

PLANNING STATEMENT

**CHANGE OF USE OF LAND TO PROVIDE 8 NO.
CONTAINERS FOR SELF STORAGE PURPOSES (USE
CLASS B8) AND ASSOCIATED WORKS**

SOUTH FARM, WATER EATON, WILTSHIRE



OCTOBER 2025

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

www.rawplanning.co.uk | admin@rawplanning.co.uk
RAW Planning Ltd | Company No. 11899496

CONTENTS:

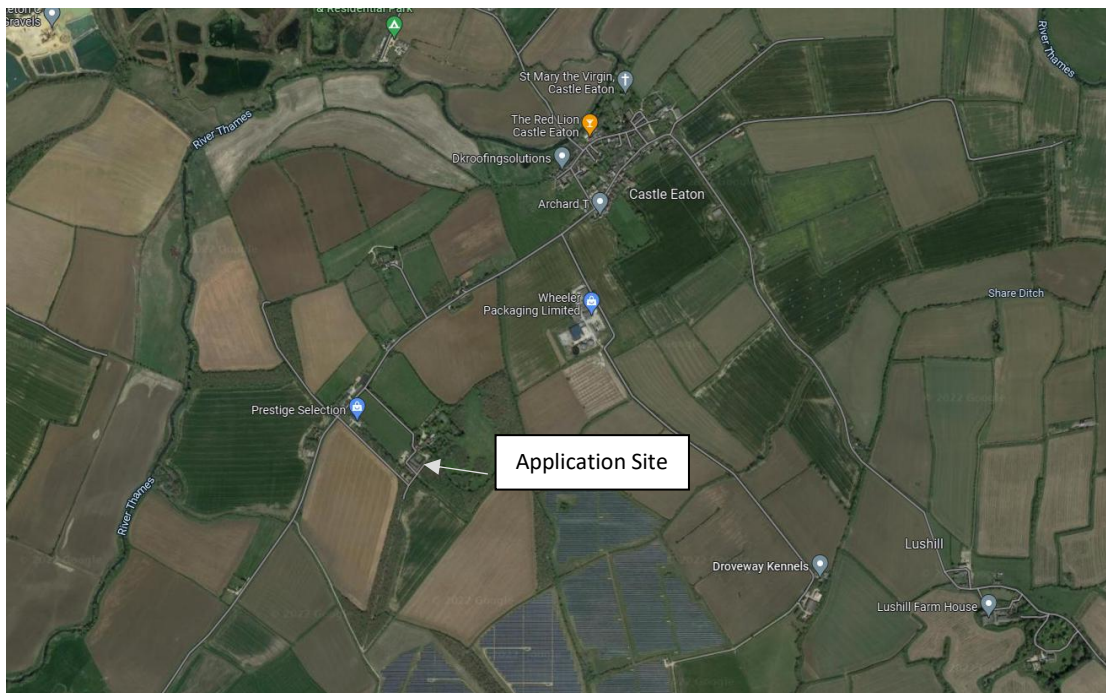
	Page No:
1. INTRODUCTION	1
2. THE APPLICATION SITE AND SURROUNDINGS	2
3. RELEVANT PLANNING HISTORY	5
4. APPLICATION PROPOSALS	7
5. RELEVANT PLANNING POLICIES	10
6. PLANNING ASSESSMENT	13
7. CONCLUSION AND SUMMARY	16

1. INTRODUCTION

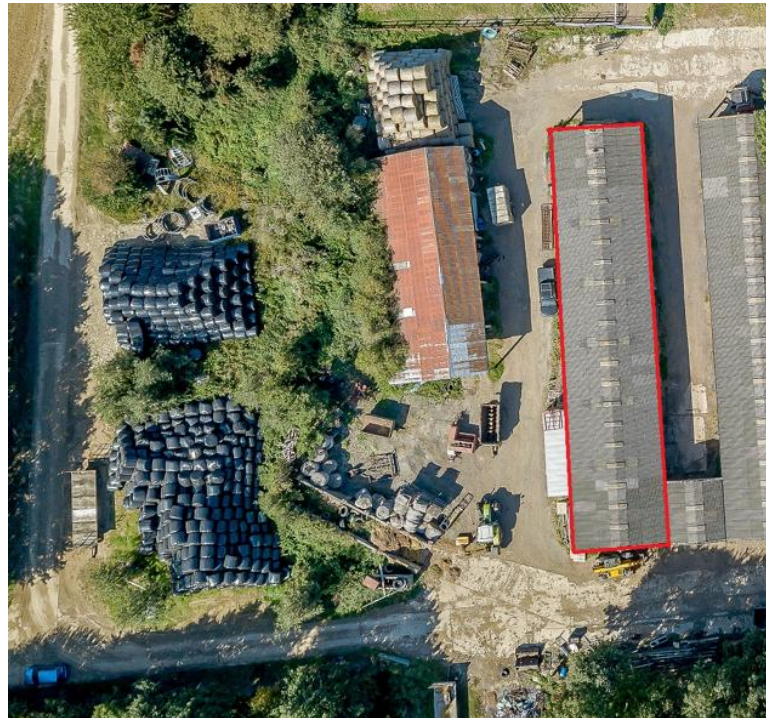
- 1.1 This Planning Statement has been prepared by RAW Planning Ltd to accompany a planning application which is submitted on behalf of Kes Ventures Ltd (“The Applicant”). The application relates to an area of hardstanding on agricultural land at South Farm, Water Eaton, Swindon, Wiltshire, SN6 6JU (the “Application Site”).
- 1.2 The application seeks planning permission for the change of use of land to provide 8 storage containers for self-storage (Use Class B8) purposes. This application follows a previous refusal for 20 containers (ref: PL/2023/10620) and has been specifically designed to overcome the reasons for refusal, as set out in detail below:
1. *The proposal entails the installation of 20 self-storage containers, with a change of land use to Class Use B8 Storage. Due to the nature of the development, being located in the open countryside and does not provide any employment opportunities. It is determined not to be essential to the wider strategic interest of the economic development of Wiltshire. Therefore, the proposed development is not acceptable in this regard. It does not comply with the core policies CP1, CP2, CP35, and CP51 of the Wiltshire Core Strategy or the principles and objectives of the NPPF. Therefore, the principle of development cannot be established.*
 2. *Part of the development site falls within the designated Priority Habitat Inventory Area. Details requested about the ecological state of the site have yet to be provided with an area already removed for the retrospective hard standing. As such, the LPA cannot ensure that the proposal has not and will not significantly affect protected habitats or species. Given this, the proposal is not in accordance with Core Policy 50 of the Wiltshire Core Strategy or Paragraph 180 of the NPPF.*
 3. *The proposal would have an unacceptable impact on the locality's character and appearance. It would not enhance the local landscape but introduce an urbanising form, significantly impacting a Priority Habitat Inventory Area and area of countryside. The proposal design and material are considered to be more appropriate within an industrial setting than that the countryside. As such, the proposal would not accord with the provisions of WCS Core Policy 51, Core Policy 57, and NPPF Paragraph 180.*
- 1.3 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 AND SURROUNDINGS

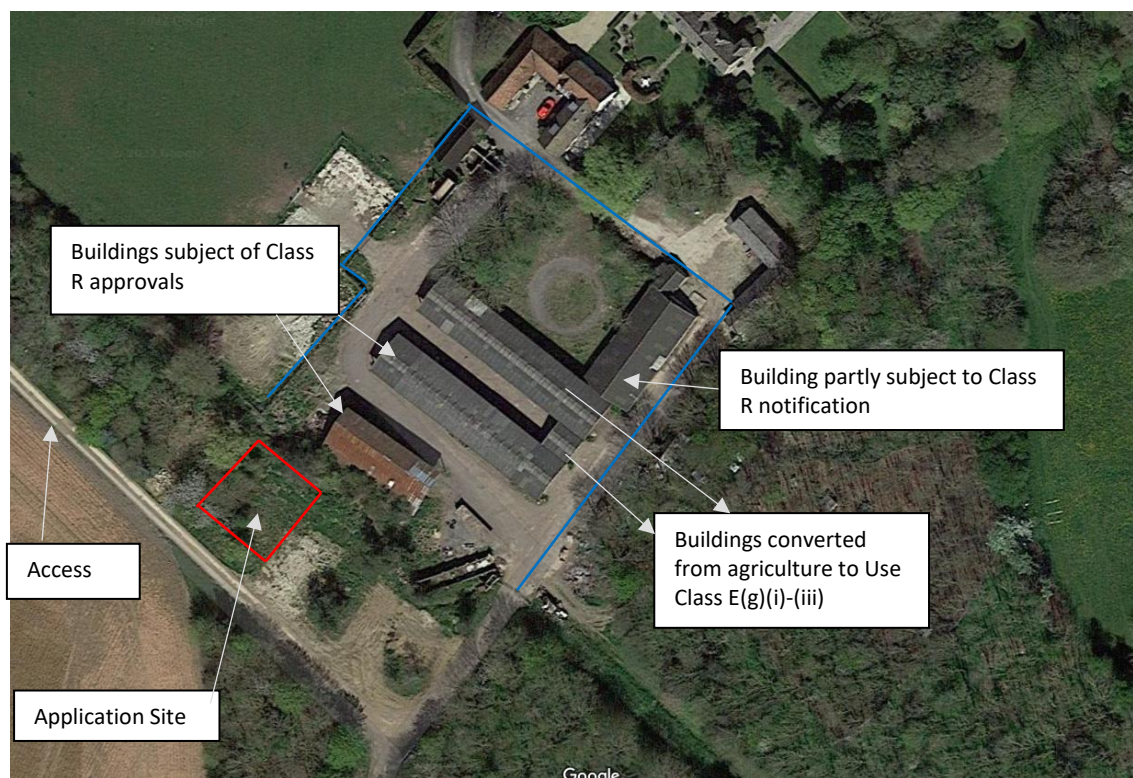
- 2.1 The application site is located approximately 1 mile south west of the village of Castle Eaton on the eastern side of the road that connects Castle Eaton (to the north east) and the A419 (to the south west).
- 2.2 The site is accessed via a concrete access track that first passes the property known 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 The wider application site comprises various buildings which historically were in agricultural use, but over the past eight years, have diversified into commercial uses. The planning history of the buildings at the site is set out in Section 3.
- 2.4 The application site itself comprises a gravelled area located on agricultural land. The site was recently cleared of overgrown vegetation, and a layer of gravel was laid under Schedule 2, Part 6 of the GPDO in accordance with agricultural permitted development rights. Prior to this, much of the site already comprised existing hardstanding, including an old concrete slurry ramp and hardstanding surrounding the bales storage area, as demonstrated by the photograph below.



- 2.5 An aerial photo of the application site is inserted below identifying various buildings at South Farm and photos of various buildings are also inserted overleaf.



- 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.

3. RELEVANT PLANNING HISTORY

3.1 The application site has been the subject of various applications for commercial development 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 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/2022/05824 – 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 was granted on 4th May 2023.
- PL/2023/07605 - Demolition of agricultural building and replacement with building for Use Class E (g) (i) - (iii) - Planning Permission was granted on 19 April 2024
- PL/2023/10620 - Change of use of existing agricultural land for laying of hardstanding (part retrospective) for the siting of 20 storage containers and erection of palisade fencing and associated gates for self-storage use (Use Class B8) – Planning Permission refused on 3rd May 2024
- PL/2024/10954 - 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 13th February 2025

- PL/2025/03472 - Application for external alterations to facilitate the use of a building to a flexible commercial use (Class E (g) (i)-(iii)) following confirmation prior approval is not required under application reference: PL/2024/10954 – Planning Permission granted 5th June 2025

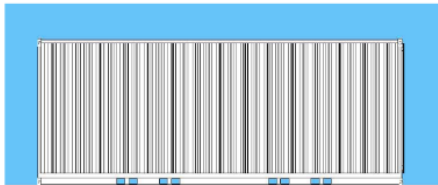
4. APPLICATION PROPOSALS

- 4.1 Planning permission is sought for the change of use of the application site to provide 8 storage containers for self storage use (Use Class B8).
- 4.2 A Site Plan is submitted as part of the application showing where the containers would be arranged within the site. The proposed layout provides sufficient space for vehicles to manoeuvre around the site and park in front of containers for loading and unloading. A copy of the proposed Site Plan is inserted below:

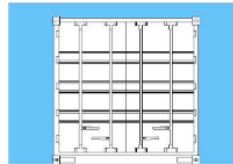


Each container would be 6m in length by 2.4m in width and 2.6m in height and would be dark green in colour as per the existing row of containers already located at the application site. A copy of the proposed container plans is inserted below:

SIDE ELEVATION:



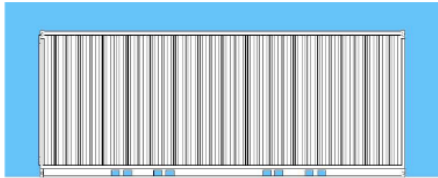
END ELEVATION:



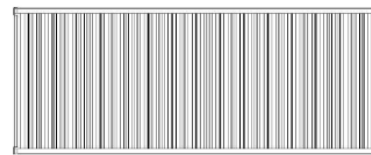
END ELEVATION:



SIDE ELEVATION:



ROOF VIEW:



- 4.3 A photo of how the containers would appear and how they would be positioned immediately adjacent to each other in a row is inserted below.



- 4.4 The containers would be served by the existing vehicular access from the existing concrete access track. No alterations are proposed to the access.
- 4.5 The container storage would operate as a self storage facility with customers renting one or more units. Units are typically rented by customers who are between houses or who require household items to be stored with insufficient space at home. The nature of the use means that customers do not frequently visit. As part of the proposals customers would be able to visit the premises and load or unload their

containers between the hours of 8am and 6pm Monday – Friday and 8am and 1pm on Saturdays. There would be no access on Sundays or bank holidays.

- 4.6 The entrance gates to the site have a pin code so that customers text a number when they arrive and they are given a code that will enable them to access the site. This facility will not operate outside of the stated opening hours.

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 and 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 Bassett 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 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.

5.14 **Core Policy 57 (Ensuring High Quality Design and Place Shaping)** requires a high standard 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

Principle of Development

- 6.1 The previous application for 20 storage containers was refused primarily on the grounds that the proposal was located in the open countryside, did not provide employment opportunities, and was not considered essential to the wider strategic economic interests of Wiltshire.
- 6.2 The site is historically part of the operational farmyard at South Farm, and the proposed containers would be sited adjacent to existing commercial activity, forming an integrated part of the wider commercial operations. The principle of commercial use on this site has previously been accepted through a number of planning approvals (see Section 3 of this Statement) for the conversion and extension of existing buildings to Class E uses. The 8-container proposal continues this established commercial context, maintaining the existing character and function of the site.
- 6.3 It is also important to note that the site itself comprises a gravelled area located on agricultural land that forms part of a wider commercial enterprise. Historically, prior to being laid with gravel, much of the site already comprised hardstanding, including an old concrete slurry ramp and areas around bales storage, as evidenced by the photographs submitted in Section 2 of this Statement. The development therefore does not constitute an expansion into the open countryside, but instead makes use of previously developed and underutilised land within the established farmyard.
- 6.4 While the proposed use does not generate significant employment opportunities, it supports farm diversification and contributes to the rural economy, consistent with both the NPPF and Wiltshire Core Strategy objectives. Section 6 of the NPPF encourages sustainable rural development, including the sustainable growth and the development and diversification of agricultural and other land-based rural businesses. Wiltshire Core Strategy Policy CP34 supports rural businesses that **form part of existing enterprises, or contribute to sustainable farm diversification**, which both apply in this case. The development therefore facilitates the ongoing use and viability of the farm enterprise, which is an important component of rural life and economic sustainability.
- 6.5 Taking all these factors into account, the sensitive siting and functional integration of the proposed containers within the wider commercial farm operations ensure that the principle of development can be considered acceptable. The proposals make efficient use of previously developed land, support the local rural economy through farm diversification, and are fully aligned with both Wiltshire Core Strategy and NPPF objectives for sustainable rural development. On this basis, the application overcomes the reasons for refusal of the previous 20-container scheme and establishes a robust case for the principle of development.

Landscape Impact

- 6.6 The previous refusal identified that the proposed development of 20 storage containers would have a harmful impact on the character and appearance of the area, introducing an urban form into an agricultural setting.
- 6.7 The current proposals are reduced to 8 storage containers, sited within an existing gravelled and hardstanding area of the historic farmyard. The containers are single-storey and arranged in a compact layout, positioned adjacent to existing commercial buildings. This ensures the development is contained within the established farmyard envelope and does not encroach into open countryside.
- 6.8 The site is largely screened from public view by mature tree belts along the access drive and surrounding the farmyard. The proposed containers would be partially visible only from limited vantage points along the access track, and views from the wider public realm, including the nearby highway, would remain largely screened. This containment ensures that the development would not dominate or materially alter the surrounding landscape character.
- 6.9 The industrial palisade fencing has been removed from the proposals, and any boundary treatment is now intended to be low-key and appropriate to a rural commercial setting. This could be secured through a detailed landscaping plan, ensuring it remains visually unobtrusive. This sensitive approach to siting and boundary treatment directly addresses the previous officer concerns regarding an urbanised appearance.
- 6.10 Overall, the development would have a neutral impact on the character and appearance of the area. The proposals integrate sensitively into the existing farmyard, preserving the rural context, and are consistent with Core Policies 51 and 57 of the Wiltshire Core Strategy and Paragraph 187 of the NPPF.

Highways and Access

- 6.11 The previous application for 20 storage containers raised no objections from the Local Highway Authority, with access via the existing farmyard drive considered acceptable and suitable for the proposed use. The current proposals are smaller in scale and continue to utilise the existing access and circulation areas within the farmyard. The reduced scale further minimises vehicle movements and any potential impact on highway safety.
- 6.12 As such, the proposals would have no adverse impact on the local highway network. The development is consistent with Core Policy 62 of the Wiltshire Core Strategy and Paragraph 1115 of the NPPF, which require development to provide safe and suitable access for all users.

Neighbouring Amenity

- 6.13 The proposed containers are sited at a sufficient distance from nearby dwellings to ensure no overbearing impacts, loss of light, or adverse effects on outlook. Noise from the proposed use would be limited to occasional loading and unloading of storage items and is negligible compared to existing operational and commercial activities on the farm. The proposals would therefore have no significant impact on the amenity of neighbouring properties, consistent with Core Policy CP57 and the NPPF.

7. CONCLUSION AND SUMMARY

- 7.1 Planning permission is sought for the change of use of land to provide 8 storage containers for self-storage (Use Class B8) purposes at South Farm, Water Eaton.
- 7.2 The proposals are sited within the existing farmyard on previously developed land, maintaining the character and function of the site, and supporting rural diversification in line with Core Policy CP34 and the NPPF. The containers are also sensitively positioned, with low-key boundary treatment, ensuring no adverse impact on the landscape or visual amenity, in accordance with Core Policies CP51 and CP57.
- 7.3 The proposals would not give rise to any adverse impacts on highways or neighbouring amenity, and any ecological effects can be appropriately mitigated.
- 7.4 In summary, the revised scheme overcomes the previous reasons for refusal and therefore it is respectfully requested that planning permission is granted.

RAW



RAW Planning

Website: www.rawplanning.co.uk