

04 November 2020  
Pre-Application Cover Letter



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Dear Sir / Madam,

### **Pre-Application Enquiry: Whitley Farm, Whitley**

I write on behalf of our client, Neston Park Estate, to request pre-application advice from the Council in respect of the demolition of the existing agricultural buildings, the conversion of the Tithe Barn to form three dwellings and the erection of eighteen dwellings at Whitley Farm, Whitley.

We have been actively promoting the site for a housing allocation through the emerging Draft Melksham Neighbourhood Development Plan. The Steering Group, comprising Melksham Without Parish Council and their appointed planning advisor, Place Studio, with the benefit of input from Wiltshire Council Conservation Officer, Ms Helen Garside, and Neighbourhood Plan Coordinator, Mr David Way, have encouraged us to make a pre-application submission and evolve the design detail with Planning Officers.

This pre-application enquiry is made in the context of the Neighbourhood Plan allocation process. The principal request is therefore to obtain officer feedback on the acceptability of the layout of the proposals and the design concepts rather than the principle of development, as the detail isn't being assessed in the potential allocation of the site for housing through the Neighbourhood Plan route.

This letter demonstrates how the scheme has evolved, having regard to advice received to-date, and highlights how the proposals comply with the spirit of adopted Policies.

This letter accompanies the completed Pre-Application Form, Site Location Plan and a series of plans informing, and including, an indicative layout plan for the proposed residential development. A Preliminary Heritage Assessment is also included with this submission.

The series of the plans provide an overview of the age of the buildings and an assessment of their significance in line with the guidance in the Historic England Farmstead Assessment. These plans have informed an indicative layout for residential development comprising the creation of 21 dwellings in total.

### **The Site**

The site is located within the south western area of the village of Whitley. Whitley Farm is located to the south of First Lane and lies adjacent to Plane Tree Close. The site is within close proximity a number of village amenities, including Pear Tree Inn and Daisy Chain pre-school.

The size is approximately 1.2 hectares, and is predominately level. It is currently used for agricultural purposes, and comprises a cluster of agricultural buildings and a significant area of hardstanding. These agricultural buildings comprise of a traditional Tithe Barn and a number of modern agricultural barns, which have varying



heights rising to a maximum of circa 3.5m to the tallest ridge. The site wraps around the north west and south west boundaries of Whitley Farmhouse.

To the east of the site is an area of grassland, mature trees and hedgerow. Adjoining the south west boundary of the site is mature hedgerows, which screens the site. The northern boundary of the site is screened by a section of dry stone walling at the entrance to the site and mature hedgerow.

Vehicle access is provided along the north western boundary of the site from First Lane, and there is ad hoc parking surrounding the agricultural buildings. There is a significant amount of extraneous agricultural deadstock and material dispersed throughout the site. The site is traversed by an access road which runs from the north to southern boundary of the site.

There are three Listed Buildings within the locality of the site; a Grade II listed mounting block to the right of the farm entrance, the Tithe Barn (Grade II) and Whitley Farmhouse (Grade II). The site is not the subject of any landscape designations that would result in additional constraints to development proposals, and the site is located outside of a flood zone.

In terms of the surrounding area, adjacent to the northern boundary of the site is residential development on First Lane, Plane Tree Close and Springfield Gardens. The majority of these dwellings are single storey or dormer bungalows, and there are no windows overlooking the site directly. To the south and west of the site is open countryside.

### **Engagement**

We have engaged in extensive discussions (covering a period of 3+ years) with the members of the NDP steering group and their appointed planning consultant, having presented the merits of redeveloping this site for housing to them and the Parish Council. To that end, we have actively been involved in the submission of representations to the emerging NDP which set out the justification for a draft housing allocation on this site.

We were encouraged by the NDP steering group to make a formal pre-application to the Council, with the NDP steering group's heritage consultant and Council's Conservation Officer offering initial comments on the previous layout of the site. The broad emphasis of their comments are summarised below; we were encouraged to:

- Redesign the scheme to reflect a courtyard layout – it was considered that the proposal needed to adopt a more sympathetic approach to the significance of the Listed Buildings on site, as well as the layout and historic use of the complex as a whole.
- Minimise the extent of the layout by reducing the amount that it protrudes in to the land to the south west, and to consider the transition between the site and the wider agricultural land.

We were also directed to consider the National Farmstead Assessment Framework 2015 prepared by Historic England as a first principle. We provide a brief assessment of the site in that regard, before assessing the proposals against key planning policies and summarising the merits of concept presented in the initial scheme.

### **National Farmstead Assessment Framework**

#### **Farmstead Assessment - Adopted guidance**

The National Farmstead Assessment Framework (herein referred to as the 'Farmstead Assessment') is a best practice guide, written by Historic England. It provides advice in relation to the evolution of proposals for alternative uses for farmstead. It requires applicants to start with an understanding of the site, to give consideration as to how its changed overtime, and then to attribute an overall value to the farmstead as a collective group of buildings.

The principle of the Farmstead Assessment is to help secure the sustainable development and conservation of traditional farmsteads and their buildings. Prior to making a planning application it makes recommendations as to how best to understand the site and its scope for change through, among other criteria:

1. Identifying the historic character and significance, including the extent of change to the site and its setting.
2. Use this understanding to consider the constraints and the opportunities at the earliest stage when considering change.

It generally encourages that where new uses are proposed, the development ensures that it sustains and enhances a farmsteads' value, being mindful of the contribution that it can make to the landscape character and local distinctiveness. Of particular interest can be a farmsteads varied forms, the use of materials and how they relate to the surrounding settlement. It recognises that agricultural buildings can be made redundant for their existing use, giving rise to the need to restructure and diversify farmsteads.

The Farmstead Assessment sets out four key stages to consider in the evolution of a scheme in the run up to making a planning application submission:

1. Site Summary – identify the historic character of the site in its setting
2. Assess Heritage Significance – assess the contribution of local distinctiveness and the significance of individual buildings
3. Capacity for Change – assess considerations relating to site access, the impact on neighbours and opportunities to enhance habitats, landscape character and improve energy efficiency.
4. Siting and Design Issues – Using the understanding gained to inform the design and development process, including opportunities to conserve and enhance the historic character and significance of the whole site in its setting.

#### Farmstead Assessment – Application of guidance to the redevelopment of Whitley Farm

The Farmstead Assessment acknowledges that understanding the baseline and historic characteristics of a Farmstead can be best achieved by appointing relevant consultants. In terms of understanding the significance of the site, a Preliminary Heritage Assessment - completed by qualified heritage consultant, is provided with this submission. It provides a detailed assessment of the significance of the site, noting:

- Whitley Farmhouse, the Tithe Barn (both Grade II Listed), and the single storey barn to the south west of the farmhouse are the most historic buildings in the Farmstead; they carry moderate significance.
- The remaining wide-span industrial sheds, previously critical to the modern farming industry, are not Listed and can be afforded only limited significance, owing solely to the association people have with these structures to the use of the site and surrounding land for agricultural purposes. Otherwise, the buildings are highly unremarkable and bear only limited interest in regard to their design, scale and materials used.
- Whilst traditional to the evolution of most Farmsteads, the modern farm buildings contrast greatly in design to the historic buildings and are only linked by association through their common use for agricultural purposes.
- The farmstead comprises a significant proportion of largescale modern farm buildings, which are tight-knit and restrict circulation for modern farm machinery. The evolution of buildings on the site appears ill-considered and ends somewhat abruptly, providing a stark transition between the south western extent of the Farmstead and the wider agricultural land beyond.

The farmstead is considered to have a range of between no to moderate heritage significance, with the modern farm buildings, being no longer fit for agricultural purposes, forming the part of the site that has greatest capacity for change<sup>1</sup>.

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<sup>1</sup> Please refer to the assigned significance plan prepared by Savills, Heritage.

Having understood the significance of the site, several key themes have been established for the revised layout of the proposed development. For example, some of the features of the farmstead lead to the site being unsuitable and undesirable for modern day farming practices (as well as employment uses that could be reliant upon the use of larger vehicles) such as the tight-knit nature of buildings. However, this key pattern of the farmstead can be retained in the revised proposals to provide more intimate courtyard spaces.

The scale and bulk of the modern farm buildings also provide a clear hierarchy, helping to direct where larger dwellings could be provided within the layout of the scheme. Furthermore, the later, more modern farm buildings are located toward the perimeters of the site. This provides an opportunity for the design of the dwellings towards the sites boundaries to be more modern and transitional design in relation to the more historic building techniques used in the construction of the heritage assets. Adopting such an approach would deliver a high quality and bespoke housing scheme, reflective of the character of the existing buildings of the farmstead in terms of the scale, bulk, design and materials and entirely appropriate for the evolution of the site as a whole.

**Proposed Development**

The proposal that is the subject of this pre-application submission comprises the demolition of the existing agricultural buildings, the sensitive conversion of the existing Tithe Barn to form three dwellings and the erection of 18 bespoke dwellings, totalling the creation of 21 dwellings. The proposals reflect our initial thoughts on the redevelopment of the site, having considered and understood the site in greater detail. In particular, the revised proposal now considers:

- the existing site and how it’s evolved,
- the hierarchy of the existing buildings, both in size and how they would have been historically used for agricultural purposes, and,
- the relationship of those structures with nearby heritage assets and the surrounding landscape.

The proposals retain the memory of the existing buildings, as well as their layout with the extent of built form replacing the existing. This results in an inverted ‘u-shaped’ cluster of dwellings along the northern boundary of the site. In principle, the courtyard facing away and northwards from the site would provide amenity for those dwellings. At the south western extent of the initial layout are a range of more modern buildings which could be designed to reflect Dutch barns; the conversion of some Dutch barns in to residential dwellings using the Class Q permitted development right has been very successful – the applicant would look to achieve a similar quality of buildings here. This form of modern agricultural buildings would mark an appropriate transition through site, from the heritage assets located to the front of the site through to agricultural land surrounding the farm. An example of the concepts for the proposed dwellings are detailed below.

**Potential Concept for design of buildings and pallet of materials**



*Figures 1: Courtyard Layouts (to the front of the site)*



*Figures 2: Converted modern agricultural buildings (to the rear of the site)*

The proposals will also provide parking and landscaping, albeit that level of detail has yet to be advanced in the initial concept layout.

Access to the dwellings will utilise the existing entrance to the site from First Lane and the agricultural track which traverses the site.

The proposed conversion of the Tithe Barn into three residential dwellings will be of a high quality, sensitive design taking into account its listed status, as well as its relationship with the neighbouring listed farmhouse.

### **Policy Context**

In support of the pre-app submission, we provide a brief summary of the planning policies relevant to the proposals. The development plan comprises Wiltshire Council Core Strategy and supplementary planning documents.

The Draft Melksham Neighbourhood Plan has recently been through Regulation 14 Consultation Draft in June 2020. In accordance with paragraph 48 of the NPPF, as the draft NDP is part way through the plan making process and as there are unresolved objections to policies relating to the allocation of housing in Whitley, the weight that can be afforded to emerging Policies in the NDP is considered to be limited. No further consideration of Policies is given at this stage.

### **Wiltshire Council Core Strategy**

The Wiltshire Council Core Strategy was adopted in January 2015 which, in line with the National Planning Policy Framework (NPPF), adopts a presumption in favour of sustainable development. Core Policy 1 recognises Whitley as a Large Village.

Core Policy 2 outlines the South Wiltshire HMA and housing requirements for settlements in Wiltshire. There is an indicative requirement for 130 dwellings in the Melksham remainder area across the plan period, with a remainder of 51 houses to be identified. Included in the South Wiltshire HMA is also a conservative windfall allowance of 449 dwellings.

Core Policy 15 sets out the hierarchy for development in Melksham Community Area to occur with Core Policy 45 promoting the requirements for meeting Wiltshire's housing needs, including the dwelling type, density and mix of housing to be built.

Core Policy 48 deals with development proposals outside the limits of development of Large Villages and supporting rural life, which reads:

*“Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where it satisfies the following criteria:*

- 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*
- 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*
- iii. *The building can be served by adequate access and infrastructure; and*
- iv. *The site has reasonable access to local services or*
- v. *The conversion or re-use of a heritage asset would lead to its viable long term safeguarding”*

In terms of use the Policy offers some flexibility to the strict application of the above, noting 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.”*

Core Policy 57 requires development proposals to be carefully planned to ensure valuable features and characteristics are protected and enhanced. Applications for new development will be expected to make a positive contribution to the character of Wiltshire through, for example, being sympathetic to and conserving historic buildings and historic landscapes and making efficient use of land.

Core Policy 58 relates to ensuring the conservation of the historic environment. It states that the designation of a listed building does not preclude the possibility of new development and the council is committed to working pragmatically with owners to find positive solutions which will allow adaptation of such buildings to reflect modern living aspirations.

### **Principle of Development**

An important policy for assessing the principle of residential development in the countryside is set out within Core Strategy Policy 48. The thrust of this policy seeks to ensure that a proposal for the demolition of existing agricultural buildings for residential use does not impact on the character of the landscape or settlement.

The buildings are no longer fit for modern day farming practices and there is a need to find an alternative use for the site. Bearing the intended use of the site for residential, whilst it would be possible to convert and re-use the agricultural buildings, without considered architectural design to inform the layout of the structures it is highly likely that the final buildings would result in undesirable and compromised dwellings, not least because of the awkwardness of working with the existing volumes. It would be far more practicable to replace the existing buildings with purpose-built dwellings. In that regard, there is an opportunity to evolve the existing concept to deliver high quality and bespoke homes, ensuring that the proposals retain the memory of the layout and form of the modern farm buildings. Furthermore, by replacing the existing farm buildings in the manner proposed, including removing the associated agricultural paraphernalia, the development has the potential to enhance the significance of the heritage assets.

Having regard to the guidance in the Farmstead Assessment, the design approach seeks provide a transition between the design of earlier farm buildings at the front of the site towards the later, more modern farm building structure to the rear. The dwellings could, in principle, retain the form and potential materiality of modern agricultural buildings so that they are reflective of the immediate rural character of the farm. The approach is considered entirely appropriate for the sites edge of settlement location.

Whitley Farm already benefits from existing and substantial infrastructure. The existing bell-mouth access and egress from the site on to First Lane would be formalised to reflect the proposed residential use. Whitley, defined as a Large Village, has a good range of services and facilities. A nucleus of uses in the village, including a bus stop serviced by a range of bus routes, are located at Top Lane (approximately 150m to the north) and can be accessed via a contiguous pedestrian footway. The Shaw Church of England Primary School, located to the south east, is approximately an 800m walk from the site, and is, again, accessed by a continuous pedestrian footway.

The initial concept for the proposed development is considered to compliant with the spirit of the broader emphasis of this Policy.

## Summary

The proposals seek the replacement of a number of existing farm buildings at Whitley Farm, Whitley, with the erection of 18 dwellings. The proposals also include the sensitive conversion of the Grade II Listed Tithe Barn to create three units, taking the number of proposed dwellings to 21.

For the reasons cited above, the development is considered to broadly align with the principles of relevant adopted planning policies. The initial layout, led by heritage principles, has been evolved having regard to the guidance set out in Heritage England's Farmstead Assessment. Furthermore, the Heritage Statement provides a better understanding of the significance of heritage buildings at Whitley Farm.

As the proposals are at an early, concept stage, we would welcome the opportunity to discuss the proposals with officers to see how a scheme could be evolved. Furthermore, we would also like to obtain advice on the scope of additional technical reports that would be necessary to support a planning application submission.

Separate, but intrinsically linked to this submission, we've made payment of £1,150 to Wiltshire Council to cover officer's time for virtual meeting and a written response. Confirmation of the payment is enclosed in the submission.

I look forward to hearing from the officer regarding their availability once the pre-application enquiry has been registered and duly assigned.

If you have any queries regarding the enclosed or require further information, please contact me on 07870183428.

Yours sincerely

  
**Senior Planner**