PLANNING STATEMENT

PROPOSED REPLACEMENT OF REDUNDANT AGRICULTURAL BUILDING TO PROVIDE 2 NO. COMMERCIAL UNITS (USE CLASS E)

SOUTH FARM, WATER EATON, WILTSHIRE

JULY 2023



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

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by RAW Planning Ltd to accompany a planning application which is submitted on behalf of Kes Ventures Ltd ("The Applicant"). The application relates to a redundant agricultural building at South Farm, Water Eaton, Swindon, Wiltshire, SN6 6JU (the "Application Site").

1.2 Full planning permission is sought for the demolition and replacement of the building to provide 2 no. commercial units (Use Class E (g) (i) – (iii)) together with car parking. The application follows a recent planning permission (LPA ref: PL/2022/05824) for the change of use and extension of neighbouring agricultural buildings to Use Class E (g) (i) – (iii) at South Farm.

1.3 This Planning Statement is submitted in support of the application and provides a summary overview of the application proposals as well as identifying the Planning Policy Framework within which it should be considered.

1.4 Section 2 provides a description of the application site and the surrounding area. Section 3 sets out the relevant planning history affecting the site. Section 4 sets out the development proposals. The Planning Policy Framework that is applicable to the application is provided in Section 5. Section 6 provides a reasoned justification for the development being proposed and Section 7 sets out a summary and conclusions.

2. THE APPLICATION SITE

2.1 The application site is located approximately 1 mile south west of the village of Castle Eaton on the eastern side of the road that connects Castle Eaton (to the north east) and the A419 (to the south west).

2.2 The site is accessed via a concrete access track that first passes the property known as The Lodge (including the business Prestige Cars) on the left (north) and then runs parallel to agricultural land before leading to the application site on the left (north). An aerial photo of the application site and immediate surrounding area is inserted below.



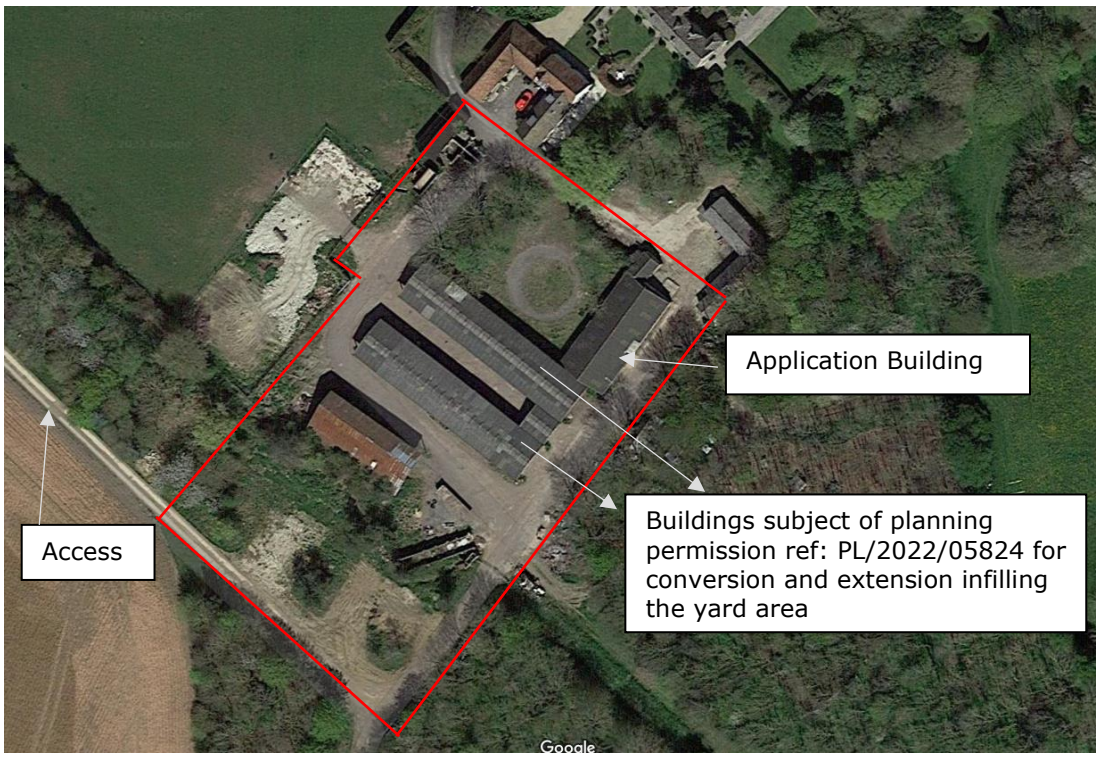
2.3 South Farm comprised a number of redundant agricultural buildings. Two partly open sided steel framed buildings (attached to the south west corner of the application building) connected by a 3 bay steel framed structure were recently granted planning permission (LPA ref: PL/2022/05824) for change of use and extension to Use Class E (g) (i) – (iii) and this permission has been implemented. A pole barn is located to the south west of the aforementioned converted buildings.

2.4 The building subject of this application is a rectangular blockwork structure as shown in the photo below. The building extends to 285 sq. m in floor area and notification was sent to Wiltshire Council on 20th January 2020 that 150 sq. m of the building would be converted to a flexible commercial use under Class R.3 of Schedule 2, Part 3 of the General Permitted Development Order. This part of the building is currently in use for Class E purposes.





2.5 An aerial photo of the application site is inserted below identifying the various buildings at South Farm as referred to above.



2.6 The application site is not subject of any statutory or local landscape, heritage or ecological designations and is located within flood zone 1 which has the lowest probability of flooding. There are no Public Rights of Way that cross or run in close proximity to the site.

3. RELEVANT PLANNING HISTORY

3.1 The application site has been the subject of various relevant applications as set out below:

- 15/01332/PNCOU – Prior Notification under Class MB – Prior Notification under Class MB – conversion of agricultural buildings to 2 dwellings – Prior Approval refused

- 15/10707/PNCOU – Notification of Prior Approval – Proposed conversion of agricultural building for form two dwellinghouses – Prior Approval refused

- 19/06241/PNCOU – Notification for Prior Approval under Class s Q(a) only for a proposed change of use of Agricultural Buildings to 5 no. dwellinghouses – Prior Approval was required and was approved on 21st August 2019.

- Letter sent to Wiltshire Council dated 20th January 2020 advising of an intended change of use of less than 150 sq. m (within the application building) under Schedule 2, Part 3, Class R of the Town and Country planning (General Permitted Development) (England) (Order) 2015.

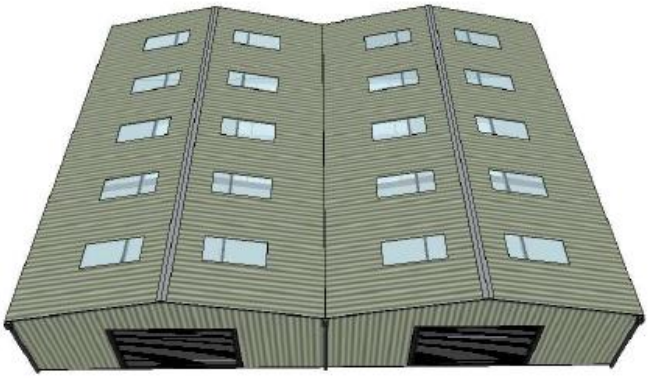
- PL/2021/05142 – Application for Prior Approval for Change of Use from Agriculture to Flexible Commercial Use under Schedule 2, Part 3, Class R of the Town and Country Planning (General Permitted Development) (England) (Order) 2015 – Prior Approval was not required 18th May 2021.

- PL/2022/0524 – Application for the change of use and extension of agricultural buildings to Use Class E (g) (i) – (iii) together with associated external alterations and car parking and external alterations to adjoining building which is subject to a change of use under Schedule 2, Part 3, Class R of the GPDO – Planning permission granted on 4th May 2023.

4. APPLICATION PROPOSALS

4.1 Full planning permission is sought for the demolition and replacement of an existing block work building with a new purpose built building providing 2 units in Use Class E (g) (i) – (iii) together with car parking.

4.2 Whilst the existing block work building is structurally sound it is in poor condition and its blockwork structure is not conducive to a modern commercial unit. It is therefore proposed to demolish the building and replace it with a two bay dual pitched building that in terms of size appears as the blockwork building converted plus an identical sized addition. The building would be clad in profiled green sheeting with a profiled green sheeting roof within which rooflights would be inserted identical to the recently permitted conversions to the south west. Two sets of roller shutter doors would be provided along the south elevation. Visualisations of the proposed building are inserted below:





4.3 The existing building provides 285 sq. m of floor area and the replacement building would increase this to 454 sq. m, 150 sq. m of which is already in use as Use Class E (g) (i) – (iii) further to the aforementioned notification dated January 2020.

4.4 The additional commercial floor area of 304 sq. m generates a requirement for 11 additional car parking spaces (at one space per 30 sq. m). An additional 15 car parking spaces are proposed to the west and

east of the building. The spaces would form a continuation of the existing car parking all of which is accessed from the access road to the south and south west of the application building.

5. RELEVANT PLANNING POLICIES

5.1 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 material consideration which attracts significant weight.

5.2 This section refers to relevant national planning policy and guidance as well as Development Plan policies that provide planning policy framework for this appeal that should be considered. It deals with the following layers of policy and guidance:

- National Planning Policy Framework (NPPF)
- The Development Plan (including Neighbourhood Plans)

National Planning Policy Framework (NPPF)

5.3 The NPPF outlines national guidance and the Government's policies on the many different aspects of planning. A third version of the NPPF was published in July 2021.

5.4 Paragraph 2 explains that planning law requires applications for planning permission to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.5 Paragraph 10 confirms that at the heart of the Framework is a presumption in favour of sustainable development.

5.6 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development and for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

5.7 Section 6 deals with building a strong, competitive economy. Paragraph 81 states that significant weight should be placed on the need to support economic growth and productivity. Paragraphs 84 ad 85 provide support for a prosperous rural economy stating that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings and the development and diversification of agricultural and other land-based rural businesses. Paragraph 85 states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

The Development Plan

5.8 The Statutory Development Plan covering the application site comprises the:

- Wiltshire Core Strategy (adopted January 2015)
- Wiltshire Site Allocations DPD (adopted February 2020)
- North Wiltshire Local Plan 2011 (Adopted June 2006) – There are no saved policies relevant to this application

Wiltshire Core Strategy (WCS) and Wiltshire Site Allocations DPD

5.9 The application site lies outside the limits of development for Castle Eaton (as defined in the Wiltshire Site Allocations DPD) and as such lies in the countryside. The site is not covered by any other designations on the Wiltshire Core Strategy Policies Map.

5.10 The most relevant policies in the consideration of this application are as follows:

5.11 **Core Policy 19 (Spatial Strategy: Royal Wootton Basset and Cricklade Community Area)** sets out that over the Plan period (2006 to 2026) 5 hectares of new employment land will be provided, including two allocations totally 4.7 hectares.

5.12 **Core Policy 34 (Additional Employment Land)** is primarily concerned with the delivery of additional employment land in Principal Settlements, Market Towns and Local Service Centres. Outside the Principal Settlements, Market Towns and Local Service Centres the Policy states that developments will be supported that:

i) Are adjacent to these settlements and seek to retain or expand businesses currently located within or adjacent to the settlements; or

ii) Support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification; or

iii) Are for new and existing rural based businesses within or adjacent to Large and Small Villages; or

iv) Are considered essential to the wider strategic interest of the economic development of Wiltshire, as determined by the Council.

Where they:

a. Meet sustainable development objectives as set out in the policies of this Core Strategy

b. Are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity and

c. Are supported by evidence that they are required to benefit the local economic and social needs and

d. Would not undermine the delivery of strategic employment allocations and

e. Are supported by adequate infrastructure.

5.13 **Core Policy 48 (Supporting Rural Life)** includes a section on the conversion and re-use of rural buildings stating that proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy 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

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.

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 viable long term safeguarding.

5.14 **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.

5.15 **Core Policy 57 (Ensuring High Quality Design and Place Shaping)** requires a high standards of design in all new developments with development expected to create a strong sense of place through drawing on the local context and being complementary to the locality.

6. PLANNING ASSESSMENT

Principal of Development

6.1 South Farm comprised various redundant agricultural buildings. As set out above 2 buildings have been extended and converted for Use Class E (g) (i) – (iii) use and the application building is partly in use for Use Class E (g) (i) – (iii) uses following a notification under Class R. 3 of Schedule 2, Part 3 of the GPDO.

6.2 This application seeks to demolish and replace a block work building with a purpose built commercial building providing 2 units for Use Class E (g) (i) – (iii). The building would provide 454 sq. m of floorspace, an increase of 169 sq. m compared to the existing building to be demolished.

6.3 The Officers Report for planning permission ref: PL/2022/05824 concluded that the proposals to convert and extend the existing buildings to provide Use Class E complied with Core Strategy Policy 34 (additional employment land) stating:

> *"Core Policy 34 regarding additional employment land supports additional employment development where it is adjacent to larger settlements, to which this site lies a 6 minute drive from the outskirts of Swindon. It is then subject to further criterion including meeting sustainable development objectives, support the local economy, are suitable in scale for their location, would not undermine strategic employment allocations and are supported by adequate infrastructure. It is therefore considered the proposed development is acceptable in this regard".*

6.4 In addition, WCS Core Policy 48 supports the re-use of rural buildings for employment use subject to specific criteria. Whilst the application proposes to replace the existing building it is clearly structurally sound with its replacement preferable to provide a modern commercial building rather than a necessity. Taking Core Policies 34 and 48 together the proposals are considered to be acceptable in principle. The proposals compliance with each of the criteria of Policy 48 is however set out below using the same numeric references:

6.5 **Criteria (i)** – The building is of a block work construction and evidently structurally sound fully supporting an intact roof and walls. The building is also partly occupied for commercial purposes further supporting the fact that it is structurally sound. The building does not require any extension to function although it is proposed to demolish and replace the building with an enlarged structure to provide a building that is suitable for modern commercial purposes and to make efficient use of the existing hard standing yard area to the west. The existing building is of no architectural merit. The replacement building would be identical to the recently converted buildings to the south west and would therefore be entirely in keeping with the character of the wider commercial site.

6.6 **Criteria (ii)** – The application site comprises redundant agricultural buildings and recently converted agricultural buildings which form an established part of the landscape character. To the south east the site is adjoined by an area of woodland with this extending around the south west corner of the site and along the north side of the access track. To the north east the site is adjoined by further agricultural buildings and a residential property which visually relate to the application site. Whilst the application buildings are visible from the field to the north west this area itself is well contained by boundary planting. The buildings are proposed to be clad with profile steel, in keeping with the recently converted buildings. The proposed replacement building would not therefore detract from the character and appearance of the landscape. Furthermore, in addition to the site being well screened there are no public rights of way within the immediate vicinity.

6.7 The proposed parking spaces would be to the west of the building within the existing hardstanding area of the former farm yard and adjacent to the existing car parking spaces for the converted buildings and would be viewed in the context of these buildings. As set out above the site is well screened and is not visible from public viewpoints. As set out below under the heading 'Highways and Access' it is concluded that there would be minimal vehicular movements associated with the proposed use and as such the proposed change of use would also not detract from the character or appearance of the landscape.

6.8 The closest residential properties to the application site are that to the north and The Lodge to the west. The application site was most recently a farm, the operation of which at times would produce considerable noise and disturbance for adjacent occupiers. Use Class E(g)(i)-(iii) (formerly Use Class B1(a)-(c)), in particular E(g)(iii) - light industrial is defined as being light industry which is appropriate within a residential area. Given the distance between the application site and nearest residential property, the lawful and historic use of the site and the nature of the proposal (i.e. light industrial) the proposal is not considered to be detrimental to the amenities of residential areas.

6.9 **Criteria (iii) –** The building is served by an existing access onto an unclassified road that leads directly to the A419. The access has good visibility in both directions and the principle of using the access to serve commercial use of the former farm yard was accepted as part of the most recent planning permission.

6.10 **Criteria (iv) –** The site is located just one mile from the village of Castle Eaton and is just 4 miles from the edge of Swindon which provide a wide range of services.

6.11 **Criteria (v) –** The application buildings are not heritage assets and as such this criteria is not relevant.

Highways and Access

6.12 A Highway Technical Note was submitted as part of planning application ref: PL/2022/05824. The Technical Note advised that the proposed floorspace would generate the following trips per 100 sq. m:

TRICS Trip Rate for Industrial Units			
	Arrivals	Departures	Two-Way Total
AM Peak Hour	0.675	0.129	0.804
PM Peak Hour	0.05	0.625	0.675
Daily Traffic	3.332	3.222	6.554

6.13 Based on the proposed additional commercial floor area of 304 sq. m the proposals would generate the following trips:

TRICS Trip Rate for Industrial Units			
	Arrivals	Departures	Two-Way Total
AM Peak Hour	2.02 (2)	0.38 (0)	2.4
PM Peak Hour	0.15 (0)	1.87 (2)	2.02
Daily Traffic	9.99 (10)	9.66 (10)	19.65

6.14 A total of 15 car parking spaces are proposed to meet Wiltshire's car parking standards and access would be via the existing vehicular access into the site.

6.15 The Officers Report for the permitted scheme confirmed that the Council's Highway Department considered that the proposal will have an acceptable impact upon highways safety. The proposals would propose a minimal increase in vehicular movements and as such there is no reason this conclusion should not remain relevant for this application.

Landscape Impact

6.16 The landscape impact of the proposed development is considered under criteria (ii) of Policy CP48 above where it is concluded that the physical building operations proposed would not detract from the character and appearance of the landscape and in addition the site is well screened with no public rights of way in the immediate vicinity. The site would not therefore be visible in public views. The Officers Report for planning permission PL/2022/05824 also considered impact on the character and appearance of the area concluding that the new dark green cladding of the permitted building would be an improvement on the existing buildings ensuring they would not detract from the local landscape. The Officers Report also concluded that the built development would not be visible from any public views and that the proposal would not result on any detrimental impacts on the character and appearance of the area. Given the siting of the proposed replacement building and the use of materials consistent with those recently permitted on the adjoining building the same conclusions can be made regarding these application proposals.

Residential Amenity

6.17 The impact on residential amenity is also considered under criteria (ii) of Policy CP48 above and it is concluded that given the distance between the application site and nearest residential property, the lawful and historic use of the site and the nature of the proposal (i.e. light industrial) the proposal is not considered to be detrimental to the amenities of residential areas. The Council's Public Protection Department also confirmed that the proposed use would be compatible with the neighbouring residential properties as part of planning permission ref: PL/2022/05824.

7. CONCLUSION AND SUMMARY

7.1 Full planning permission is sought for the demolition and replacement of an existing agricultural building for Use Class E (g) (i) – (iii) together with associated car parking at South Farm, Water Eaton.

7.2 The Council have previously accepted that the application site is a suitable location for additional employment development in accordance with Core Strategy Policy 34.

7.3 Whilst the application building is structurally sound and capable of conversion without major rebuilding it is proposed to replace the building with a structure that is more conducive to modern commercial use. The replacement building would also make efficient use of an existing yard area adjacent to the existing commercial buildings and the application building. The proposed replacement building would visually enhance the application site and would not detract from the character and appearance of the landscape. The building can be served by adequate access and infrastructure and the site has reasonable access to local services. The proposal therefore complies with Core Policy 34 as well as the principles of Core Policy 48.

7.4 The buildings are served by an existing access road with good visibility in both directions. The proposals would generate minimal additional vehicular movements with a total of 2.4 traffic movements in the AM peak and 2.02 in the PM peak. A Policy compliant level of car parking would be provided.

7.5 In summary, the application proposals would replace a redundant agricultural building make efficient use of an existing hardstanding area to create additional commercial floorspace adjacent to existing commercial units at South Farm, Water Eaton. The proposals would comply with Wiltshire Core Strategy Policy 34 and the broad principles of Policy CP48.



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