

**REPORT OUTLINE FOR AREA PLANNING COMMITTEES****Report No.**

<b>Date of Meeting</b>	19 <sup>th</sup> August 2021
<b>Application Number</b>	PL/2021/03114
<b>Site Address</b>	Barn on land adjacent to Greenfields, Butts Lane, Kilmington, Warminster, BA12 6RB
<b>Proposal</b>	Conversion of part of redundant barn to form 1-bedroom dwelling
<b>Applicant</b>	Mr & Ms Day and White
<b>Town/Parish Council</b>	Kilmington
<b>Electoral Division</b>	Mere– (George Jeans)
<b>Grid Ref</b>	377532 137062
<b>Type of application</b>	Full Planning
<b>Case Officer</b>	Joe Richardson

**Reason for the application being considered by Committee**

The application has been called-in by Cllr Jeans if officers are minded to refuse.

**1. Purpose of Report**

The purpose of the report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application be refused for the reason(s) set out below.

**2. Report Summary**

The issues in this case are:

- Principle of development, policy and planning history;
- Design, scale and impact to the amenity of the area including the AONB;
- Parking/Highways Impact;
- Ecological Impact/River Avon Catchment Area

The publicity has generated one letter of objection and three letters in support of the application with support from the Kilmington Parish Council given to the proposed development.

**3. Site Description**

The site is an existing barn on an isolated parcel of land located on the outskirts of the village of Kilmington. Whilst there are occasional existing dwellings within the surrounding locality of the site, the site is not located within a settlement boundary and is therefore outside of the defined limits of development as defined by the relevant policies of the adopted Wiltshire Core Strategy (WCS) and as such is considered to be within the countryside for the purposes of the local plan. The site is located within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB).

#### **4. Planning History**

19/10758/PNCOU - Notification for Prior Approval under Class Q for a Proposed Change of Use and Conversion of Barn into a Single Dwelling (Use Class C3) and for Associated Operational Development - WDN on the advice of WC Officers

19/11868/FUL - Conversion of redundant barn to form 2-bedroom dwelling – WDN on the advice of WC Officers 29.01.20

20/06169/FUL - Conversion of redundant barn to form 2-bedroom dwelling REF 29.09.20

#### **5. The Proposal**

The proposal seeks planning permission for the conversion of part of a redundant barn to a one bedroom dwelling house.

#### **6. Local Planning Policy**

##### National Planning Policy Framework

Section 2 Achieving Sustainable Development

Section 12 Achieving Well Designed Places

Section 15 Conserving and enhancing the natural environment

##### Wiltshire Core Strategy

Core Policy 1 Settlement Strategy

Core Policy 2 Delivery Strategy

Core Policy 48 Supporting Rural Life

Core Policy 49 Protection of rural services

Core Policy 50 Biodiversity and Geodiversity

Core Policy 51 Landscaping

Core Policy 57 Ensuring high quality design and place shaping

Core Policy 61 Transport and New Development

Core Policy 69 Protection of the River Avon SAC

##### Saved Salisbury District Local Plan

H28 Housing for Rural Workers

##### National Planning Policy Framework

Section 2 Achieving Sustainable Development

Section 12 Achieving Well Designed Place

Section 15 Conserving and enhancing the natural environment

Wiltshire Local Transport Plan 2015-2026:

Car Parking Strategy

AONB Management Plan

#### **7. Summary of consultation responses**

**Kilmington Parish Council** – Support with comment stating:

Use classes to be defined as residential and agricultural and all permitted development rights to be extinguished.

**WC Highways** – No objection subject to conditions

**WC Ecology** – Objection with comments summarised as:

The application contains insufficient information to determine potential impacts on biodiversity protected species, priority habitats and wildlife sites (River Avon SAC);

The application is supported by a 'Bat Statement for Proposed Conversion of Agricultural Barn to Residential Dwelling at Butts Lane, Kilmington' prepared by Matthew Hollands Architects Limited. This report has not been prepared by a suitably qualified ecologist and doesn't include a desk study or baseline survey of the application area and it is not clear when the survey was carried out.

**AONB Group** – Objection (see report below)

## **8. Publicity**

The application has been advertised by way of letters to near neighbours.

The publicity has generated one letter of objection, three letters of support for the application with support from the Kilmington Parish Council given to the proposed development.

## **9. Planning Considerations**

### **9.1 Principle of development, policy and planning history**

The site is an existing building on an isolated parcel of land located on the outskirts of the village of Kilmington. Whilst there are occasional existing dwellings within the surrounding locality of the site, the site is not located within a settlement boundary and is therefore outside of the defined limits of development as defined by the relevant policies of the adopted Wiltshire Core Strategy (WCS) and as such is considered to be within the countryside for the purposes of the local plan. The site is located within the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty (AONB). The proposal seeks planning permission for the conversion of an existing barn/garage to a two bedroom dwelling house.

It is noted that this application is a resubmission of planning application 20/06169/FUL which was refused by officers under delegated powers for the following reason(s):

- 1. The existing building is located on an isolated parcel of land on the outskirts of the village of Kilmington within the open countryside of the Area of Outstanding Natural Beauty (AONB). The existing structure on the land is considered to be of poor visual quality and is not considered to positively enhance the landscape character. Consequently, its conversion and retention (or rebuild) for the use as a dwellinghouse,*

*together with any curtilage/residential paraphernalia including the creation of a long driveway, would be detrimental to the special character and appearance of the landscape of the AONB. Subsequently, the proposal is considered to contrary to the aims of Core Policies CP48, CP51 and CP57 of the Wiltshire Core Strategy and the aims of the NPPF.*

2. *The site is situated within the River Avon catchment area that is a European site. Advice from Natural England indicates that every permission that results in a net increase in foul water entering the catchment could result in increased nutrients entering this European site causing further deterioration to it. The application does not include detailed proposals to mitigate the impact of these increased nutrients and consequently, without such detailed proposals, the Council as a competent authority cannot conclude that there would be no adverse effect on the integrity of this European Site as a result of the development. The proposal would therefore conflict with Wiltshire Core Strategy policies CP50 (Biodiversity and Geodiversity) and CP69 (Protection of the River Avon SAC); and paragraphs 175 and 177 of the National Planning Policy Framework.*

Core Policy 2 of the WCS states there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages. Other than in circumstances as permitted by other policies within this Plan, identified in para 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The Delivery Strategy set out in Policy CP2 states that other than in circumstances as permitted by other policies within this Plan, identified in paragraph 4.25, development will not be permitted outside the limits of development. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.

Paragraph 79 of the NPPF states:

*Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

- a) *there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- b) *the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- c) *the development would re-use redundant or disused buildings and enhance its immediate setting;*
- d) *the development would involve the subdivision of an existing residential dwelling; or*
- e) *the design is of exceptional quality, in that it:*

*- is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and*

*- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.*

Core Policy 48 of the WCS seeks to support rural life. With reference to the conversion and reuse of rural buildings, the supporting text (at para 6.67), indicates that *"additional dwellings may be justified in certain circumstances when they are required in the interests of supporting rural employment, for example .....when worker accommodation is needed onsite"*. At para 6.68, the text also indicates that *...insensitive reuse of rural buildings can be damaging to the*

*character of the building and its rural setting. Furthermore, additions and extensions should normally be avoided”*

The policy states that:

*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*

*Where there is clear evidence that the above uses are not practical propositions, residential development may be appropriate where it meets the above criteria. In isolated locations, the re-use of redundant or disused buildings for residential purposes may be permitted where justified by special circumstances, in line with national policy.*

Policy H27 of the previous Salisbury District Local Plan which related to Permanent housing for rural workers was not saved and was replaced by Core Policy CP48. However, although saved policy H28 (Housing for Rural Workers) of the Salisbury District Local Plan (SDLP) relates solely to proposals for temporary housing for rural workers, the preamble supporting text for both policies (and therefore presumably saved) indicates that:

*The Local Planning Authority acknowledges that agriculture and forestry require an adequate workforce in order to operate efficiently, and that it may be essential for workers and managers engaged in agricultural and forestry businesses to live on or near the holding. New housing may therefore be permitted in order to meet these needs, but applicants must demonstrate why it is essential. The Local Planning Authority will need to be satisfied that it is essential for the proper functioning of the enterprise or one or more workers to be readily available at most times, and will wish to establish the extent to which any existing accommodation in the area is suitable and available for the workers concerned. In addition, it will need to be demonstrated that the farming enterprise is economically viable...*

The applicant has submitted a business plan to explain the need to reside on the land in respect of the activities proposed and associated with the business enterprise at ‘Nettlebed Farm’. This name, ‘Nettlebed Farm’ is the unofficial name of the application site and land shown in blue on the location plan.

It appears that the business would relate to the production of hay bales, local produce and agricultural machinery repairs of which small levels are already in operation following confirmation from the agent. Officers also note that the planning statement submitted by the agent on behalf of the applicants states: ***‘The Applicants are setting up a new agricultural enterprise and have developed a Business Plan which is provided with this application on a confidential basis. It is accepted that this does not engage an essential need at present’*** (officer emphasis).

Officers remain to be convinced that there is any real need to permanently reside on the land, even more so, considering the business is not currently in full operation as per the business plan forecast. As explained by saved policy H28, the applicants should in this instance have applied under that policy for a temporary dwelling, so that the LPA could ascertain whether the new business has a long term future. However, as this particular application relates to the conversion of an existing building (and not a new temporary building), this current proposal does not accord with the aims of saved policy H28.

Notwithstanding the lack of identified need, officers consider that the current proposal does not accord with CP48. Whilst this policy does not require there to be an identified need for a dwelling for a rural enterprise, it's clear aims is to permit the retention and conversion of buildings within the countryside, but only those which can positively contribute to the landscape character without significant works which would be tantamount to the creation of a new dwelling in the open countryside (as emphasised by criterion i) and ii) of CP48). For the reasons outlined in the next section of this report, officers consider that this proposal does not meet these policy aims.

## 9.2 Impact to the amenity of the area/ AONB and economic benefits

The NPPF guidance supports proposals to enhance rural employment opportunities, and adopted policy CP48 of the WCS also deals with supporting rural life, including improved local services and facilities.

Core Policy CP51 of the WCS which states:

*Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas.*

The proposal should also aim to conform to the objectives of Core Policy 57 of the Wiltshire Core Strategy which aims to achieve a high standard of design in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complimentary to the locality.

Further relevance is given to Para 115 and para 172 of the NPPF which states '*great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty*'.

Paragraph 172 of the NPPF states '*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited*'.

Also of relevance is recent case law - R (Cross) v Cornwall Council 2021. This court case quashed Cornwall Council's decision to grant planning permission for an agricultural dwelling, due to the impact the proposal would have on the AONB. The decision emphasised the importance of the AONB landscape in planning policy and national guidance, and dealt with

the weighing up of any harm to the AONB against any social/economic benefits of the proposal.

The AONB Group have raised concerns related to the application and have pointed out that:

*“4. The National Planning Policy Framework (2019) states (paragraph 170) that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, commensurate with their statutory status. Furthermore, it should be recognised that the ‘presumption in favour of sustainable development’ does not automatically apply within AONBs, as confirmed by paragraph 11 and footnote 6, due to other policies relating to AONBs elsewhere within the Framework.*

*5. For decision making the application of NPPF policies that protect an AONB ‘provides a clear reason for refusing development proposals’ (paragraph 11[d]). Furthermore paragraph 11(b) explains that for plan making being in an AONB provides ‘a strong reason for restricting the overall scale, type or distribution of development in the plan area’.*

*6. It also states (paragraph 172) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and enhancement of wildlife and cultural heritage are important considerations in these areas. This paragraph is also clear that the scale and extent of development within AONBs and National Parks should be limited, and planning permission should be refused for major development.”*

The AONB Group also go on to indicate that:

*13. The application seems substantially similar to the previous, refused, application. The AONB’s views on that still seem to be relevant and I therefore attach a copy of that consultation response.*

*14. The site is clearly in an isolated location, distant from services, and therefore the proposal cannot be described as sustainable development. The agent fails to recognise that within an AONB the presumption in favour of sustainable development does not automatically apply. Nevertheless, as this is not a sustainable location his logic is flawed.*

*15. The Planning Statement, at paragraph 3.9, refers to paragraph 115 of the NPPF which relates to electronic communications and not Areas of Outstanding Natural Beauty and National Parks. The Planning Statement fails to acknowledge development within an AONB should be limited (paragraph 172) and that planning decisions should contribute to the enhancement of the natural and local environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status. Areas of Outstanding Natural Beauty have the highest status of protection in relation to conserving and enhancing landscape and scenic beauty.*

*16. The Wiltshire Core Strategy Policy 51 reference is incomplete, and I do not see within the submitted documentation the requisite demonstration of how the proposal complies with the objectives and policies of the AONB Management Plan.*

*17. The Planning Statement refers to NPPF paragraph 79 as support for the proposals. However, careful reading of that paragraph, and in particular subparagraph C, shows that the reference is to ‘reuse’ of redundant or disused buildings. The current proposal is clearly, a change of use for a disused building and, therefore, that element of the NPPF does not apply.*

*18. The proposed design of the conversion does not conserve nor enhance the AONB. Taken*

*as a whole, which we are supposed to do with the NPPF, the proposal is not sustainable development, it does conflict with policies to conserve and enhance the AONB, and the design is remarkably utilitarian and does not conserve nor enhance the AONB”.*

It is evident that the appearance of the land has evolved to the detriment of the AONB over course of the recent planning history of this site.

Following a recent site visit to the application site by the case officer, it was noted that there were a number of vehicles, vehicle parts, outbuildings, a shepherd's hut and domestic paraphernalia on the land in question with no reference to these made within the planning application or submitted plans. Whilst it is acknowledged within the planning statement submitted by the applicant that a condition attached to any consent would be acceptable to tidy the land, this in officer opinion would not be acceptable and does not give a true reflection of the current appearance of the land given the location of the site within the AONB.

It should be noted that this application is for the part conversion of the existing redundant barn to a one-bedroom dwelling only. The agent has stated that the use of the shepherd's hut upon the land is used as an ancillary restroom in connection with the current agricultural use of the land. Whilst this is noted, there is in officer opinion no justification for the storing of a number of vehicles, vehicle parts, the erected outbuildings and domestic paraphernalia on the application site. Furthermore, there would appear to be no immunity from planning enforcement action under the 4 year ruling given that it is evident the appearance of the land has changed as described since the withdrawal of planning application 19/11868/FUL. This application was withdrawn on officer advice in January 2020 due to the detrimental impact the proposal would have to the AONB.

The proposal seeks to convert part of the existing barn into a one bedroom dwelling house. The existing barn on site is considered to be of poor visual quality. The submitted plans show that the converted barn would also be utilitarian in appearance following the proposed works. Materials to be used in the conversion of the barn include timber cladding over the existing blockwork opposed to render of the previous application. The existing fibre cement roofing over the proposed converted section of the building is to remain with replacement brown corrugated cladding proposed over the retained garage section of the barn. Access to the proposed dwellinghouse would be via a track across the field accessed via a slip road serving the nearby dwellinghouse, (Greenfields).

Whilst the modest differences in materials proposed for the conversion of the building are noted, having regard for the above mentioned policies, case law and the previous recent planning history, officers remain of the opinion that the existing building is of poor visual quality and that its proposed retention and reuse as a dwellinghouse in the manner suggested, together with any curtilage/residential paraphernalia (which would be difficult to control), include the creation of a long driveway, would result in a building and surroundings of limited visual quality, and thus the proposal would remain visually detrimental to the special landscape character and appearance of the AONB, particularly given its isolated position within the landscape.

Consequently, on the basis of the information submitted, officers remain to be convinced that there is any identified need to permanently reside on the land, particularly considering the business is not currently in full operation. Notwithstanding, the proposed building works involved in the reuse of the existing building would not result in an enhancement of the site or the wider landscape of the AONB. As such the proposal (the effective retention of a building of poor visual quality together with residential paraphernalia) and current unkempt appearance as previously outlined is considered to cause significant harm to the landscape character of the AONB. This is given great (significant) weight in line with the guidance given in the NPPF.



Whilst there may be some economic benefits from the applicants proposed business, these are likely to be localised and small scale, and there is no guarantee that the business would have a long term future. Officers therefore give this matter limited weight.

As result, it is considered that the harm caused by this proposal would outweigh any social/economic benefits of the proposal.

### 9.3 Highway safety/parking

Access to the proposed converted barn would be via an existing access road from the neighbouring property Greenfields which would then lead to the long driveway as proposed via the field to the existing building.

The Council's Highways Officer has assessed the proposal and following the submission of an additional plan detailing the appropriate visibility splay available from the existing access from the private track onto Butts Lane raises no objection subject to a number of conditions attached to any consent. The conditions proposed refer to the visibility splays, consolidated access and no entrance gates opening outwards. In officers opinion, based on the submitted plan, the visibility splays are unlikely to result in the removal of adjacent hedging or trees which currently enhance the landscape of the AONB, and thus such visibility works are unlikely to cause any significant harm to the AONB landscape.

Comments received from a member of the public regarding access rights across the road via Greenfields is a civil issue and not a matter for the Local Planning Authority to become involved with.

### 9.4 Ecological Impact/River Avon Catchment Area

The application is accompanied by an ecological survey which has been reviewed by the Council's Ecologist. The following comments have been provided:

*The application is supported by a 'Bat Statement for Proposed Conversion of Agricultural Barn to Residential Dwelling at Butts Lane, Kilmington' prepared by Matthew Hollands Architects Limited. This report has not been prepared by a suitably qualified ecologist and doesn't include a desk study or baseline survey of the application area and it is not clear when the survey was carried out. As a result the application does not demonstrate that impacts on biodiversity (protected/ notable species and habitat) would be mitigated.*

As insufficient information has been provided in respect of mitigated impacts to protected species, it is not possible to fully assess the ecological impact of the proposal.

WCS policy CP50 (Biodiversity and Geodiversity) and the NPPF requires the Local Planning Authority to ensure protection of important habitats and species in relation to development and seeks enhancement for the benefit of biodiversity through the planning system. Whilst the site is not adjacent to any rivers or in any respective flood zones, it is situated within the River Avon Special Area of Conservation (SAC) catchment area. The SAC is designated for several species of wildlife that depend on pristine water quality that is typical of chalk rivers such as the Avon. It is part of a network of sites across Europe designated in order to protect these and other species vulnerable to man-induced habitat change. This SAC is particularly vulnerable to the effects of pollutants including phosphate and nitrogen which may enter the river for example at sewage treatment works or from fertilizers applied to farmland throughout the catchment.

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. The Council has agreed through a Memorandum of Understanding with Natural England and others that measures will be put in place to ensure all developments permitted between March 2018 and March 2026 are phosphorus neutral in perpetuity. To this end it is currently implementing a phosphorous mitigation strategy to offset all planned residential development, both sewered and non sewered, permitted during this period.

However, in officer opinion, in this instance, as this proposal is not considered to be policy compliant “planned development” due to it being contrary to other policies in the plan particularly CP2 and CP48, the proposal is not covered by the generic AA agreed between the Council and Natural England. Consequently, as no bespoke mitigation scheme for phosphate mitigation has been provided for this proposal, it is considered the proposal is contrary to Core Policies CP50 and CP69 of the WCS.

## **10. Conclusion and Planning Balance**

This application has generated support from third parties, including the Parish Council and members of the public, which is duly noted. Such local support is given modest weight. Furthermore, the proposed business may, if it were to survive long term, have some smaller scale localised benefits to the local rural economy. However, as this business is not yet established on site, such benefits are given only limited weight, particularly as CP48 and NPPF does not in itself require there to be a local need for housing in the area in order to reuse a building.

The protection of the landscape of the AONB must be given great weight, in accordance with NPPF guidance. The current appearance of the land with the storage of vehicles, vehicle parts the erected outbuildings and residential paraphernalia for which there is no justification has a detrimental impact to the special appearance and character of the AONB. The AONB group have raised significant concerns, and the application proposal is little changed from the previous refusal. The proposal would result in the retention of a building of poor visual quality, and together with the associated residential paraphernalia and long access drive, it is considered that the proposal would cause significant harm to the landscape character of the AONB. Furthermore, due to the limited evidence submitted, the proposal would be likely to cause significant harm to protected species and the River Avon SAC. This harm is given significant weight.

Therefore, for the reasons outlined within this report, officers consider that the retention and reuse of the existing building as a dwellinghouse as proposed would cause significant harm to the AONB and biodiversity which is not outweighed by the limited economic benefits, and would be contrary to the aims of Core Policies CP 2, 48, 50, 51, 57 and 69 of the Wiltshire Core Strategy and the aims of the NPPF.

## **11. RECOMMENDATION:** Refuse for the following reason(s):

1. The existing building is located on an isolated parcel of land on the outskirts of the village of Kilmington within the open countryside of the Area of Outstanding Natural Beauty (AONB). The existing structure on the land is considered to be of poor visual quality and is not considered to positively enhance the landscape character. However,

the proposed scheme is also considered to be of a similarly utilitarian appearance and of poor visual quality. Consequently, retention and reuse of the building for residential use, together with any curtilage/residential paraphernalia including the creation of a long driveway, would be detrimental to the special character and appearance of the landscape of the AONB. Whilst the proposal may result in some localised and small scale economic benefits, these are not considered to outweigh the significant harm caused by the proposal. Subsequently, the proposal is considered to be contrary to the aims of Core Policies CP48, CP51 and CP57 of the Wiltshire Core Strategy and the aims of the NPPF.

2. Whilst the application is supported by a bat report, the report has not been prepared by a suitably qualified ecologist and does not include a desk study or baseline survey of the application area, and it is not clear when the survey was carried out. As a result, the application does not demonstrate that impacts on biodiversity would be mitigated. Furthermore, the site is situated within the River Avon catchment area that is a European site. Advice from Natural England indicates that every permission that results in a net increase in foul water entering the catchment could result in increased nutrients entering this European site causing further deterioration to it. The application does not include detailed proposals to mitigate the impact of these increased nutrients and consequently, without such detailed proposals, the Council as a competent authority cannot conclude that there would be no adverse effect on the integrity of this European Site as a result of the development. Whilst the proposal may result in some localised and small scale economic benefits, these are not considered to outweigh the significant harm likely to be caused by the proposal. The proposal would therefore conflict with Wiltshire Core Strategy policies CP50 (Biodiversity and Geodiversity) and CP69 (Protection of the River Avon SAC); and paragraphs 175 and 177 of the National Planning Policy Framework.