

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

APPLICATION REFERENCE:	PL/2026/04938
APPLICATION TYPE:	Prior approval Part 3 Class Q: Agricultural buildings to dwellinghouses
SITE ADDRESS:	Pickers Palmers Farm, Capps Lane, Heywood, Westbury, BA13 4NE
DEVELOPMENT DESCRIPTION:	Convert barn 4 and barn 6 into 4 dwellings with external insulated cladding and external garden and parking space area
RECOMMENDATION:	That Prior Approval is Granted

SITE DESCRIPTION/CONTEXT

Pickers Palmers Farm is located in the open countryside to the east of the village of Heywood. The site is surrounded by farmland with mainly farm buildings located adjacent, although some of these have been subject to previous Class Q approvals for conversion to residential uses.

The site is located within the Salisbury Plain Special Protection Area (SPA) and within the 'Grey' and 'Yellow' zones of the adopted Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) relating to areas at medium risk for habitat loss and increased pressure from recreational impacts. A lake referenced as the Clay Pit is located directly to the south. The site does not lie within Flood Zones 2 or 3 and is not subject to high levels of surface water or ground water flooding.



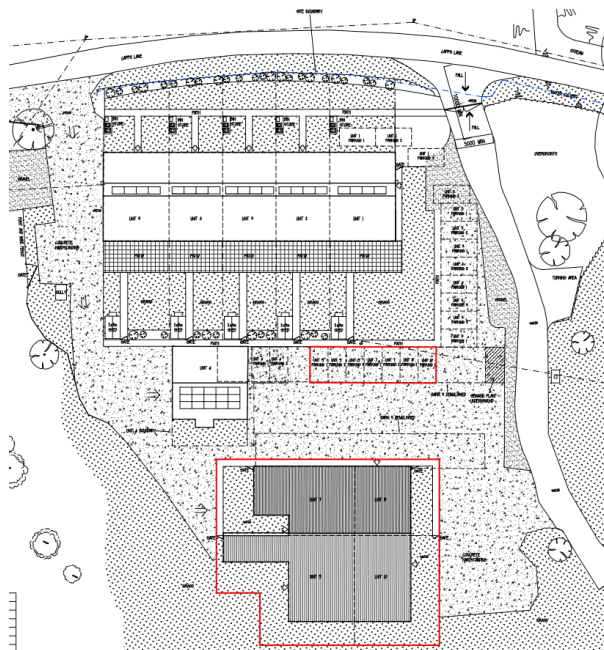
Existing building east elevation



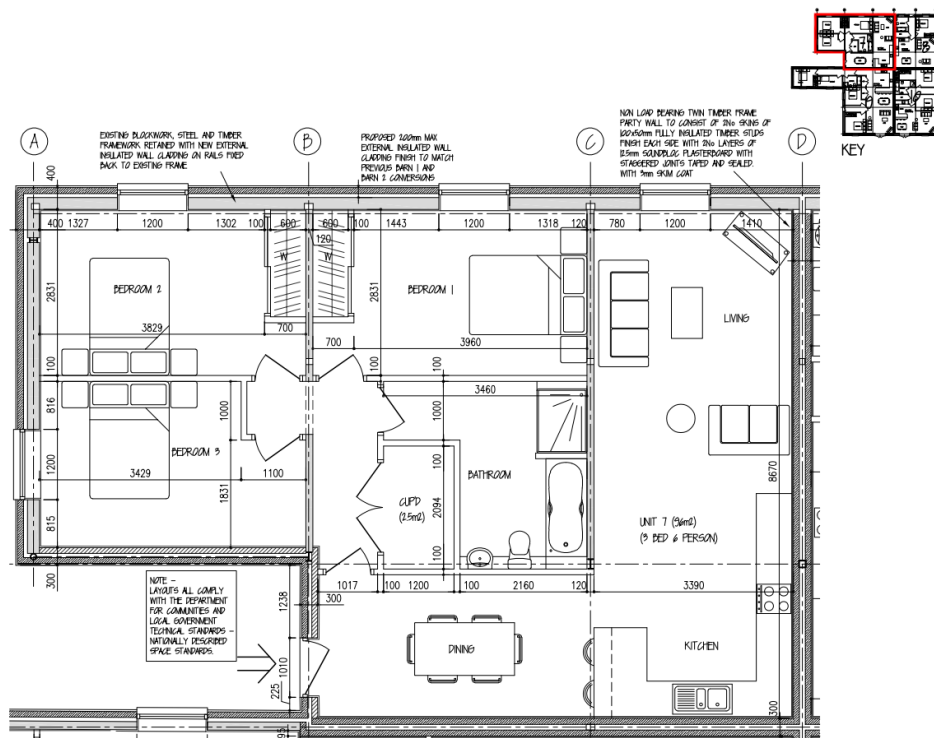
Existing building south elevation

PROPOSAL

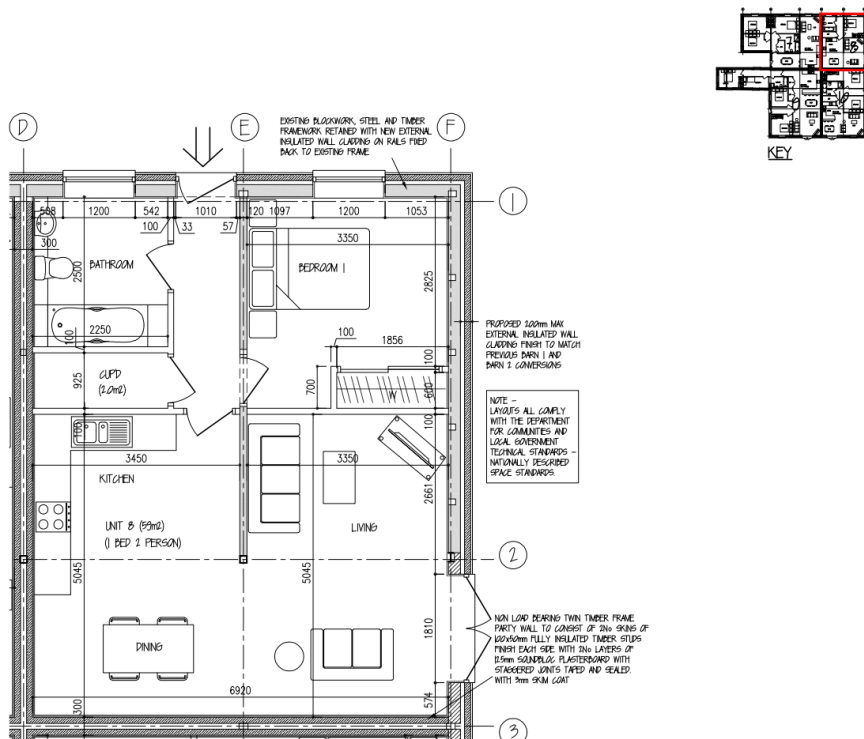
This application seeks the conversion of 2 barns on site (referred to as barn 4 and barn 6) to 4 residential dwellings (1 x 1 bed, 1 x 2 bed, 1 x 3 bed and 1 x 4 bed) as detailed in the plans below.



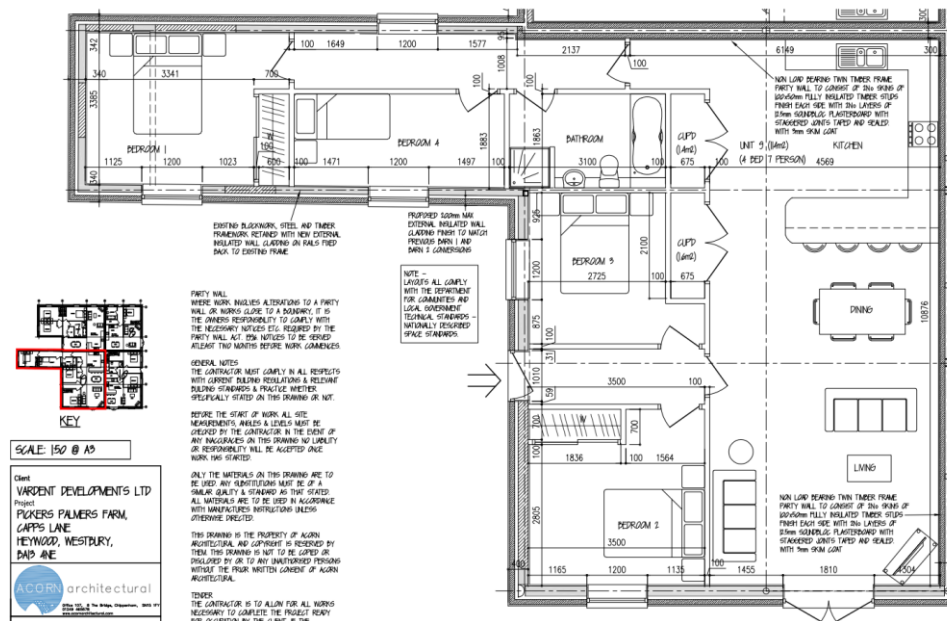
Proposed block plan detailing proposed 4 new dwellings (units 7 to 10 within red line) and existing 6 dwellings (units 1 to 6) approved under previous prior approval/ full applications



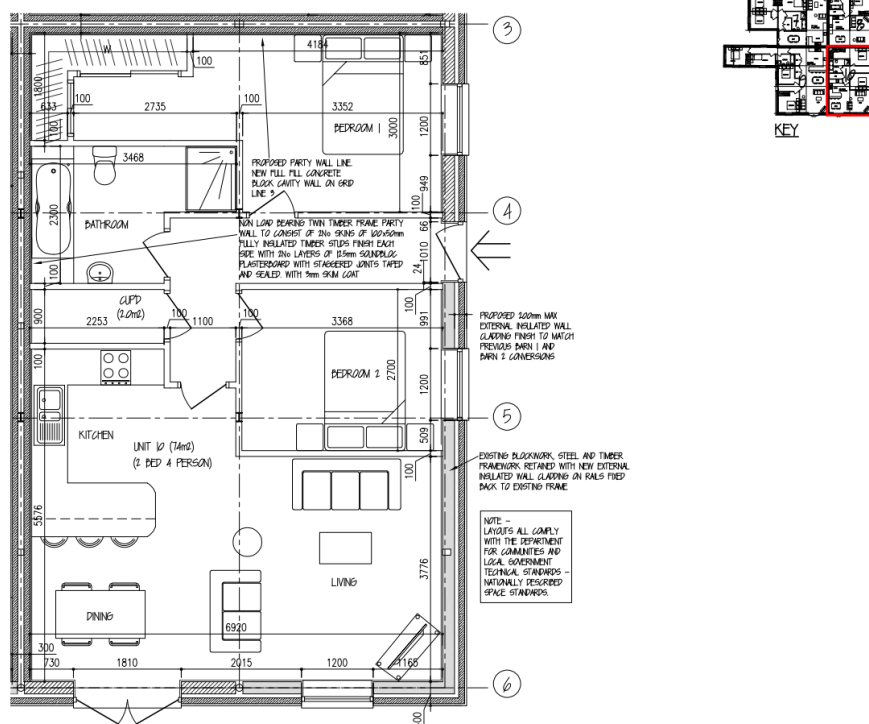
Floorplan unit 7



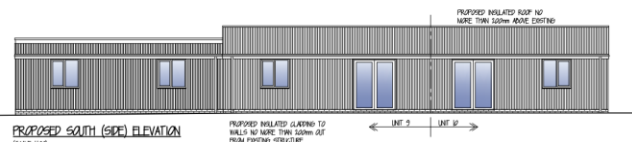
Floorplan unit 8

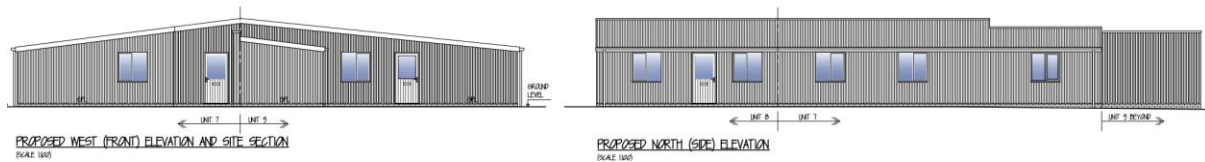


Floorplan unit 9



Floorplan unit 10





Proposed elevations

RELEVANT LEGISLATION, POLICY AND GUIDANCE

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

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

Conservation of Habitats and Species Regulations 2017 (as amended).

RELEVANT PLANNING HISTORY

PL/2026/02089 – Convert barn 4 and barn 6 into 4 dwellings with external insulation to walls and roof not exceeding 0.2m (200mm) and proposed external garden and parking space area to not exceed the original Barn area – **Refused, for the following reason –**

1. *The submitted plans and supporting information fail to satisfactorily demonstrate that the existing structures, in particular 'Building 6', would be capable of taking the loading associated with residential conversion and use. The scope of the proposed building operations, which are shown to include new external load bearing walls and new foundations, are considered to fall beyond those reasonably necessary to convert the buildings to residential use and amount to a substantial rebuild, contrary to Paragraph Q (c) and Q1 (j) of Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).*

The following planning history relates to other buildings within the wider farm complex:

PL/2025/09355 – Changes after approval for Barn 1 (residential conversion to units 1-5), Barn 2 (residential conversion to unit 6). Proposed boundary change to external areas for units 1-6. Proposed roof alteration to units 1-5 to include solar panels. Proposed brickwork finish to unit 6 to match units 1-5. Proposed bin store area and sheds added for units 1-6. – **Approved**

PL/2025/06077 – Convert barn 2 into 1 dwelling with proposed rear extension and external insulation to walls and roof not exceeding 0.2m (200mm). Proposed external

garden and parking space area to not exceed the original Barn area. – **Prior Approval Granted**

PL/2025/04488 – Prior approval under Part 3 Class Q for the Conversion of barn to 1 dwelling. – **Prior Approval Refused**

PL/2025/03730 – Prior approval under Part 3 Class Q to convert barn to 5 dwellings with proposed rear extension and external insulation to walls and roof not exceeding 0.2m (200mm). Proposed external garden and parking space area to not exceed the original Barn area. – **Prior Approval Not Required**

PL/2023/06122 – (Class Q) Change of use of agricultural building to 4 no. dwellinghouses – **Prior Approval Not Required**

CONSULTATIONS

Bratton Parish Council: The Parish Council has the following comments:
Comment as per the below:

(a) transport and highways impacts of the development, BPC remains concerned that the increases in housing will exacerbate traffic problems on Capps Lane.

(b) noise impacts of the development, not aware of any issues – for Wiltshire Council Planning to advise

(c) contamination risks on the site, not aware of any issues – for Wiltshire Council Planning to advise

(d) flooding risks on the site, not aware of any issues – for Wiltshire Council Planning to advise

(e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order, and Not aware of any issues – for Wiltshire Council Planning to advise

(f) the design or external appearance of the building

Not aware of any issues – expect design to be consistent with Bratton's 'made' Neighbourhood Development Plan.

(g) provision of adequate natural light in all habitable rooms of the dwellinghouses
Not aware of any issues – for Wiltshire Council Planning to advise

Wiltshire Council Highways Officer: No objection

Wiltshire Council Public Protection Officer: No comments received

ASSESSMENT

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

Q. Development consisting of—

(a) a change of use of—

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

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

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

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

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

(a) the piece of land, whether enclosed or unenclosed, immediately beside or around the agricultural building, closely associated with and serving the purposes of the agricultural building, or

(b) an area of land immediately beside or around the agricultural building no larger than the land area occupied by the agricultural building,

whichever is the lesser;

Does the Proposal Qualify as Permitted Development?

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

Having completed the detailed checklist at Appendix 1, it is concluded that the proposed development qualifies as permitted development under Schedule 2, Part 3, Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

In addition to the limitations set out in Paragraph Q.1 of the GPDO, case law has established that certain proposals may exceed the scope of a "change of use" and instead constitute substantive construction work to form a new dwelling. In such instances, the development would fall outside the permitted development rights granted under Class Q. Therefore, it is necessary to assess whether the proposed works amount to a genuine "conversion" of the existing agricultural building, or whether they effectively result in a "replacement building."

Planning Practice Guidance (PPG) provides helpful clarification on this point, emphasising that the structural integrity and extent of building operations must be considered when determining whether a proposal qualifies as a conversion under Class Q. More specifically the PPG¹ provides the following guidance in this regard:

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

However, the right assumes that the agricultural building is capable of functioning as a dwelling. The right permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right...

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

This application is accompanied by a Structural Report by David Edwards Associates dated Aug 2026 and Planning, Structural & Technical Supporting Statement by Acorn Architectural.

Barn 4 comprises a single storey block built structure. The roof is of lean-to construction formed with timber purlins supporting corrugated steel sheeting. The floor consists of a concrete slab.

Barn 6 comprises a single storey timber framed structure. External walls are framed with low level dense blockwork with timber posts and timber side rails supporting corrugated steel cladding. Internal walls are formed with low level dense blockwork with timber posts. Internally the building is formed with regular timber frames supporting timber purlins. The southern external wall has partially collapsed in one bay.

The Structural Report concludes that –

- the existing timber frames within barn 6 are structurally suitable to form part of the proposed redevelopment
- based on the visual inspection undertaken, trial holes to show the existing slab and foundation, structural calculations and subject to the recommendations outlined

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

above, the existing structures are robust, permanent and substantial, providing a strong basis for conversion.

- the external cladding is proposed to be a lightweight panel system which is non load bearing and can be readily supported by the existing structure.

As detailed above, application PL/2026/02089 was refused, in summary, because the LPA considered insufficient information had been submitted to satisfactorily demonstrate that the existing structures, in particular 'Building 6', would be capable of taking the loading associated with residential conversion and use.

In this case, the applicants have submitted additional technical details (contained within the Planning, Structural & Technical Supporting Statement) that specifically deal with the points raised in the officer's report for refused application PL/2026/02089.

The technical statement advises additional structural investigations have been undertaken including –

- Drilling the slab to confirm thickness.
- Trial holes to expose foundations.
- Structural calculations of existing timber posts.

The technical statement advises –

- additional investigations as detailed above conclude the existing timber frames, foundations and slab are structurally capable of supporting the proposed conversion
- recognises that there is damage to the southern dwarf walls however this is repairable, walls would benefit from some upgrading, however the core structure is sound and suitable for conversion
- works of upgrading will be required to the roof and the entire roof will not need replacing
- the existing cladding and proposed lightweight insulated cladding is non-loadbearing.
- the few steel posts are supplementary rather than the primary load-bearing structure
- lightweight cladding is proposed as detailed on the plans
- the existing foundations and slab remain structurally adequate
- Internally the revised scheme has eliminated blockwork in place of non-load bearing timber partitions

The report concludes the retained timber frames, dwarf walls, slab and foundations are continuing structural elements and remain capable of performing their primary function

The proposed works are therefore considered to fall within the scope of those permitted under Class Q of the GPDO. The development comprises alterations that are consistent with the conversion of the existing agricultural building to residential use, including the installation of new windows and doors, replacement cladding and roof coverings, and internal works such as flooring. These works are to be carried out within the existing structural frame, which is to be retained without modification.

No structural alterations are proposed or appear necessary to facilitate the conversion, and the works are therefore regarded as internal or superficial in nature, not requiring separate planning permission. Therefore, the proposal does not exceed the limitations set out in paragraph Q.1 and is considered to constitute permitted development.

Is Prior Approval Required?

Where a proposal complies with all the provisions limitations set out under Class Q of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), the developer must apply to the Local Planning Authority (LPA) for a determination as to whether prior approval is required for the specified impacts and, if so, whether it should be granted.

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

Where the development proposed is development under Class Q(a) together with development under Class Q(c), development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to—

- (a) transport and highways impacts of the development,*
- (b) noise impacts of the development,*
- (c) contamination risks on the site,*
- (d) flooding risks on the site,*
- (e) whether the location or siting of the building makes it otherwise impractical or undesirable for the building to change from agricultural use to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,*
- (f) the design or external appearance of the building, and*
- (g) the provision of adequate natural light in all habitable rooms of the dwellinghouses,*

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

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

The local planning authority must, when determining an application—

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

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

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

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

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

Transport and highways impacts of the development

Assessment

Access to the site would be off an existing driveway off Capps Lane. Seven parking spaces are proposed for the 4 dwellings. Council parking standards would normally require 8 for the proposed 4 units however there is considered plenty of room on site to accommodate an additional parking space. In addition, details submitted under application PL/2025/09355 advise the access works to the site have been completed as detailed in the photo below and confirmed following a site visit. The existing access is considered adequate to accommodate additional vehicular movement without alteration. Whilst noting comments from Bratton Parish Council, it is not considered that the scheme would result in the level of harm to highway safety to warrant a recommendation for refusal or to request additional details.



Photograph of completed access submitted with application PL/2025/09355

Conclusion

Prior approval in relation to traffic matters is not required.

Noise impacts

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

Assessment

The building is located in an open countryside location where previous farming operations on the former agricultural holding have ceased, therefore it is considered there would be no noise issues impacting the amenity of future residents.

Conclusion

Prior approval in relation to noise matters is not required.

Contamination risks

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

Assessment

The Council's public protection officer has raised no specific issues in respect of contamination, and it is therefore considered there are no contamination risks on site.

Conclusion

Prior approval in relation to contamination matters is not required.

Flooding risks

Assessment

The site does not lie within Flood Zones 2 or 3 and is not subject to surface water or groundwater flooding. As such it is considered the development is not subject to flooding risks.

Conclusion

Prior approval in relation to flood risk matters is not required.

Location (impractical or undesirable)

Assessment

Previous applications as detailed above have already been approved for residential use on the wider site. The location and siting of the buildings currently under consideration, located directly to the south of those previously approved, is therefore considered acceptable in principle.

Conclusion

Prior approval in relation to location matters is not required.

Design or external appearance of the building

Assessment

The design and appearance of the dwellings is considered acceptable in this rural location, reflecting the former use as agricultural buildings.

Conclusion

Prior approval in relation to design matters is not required.

Provision of Natural Light

Assessment

Submitted plans indicate adequate natural light to all habitable rooms can be provided by new window openings in the new walls which would be provided.

Conclusion

Prior approval in relation to natural light matters is not required.

Other matters

The site is located within the Salisbury Plain Special Protection Area (SPA) and within the 'Grey' and 'Yellow' zones of the adopted Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) relating to areas at medium risk for habitat loss and increased pressure from recreational impacts.

The applicant is therefore advised that they should consult with Natural England, and that the conversion to dwellings (under prior approval) should be subject to an application submitted under Regulation 77 of the Conservation of Habitats and Species Regulations (2017).

CONCLUSION

The proposed works are therefore considered to fall within the scope of those permitted under Class Q of the GPDO. The development comprises alterations that are consistent with the conversion of the existing agricultural building to residential use, including the installation of new windows and doors, replacement cladding and roof coverings, and internal works such as flooring. These works are to be carried out within the existing structural frame, which is to be retained without modification.

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

		on this site)
(d)(ii)	Would the total cumulative floor space of all dwellings on the unit exceed 1,000 square metres?	No (applicants advise total cumulative floorspace over the 10 units is 835sq metres)
(e)	Is the site occupied under an agricultural tenancy without written consent from both landlord and tenant?	No
(f)	Was an agricultural tenancy terminated less than 1 year before development begins for the purpose of Class Q development, without written agreement that the site is no longer needed for agriculture?	No
(g)	Has development under Class A(a) or B(a) of Part 6 (agricultural buildings/operations) occurred on the unit within the last 10 years?	No
(h)	Would the development extend the building beyond its existing external dimensions, except for: (i) Extensions allowed under Q.1(i), or (ii) Protrusions up to 0.2m allowed under Q.1(j)(i)?	No
(i)	Would the proposed extension: (i) Have more than one storey? (ii) Be sited anywhere other than the rear? (iii) Extend more than 4m beyond the rear wall? (iv) Have eaves higher than the existing building? (v) Be taller than the highest part of the roof or 4m above ground? (vi) Extend beyond a side or principal elevation? (vii) Be sited on land not covered by a hard surface installed before 24 July 2023 or not in place for at least 10 years?	N/A
(j)	Would the building operations include anything other than: (i) Installation/replacement of windows, doors, roofs, exterior walls, or services, or (ii) Partial demolition reasonably necessary for those operations?	
(k)	Is the site located on article 2(3) land (e.g., National Parks, AONBs, conservation areas)?	No
(l)	Is the site or any part of it: (i) A Site of Special Scientific Interest? (ii) A safety hazard area? (iii) A military explosives storage area?	No
(m)	Is the site or any part of it a scheduled monument?	No

(n)	Is the building a listed building?	No
(o)	Would the converted building (excluding extensions) fail to meet the nationally described space standard?	No
(p)	Does the building lack suitable existing access to a public highway?	No