

Conversion Method Statement

In support of

Notification for Prior Approval for the Change of Use (Class Q)
of a barn to one dwellinghouse
(resubmission of
26/00146/P3CQ)



At

Agricultural building
Folly Farm
Shilton Road
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LE9 7QL

Applicant

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Agent

Providing planning solutions for
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1.0 Introduction

- 1.1 This Conversion Method Statement is provided in support of a notification for prior approval submitted under the provisions of Schedule 2, Part 3, Class Q (parts a, b and c) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).
- 1.2 The updated legislation for Class Q ‘permitted development’ rights was introduced on 21st May 2024 which expanded upon the earlier provisions of Schedule 2, Part 3, Class Q of the Town & Country Planning (General Permitted Development) (England) Order 2015 (as amended). These are informally referred to as the “new rules” for Class Q and are fully applicable to the subject notification for prior approval.
- 1.3 This Conversion Method Statement is to be read in conjunction with the accompanying Planning Statement submitted as part of this notification.
- 1.4 Paragraph (b) of the Class Q legislation sets out that, alongside the change of use of the building, ‘building operations reasonably necessary to convert the building’ are also within the allowances of Schedule 2, Part 3, Class Q of the General Permitted Development Order.
- 1.5 This part of the legislation has a subjective aspect to it, requiring the decision maker to make a planning judgement, based on the facts and merits of each case, on what is ‘reasonably necessary’. This assessment and the ultimate decision must be made having regard to the Class Q legislation, the guidance contained within Planning Practice Guidance and relevant case law, so as the decision can be made with the correct assessment.
- 1.6 This Conversion Method Statement is submitted to the Local Planning Authority to provide additional detail relating to how the subject building is to be converted, so as it is possible to assess the scope of the building operations.

2.0 The Allowances of Class Q Legislation

- 2.1 The provisions of Schedule 2, Part 3, Class Q (parts a, b and c) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) expressly allow for “*building operations*” reasonably necessary to convert the building to a dwellinghouse.
- 2.2 The legislation goes on to summarise the types of building operations that are permitted under the provisions of Schedule 2, Part 3, Class Q of the Order.
- 2.3 The legislation explains that the installation or replacement of windows, doors, roofs or exterior walls, the installation or replacement of water, drainage, electricity, gas or other services, and the partial demolition of the building or elements of the building are within the allowances of Class Q legislation.
- 2.4 The pertinent wording is provided below for ease of reference.

Permitted development

Q. Development consisting of—

- (a) a change of use of—
 - (i) a building that is part of an established agricultural unit and any land within that building's curtilage, or
 - (ii) a former agricultural building that was (but is no longer) part of an established agricultural unit and any land within that building's curtilage,to a use falling within Class C3 (dwellinghouses) of Schedule 1 to the Use Classes Order,
- (b) development referred to in sub-paragraph (a) together with the extension of the building referred to in sub-paragraph (a), or
- (c) development referred to in sub-paragraph (a) together with building operations reasonably necessary to convert the building referred to in sub-paragraph (a) to a use falling within Class C3 (dwellinghouses) of that Schedule or to extend that building.

- (j) the development under Class Q(c) would consist of building operations other than—
 - (i) the installation or replacement of—
 - (aa) windows, doors, roofs, or exterior walls, or
 - (bb) water, drainage, electricity, gas or other services,to the extent reasonably necessary for the building to function as a dwellinghouse; and
 - (ii) partial demolition to the extent reasonably necessary to carry out building operations allowed by paragraph Q.1(j)(i),

2.5 The question of which building operations are “reasonably necessary” (as referred to in paragraph Q.1(ii) of the legislation) was tested in the High Court case *Hibbitt v Secretary of State for Communities and Local Government* [2016] EWHC 2853 which is discussed in greater detail at Section 4.0 of this Conversion Method Statement.

3.0 Planning Practice Guidance

- 3.1 Planning Practice Guidance (“PPG”), at Paragraph 105, provides a brief written summary of the building operations that are within the allowances of Class Q ‘permitted development’ rights and transcripts are provided below for ease of reference:

What works are permitted under the Class Q permitted development right for change of use from an agricultural building to residential use?

The right allows either the change of use (a), or the change of use together with reasonably necessary building operations (b). Building works are allowed under the right permitting agricultural buildings to change to residential use: [Class Q of Part 3 of Schedule 2 to the Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#). However, the right assumes that the agricultural building is capable of functioning as a dwelling. The right permits building operations which are reasonably necessary to convert the building, which may include those which would affect the external appearance of the building and would otherwise require planning permission. This includes the installation or replacement of windows, doors, roofs, exterior walls, water, drainage, electricity, gas or other services to the extent reasonably necessary for the building to function as a dwelling house; and partial demolition to the extent reasonably necessary to carry out these building operations. It is not the intention of the permitted development right to allow rebuilding work which would go beyond what is reasonably necessary for the conversion of the building to residential use. Therefore it is only where the existing building is already suitable for conversion to residential use that the building would be considered to have the permitted development right.

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

- 3.2 The above PPG guidance has not been updated in line with the new ‘permitted development’ rights legislation for Class Q that was introduced on 21st May 2024.
- 3.3 However, the PPG guidance remains useful in several ways, including through its clarification that confirms that internal works (such as the installation of a new floor or mezzanine floor) are within the allowances of Class Q ‘permitted development’ rights.

4.0 Relevant Case Law: The Hibbitt Case

- 4.1 The High Court case of *Hibbitt v Secretary of State for Communities and Local Government* [2016] EWHC 2853 concerned the distinction between 'conversion' building works and 'rebuild' building works from agricultural building to dwellinghouse, and whether the latter was within the allowances of Class Q 'permitted development' rights.
- 4.2 The Hibbitt case is pertinent to the assessment and determination of prior notifications under the provisions of Class Q seeing as the legal judgement is oft referred to in contemporary planning appeals.
- 4.3 Link to full script - [Hibbitt & Anor v Secretary of State for Communities & Local Government & Ors \[2016\] EWHC 2853 \(Admin\) \(09 November 2016\) \(bailii.org\)](#)
- 4.4 The most relevant extracts of the legal judgement are provided below.

Paragraph 23

"The essence of the dispute concerns whether the proposed "conversion" amounts to a "rebuild"

Paragraph 26

"First, the concept of "conversion" is found in the overarching provisions of Class Q (not in Q.1) and it thereby introduces a discrete threshold issue such that if a development does not amount to a "conversion" then it fails at the first hurdle and there is no need to delve into the exceptions in Q.1. It is thus a freestanding requirement that must be met irrespective of anything in Q.1. Mr Campbell responded to this by saying that Class Q must be read as a whole (including therefore Q.1) and read as such it provides a comprehensive definition of "convert". This was made up of (i) the requirement in Q that the starting point be an "agricultural building" and the end point be a "dwelling"; and (ii) the requirement in paragraph [105] NPPG that the existing building be sufficiently load bearing.

The requirement in Q.1(i) that the works be no more than "reasonably necessary for the building to function as a dwelling house" was inherent in the first condition i.e. the definition of a dwelling. It was argued that provided these conditions were met there was no more that was needed to be assessed by a decision maker in order to come to the conclusion that the works amounted to a conversion. The difficulty with this argument is that, on a fair construction of the drafting logic of the Order, the requirement that development amount to a "conversion" is drafted as a separate requirement from these other conditions. In particular (as set out in the second point below) the concept of conversion has inherent limits which delineate it from a rebuild."

Paragraph 27

“Second, a conversion is conceptually different to a "rebuild" with (at the risk of being over simplistic) the latter starting where the former finishes. Mr Campbell, for the Claimant, accepted that there was, as the Inspector found, a logical distinction between a conversion and a rebuild. As such he acknowledged that since Class Q referred to the concept of a conversion then it necessarily excluded rebuilds. To overcome this Mr Campbell argued that a "rebuild" was limited to the development that occurred following a demolition and that it therefore did not apply to the present case which did not involve total demolition. In my view whilst I accept that a development following a demolition is a rebuild, I do not accept that this is where the divide lies. In my view it is a matter of legitimate planning judgment as to where the line is drawn. The test is one of substance and not form based upon a supposed but ultimately artificial clear bright line drawn at the point of demolition. And nor is it inherent in "agricultural building".

There will be numerous instances where the starting point (the "agricultural building") might be so skeletal and minimalist that the works needed to alter the use to a dwelling would be of such magnitude that in practical reality what is being undertaken is a rebuild. In fact a more apt term than "rebuild", which also encapsulates what the Inspector had in mind, might be "fresh build" since rebuild seems to assume that the existing building is being "re" built in some way. In any event the nub of the point being made by the Inspector, in my view correctly, was that the works went a very long way beyond what might sensibly or reasonably be described as a conversion. The development was in all practical terms starting afresh, with only a modest amount of help from the original agricultural building. I should add that the position of the Claimant was that the challenge was as to law; if the argument in law was lost (and the Inspector did not therefore misdirect herself) then it was not argued that the Inspector acted irrationally in coming to the conclusion that the works were a rebuild / fresh build, and not a conversion."

Paragraph 34

“Finally, I should say a brief word about two discrete points of construction which were raised in argument. The first concerns the Inspector's analysis of the weight she attached to the extent of the proposed works. In my view she correctly recognised that the extent of the works was not dispositive. In many permitted developments the work might be extensive yet that does not thereby disqualify a development from automatic permission. I also accept her analysis that the extent of the works to be undertaken was one, amongst other, relevant consideration that could assist in forming a judgment whether the works were part of a conversion or were, instead, part of a rebuild or fresh build. I thus accept the analysis that the extent of the works is a relevant but not dispositive consideration.”

4.5 In view of the above, the headline points to take from the Hibbitt judgement are as follows:

- a) The development must be a ‘conversion’ and not a rebuild otherwise it fails Class Q (paragraphs 23 and 26)
- b) Rebuilding can happen without demolition – something does not have to be demolished before it constitutes rebuilding (paragraph 27)
- c) In the Hibbitt case, the works went ‘a very long way beyond what might sensibly or reasonably be described as a conversion. The development was in all practical terms starting afresh, with only a modest amount of help from the original agricultural building’ (paragraph 27)
- d) The extent of works is relevant but not dispositive (the deciding factor) (paragraph 34).

5.0 Conversion Method Statement

5.1 The following sections seeks to demonstrate how the prior notification proposals fall within the allowances of Class Q 'permitted development' rights and to assist the Local Planning Authority to understand the extent of the proposed works and conversion methodology.

5.2 This section will take the following structure:

- 1. Is the existing building structurally sound and able to accommodate the proposed conversion to a dwelling?**
- 2. What are the building operations required for the building to function as a dwelling?**
- 3. When taken as a whole, are the works required considered to be a "conversion"?**

5.3 As a reminder, the relevant legislation and Planning Practice Guidance ("PPG") is clear that Class Q 'permitted development' rights allow for:

- The installation or replacement of windows, doors, roofs or exterior walls.
- Internal works such as installation of a floor, mezzanine, stairs and internal walls are 'not development' thereby permitted through the Class Q
- Extensions of the building as allowed by paragraph Q.1(i)
- Protrusions of up to 0.2 metres to accommodate building operations allowed by paragraph Q.1(j)(i).

Is the existing building structurally sound and able to accommodate the proposed conversion to a dwelling?

5.4 In November 2025, the applicants instructed the structural engineers at Geomex Ltd to undertake a survey of the subject building to assess its structural integrity and suitability for conversion to a dwellinghouse.

5.5 A copy of the associated report is submitted in support of this notification for prior approval.

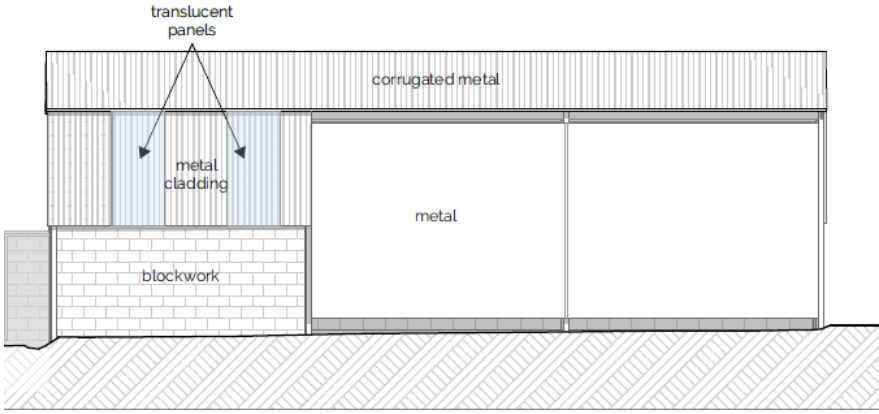
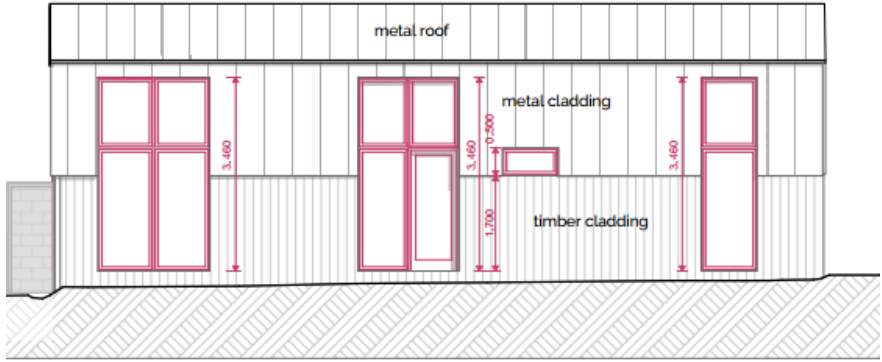
5.6 The headline findings of the report are summarised below:

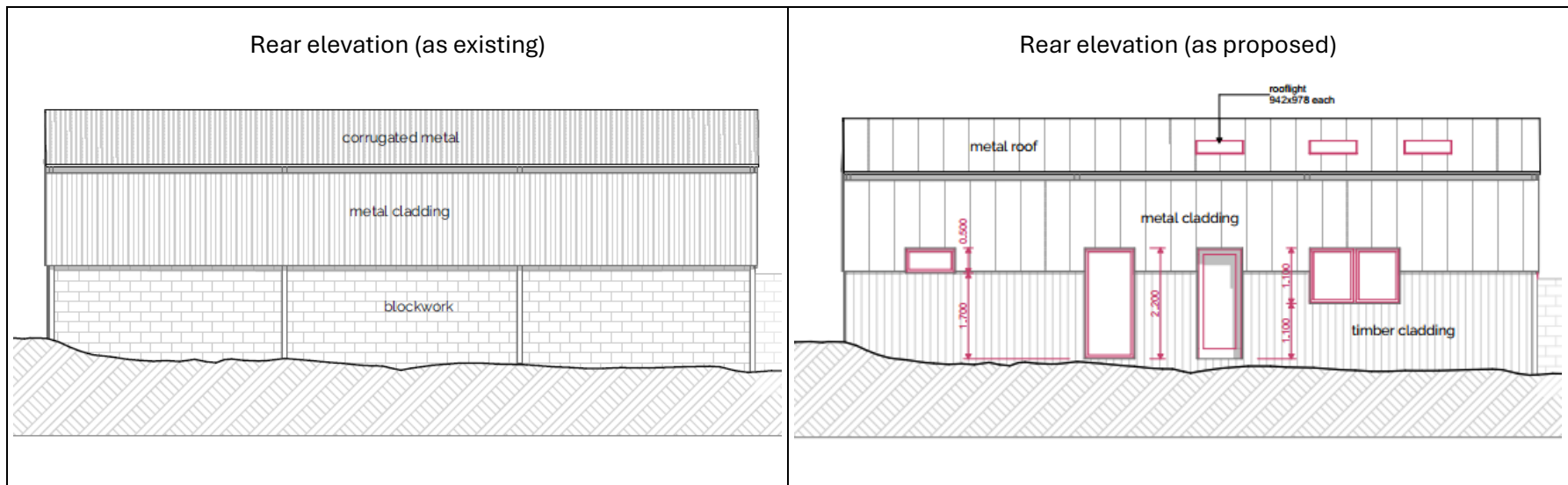
- The barn does not appear to have suffered any structural distress and should be able to be converted to a habitual dwelling in accordance with the plan submitted
- The steel framework would appear adequately sized and considered suitable for the proposed change to residential accommodation
- The addition of floor insulation and insulation to the existing walls and roof does not afford any necessary structural improvements as the building is already able to sustain the loads imposed on it
- The existing concrete floor already benefits from a damp proof membrane, and can accommodate a residential load

- 5.7 The report goes on to confirm the building works which would be required to convert the building (which are expanded on further below) and concludes that the building is suitable for conversion to domestic living accommodation without needing any structural changes. All of the existing building structure and materials are suitable for reuse and will not require modification; only cleaning, painting and light surface corrosion removal if needed.
- 5.8 Having regard to the above and with reference to the full commentary contained within the report, there are no concerns as to whether the subject building is structurally sound and capable of conversion to a single dwelling.

What are the building operations required for the building to function as a dwelling?

- 5.9 The set of tables below provide a side-by-side comparison of the 'existing' and 'proposed' elevations drawings by way of illustrating the scope of the building operations proposed as part of this notification for prior approval under Class Q 'permitted development' rights.
- 5.10 Subsequently, a 'Table of Proposed Works' is provided which contains a brief written summary of the existing building, proposed building operations or alterations, as well as the scope of repairs (referred to as "remedial works") that might be necessary.

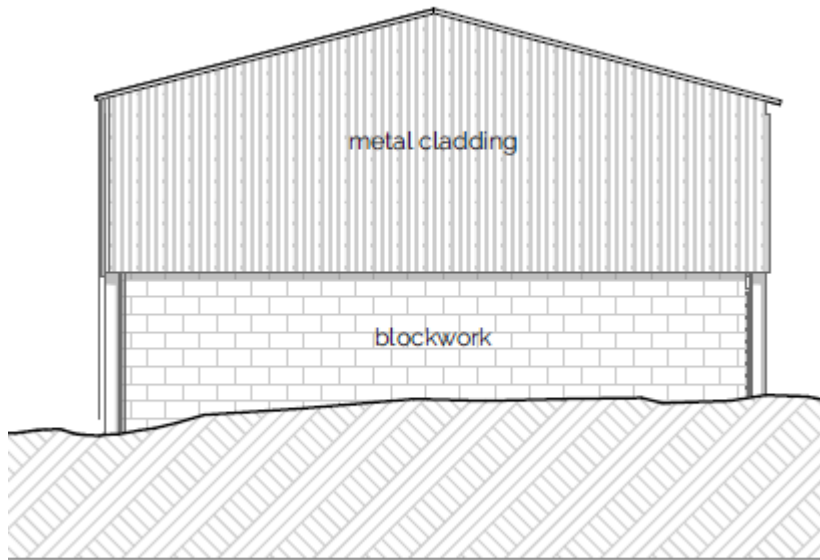
EXISTING AGRICULTURAL BUILDING	PROPOSED CONVERSION
Front elevation (as existing) 	Front elevation (as proposed) 
Scope of Building Operations • Existing structural frame to be retained as existing, with cleaning and painting to prevent corrosion • Existing blockwork lower walls and metal cladding will be retained internally • Corrugated roof cladding to be replaced with insulated metal cladding • Metal doors to be removed • Doors and windows to be inserted into existing openings where possible, allowing for a minimum 650mm return on existing wall to optimise structural integrity • New walls to be provided to enclose the existing doorways, comprising of an internal timber studwork structure • External insulation and new metal and timber cladding to be added • Concrete floor to be retained • All other building operations to facilitate the conversion will be internal	



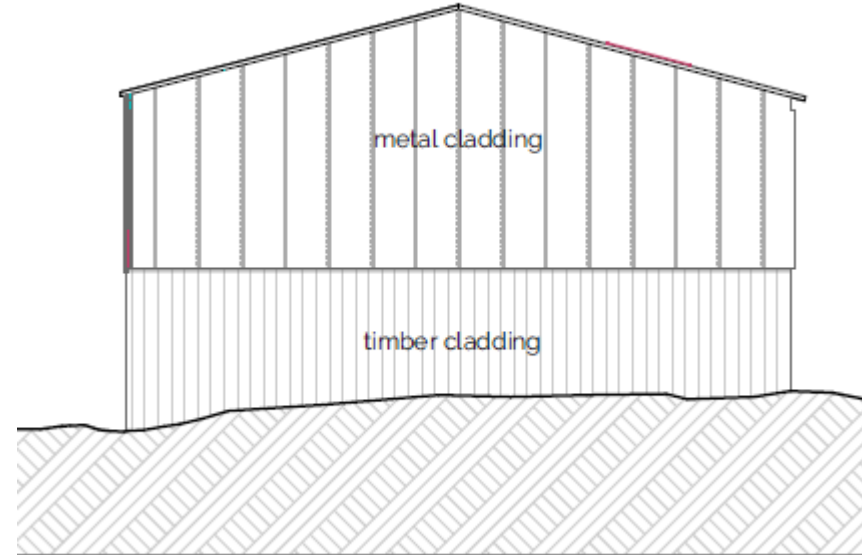
Scope of Building Operations

- Existing structural frame to be retained as existing, with cleaning and painting to prevent corrosion
- Existing blockwork lower walls and metal cladding will be retained internally
- Corrugated roof cladding to be replaced with insulated metal cladding
- One new rear door opening to be made, structurally dependent on the existing building
- Three new window openings to be made, structurally dependent on the existing building
- External insulation and new metal and timber cladding to be added
- Three rooflights to be inserted
- Concrete floor to be retained
- All other building operations to facilitate the conversion will be internal

Side elevation (as existing)



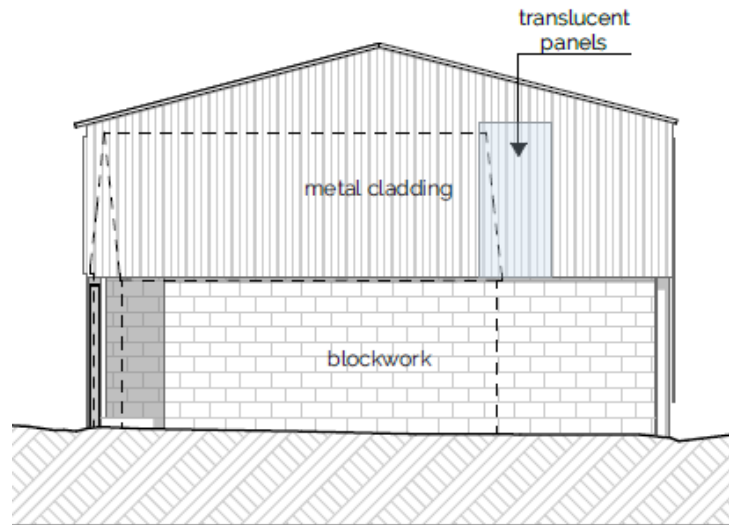
Side elevation (as proposed)



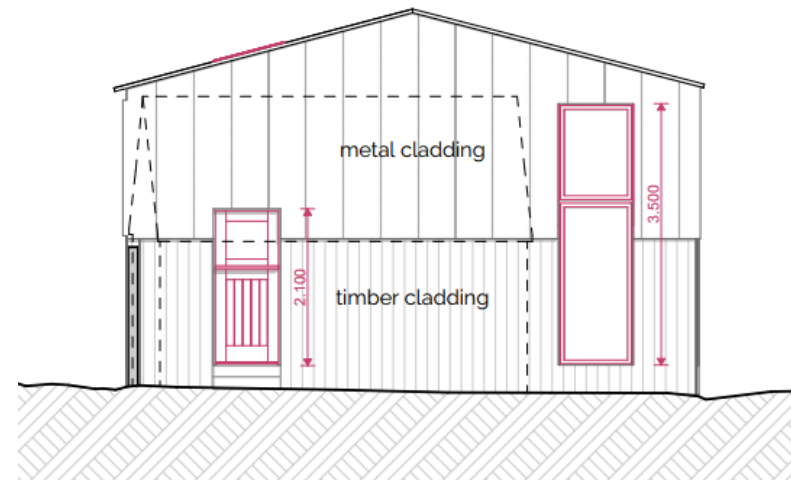
Scope of Building Operations

- Existing structural frame to be retained as existing, with cleaning and painting to prevent corrosion
- Existing metal cladding and blockwork to be retained internally
- External insulation and new metal and timber cladding to be added
- Concrete floor to be retained
- All other building operations to facilitate the conversion will be internal

Side elevation (as existing)



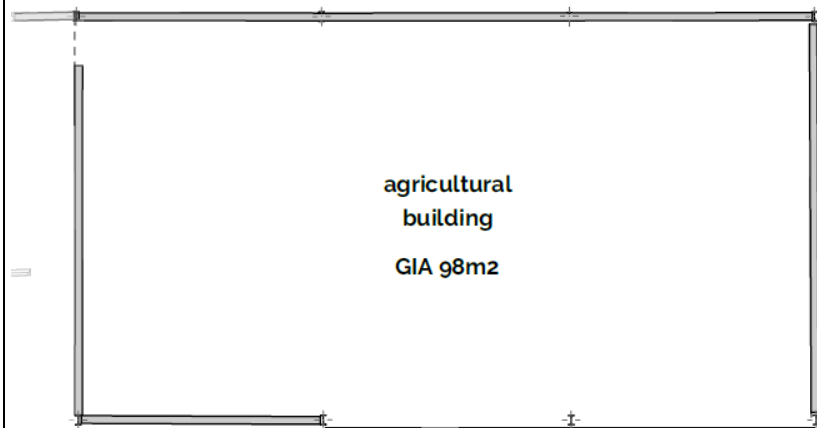
Side elevation (as proposed)



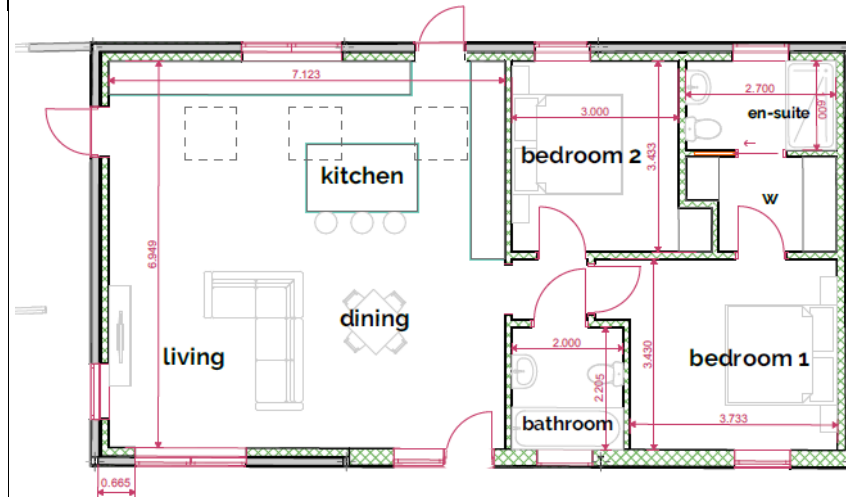
Scope of Building Operations

- Existing structural frame to be retained as existing, with cleaning and painting to prevent corrosion
- Existing blockwork lower walls and metal cladding will be retained internally
- One new rear door opening to be made, structurally dependent on the existing building
- Existing doorway to be enclosed with new wall and cladding
- One new window to be added, utilising existing opening
- External insulation and new metal and timber cladding to be added
- Concrete floor to be retained
- All other building operations to facilitate the conversion will be internal

Floorplan (as existing)



Floorplan (as proposed)



Scope of Building Operations

- Existing floor slab includes a damp proof membrane, and will be overlain with insulation and screed
- New internal perimeter wall to be constructed in timber studwork
- Addition of internal walls
- Internal fixtures and fittings
- External insulation and cladding to be added

Table of Proposed Works

Building Element	Existing Structure	Building Operations	Extent of Remedial Works
Frame	Steel Frame	The existing steel frame is to be retained. The structural report confirms that the steel frame is adequately sized and considered suitable for the proposed change to residential accommodation.	No building operations are required to the steel frame. The frame will be cleaned and painted as necessary.
Roof	Corrugated cement fibre roofing with Perspex sky lights, fixed to steel and timber framework.	Retain existing roof structure and replace corrugated cladding with metal insulated cladding. Insertion of new roof lights. NB: there will be additional loading as result of use of insulated cladding, compared to reusing existing roof cladding and adding insulation.	Roof cladding to be replaced. No remedial repairs to roof structure needed.
External Walls	Partial blockwork lower wall and corrugated fibre cement cladding above. Existing openings enclosed by steel doors and Perspex windows.	Retain blockwork lower wall and corrugated cladding, except where it is necessary to remove small sections for openings. External insulation (100mm Kingspan type) will be fixed to the existing walls using a timber frame system, and timber and steel cladding affixed to the outside. This addition is non-structural but will improve the energy efficiency and appearance of the building. New timber framing and cladding to be used to infill existing openings around proposed windows and doors.	Existing materials to be cleaned and painted where required.
Windows and Doors	Existing openings to the front of the	Windows and doors to re-use the existing openings wherever possible.	Windows and doors constitute a building operation which is permitted

	building and a small access door to the side. Existing windows.	Creation of minimal new openings; a kitchen window, back door, bedroom window and small en-suite windows to the rear elevation. Entrance door and front windows within existing doorway openings. New living room windows to utilise existing openings. New openings to be structurally supported by the existing building. No additional structural elements required for installation.	under the provisions of Class Q 'permitted development' rights.
Concrete floor	Existing concrete floor slab	Existing concrete floor with damp proof membrane. To be overlain with insulation and screed.	Existing slab is flat, level and in good condition for reuse.

When taken as a whole, do the proposed building operations constitute a “conversion” and therefore meet the relevant tests for Class Q?

- 5.11 The subject building was inspected by a structural engineer in November 2025 and the report confirmed that the building is in good condition and is capable of conversion to a single dwellinghouse.
- 5.12 The building operations required for this building to function as a dwelling are primarily the installation of new windows and doors, and the enclosure of the existing doorways. The existing roof cladding has been shown to be capable of retention, but for aesthetic and efficiency reasons is proposed to be replaced. All of these building operations are expressly permitted in Class Q legislation. All other works required for the conversion are internal works which fall outside the definition of ‘development’ and are therefore permissible.
- 5.13 New external timber and steel cladding will be fixed to the existing building, along with external insulation. This is work which will amount to a minor protrusion less than 0.2m, allowed expressly within the legislation, and which is reasonably necessary building works to enable the building to function as a dwelling. Importantly, the existing walls will be retained within the build and used to affix the insulation and new cladding; the insulation and cladding does not amount to the construction of new walls and the building works are still entirely considered a conversion as a result.
- 5.14 With reference to the relevant case law, such as the High Court case of *Hibbitt v Secretary of State for Communities and Local Government* [2016] EWHC 2853, it is submitted that the extent of the proposed building operations clearly constitutes a “conversion” rather than anything amounting to a ‘substantial rebuild’ or ‘starting afresh’. On this basis, the proposals would meet the relevant tests as far as Class Q legislation is concerned.

6.0 Summary

- 6.1 As is demonstrated in the previous sections of this Conversion Method Statement and the accompanying structural report, the subject agricultural building is in good structural condition throughout.
- 6.2 The majority of existing built features would remain in situ including steel frame, purlins, rafters, blockwork lower walls, corrugated metal sheeting, and concrete floor.
- 6.3 Otherwise, the new windows, doors and cladding that are proposed, are expressly permitted by Class Q ‘permitted development’ rights. All other works are internal and do not come within the remit of Class Q as they are not ‘development’.