPPF and Core Policy 48, and are material considerations of substantial weight in favour of the proposal.

7.0 Other material considerations

Ecology and BNG

- 7.1 The application is accompanied by an ecological walkover & Preliminary Bat Roost Assessment together with subsequent Bat Survey Report prepared by Smart Ecology Ltd.
- 7.2 The walkover assessed Building 3 (the traditional brick building to be converted to office use) as having moderate suitability for roosting bats, by reason of gaps around its roof tiles, purlins and brickwork, while Buildings 1, 2 and 4 were assessed as having negligible suitability. Two dusk emergence surveys of Building 3 were accordingly undertaken, on 30 July and 27 August 2025, by licensed surveyors. No bats emerged from the building on either occasion, and no internal evidence of bats (droppings, staining, feeding remains) was found; the surveys conclude that roosting bats are likely to be absent. Foraging and commuting passes by common pipistrelle, soprano pipistrelle, noctule, Myotis species and long-eared bat species were recorded in the wider vicinity, several of which are priority species under Section 41 of the Natural Environment and Rural Communities Act 2006.
- 7.3 As a precaution against sporadic, undetected use, a precautionary method of working is proposed for the removal of roof tiles and other features with roosting potential (careful removal by hand, inspection as works proceed, and an immediate stop-works and ecologist call-out should bats be found), together with a commitment not to introduce additional external lighting beyond the existing baseline or, where essential, to follow ILP Guidance Note 8 on bats and artificial lighting. Biodiversity enhancement is proposed through the installation of one or more integrated bat boxes within the converted buildings.
- 7.4 The walkover also identified active swallow nests within Building 3. Swallows and their active nests are protected under the Wildlife and Countryside Act 1981, and it is proposed that any works affecting the nesting area are undertaken outside the bird nesting season (broadly March to September) or preceded by a check by a suitably experienced ecologist, together with the provision of compensatory nest cups within the retained structure as a biodiversity enhancement.

- 7.5 In respect of statutory Biodiversity Net Gain, the proposed development site measures less than 0.20ha. As of 6th August 2026, the site is below the BNG threshold.

Contamination

- 7.6 Within the LPA's pre-application advice, the council's Public Protection team has identified the potential for land contamination associated with the buildings' historic agricultural and livestock use. The buildings have been redundant for some years and it does not always follow that agricultural or livestock use leads to contamination. In this instance on site there are no contamination sources identifiable and therefore contamination is not considered critical to this application. Notwithstanding this, should the Local Authority require a proportionate assessment, this can be considered by an appropriate condition.

Sustainable construction

- 7.7 Core Policy 41 encourages developers to incorporate sustainable construction principles, and the case officer has specifically invited further information on this point within the Pre-Application Response.
- 7.8 The re-use of the existing building fabric, rather than new-build construction, delivers an inherent embodied carbon benefit. The applicants' approach to operational carbon will follow a fabric-first principle, reducing energy demand through appropriate insulation, before meeting remaining demand through an all-electric approach to building services, ensuring the development is net zero ready as the electricity grid decarbonises.
- 7.9 The scale of Buildings 1 and 2 offers potential for a roof-mounted solar photovoltaic array in due course. Any such installation would represent a further, welcome diversification of the farm's income base, consistent with the objectives of this application, and its detailed consideration is reserved to a future application should the applicants wish to pursue it.

Fallback

- 7.10 Notwithstanding the above considerations, an alternative development may be secured at Dodford Farm for other general industrial purposes under Class R of the General Permitted Development Order subject to the consideration of transport, noise, contamination and flood risk – all of which have been concluded here.
- 7.11 The site therefore benefits from a credible fall-back position. Where there is a real prospect of a fall-back permission being implemented it is a material consideration. If it is a material consideration, the decision maker must have regard to it. The question is one of real possibility, not certainty; definitive resolution is not required. It is therefore clear that there does not need to be a guarantee. This has been confirmed through Zurich Assurance Ltd (t/a Threadneedle Property Investments), R (on the application of) v North Lincolnshire Council & Anor [2012] EWHC 3708 (Admin) (20 December 2012), which stated that; *"The prospect of the fall-back position does not have to be probable or even have a high chance of occurring; it has to be only more than a merely theoretical prospect. Where the possibility of the fall-back position happening is "very slight indeed", or merely "an outside chance", that is sufficient to make the position a material consideration."*

8.0 Discussion and conclusion

- 8.1 The starting point for determination is the development plan. The proposal falls to be assessed against Core Policy 48, as an accepted exception to the settlement strategy at Core Policies 1 and 2 – a conclusion shared by the case officer within the Pre-Application Response.
- 8.2 The detailed criteria of Core Policy 48 have been substantively evidenced. The buildings are confirmed structurally sound and capable of conversion without major rebuilding by the accompanying Structural Report; the proposed works would preserve their character and would not harm the character or appearance of the landscape; no material harm to residential amenity is anticipated, the accompanying Noise Impact Assessment confirming a low impact some 6dB below background levels at the nearest residence; the site benefits from adequate access and infrastructure, confirmed by the accompanying Transport Statement, which records no highway safety issue and a negligible effect on the highway network, together with continued observance of the Rights of Way Officer's requirements in respect of bridleway CMAL31; and the proposal would secure the long-term viable safeguarding of Building 3, now accepted as curtilage listed, subject to the grant of listed building consent.
- 8.3 The site's accessibility to local services by means other than the private car is limited, and this is accepted, consistent with the case officer's own assessment, as a matter carrying limited negative weight. This is an inherent and unavoidable feature of a countryside site properly qualifying for the Core Policy 48 exception, and is not considered to outweigh the benefits of the scheme, particularly given the support for rural economic development and diversification of agricultural enterprises given by paragraphs 88 and 89 of the NPPF.
- 8.4 In heritage terms, any harm to the significance of Dodford Farmhouse and curtilage-listed Building 3 is considered to sit at the very lowest end of less than substantial harm, and is clearly outweighed by the public benefits of the proposal, in accordance with paragraph 208 of the NPPF.
- 8.5 Ecological matters have been addressed through an Ecological Walkover and Bat Survey Report, confirming roosting bats to be likely absent from Building 3 subject to a precautionary method of working, and identifying appropriate mitigation for active swallow nests to be secured by condition. Land contamination and drainage matters are not considered to be critical to the proposed development and can be addressed through appropriately worded planning conditions if necessary.

- 8.6 The proposal would secure the retention of an established local employer of 38 years' standing and six jobs, and would provide Dodford Farm with a diversified income stream necessary to address its current annual operating loss and to secure the long-term future of the holding. These benefits are directly consistent with paragraph 88 of the NPPF and Core Policy 48, and, taken together with the heritage benefit of securing Building 3's optimum viable use, are considered to weigh substantially in favour of the proposal.
- 8.7 Having regard to the development plan as a whole, the relevant provisions of the NPPF, and the material considerations addressed in this Statement, it is submitted that the proposal represents sustainable development which should be granted planning permission, together with the accompanying listed building consent, subject to appropriately worded conditions.



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