

Our ref; SA/Cornish/COU

3rd September 2025

Planning Services,
Wiltshire Council,
County Hall,
Bythesea Rd,
Trowbridge,
BA14 8JN

Willis & Co.

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Dear Sir,

**Town and Country Planning Act 1990
Planning Application for the change of use of land and building for
storage (Class B8 use), General Industrial (Class B2 use) and
Light Industrial uses (Class E (g) (iii) use) (Retrospective) on land
at Knoll Farm, Norton Ferris, Warminster, BA12 7FG**

Our client, Mr R. Cornish of Westcorn Environ Waste Ltd., instructs us to submit this enclosed full planning application for the above development on land at Knoll Farm, Norton Ferris, Warminster. Please find enclosed:

- The completed application form and certificates;
- The Design and Access Statement (this letter);
- The location plan at a scale of 1:1,250 numbered RC-JH-01;
- The site plan numbered RC-JH-02;
- The plans and elevations of the building as existing numbered RC-JH-03;
- The plans and elevations of the building as proposed numbered RC-JH-04;
- The section plan numbered RC-JH-05;
- Details of planting for new sections of hedgerow; and
- The relevant application fee of £578 payable to the Council.

1.0 Background and Description of the site

- 1.1 Willis & Co. are instructed by Mr R. Cornish to prepare and submit this full retrospective planning application for the change of use of the land and building for storage (Class B8 use), general industrial (Class B2 use) and light industrial (Class E (g) (iii) use) uses at the above site.

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- 1.2 The application involves the retrospective conversion of the redundant rural building, found to the north-east of the application site.
- 1.3 Part of the building will be used for storage by the clients with the other part used by third parties (to be rented) for a light/general industrial purpose. There will also be some external storage to the rear (north-east) of the building.
- 1.4 The applicants initially rented the site from August 2019 before purchasing it in March 2020.
- 1.5 The highway (B3092) immediately to the north of the site has been prone to flooding in the past. This issue was created by Wiltshire Council when they undertook highway work; it was not the applicant's responsibility. In order to relieve any issues of flooding on the site, the applicant lowered the land levels on areas of the application site and they also created a land drain and excavated the ditches. This has already been undertaken which is why this application is retrospective.
- 1.6 The applicant's business is the haulage of animal by-products. The items are not regularly stored on the site with the empty containers and vehicles (van, private cars and HGVs) being found on the site in between jobs and assignments. The loaded lorries are occasionally found on the site but only to allow the driver to have a rest when their hours have expired. Nothing is removed from the lorries and DEFRA are aware of this and, importantly, are fine with that arrangement.
- 1.7 The business is listed in relation to remediation activities and other waste management services. This will continue on the site but the building that is the subject of this application, along with the associated outside space, will be used for general storage by the applicant and for general industrial uses and also by third-parties.
- 1.8 There will, very occasionally (and subject to APHA approval and regulations), be a transfer of waste/animal by-products from one trailer to another. A trailer will be left on the site and then the product within the trailer will be moved into another trailer before leaving the site on a lorry. This will happen rarely but the applicant considered it worthy of note. This operation will fall under the uses of the site proposed as part of this application submission. Westcorn Environ Waste Ltd are a closely monitored and regulated company that has been operating since 2007. They have built up relationships with major companies and organisations and undertake a lot of projects for many LPA's (Wiltshire, Somerset, Dorset) as well as government bodies such as DEFRA.

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- 1.9 The site is provided with a private safe point of access from the B3092, with excellent visibility splays in both directions when leaving the site. All vehicles can currently park and turn clear of the highway to leave in a forward gear. At least 2no. vehicles can pass one another on the established apron provided at the access.
- 1.9 The application building is a single storey portal steel framed building which is divided into 7no. bays; with each end bay being open. The building is not currently required by the applicant for its current use and is, therefore, redundant and offers any ideal opportunity to be used for the proposed uses.
- 1.10 The building is built from blockwork and corrugated steel walls and a grey fibre cement sheet roof.
- 1.11 The site is relatively flat and is not found within a flood plain; it is found within Flood Zone 1.

2.0 Description of the proposed development

- 2.1 It is the intention of the applicant to use the land and building, within the red line, for storage and general industrial purposes.
- 2.2 The site is used in conjunction with the applicant's business and they would like to use the building found to the north-east end of the site for a Class B8 storage use (Unit 1 and 2 on the proposed plans and elevations) and Class B2 (general industrial) and E (g) (iii) (light industrial) uses (Units 3 - 5 on the proposed plans and elevations).
- 2.3 Although, not definitive, it is envisaged that the applicants will use the general storage element of the building to store lorries, trailers and other equipment associated with their business with the option for third parties to potentially use it in the future. It will also provide a workshop to maintain the HGV as and when required.
- 2.4 The remaining industrial element is to be rented out to third parties.
- 2.5 The area of hardstanding immediately to the rear of the building, and within the red line, will also be used for some storage. Parking and turning areas will remain available on the site to the front of the building. An access track is also extended to the rear of the building.
- 2.6 The 7no. bay building, the subject of this application, is a single storey portal steel framed building. The existing building measures

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- some 42m x 24m providing a gross floor area of approximately 1,008sq.m. It measures 3.4m to the eaves and 6.85m to the ridge.
- 2.7 The dimensions of the building will remain as existing and it will not be extended upwards or outwards in any way with the only works being the closing up of the south end elevation and the internal partitioning within the building as shown on the proposed plans.
- 2.8 The storage element will be created in the northern end of the building and is labelled as Unit 1 and 2. This will be used by the applicant to store items; lorries, trailers and general equipment; in connection with their business as well as a workshop to maintain HGVs as required.
- 2.9 A modest area for external storage will be provided externally to the rear of the building as shown on the site plan. This will be used when required but the applicant would like the option to store items externally. The views of this area will be obscured and kept to a minimum due to the location of the external storage area which will be found behind the building, the proposed boundary treatment and the existing buildings found on the site.
- 2.10 The general and light industrial uses will be found towards the southern end of the building and is separated into 3no. units; Unit 3, 4 and 5. It is envisaged that these three units will be let out to third parties.
- 2.11 In terms of dimensions:
- Unit 1 = 18m x 12m to provide a floor area of 216 sq.m;
 - Unit 2 = 18m x 12m to provide a floor area of 216 sq.m;
 - Unit 3 = 12m x 24m to provide a floor area of 288 sq.m;
 - Unit 4 = 12m x 12m to provide a floor area of 144sq.m; and
 - Unit 5 = 12m x 12m to provide a floor area of 144sq.m
- 2.12 In the main, the building will remain of a similar appearance to that found at present with the materials being refreshed as needed, the openings being filled with roller doors, the northern end elevation being enclosed but provided with 4no roller shutter doors, and openings being provided to the east and west elevations as shown on the proposed plan and elevation.
- 2.13 The building will remain to be built from concrete blockwork with corrugated steel sheeting above. The roof is pitched and will remain to be made from fibre cement sheet.
- 2.14 By ensuring that the appearance is similar to that found at present, it means that the building will retain its agricultural/rural

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appearance and remain in keeping with the character and appearance of the surrounding area.

- 2.15 This application only concerns the change of use of the land and buildings into a storage and general industrial use with only a few modest alterations to the building occurring. No new structures or extensions will be built.
- 2.16 We consider that the storage use of the land and building and industrial use of the building, in this location, accords with the relevant national and local planning policies which will be discussed below.
- 2.17 Although a dwelling is found next to the site, this is at the opposite end of the site; to the south-western end; which does not form part of this application. It is also owned by the the applicants, Westcorn Environ Waste Ltd. It is therefore a significant distance away from the application building which means that the levels of amenity experienced by this dwelling will not be altered in any way. In this regard, it is also worthy of note that the site has a current use; it is not vacant.
- 2.18 Subject to the full planning approval of this application, the applicant intends to create a grass verge alongside the carriageway, a re-instated hedge with a post and rail fence behind and a bank/bund, to be planted with grass. A hedgerow will also be planted to the eastern boundary. The details are shown on the enclosed section plan.
- 2.19 We have enclosed the details of planting for new sections of hedgerow and we refer the offer to this document. This document will be adhered to and, if required, this can be discussed and agreed during the determination process. The applicant informs us that a hedge was originally found along this boundary but was removed by Wiltshire Council (WC) when they undertook works to the road. WC were to replace this hedge but, to date, the hedge has not ever been replaced. The applicant invites a discussion in relation to the hedge during the determination process and in regards to WC being involved in the re-planting.
- 2.20 A post and rail fence will be created behind the re-instated hedgerow as shown on the section plan and this planting and bund will be created to support the road and to ensure that the proposals will improve the appearance of the site and the surrounding area in general by minimising the views in and out of the site from the public realm, specifically from the northern side of the site on and past the B3092. It will also act as a noise barrier. A hedgerow will also be planted along the eastern boundry of the application site for the same reasons.

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3.0 Access

- 3.1 The site is accessed from a private access from the B3092 with another historic point of access being re-opened for tractor access. The access is provided with a wide concrete apron with nothing obstructing the views when entering and leaving the site. There are excellent clear and long views (visibility splays) in both directions when leaving the site. This is shown on the enclosed location plan with a splay of 110m achievable to the south-west and 132m to the north-east when leaving the site.
- 3.2 All vehicles accessing the site can park and turn on the site which ensures that they park clear of the highway and leave in a forward gear. This proposal will preserve highway safety. A track is created on the site to allow access to the rear of the building.
- 3.3 The proposed use of the land and buildings will not significantly increase the levels of traffic on the local highways especially when considered against the current approved daily vehicles movements that the site experiences.
- 3.4 The access, although considered suitable at present can be upgraded if required and the applicant is content to discuss this during the determination process.
- 3.5 The proposed storage element, by its very nature will not have daily vehicle movements to and from the site. Items will be deposited in the building and left for prolonged periods of time. This is in line with the movements currently experienced on the site. This will be the case for both the internal and external storage areas.
- 3.6 In terms of the general industrial use, whilst vehicle movements can be expected by those working in the building, these will not be significant especially, again, when considered in relation to the existing use of the site and the past agricultural use of the building.
- 3.7 It is not envisaged that the daily traffic movements will significantly differ from that currently experienced with the existing movements being replaced by those associated with the proposed uses.
- 3.8 The applicants have provided a list of the current daily vehicle movements to and from the site. These are in the table below which show that, on average, there are around 12no.

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vehiclemovements (vans, private cars and HGVs) that occur on a daily basis during the weekdays.

CURRENT PLANNED / REGULAR VEHICLE MOVEMENTS									
DAY	VEHICLE	7am		12.00		14.00		16.00	
		IN	OUT	IN	OUT	IN	OUT	IN	OUT
MON	PRIVATE CAR	1					1		
	VAN		1	1	1				
	PRIVATE CAR		1	1			1	1	
	VAN		1	1					
TUE	PRIVATE CAR	1					1		
	LORRY		1			1			
	PRIVATE CAR		1	1	1	1			
	VAN		1	1					
	VAN				1	1			
WED	PRIVATE CAR		1		1				
	LORRY		1	1					
	PRIVATE CAR		1	1	1	1			
	LORRY		1	1					
	VAN		1	1					
THUR	PRIVATE CAR	1			1				
	LORRY		1	1					
	LORRY		1	1					
	PRIVATE CAR		1	1	1	1			
	VAN		1	1					
FRI	} NO PLANNED WORK								
SAT									
SUN									

3.9 The proposals are, therefore, in compliance with paragraph 116 of the NPPF, which will be discussed below.

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4.0 Ecology and Biodiversity Net Gain

- 4.1 This application involves the, retrospective, change of use of an existing building without the need to re-build or extend the structure.
- 4.2 The application building is found on a site with no ecological merit; being hardstanding; which means that the development is below the BNG threshold. The application is also retrospective.
- 4.3 Considering the nature of the development and the site we do not consider that an ecological report or a BNG metric/report is required in this instance.
- 4.4 We note that the applicant intends to plant a hedgerow with a post and rail fence behind along the boundary between the site and the road which not only minimises views in and out of the site but will have an ecological and BNG merit. A hedge was originally found along this boundary but was removed by Wiltshire Council when they undertook works to the road. WC were to replace this hedge but, to date, the hedge has not ever been replaced. A hedgerow will also be planted to the rear of the building.

5.0 Planning Policy

5.1 Relevant National Policy Guidance

- 5.2 We consider that paragraphs 88 and 116 of the National Planning Policy Framework, updated December 2024, are relevant in this instance.
- 5.3 **Paragraph 88** of the NPPF sets out national guidance in respect to supporting the rural economy, and states:

"Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

b) the development and diversification of agricultural and other land-based rural businesses;"

- 5.4 This paragraph supports rural enterprises such as that being proposed. The proposed storage and general industrial use of the redundant rural building will support the rural business, help towards its potential growth and provide employment opportunities.

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- 5.5 **Paragraph 116** states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 5.6 The development, certainly when compared to the existing use of the site, will not have an unacceptable severe impact on highway safety with traffic movements to and from the site being similar. The neighbouring property, Highlands, cause daily traffic disruption due to receiving multiple HGV's visits per day.
- 5.7 Relevant Local Policy Guidance.
- 5.8 *Wiltshire Core Strategy adopted January 2015.*
- 5.9 We consider that paragraphs 5.112 and 6.68 and Core Policy 48 are relevant to this application.
- 5.10 ***"5.112...the Core Strategy seeks to deliver 29 ha of employment land based on B1, B2 and B8 uses and up to 40,000 sq m gross external area retail and leisure floorspace..."***

Comment: The proposed Class B8 and Class B2 and E (g) (iii) use of the land and buildings helps to provide the much needed employment land (Class B8 storage, Class B2 General Industrial and Class E (g) (iii) light industrial uses) within an existing building as listed in this paragraph of the Core Strategy.

- 5.11 ***6.68 Proposals to convert or re-use buildings for employment [my underlining], tourism or residential uses, community uses, meeting rooms or places of worship will need to fulfil the requirements set out in Core Policy 48. Proposals must not lead to subsequent applications for replacement buildings elsewhere. It is recognised that the insensitive re-use of rural buildings can be damaging to the character of the building and its rural setting. Furthermore, additions and extensions should normally be avoided.***

Comment: The proposed re-use of the existing land and building for employment purposes will meet the requirements of Core Policy 48 as set out below. The development will not involve the replacement or extensions of the building.

- 5.12 **Core Policy 48 - Supporting rural life (Inter Alia):**

Conversion and re-use of rural buildings Proposals to convert and re-use rural buildings for employment, tourism, cultural and community uses will be supported where they satisfy the following criteria:

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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.

Comment: The building is structurally sound and capable of the proposed uses. There will be no need for any significant re-building or extension/modification of the building; apart for closing the open south elevation meaning that the re-use will occur within the structure and on the land as found at present.

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.

Comment: The building will, in the main, remain as found at present meaning that the proposals will preserve the character and appearance of the surrounding landscape. If anything a planning permission will allow the appearance of the building to be significantly improved which will, in fact, enhance the character and appearance of the site.

The proposals intend to create a grass verge alongside the carriageway, a re-instated hedge with post and rail fence behind and a bank/bund, to be planted with grass. A hedgerow will also be planted to the eastern boundary behind the building. The details are shown on the enclosed section plan.

This is will be created to support the road and to ensure that the proposals will improve the appearance of the site and the surrounding area in general and minimise views in and out of the site from the public realm, specifically from the northern side of the site on and past the B3092. It will also act as a noise barrier.

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

Comment: The existing access is safe and will remain unaltered. There are excellent visibility splays in both directions when leaving the site as shown on the enclosed location plan.

Although the existing access is considered to be suitable, if required, the applicant is content to discuss it's upgrading during the application process.

iv. The site has reasonable access to local services.

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Comment: This is the case. The site is found some 7.2km (4.5 miles) to the east of Bourton and 8.8 km (5.5 miles) to the north of Burton. It is also well served by the B3092.

6.0 Summary and Conclusion

- 6.1 It is clear that this retrospective proposal for the use of the land and building for storage (Class B8), general industrial (Class B2) and light industrial (Class E (g) (iii)) uses can be achieved by re-using the existing building without the need of any significant alterations or extensions to the building.
- 6.2 The proposals preserve the levels of amenity experienced by the surrounding land uses and, with the proposed boundary treatments, will improve the character and appearance of the site and surrounding area.
- 6.3 The site is provided with a suitable and safe point of access and will preserve highway safety.
- 6.4 Recycling will be carried out on the site and the applicants will harvest rainwater in order to wash down the vehicles on the site, as needed.
- 6.5 The use of the land and building is in keeping with the character and appearance of the surrounding area and land uses and supports the growth of the rural business.
- 6.6 The proposals generally accord with the relevant national and local planning policies and this type of development is encouraged in the policies.
- 6.7 Finally, it is worth noting that the site has been used daily by Westcorn for its current and proposed use since August 2019 without any antipathy or antagonism from others.

I trust this is clear and please do not hesitate to contact me should you require any further information or clarification.

Yours faithfully,



Stuart Anderson BTP MA MRTPI