

PLANNING, DESIGN AND ACCESS STATEMENT

**CONVERSION OF TWO AGRICULTURAL BUILDINGS TO
FORM A SINGLE RESIDENTIAL DWELLINGHOUSE AND
ASSOCIATED WORKS**



**BARNS AT WILSFORD DOWN COTTAGE, WILSFORD,
PEWSEY, SN9 6HB**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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APPENDIX 1: Keevil Appeal Decision (ref: (ref: 6004625)

1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by RAW Planning Ltd on behalf of the Tuckey family in support of a full planning application for the conversion of two former agricultural buildings to form a single dwellinghouse with associated landscaping and ancillary works at Barns at Wilsford Down Cottage, Wilsford, Pewsey, SN9 6HB ("the Application Site").
- 1.2 The application follows the withdrawal of planning application ref. PL/2024/10740. Since that time the proposals have been comprehensively reviewed and refined in response to comments received during the previous application. The revised scheme has been designed to reinforce the agricultural character of the buildings, reduce their domestic appearance, simplify the overall form of development and lessen its visual impact within the Wilsford Conservation Area, the setting of the adjacent Grade II listed Wilsford Down Cottage and the North Wessex Downs National Landscape.
- 1.3 The revised proposals are accompanied by an updated package of technical information including:
- Supporting architectural drawings and plans, prepared by Tuckey Design Studio.
 - Planning Statement, prepared by RAW Planning;
 - Heritage Statement, prepared by Forum Heritage;
 - Preliminary Ecological Appraisal, prepared by Pro Vision;
 - Structural Inspection Report, prepared by Shire Engineers;
 - Flood Risk Assessment, prepared by Calibro Consulting;
 - Viability Report prepared by Woolley & Wallis, and
 - Nutrient Neutrality Assessment, prepared by Holbury Consulting.
- 1.4 Together these documents demonstrate that the proposal represents the sensitive re-use of redundant, economically unviable rural buildings that are capable of conversion without substantial rebuilding. The revised design provides a viable long-term use for the buildings and is respectful of both the Conservation Area, adjacent listed cottage and the overall landscape setting.
- 1.5 This Statement provides an assessment of the proposal against the Development Plan and other material considerations. It explains how the revised scheme satisfies the requirements of Core Policy 48 of the Wiltshire Core Strategy together with the relevant provisions of the National Planning Policy Framework and demonstrates why planning permission should be granted.

2. THE APPLICATION SITE AND SURROUNDINGS

- 2.1 The application site is located at the western end of Wilsford, a small village and civil parish in the Vale of Pewsey. It is approximately 6 miles to the north east of Pewsey, 8 miles to the west of Devizes and 11 miles to the north of Marlborough. The village is characterised by ribbon residential development focused along Wilsford Road and a couple of farmsteads. Wilsford has a place of worship (Church of St. Michaels) and a village hall.



Image 1: aerial photograph of application site

- 2.2 The site within the red line area extends to approximately 0.3ha and includes two agricultural buildings. The westernmost barn is a large open-faced barn with single-skin corrugated cement walls and roof, the first 1.5 metres of the walls comprise breeze blocks on the southern elevation, and railway sleepers on the eastern and western elevations. The barn comprises of three spans, the two outer spans being duopitch roofs and the central span being a monopitch. The date of construction is unknown but is estimated to be circa the 1960's.



Image 2: Western Barn – north elevation



Image 3: Western Barn – south elevation

- 2.3 The easternmost barn is constructed of more modern materials. The barn is a tall single storey steel portal framed building with a fibre cement cladded roof. The walls are clad in corrugated steel cladding with low level single skin block walling. The barn comprises of three bays with each frame having a central column.



Image 4: Eastern Barn – west elevation



Image 5: Eastern Barn – east elevation

- 2.4 An area of hardstanding and modified grassland is present around the barns, as well as a small blockwork and render outbuilding immediately north. The surrounding land use is predominantly agricultural and rural residential, with arable and pasture fields surrounding the village on all sides.
- 2.5 Near the entrance into the site is a simple, blockwork building which is proposed for demolition. An image of the barn can be seen overleaf.



Image 6: Existing Blockwork Barn

- 2.6 The agricultural buildings are associated with No. 21 The Street, which itself is Grade II listed. The property, also known as 'Wilsford Down Cottage' is an 18th century two-storey house constructed of brick and timber framed with a thatched roof. Wilsford Down Cottage is visible in the below Image.



Image 7: Wilsford Down Cottage – Grade II Listed

- 2.7 In relation to national and local land designations for the purpose of planning policy, the site is situated in the Pewsey Community Area and the settlement of Wilsford. The site and surrounding landscape lie within the North Wessex Downs National Landscape and the Wilsford Conservation Area.
- 2.8 The site falls within Flood Zone 1 (lowest risk of flooding) and is less than 1ha but falls within an area identified by the Wiltshire Strategic Flood Risk Assessment (SFRA) as having groundwater flooding potential. The site also falls within the Hampshire River Avon Catchment where new residential development is required to deliver nutrient neutrality.

3. THE APPLICATION PROPOSALS

- 3.1 The application proposes the conversion and re-use of two agricultural buildings to form a four-bedroom dwellinghouse with associated parking and amenity land. The buildings are no longer part of an established agricultural unit and therefore are surplus to requirements. They have only been used partially in recent years on an ad hoc basis.
- 3.2 The application follows the withdrawal of planning application ref. PL/2024/10740. Prior to the submission of the original application, the applicant held a well attended public consultation event at Wilsford Village Hall to explain the proposals and invite feedback from local residents.
- 3.3 Since that time the proposals have been carefully amended and now result in a revised scheme that responds positively to the comments received from statutory consultees during the previous application process. The amendments focus on simplifying the design and materials and retaining more of the original buildings. It is considered that this reinforces the agricultural character of the buildings and their setting. The table below summarises the key consultation responses and how this application has adequately addressed them.

Consultee	Comment	How it has been addressed
Highways	No objection	n/a
Drainage	No objection	n/a
Charlton St Peter & Wilsford Parish Council	No objection in principle to the conversion of the existing agricultural buildings. Objection to the proposed vehicular access across the adjoining agricultural field. Concerns raised regarding potential light spill/dark skies and the lack of detail regarding the colour of the external cladding.	Removal of access across the adjacent field and removal of the field from the application (the field will remain in agricultural use). External lighting can be controlled by condition to ensure that it is motion-sensitive and designed to minimise light spill. The revised scheme also confirms a natural treated timber cladding and has substantially reduced glazing and other domestic detailing.
CPRE	Welcomed the principle of re-purposing the buildings but raised	The access across the adjoining field has

	concerns regarding the proposed access across the adjoining field and its effect on the rural character. Also raised concerns regarding the domestic appearance of the conversion, its visibility within the Conservation Area and National Landscape, external materials, dark skies/light spill, ecology and sustainability.	been removed. The design has been simplified to retain the agricultural form and character so it does not have a domestic appearance – there is a detailed description below. The external materials are consistent with agricultural buildings – all detailed below. In terms of visibility, the proposals significantly reduce the existing volume and therefore will be less visible than previously. Details set out below. With regards to ecology, a full report accompanies this application and details set out below. With regards to sustainability, the existing structure would be entirely re-used and will be an exemplar of retrofit architecture. The new building interior will be built using straw bale construction, clay plaster and natural insulation. It will be a high performing, low energy home. Solar panels will produce renewable energy for the new building and rainwater harvesting will collect all water from the roofs for reuse within the building. As above - external lighting can be controlled by condition to protect dark skies and the timber cladding will be natural treated timber.
Conservation	Concern that the conversion and associated residential curtilage would erode the open agricultural character	The access and residential use of the adjoining field have been removed and the development is now contained within the existing farmstead. The design has

	of the site and Conservation Area. Considered that the modern agricultural buildings detract from the setting of No. 21 and that their retention in residential use would perpetuate their presence without an agricultural purpose. Limited weight was given to existing hedge screening.	been simplified, with reduced glazing and agricultural materials so that the buildings retain their utilitarian agricultural character. The updated Heritage Statement concludes that the sheds provide a tangible link with the historic farmstead and contribute to understanding No. 21 as a former farmhouse. The removal of the blockwork shed and part of the western barn would also improve the immediate setting of No. 21.
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Site Layout

- 3.4 The site layout has been amended by removing the access through the adjacent field which was proposed in the original application. This has ensured that the existing mature hedgerow can remain in situ as a natural site boundary. The hedge along the site frontage has grown since the previous application and it is now not possible to glimpse into the site over the hedge from the street. New native tree planting is proposed alongside the retained boundary to soften views into the site and reinforce the agricultural nature of the site. The resulting curtilage reflects the scale and character of the existing farmstead and will help to reduce any domestic appearance.



Image 8: View of the site with buildings just visible beyond the existing mature hedge

Building Design and Materials

- 3.5 The design of the conversion has also been substantially revised to retain more of the buildings' agricultural character. The number of openings has been significantly reduced, with the removal of openings from the principal elevation and a reduction in both the number and size of first-floor windows.
- 3.6 The existing structural steel frame has been retained and expressed wherever practicable, allowing the original agricultural construction to remain a defining feature of the development.
- 3.7 A window from each bedroom has been removed at the first floor and the size of the windows has been reduced in scale. There is now a more ordered style of window.
- 3.8 The overall form of the development has been simplified through the removal of the previously proposed link element which has reduced the appearance of bulk from the front of the building. This can be seen clearly below at Images 7 and 8.
- 3.9 The palette of materials for the elevations has been amended to better reflect the original agricultural purpose of the building. The existing blockwork has been retained wherever practicable, and where it has not been retained, it is proposed to replace it on a like for like basis.
- 3.10 The corrugated iron on the original design has been replaced by vertical "hit and miss" timber boarding which would be set back. This will maintain an agricultural character but have a softer appearance. Essentially, the materials amendments have reduced the domestic features from the original application and sought to preserve and enhance utilitarian character.



Image 9: Previously Proposed North Elevation (application ref: PL/2024/10740)



Image 10: Revised Proposed North Elevation

Internal Layout

- 3.11 Internally, the proposals provide a spacious family dwelling arranged around the existing structural framework. The western barn accommodates the principal living accommodation, including kitchen, dining and living spaces together with ancillary accommodation at ground floor level and four bedrooms at first-floor level. The eastern building provides garaging, storage and a home studio, ensuring that ancillary functions remain contained within the existing built form.
- 3.12 The proposal will have sustainability at its core. The existing structure would be entirely re-used, and would be an exemplar of retrofit architecture. All of the demolished materials (blockwork, railway sleepers etc) would be retained for re-use in the construction works.
- 3.13 The new building envelope is proposed to be constructed using straw bale construction, clay plaster and natural insulation. The house would be a low carbon and high performing house. Rainwater harvesting would collect all water from the roofs for re-use within the house.

4. RELEVANT PLANNING POLICIES

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is considered to be a material consideration which attracts significant weight.
- 4.2 This section refers to relevant national planning policy and guidance as well as Development Plan policies that provide the planning policy framework for this application that should be considered. It deals with the following layers of policy and guidance:
- National Planning Policy Framework (NPPF); and
 - The Development Plan (including Neighbourhood Plans).

National Planning Policy Framework (NPPF)

- 4.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The latest version was published on 17 August 2026 and replaces the previous Framework published in December 2024.
- 4.4 **Policy S5** addresses the principle of development outside settlements. It identifies the forms of development which should be approved unless their benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies as a whole. These expressly include the reuse, alteration or extension of an existing building, provided that the building is lawful and of permanent and substantial construction and that any alteration or extension would not result in a disproportionate increase in its size.
- 4.5 Policy S5 also supports development outside settlements where it would address an evidenced unmet need, including housing proposals where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, provided that the development is physically well-related to an existing settlement and can be accommodated having regard to available infrastructure.
- 4.6 **Policy L2** concerns the effective use of land. It requires substantial weight to be given to the benefits of proposals which make better use of vacant and underutilised land and buildings, including by bringing suitable buildings into residential use. The proposal accords with this objective by providing a viable and enduring use for buildings which are no longer required for agricultural purposes.
- 4.7 **Policy DP3** sets out the key principles for well-designed places. Development should respond positively to the history, character and features of the site and its setting so that it integrates with and enhances

its surroundings. Relevant considerations include the arrangement and form of buildings, materials and architectural detailing, the reuse and integration of heritage assets, landscape, nature, movement and the creation of attractive and functional places.

- 4.8 Chapter 18 of the NPPF addresses the conservation and enhancement of the historic environment. **Policy HE4** confirms that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.
- 4.9 **Policy HE5** requires proposals affecting heritage assets to be supported by a proportionate assessment of the significance of those assets, including the contribution made by their settings, and of the potential effects of the development upon that significance. The application is supported by a detailed Heritage Statement which considers the Wilsford Conservation Area, the setting of the adjacent Grade II listed Wilsford Down Cottage and the contribution made by the existing agricultural buildings.
- 4.10 **Policy HE6** requires substantial weight to be given to the conservation of designated heritage assets, irrespective of whether an identified effect would amount to a positive effect or harm.
- 4.11 **Policy HE9** relates specifically to conservation areas. It requires proposals within or affecting a conservation area to retain and conserve buildings and features which make a positive contribution to its character or appearance and to take account of the area's special architectural or historic interest in the design of development. Proposals which conserve those elements that make a positive contribution should be supported.

The Development Plan

- 4.12 The Statutory Development Plan covering the application site comprises the Wiltshire Core Strategy (WCS) (2015). The most relevant policies in the consideration of this application are as follows:
- 4.13 **Core Policy 48 (Conversion and re-use of rural buildings)** supports proposals to convert and re-use rural buildings for tourism (amongst other) uses where they satisfy five criteria as follows:
- i. *The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the existing building.*
 - 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 streets.*
 - iii. *The building can be served by adequate access and infrastructure.*

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

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

- 4.14 It is then noted that “where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria”.
- 4.15 **Core Policy 50 (Biodiversity and geodiversity)** states that developments should attempt to conserve and preserve sites for their ecological value, as part of this the policy expects there should be no net loss gain of the local biodiversity resource
- 4.16 **Core Policy 51 (Landscape)** requires development to protect, conserve and where possible enhance landscape character and to not have a harmful impact upon landscape character with any negative impacts mitigated as far as possible through sensitive design and landscape measures.
- 4.17 **Core Policy 57 (Ensuring high quality design and place shaping)** sets out 14 criteria which all new developments must meet, including alterations to existing buildings. Specifically, criterion (iv) requires development to be sympathetic to, and conserve historic buildings, and criterion (xii) requires the use of high standards of building materials and finishes.
- 4.18 **Core Policy 58 (Ensuring the conservation of the historic environment)** states that development should protect, conserve and enhance the historic environment. Designated heritage assets should be appropriately enhanced in a manner appropriate to their significance.

5. PLANNING ASSESSMENT

The Principle of Development

- 5.1 Core Policy 48 establishes five criteria against which proposals for the conversion and re-use of rural buildings should be assessed. The policy goes on to state that where there is clear evidence that employment, tourism, community or cultural uses are not practical propositions, residential development may be appropriate provided those criteria are met. The suitability for alternative uses is considered later in this section.
- 5.2 Each criteria of Core Policy 48 is considered below.
- i. *The building(s) is/are structurally sound and capable of conversion without major rebuilding, and with only necessary extension or modification which preserves the character of the original building; and*
- 5.3 Firstly, the buildings have been examined by a qualified structural engineer and his report findings have been submitted alongside this application for consideration. The assessment confirmed that the barns proposed for conversion are structurally sound and are readily capable of being renovated and being brought back into residential use.
- 5.4 The amendments made since the previous application have further reduced the extent of intervention. The number of openings have been reduced, existing blockwork, existing portal steelwork is left visible and replacement works are limited to those necessary to facilitate the conversion.
- 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; and*
- 5.5 The site falls within the Conservation Area and is adjacent to a Grade II listed cottage. The buildings occupy an established part of the former farmstead associated with Wilsford Down Cottage and have long formed part of the built character of this part of the village.
- 5.6 The revised design reinforces the agricultural character of the buildings. As described in previous sections, the overall bulk has been reduced whilst maintaining the barn appearance, and the elevations have been amended to retain more original features and materials. The buildings that were immediately adjacent to the listed cottage have been removed giving the cottage its own space.
- 5.7 The existing access into the site is being retained and the field separating the site from the road will be planted with trees. The removal of a number of an unattractive blockwork building in the site frontage and the reduction in the bulk of the barns all work to improve the site by opening it up and creating

space around the cottage. The proposed reduction in bulk is presented in Images 9 and 10 below, and 11 and 12 overleaf.



Image 9: Existing built form on the site



Image 10: Reduction in built form through proposed development



Image 11: Rear view of existing built form



Image 12: Reduction in built form through proposed development

5.8 By retaining the access and significantly reducing the bulk rather than adding to it, would ensure that the character and appearance of the settlement would be enhanced.

5.9 Moreover, residential use is entirely compatible with surrounding land uses. The buildings adjoin existing residential properties and have historically formed part of a mixed farmstead environment. The proposal will not generate unacceptable levels of activity, noise or disturbance and will provide a level of residential amenity consistent with neighbouring properties.

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

5.10 The site benefits from an existing vehicular access point on to Wilsford Road, which provides direct access to the public highway. Wilsford Road is a well-established route with good connectivity to surrounding areas, including the A432 to the south and A345 to the east, which provide transport links to Devizes, Pewsey, and beyond. The existing access point offers good visibility in both directions, ensuring that the proposed residential use will not create any safety concerns related to vehicular access.

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

5.11 Wilsford is a small but well-connected village, offering essential local services, including a church and a village hall, which host a variety of activities for residents. The site is situated just 6 miles east of Pewsey, which is identified as a Local Service Centre within the WCS, providing a broad range of services and facilities, including schools, shops, healthcare services, and transport links. Pewsey also benefits from a railway station with services to London, further enhancing its accessibility. Wilsford is 3 miles from Upavon which has school, pubs, a village shop and transport links.

5.12 Additionally, the application site is approximately 8 miles from Devizes and 11 miles from Margood proximity to these two settlements (and their services and amenities) but notwithstanding this, there is a bus service in Marden that can be accessed on foot as well as the very popular Wiltshire Connect Pewsey Vale DRT minibus service where the timetabled route 210 goes to Devizes.

5.13 As stated in paragraph 109 of NPPF, varying opportunities for sustainable transport solutions should be considered, and the site's access to Pewsey, Upavon and other towns meets this criterion for a sustainable rural location.

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

5.14 Whilst the buildings are not designated heritage assets in their own right, they form part of the historic farmstead associated with the adjacent Grade II listed Wilsford Down Cottage and make a positive

contribution to the character of the Wilsford Conservation Area. The proposed residential use will secure their long-term future and preserve that historic relationship.

- 5.15 The removal of the western barn will result in a benefit, due to essentially “debulking” the barns massing, thereby enhancing the Grade II listed cottage by increasing the curtilage around it and future proofing it. The effect of this can be seen illustrated at Images 9-12.
- 5.16 The application is supported by a Heritage Statement prepared by Forum Heritage Services, which assesses the effect of the revised proposals on the setting and significance of the Grade II listed No. 21 The Street and on the character and appearance of the Wilsford Conservation Area. The assessment identifies the historic relationship between No. 21 and the former farmstead, concluding that, although modern, the existing agricultural sheds provide a tangible reminder of the agricultural history of the site and therefore make a positive contribution to the understanding and significance of the listed building.
- 5.17 The Heritage Statement concludes that the revised conversion would preserve this relationship, and that the buildings would retain their existing agricultural form, scale and character. The reduced glazing and improved cladding materials would ensure that they continue to be read as former agricultural buildings. Importantly, the proposal would not affect the ability to experience No. 21 or appreciate its significance. The removal of the blockwork structure closest to the listed building, together with the removal of part of the larger western shed, would improve its immediate setting and is identified as a minor public benefit to weigh in favour of the application.
- 5.18 In relation to the Wilsford Conservation Area, the Heritage Statement finds that the proposal would cause no harm to its character or appearance. The existing buildings are largely screened and form an established part of the agricultural character of this part of the village. Their sensitive conversion, improved materials and reduced domestic detailing would at least preserve, and potentially provide a minor enhancement to, the Conservation Area. The Heritage Statement therefore concludes that the proposals accord with the statutory duties relating to listed buildings and conservation areas, the NPPF and Core Policy 58 of the Wiltshire Core Strategy.

Alternative Uses

- 5.19 Core Policy 48 recognises that residential conversion may be appropriate where there is clear evidence that employment, tourism, community or cultural uses are not practical propositions. The previous application was not supported by a detailed viability assessment. The revised application addresses that matter through the submission of an independent Viability Report prepared by Woolley & Wallis.

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- 5.20 The Viability Report provides a detailed assessment of the realistic alternative uses of the buildings, including employment, tourism and community uses. It considers market demand, conversion costs, operational requirements and likely financial returns before concluding that none of those alternatives would represent a realistic or commercially viable long-term use of the buildings.
- 5.21 The report concludes that residential conversion represents the only realistic means of securing the long-term maintenance and conservation of the buildings. That conclusion is entirely consistent with their location within an established village, their relationship with surrounding residential development and the limited demand for alternative commercial or community uses in this location.
- 5.22 The revised application therefore provides the clear evidence required by Core Policy 48 that alternative uses are not practical propositions. When considered alongside the revised design, the updated Heritage Statement, the Structural Report and the remaining technical evidence submitted with the application, the proposal demonstrably satisfies each of the requirements of Core Policy 48.

Keevil Appeal Decision (ref: 6004625) – Material Consideration

- 5.23 Since the previous application was withdrawn, the Planning Inspectorate has issued its decision in respect of The Old Barn, Keevil (Appeal Ref. 6004625, decision dated 24 June 2026), concerning the conversion of a redundant rural building to a single dwelling following refusal by Wiltshire Council. This decision is a significant material consideration because it provides recent guidance on the interpretation and application of Core Policy 48 in the context of Wiltshire's current housing land supply position.
- 5.24 In reaching his decision, the Inspector identified conflict with aspects of the policy, and concluded that parts of Core Policy 48 are more restrictive than the NPPF because it supports the re-use of redundant rural buildings *without* requiring applicants to first demonstrate that alternative employment uses have been exhausted or that the site has reasonable access to local services. As a result, the Inspector concluded that conflict with those elements of Core Policy 48 attracted only limited weight in the overall planning balance.
- 5.25 The Inspector also recognised that Wiltshire's substantial housing land supply shortfall reduced the weight to be attached to those development plan policies that seek to restrict housing in the countryside and ultimately concluded that the benefits of delivering a windfall dwelling through the re-use of an existing rural building outweighed the identified policy conflict. When considered alongside the benefits and the efficient re-use of redundant rural buildings, the Inspector allowed the appeal.

Highways and Parking

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- 5.26 The proposed development will continue to utilise the existing vehicular access from The Street, which currently serves the site. No alterations to the access arrangements are proposed and the development will not require the formation of any new access onto the public highway.
- 5.27 As part of the revised scheme, the previously proposed access route through the adjoining field has been removed. The application site has been reduced in size and the retained hedgerow now forms the permanent site boundary. This amendment reinforces the relationship between the buildings and the existing farmstead, reduces the extent of domestic curtilage and limits the visual impact of the development.
- 5.28 The proposed dwelling will generate a modest level of traffic that is typical of a single residential property and considerably less intensive than many modern agricultural operations. The proposals therefore will not give rise to any material highway safety concerns or have an adverse effect on the operation of the local highway network.
- 5.29 Parking is provided within the existing group of buildings, with enclosed garaging and additional external parking spaces capable of accommodating the needs of future occupiers and visitors. Adequate turning space is also provided to enable vehicles to enter and leave the site in a forward gear.
- 5.30 The proposal makes effective use of existing infrastructure and does not require any off-site highway works. It therefore represents a sustainable re-use of an existing developed site without introducing additional infrastructure or unnecessary engineering operations.
- 5.31 The proposed access and parking arrangements are appropriate to the scale and nature of the development and are considered to satisfy the requirements of Core Policies 57 and 61 of the Wiltshire Core Strategy.

Biodiversity

- 5.32 A Preliminary Ecological Appraisal (PEA) of the application site was carried out in August 2021, and a copy of the report is submitted as part of this planning application. The survey provided a thorough assessment of the site's ecological value, identifying key habitats and species present, as well as potential ecological constraints associated with the proposed development.
- 5.33 The ecological survey found no evidence of roosting bats within the barns, although it did highlight the potential for nesting birds, particularly in the eaves and other suitable features of the buildings. The site also has the potential to support barn owls, given the agricultural nature of the barns and the surrounding landscape. These findings are consistent with the site's rural context and the existing building structure, which offers potential for nesting opportunities for both birds and bats.

5.34 In light of these findings, the ecological survey has provided specific recommendations to mitigate any potential impacts on biodiversity and to enhance the ecological value of the site. These measures include:

- The installation of bat and bird boxes within the buildings, which will provide suitable roosting and nesting opportunities for a variety of species.
- The provision of a replacement barn owl nesting box to ensure the continued availability of suitable habitat for barn owls in the vicinity.

5.35 Further recommendations for ecological enhancements are detailed in Section 5.0 of the submitted Biodiversity Report and have been annotated on the proposed plans to demonstrate their integration into the design of the development.

Ecology and Biodiversity Net Gain

5.36 An updated Preliminary Ecological Appraisal (PEA) has been prepared by Pro Vision Ecology and is submitted with the application. The assessment included an updated site walkover undertaken in July 2026.

5.37 The agricultural buildings were again assessed as having negligible potential to support roosting bats, with no evidence of bats or suitable roosting features identified. The boundary hedgerows provide suitable foraging and commuting habitat and as such will be retained. Any external lighting will therefore be designed to minimise light spill onto these features in accordance with the recommendations of the PEA.

5.38 A barn owl was recorded using an existing nest box within Building B and the PEA therefore identifies the building as supporting a confirmed barn owl nest. As the existing box cannot be retained as part of the conversion, a replacement nesting site will be provided on land within the applicant's ownership prior to the commencement of conversion works. Works will be appropriately timed to avoid impacts upon nesting barn owls and other nesting birds.

5.39 The PEA also identifies limited recently established habitat suitable for reptiles. A precautionary sensitive clearance methodology is therefore proposed, but no further surveys are required.

5.40 The development also incorporates a series of ecological enhancements to provide additional habitat and nesting opportunities.

Biodiversity Net Gain

- 5.41 The PEA confirms that the application site is less than 0.2 hectares in area and therefore falls within the de minimis exemption from the statutory Biodiversity Gain Requirement. Although native and species-rich hedgerows are present, these will be retained and will not be adversely affected by the development. Notwithstanding the exemption, the ecological enhancement measures outlined above will secure biodiversity benefits as part of the scheme.

Flood Risk

- 5.42 The application site is located within Flood Zone 1, which is defined by the Environment Agency as an area with a low probability of flooding (less than 1 in 1,000 annual probability of river or tidal flooding). As such, the site is considered to be at minimal risk from fluvial (river) or tidal flooding. Additionally, the site is situated outside of areas identified as at significant risk of surface water flooding, according to the Environment Agency's surface water flood maps.
- 5.43 To ensure a comprehensive understanding of the potential flood risks, a site-specific Flood Risk Assessment (FRA) has been prepared and is submitted alongside this application. The FRA specifically considered the risk of groundwater flooding, which was highlighted as a potential concern in the Council's Strategic Flood Risk Mapping. Groundwater flooding can occur when the water table rises above the surface, often due to prolonged periods of heavy rainfall or specific local geological conditions. However, following a detailed review of the site's topography, geology, and historical flood data, the FRA concludes that the risk of groundwater flooding on the site is low. There is no significant evidence to suggest that the site is susceptible to groundwater flooding, and the development is unlikely to be impacted by such flooding during its lifetime.
- 5.44 The findings of the FRA confirm that the proposed development will be safe for its lifetime, in compliance with the requirements set out in Paragraph 159 of the NPPF, which states that development should be located in areas where it is at low risk of flooding and where any residual flood risk can be managed effectively.

Nutrient Neutrality

- 5.45 The application site lies within the Hampshire River Avon Catchment Area, which is part of a broader region affected by nutrient pollution concerns, particularly relating to the discharge of excess nutrients such as phosphorus into watercourses. This issue has significant implications for the ecological health of the river, particularly in terms of its water quality and biodiversity, and is a key consideration for planning applications within catchment areas affected by such pollution.
- 5.46 As a result of the Nutrient Neutrality requirements outlined in the Habitats Regulations (as amended) and as set out in guidance issued by Natural England, the proposed development must demonstrate that it will not result in any net increase in nutrient loading, particularly in relation to phosphorus. The core principle of nutrient neutrality is to ensure that new developments do not contribute to the deterioration of water quality within protected water bodies, such as the River Avon, which is designated as a Special Area of Conservation (SAC) due to its ecological significance.

- 5.47 To comply with these requirements, the application includes a Nutrient Neutrality Calculator which calculates that 0.61kg TP/yr will need to be mitigated, and it is proposed to address these through the purchase of credits.

6. SUMMARY AND CONCLUSION

- 6.1 This Planning Statement demonstrates that the proposed conversion of the redundant agricultural buildings to a single dwelling represents a sustainable and sensitive form of rural development that fully accords with the objectives of the National Planning Policy Framework and the relevant policies of the Wiltshire Core Strategy.
- 6.2 Following the withdrawal of the previous application, the scheme has been comprehensively revised to respond positively to the issues previously raised. The proposal will secure the long-term future of these redundant buildings whilst preserving the character and appearance of the Wilsford Conservation Area, safeguarding the setting of the adjacent Grade II listed Wilsford Down Cottage and conserving the natural beauty of the North Wessex Downs National Landscape.
- 6.3 The accompanying Structural Report confirms that the buildings are capable of conversion without substantial rebuilding, whilst the independently prepared Viability Report provides the clear evidence required by Core Policy 48 that alternative employment, tourism, community and commercial uses are not realistic or viable long-term options. The proposal therefore satisfies the requirements of Core Policy 48 in full. The application is also supported by detailed technical evidence addressing ecology, flood risk, nutrient neutrality and all other relevant planning considerations.
- 6.4 The proposal would secure the beneficial re-use of previously developed rural buildings, deliver an additional windfall dwelling at a time when Wiltshire Council is in a housing land supply deficit. Taking the tilted balance into account, these benefits attract significant weight in favour of the development. Furthermore, the recent Planning Inspectorate decision at Keevil provides a strong material consideration which supports a positive approach to the re-use of redundant rural buildings in Wiltshire, particularly in the context of the Council's current housing land supply position.
- 6.5 When considered as a whole, the proposal represents high-quality sustainable development for which there are no adverse impacts that would justify withholding planning permission. It is respectfully submitted that the proposal accords with the Development Plan when read as a whole and that any limited conflict is clearly outweighed by the substantial environmental, heritage and planning benefits arising from the development. Accordingly, planning permission should be granted without delay.

APPENDIX 1



Appeal Decision

Site visit made on 27 May 2026

by R Kent BA (Hons) MTP DipM MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24 June 2026

Appeal Ref: 6004625

The Old Barn, Keevil, Wiltshire BA14 6NQ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by J Skinner against the decision of Wiltshire Council.
 - The application Ref is PL/2025/05419.
 - The development proposed is described as 'Change of use and conversion to a self-build dwelling, construction of open fronted car port, EV charging point, log store and associated works'.
-

Decision

1. The appeal is allowed and planning permission is granted for Change of use and conversion to a self-build dwelling, construction of open fronted car port, EV charging point, log store and associated works at The Old Barn, Keevil, Wiltshire BA14 6NQ in accordance with the terms of the application, Ref PL/2025/05419, and the plans submitted with it subject to the conditions in the attached schedule.

Preliminary Matters

2. During the appeal a Deed of Variation to the previously submitted Unilateral Undertaking (UU) was submitted to ensure that the obligations in the undertaking apply to a planning permission granted on appeal in the event that the appeal is allowed. The Council has been consulted on the Deed of Variation and I have taken its comments into account in my decision.
3. On 16 December 2025, the Government published a consultation on proposed reforms to the National Planning Policy Framework (the Framework). Whilst broad changes to the structure of the Framework are proposed as part of this consultation, these proposals could be subject to further change and can only be given very limited weight at this stage. It has therefore not been necessary to consult the parties on the proposed changes, and in reaching my decision, I have had regard to the Framework published in December 2024.

Main Issues

4. The main issues are
 - Whether the site would be in a suitable location having regard to the development plan policies concerning new housing in the countryside with reference to the conversion and re-use of rural buildings; and
 - The effect of the proposal on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).

Reasons

Location

5. The site lies outside the limits of development defined in the Wiltshire Core Strategy 2015 (WCS) and is within the countryside for development plan purposes. Core Policies 1, 2 and 15 of the WCS set out the settlement and delivery strategies for new residential development in this location. Core Policy 48 sets out the circumstances in which the conversion and re-use of rural buildings will be supported.
6. The existing building on the site is a single storey, predominantly brick building which received planning permission in 2018 for “B8 storage use”. Since the Covid pandemic, the owner’s business operations have changed and now operate from a site elsewhere.
7. Core Policy 48 supports the conversion and re-use of rural buildings for employment, tourism, cultural and community uses subject to various criteria being met. Where there is clear evidence that those uses are not practical propositions, residential development may be appropriate where it meets the same criteria.
8. The evidence indicates that the building was constructed for storage purposes to a basic specification. The cost estimates and Carter Jonas valuation¹ provided in 2020 for the appellant indicate that the cost of installing a water supply and electricity to the site is prohibitive. When the valuation was made, the Carter Jonas letter questioned whether a commercial business would look to occupy the site.
9. Although the appellant has not produced evidence that the market for a storage or alternative employment use has been fully tested through a recent marketing exercise, nor has the Council provided compelling evidence that there is a market demand for a unit of this type. Nevertheless, it is unclear why a storage use would by necessity require three phase electricity or a water supply or why such a use could not take place without those services being installed. It is also not evident whether alternative means of power generation, such as solar power, have been fully explored. As a result, I am not convinced that there is clear evidence that an alternative employment use, including a storage use, is not a practical proposition.
10. I recognise that the absence of a viable water supply means that a tourism use, such as holiday accommodation, is unlikely to be practical. The distance from the nearest villages, combined with the limited size of the building, the absence of a water supply and the limited space for parking, means that its use for community or cultural purposes is also unlikely to be practical.
11. Even if there was clear evidence that a use for employment purposes was not a practical proposition, the villages of Keevil, Steeple Ashton, Bulkington and Seend provide only limited services and facilities for any future occupier of the proposed dwelling. Access by foot would be via rural roads without footways and street lights. Together with the distances to the villages, this means that it would not be a safe and suitable pedestrian route for all users, especially in bad weather or after dark.
12. Although there are bus stops on the A361 to the north of the site and in some of the villages, for the reasons given above, the pedestrian routes to them would not

¹ Appellant’s appendix 5: Carter Jonas letter dated 11 November 2020

be safe or suitable for all users. As a consequence, whilst some of the villages are within cycling distance of the site, travel by car would be likely to be a necessity for future occupiers of the proposed dwelling needing to access the majority of the services and facilities for their daily needs in Melksham, Trowbridge and Devizes.

13. The permitted use of the building for B8 storage purposes would also generate vehicle movements. However the pattern and frequency of those movements and the vehicles involved would be likely to be different to those of the future occupiers of a dwelling who would be expected to make regular trips for purposes such as work, shopping, health care, leisure, educational or other activities.
14. Despite the occasional building in the surrounding area, from what I saw on my visit, the site is in a remote location physically separate from the nearest settlements. The distance from the nearest villages and other settlements means that the site is isolated from them.
15. Even though future occupiers of the dwelling might be able to make use of car sharing, no details of how this might take place are before me or how such an arrangement would reduce reliance on the private car. The provision of an electric vehicle (EV) charging point might encourage future occupiers to use ultra-low or zero emission vehicles. Nevertheless, I am not convinced from the evidence before me, that future occupiers of the proposed dwelling could be prevented from using other types of vehicle if they so wished.
16. The lack of sustainable transport alternatives and the distance to the villages and towns therefore leads me to conclude that the site does not have reasonable access to local services.
17. The Council accepts that the building is structurally sound and that the proposed conversion would retain its character and the effect of the proposal on the character or appearance of the landscape could be made acceptable through a landscaping scheme if the appeal is allowed. It also accepts that the site has adequate access to the highway. Whilst I have found no sound reason to come to a different conclusion on these points, the location of the proposed dwelling would nevertheless result in a moderate level of harm to the Council's objectives to reduce the need to travel as required by WCS Core Policies 60 and 61.
18. The reliance on the private car and the absence of clear evidence that employment use, including B8 storage, is not a practical proposition means that the proposal is not in a suitable location having regard to the development plan policies concerning new housing in the countryside. The moderate harm caused results in conflict with WCS Core Policies 1, 2, 15, 48, 60 and 61 which seek to restrict residential development in the countryside and promote sustainable transport.

European protected site

19. The proposal has the potential to effect the Bath and Bradford on Avon SAC. The qualifying features of the SAC are its populations of Bechstein's bats, greater horseshoe bats and lesser horseshoe bats. Regulation 63(1) of the Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations) requires me to make an appropriate assessment of the implications of the proposal for the conservation objectives of the SAC.

20. The conservation objectives for the SAC seek to maintain or restore the extent and distribution of the habitats of qualifying species; the structure and function of the habitats of qualifying species; the supporting processes on which the habitats of qualifying species rely; the populations of qualifying species; and the distribution of qualifying species within the site.
21. A lesser horseshoe bat night roost was identified on the site as part of the previous proposal. The evidence indicates that of 2 night roosts subsequently installed on the site, one is no longer functioning as a roost and the other is deteriorating. Hedgerows along the northern and eastern site boundaries are likely to be used as commuting and foraging corridors by bats using the on-site roosts.
22. Any increase in external light levels has the potential to have an adverse effect on the use of these corridors by bats. Unmitigated, the development could result in the loss of night roosts and the disruption of the bats' flight lines from increased light. This could have an impact on the local distribution of bats. This effect could be significant and effect the integrity of the SAC. I have therefore carried out an appropriate assessment.
23. The proposal would include a dedicated bat loft within the roof void above the car port. It would be serviced by a fly-in entrance in the north elevation of the proposed car port facing the site boundary and adjoining field. The proposed log store would also provide night roosting opportunities. Whilst the proposed bat roost would be sited away from the proposed dwelling and therefore less likely to be affected by lighting from it, a control on external lighting at the site could be secured through a planning condition if the appeal is allowed. I note that the Council has previously carried out an appropriate assessment under the Habitat Regulations which arrived at the same conclusion. I have also consulted Natural England which has confirmed that suitable conditions would avoid an adverse impact on the SAC.
24. Therefore, subject to the imposition of appropriate planning conditions if the appeal is allowed, I am satisfied that the likely significant effects of the proposal on the SAC would be avoided. For these reasons, I conclude that the proposal would not have an adverse effect on the integrity of the SAC and would therefore comply with the Habitats Regulations.

Other Considerations

25. Against the harm I have identified, there would be economic, social and environmental benefits arising from the proposal. It would provide an additional windfall dwelling using previously developed land which, given the Council's housing land supply shortfall, would be a moderate benefit.
26. As well as meeting general housing needs, the proposal would also provide one self-build dwelling to be secured through the UU and Deed of Variation submitted with the appeal. The Framework highlights the importance of a sufficient amount and variety of land coming forward where it is needed and that the needs of groups with specific housing requirements are addressed. Those groups include people wishing to commission or build their own homes. The Council accepts that there is an unmet need in Wiltshire for self-build plots. Therefore, the provision of an additional self-build unit would be a further moderate benefit of the scheme.
27. The development would generate modest economic benefits to the construction sector during the conversion of the building and future occupants would contribute

to the vitality of the local community. The provision of an EV charging point would be a further limited benefit of the scheme.

28. Whilst the emerging Wiltshire Local Plan has been the subject of an examination by Inspectors, the Inspectors' letter to the Council dated 27 February 2026 identifies significant soundness concerns. As a result, the draft plan carries very limited weight in this appeal.
29. Although reference has been made to appeal decisions at Sherston², Warminster³, Swindon⁴ and Old Sarum⁵ I am not aware of the full details of those schemes, the sites involved or their planning context. I have determined this appeal on its individual merits.

Planning balance

30. The conflict I have identified with WCS Core Policies 1, 2, 15, 48, 60 and 61 results in conflict with the development plan when read as a whole. The Council can only demonstrate 2.42 years supply of deliverable housing sites which is well below the minimum level required. The policies most important for determining the appeal are therefore out of date for the purposes of the Framework. Consequently, with reference to paragraph 11 d) of the Framework, consideration of the presumption in favour of sustainable development is required.
31. Paragraph 232 of the Framework states that due weight should be given to existing policies according to their degree of consistency with the Framework. The Framework recognises the re-use of redundant or disused isolated buildings in the countryside where the development would enhance its immediate setting. Whilst the evidence is unclear whether there is a practical proposition of an alternative employment use taking place in the building, the appellant states that the owner's business operations have changed and the building is therefore redundant.
32. The Framework's policy for the re-use of isolated buildings in the countryside does not require those buildings to have reasonable access to local services or require that an alternative use is explored before the re-use for residential purposes is considered. Core Policy 48 is not consistent with the Framework in this respect and therefore the conflict with it carries limited weight in this appeal. The proposed re-use of the building would be consistent with the Framework's policy to make effective use of under-utilised land and buildings to meet identified needs for housing.
33. The significant shortfall in the Council's housing land supply indicates that the settlement strategy in Core Policies 1, 2, and 15 is not delivering the required number of houses. The conflict with those policies therefore also carries limited weight.
34. Whilst the Framework requires that developments promote sustainable transport and that sustainable transport modes are prioritised, it also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. As a consequence, although Core Policies 60 and 61 are broadly consistent with the Framework, taking into account the permitted use of the

² APP/Y3940/W/23/3327178

³ APP/Y3940/W/24/3351590

⁴ APP/Y3940/W/22/3303198

⁵ APP/Y3940/W/24/3356285

building which would generate its own vehicle movements, the conflict with those policies is given moderate weight in this appeal.

35. The Framework sets out the Government's objective of significantly boosting the supply of homes and highlights that small sites such as this can make an important contribution to meeting the housing requirement in the area. Therefore, taking into account the significant shortfall in the Council's supply of deliverable housing sites, the addition of a self-build dwelling is a benefit which attracts moderate weight in favour of the proposal. The modest economic benefits also attract moderate weight in favour of the proposal. The proposed provision of EV charging also carries limited weight in favour of the scheme.
36. Overall, the moderate adverse impact of the proposal does not significantly and demonstrably outweigh the totality of the benefits when assessed against the policies in the Framework taken as a whole. As a result, the presumption in favour of sustainable development applies to this appeal.

Conditions

37. Conditions setting out the period for commencing the development and requiring it to be carried out in accordance with the approved plans are necessary to provide certainty. In view of the rural location of the site it is also reasonable and necessary to require that any materials to be used in the external surfaces of the development are submitted to the local planning authority for approval prior to their installation. It is also reasonable and necessary to require the submission and implementation of a landscaping scheme to ensure the development would enhance its setting and would not detract from the character and appearance of the landscape.
38. A condition securing the means for charging electric vehicles is reasonable and necessary to promote the use of sustainable transport in accordance with the relevant development plan policies. Conditions securing the provision of the required bat roosts and controlling external illumination are necessary to protect the integrity of the SAC and ensure the development complies with the Habitat Regulations. A condition safeguarding the visibility splays at the site entrance is also reasonable in the interests of highway safety.

Conclusion

39. The proposed development would conflict with the development plan but material considerations, particularly the Framework, indicate that a decision should be made other than in accordance with it. For the reasons given above the appeal should be allowed.

R Kent

INSPECTOR

SCHEDULE OF CONDITIONS

1. The development hereby permitted shall begin not later than three years from the date of this decision.
2. The development hereby permitted shall be carried out in accordance with drawing numbers:

Location Plan. Existing & Proposed Site Plans 01 rev 2. August 2024;
Existing & Proposed Floor Plans. Existing & Proposed Elevations 02. August 2020;
Car Port and Log store Proposed Floor Plans. Car Port and Log Store Proposed Elevations 03. November 2022.
3. Details of the materials to be used in the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the local planning authority prior to their installation. The development shall be carried out in accordance with the approved details.
4. The dwelling hereby permitted shall not be occupied until a scheme of landscaping has been submitted to and approved in writing by the local planning authority. The scheme shall include details of all existing trees and hedgerows on the land, identify those to be retained and set out measures for their protection throughout the course of development.
5. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the dwelling or the completion of the development, whichever is the sooner; and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.
6. The dwelling hereby permitted shall not be occupied until a scheme for the charging of electric vehicles has been installed on the site in accordance with details to be submitted to and approved by the local planning authority. The approved scheme shall thereafter be retained.
7. Prior to the occupation of the dwelling and car port hereby permitted, the bat roosts and access points for bats, as detailed in the Ellendale Environmental 'Bat Survey & Assessment, 7 July 2025' and 'EEL532 PL/2025/05419 COU and conversion of barn - The Old Barn, Keevil, Trowbridge, BA14 6N – Addendum' shall be implemented in accordance with plans and details to be submitted to and approved in writing by the local planning authority. The bat roosts and access points for bats shall thereafter be permanently retained in accordance with the approved plans and details.
8. The visibility splays shown on plan no. 25-0378-RAP-XX-XX-DR-TP-3200 shall be kept free of any obstruction exceeding 0.6m in height and shall be retained as such thereafter.

9. No means of external illumination shall be installed on the site unless full details including the height, design, location and intensity of the means of illumination have first been submitted to and approved in writing by the local planning authority. The means of external illumination shall thereafter be installed and maintained in accordance with the approved details.

END OF CONDITIONS

RAW



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