

APPLICATION FOR FULL-PLANNING PERMISSION

CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/08929
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	South Farm, Water Eaton, Swindon, SN6 6JU
DEVELOPMENT DESCRIPTION:	Change of use of the application site to provide 8 storage containers for self storage use (Use Class B8). (resubmission of PL/2023/10620)
RECOMMENDATION:	Refuse

SITE DESCRIPTION/CONTEXT

South Farm is an operational farm situated approximately 1 mile to the southwest of the village of Castle Eaton on the eastern side of the road that connects Castle Eaton (to the northeast) and the A419 (to the southwest), and a 4-mile drive into the outskirts of Swindon, which lies to the south of the site. 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).

The wider farm comprises various agricultural and commercial buildings that were approved under previous permissions. The buildings vary in design across the site. The proposed development area is between existing hardstanding buildings and the access drive and comprises eight sited containers, cleared priority habitat which runs awith hardstanding installed, and erected palisade fencing.

The proposed site is located outside any defined settlement boundary, placing it within the open countryside for planning purposes. Importantly, the site is not subject to any statutory or local landscape, heritage, or ecological designations. It is also situated within flood zone 1, which has the lowest probability of flooding.

PROPOSAL

Planning permission is sought for the Change of use of existing agricultural land for the siting of 8 storage containers (retrospective) for self-storage use (Use Class B8).

The containers would measure 2.4m x 2.6m in height. The containers would be sited elevation to elevation, forming a tight row. The rear of the containers would face Priority Habitat to the northwest, with the container doors facing onto the front. Access would be via the existing parking and turning around on land fronting the containers.

PLANNING HISTORY

Proposal / Summary

15/10707/PNCOU Notification of Prior Approval - Proposed Conversion of Agricultural Building to Form Two Dwelling Houses – prior approval refused and then dismissed at appeal 17/12/2015
15/01332/PNCOU Prior Notification under Class MB - Conversion of Agricultural Buildings to 2 Dwellings – prior approval refused and then dismissed at appeal 09/04/2015
19/06241/PNCOU Notification for Prior Approval under Class Q(a) only for a Proposed Change of Use of Agricultural Buildings to 5 no. Dwellinghouses (C3 Use) – prior approval granted 21/08/2019
21/00972/CLASSR Prior Notification under Class R for a Proposed Change of Use of Building no Bigger than 150 Square Metres to B1(a) Office Use to Start on the 1st February 2021 – decision date 04/02/2021
PL/2021/05142 Application for Prior Approval for Change of Use e 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- approved 18/05/2021
PL/2022/05824 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 General Permitted Development Order (GPDO)- Prior Approval Granted decision date 04/05/2023
PL/2023/07605 Demolition of agricultural building and replacement with building for Use Class E (g) (i) - (iii), Approve with Conditions, 19/04/2024
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). Refuse 05 April 2024
PL/2024/10954 - Prior approval Part 3 Class R: Agricultural buildings to a flexible commercial use Decision - Prior Approval Not Required Date: 13/2/2025 – Change of use of agricultural buildings to flexible commercial use Class E (g) (i)-(iii)
PL/2025/03472 - Full planning permission Decision - Approve with Conditions Date: 5/6/2025 – 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

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Statutory Legislation:

National Planning Policy:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide

Development Plan:

The development plan for Wiltshire comprises the *Wiltshire Core Strategy (WCS)* (adopted January 2015) and any made neighbourhood plans, which remains the principal statutory planning document guiding development across the county. In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise.

Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy;
- Core Policy 2 Delivery Strategy;
- Core Policy 19 Royal Wootton Bassett and Cricklade Community Area
- Core Policy 34 Additional Employment Land
- Core Policy 48 Supporting Rural Life
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 51 Landscape
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 60 Sustainable Transport;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 67 Flood Risk;

Draft Wiltshire Local Plan Policies [delete/insert above as appropriate]

- Policy 1: Settlement Strategy
- Policy 2: Delivery Strategy
- Policy 4: Addressing climate change
- Policies 44- 51: Swindon Area Strategy
- Policies 52 – 63: Trowbridge Area Strategy
- Policies 64 – 75: Economic, tourism, retail and transport
- Policies 85 – 101: Sustainability, ecology, water and landscape, heritage, air quality

The above are currently the strategic policies within the emerging Local Plan. The Wiltshire Local Plan review is advancing through its preparatory stages and is currently being examined. In accordance with the advice set out in paragraph 49 of the NPPF, the emerging Plan is capable of carrying weight in decision-making.

Supplementary Planning Documents and other Guidance:

- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030

ISSUES

The main issues that need to be addressed in this case include:

- Whether the development is acceptable in principle (CP 1 and 2)
- Whether the scheme constitutes high quality design (CP 57)
- Whether the scheme would have an acceptable impact upon the reasonable living conditions of the adjoining occupants (CP 57)
- Whether the scheme would have an acceptable landscape impact (CP 51)
- Whether the proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 61 and 64)

- Whether the site can be adequately drained without increasing flood risk elsewhere (CP 67)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)
- Whether the proposal results in the loss of best and most versatile agricultural land (NPPF 187)
- Are there any other planning issues raised by the development?

CONSULTATION RESPONSES

WC Highways: No objection

Typically, self-storage container sites generate a low level of daily vehicle movements and the major highway concern, with this application will be with the delivery of the containers to the site. Once in place the containers will attract a low number of vehicle movements over any given weekly period and I can raise no highway objection based on the information provided within this application.

WC Ecology: No comments received at time of writing

Parish/Town Council: Objection on the following grounds

We object to the proposal due to severe flood risk from unauthorised land raising and infilled drainage, ecological harm caused by extensive unlicensed tree removal, and ongoing industrial activity inconsistent with the rural character. The site already hosts containers without permission, and the access on a bend with poor visibility poses significant highway safety concerns. No drainage or highway assessments have been provided, and the development represents unjustified commercial intensification in a water-sensitive location, contrary to previous refusals and local policy.

REPRESENTATIONS

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

- **Highway Safety-** The C114 is narrow, lacks footpaths, and has poor visibility at the site access on a bend. Increased traffic from commercial use would heighten accident risk on an already hazardous route.

- **Flood Risk and Drainage** The site lies in a water-sensitive area with existing flooding issues. Land levels have been raised by approximately 3ft and a drainage ditch infilled without permission, worsening surface water run-off. No drainage strategy or flood risk assessment provided.
- **Environmental Impact-** Extensive tree removal and vegetation clearance without consent, reducing biodiversity and increasing run-off. Loss of natural habitat and soil stability due to unauthorised works.
- **Unauthorised Works-** Containers installed before approval, showing disregard for planning controls.
- **Character of the Area-** The proposal represents unjustified commercial intensification in a rural location lacking suitable infrastructure. Inconsistent with the character of Water Eaton and previous refusals.
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ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise."

In accordance with this statutory requirement, this application has been assessed against the relevant policies of the Development Plan, including the Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans. Consideration has also been given to the policies of the National Planning Policy Framework (NPPF) as a material consideration in the assessment.

Principle of Development

Policy Context

Core Policy 1: Settlement Strategy of the WCS establishes a hierarchy of settlements to guide where development should be focused. The policy prioritises growth in:

- Principal Settlements (e.g., Salisbury, Chippenham, Trowbridge) – main focus for strategic growth.
- Market Towns – support local services and employment; suitable for sustainable development.
- Local Service Centres – smaller towns and villages with a range of services; limited development supported.
- Large and Small Villages – development should be limited and respond to local needs.
- Outside the defined settlements – development is strictly controlled and generally not supported unless exceptional circumstances apply.

Core Policy 2: Delivery Strategy of the WCS sets out how development will be distributed and delivered across Wiltshire. The policy emphasises:

- Sustainable patterns of growth, reducing the need to travel and supporting local services.
- Development should be plan-led, aligning with the settlement strategy and supported by infrastructure.
- Windfall development (not allocated in plans) must still comply with the principles of sustainable development.
- Development outside settlement boundaries is generally not permitted, unless it meets specific policy exceptions (as set out in paragraph 4.25 of the WCS).

Together, CP1 and CP2 ensure that new development is strategically located, sustainable, and supports the character and function of Wiltshire's communities.

Assessment

The site lies outside of any defined settlement boundary and therefore constitutes open countryside in planning terms.

The proposal seeks the Change of use of existing agricultural land for laying of hardstanding (part retrospective) for the siting of 8 storage containers and erection of palisade fencing and associated gates for self-storage use (Use Class B8).

The proposal would not fall within a military establishment (Core Policy 37), or be development related to tourism (Core Policies 39 and 40), or fall within a rural exception site (Core Policy 44). The proposal does not relate to specialist accommodation (Core Policies 46 and 47) nor does it relate to a development that would support rural life (as defined by Core Policy 48). As such those exception policies do not apply.

Core Policy 34 states that Proposals for employment development (use classes B1, B2 or B8) will be supported within the Principal Settlements, Market Towns and Local Service Centres, in addition to the employment land allocated in the Core Strategy. In this case the proposal is within the open countryside. CP 34 states that outside of Principal Settlements, Market Towns and Local Service Centres development will be supported provided 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 and
- 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.

The proposal would be sited adjacent to the farmyard at South Farm, Water Easton, in the countryside, which is 3.5km as the crow flies from the nearest large village. The closest principal settlement would be Swindon, which is 4.4m to its urban boundary. As such, it can be concluded that the site is neither in nor adjacent to any settlement. The proposal entails the installation of 8 self-storage containers, with a change of land use to Class Use B8 Storage. This change in land use, however, does not align with the criteria for supporting sustainable farming and food production, as it does not directly contribute to these activities.

While the proposed development would be adjacent to a farm with mixed agricultural and commercial use, it is not located near a settlement or small village. The application indicates that the development would not generate any new jobs or employment opportunities, which is a key factor in determining its impact on rural life and economic development. Due to the nature of the development, that the proposal is 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.

The LPA has had regard to the planning policy advice of para. 88 of the NPPF that supports the “the sustainable growth and expansion of all types of business in rural areas”. However, the NPPF as a whole aims to direct new development to the most sustainable areas, predominantly established settlements with particular regard to employment uses. For the reasons stated above, the location is not considered to be sustainable for the proposed use and the LPA considers it is not supported by the NPPF.

Conclusion

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, and the proposal cannot be supported.

Design and Impact on the Character and Appearance of the Area

Policy Context

Core Policy 57 of the WCS requires high-quality design that:

- Enhances local character.
- Responds to the natural, historic, and built environment.
- Retains important features (e.g., trees, hedges).
- Supports sustainable construction and compatibility with surrounding uses.
- Creates safe, legible, and accessible spaces.

Section 12 of the NPPF emphasises design that is:

- Visually attractive.
- Functionally effective.
- Contributes to the quality of the built environment.

The Wiltshire Design Guide encourages sensitivity to local character, materials, and architectural styles and supports modern living standards while maintaining aesthetic and functional quality.

Building for a Healthy Life Framework promotes healthy, inclusive, and sustainable places. The document encourages:

- Walkability.
- Access to green space.
- Active design principles for well-being.

Assessment

The proposal creates eight self-storage units (Class Use B8) on a site served by an existing access drive leading to a service yard containing a mix of commercial and agricultural buildings. The development uses the existing drive and occupies an area between the drive and the buildings, which are fenced with electric gates. The site includes land—part of which is designated as Priority Habitat Inventory—that has been cleared of trees, brash, and grasses, with hardstanding covering approximately 634 square metres. The storage containers sit elevation to elevation in a single row of eight and are single storey. The site is located approximately 274 metres from the public highway and is enclosed by 1.8-metre-high industrial-grade palisade fencing with similarly designed electronic gates.

The existing farmyard and wider site are screened from public view by a mature tree belt. In contrast, the proposed development area has been cleared, allowing for the retrospective hardstanding, siting of eight containers, and erection of fencing. The clearing of Priority Habitat, creation of hardstanding, and installation of palisade fencing have not been granted planning permission and are not included within this application. These elements were refused in a previous application in 2024, as the applicant is aware. If the current proposal is considered acceptable, separate applications would still be required for these works as part of a distinct permission. This application relates solely to the siting of eight containers for B8 self-storage and the associated change of use of the land.

Should the proposal be granted, the development would formalise works within a section of the Priority Habitat Inventory. The existing tree belts along the access drive from The Lodge to the farmyard form a woodland corridor, only intersected by farm tracks and field clearings. The opening up of the site has exposed it to public view. While farmyards and agricultural buildings are typical in the countryside, industrial palisade fencing and a row of storage containers are not and appear incongruous in this rural setting. Furthermore, the applicant has not submitted any ecological or arboricultural assessment, with the only proposed mitigation being hedging; however, only the location detail has been supplied on the accompanying site plan and no further details or measures to address the impact of the proposal on the area's character.

Conclusion

Given the harm to local character arising from the proposal—retrospective in nature—being more akin to an industrial site than agricultural, and the associated biodiversity losses which

further erode that character, combined with the additional unauthorised retrospective works required to support the scheme and the absence of supporting assessments, the proposal is considered contrary to WCS Policy CP57 and the objectives of the NPPF.

Amenity

Policy Context

Core Policy 57 (Point vii) of the Wiltshire Core Strategy requires development to respect the amenity of existing occupants and ensure appropriate amenity levels for future residents.

The National Planning Policy Framework (NPPF), particularly Paragraph 135, reinforces the need for development to provide a high standard of amenity for both existing and future users.

The submitted plans confirm that the additional built development would be contained to the south of the current yard, sited between the existing drive and the current yard on hardstanding. Due to the siting, the proposal would not result in any overbearing impacts or loss of light to the nearby dwellings. In terms of outlook, there is sufficient distance and landscaping between the proposed container site and nearby dwellings to ensure no overbearing impacts. The containers would also be single-stacked, reducing visibility from the dwellings.

Regarding noise impacts of the proposal, dwellings within 250 metres of the proposal would experience existing noise associated with the farm's operational use and other commercial uses that neighbours would hear. Therefore, any further development-associated noise via Use Class B8 would be negligible. The proposal is for storage containers, for which any noise would be limited to the adding or removal of items, which is accepted.

It is considered that the proposed change of use of land for the siting of containers for Class B (8) storage or distribution use would be compatible with residential use in that it would not be significantly damaging to neighbouring amenity.

Conclusion

Accordingly, it is concluded that the change of use of the land and siting of 8 storage containers would be acceptable in amenity terms in accordance with the provisions of Core Policy 57 of the WCS and Paragraph 135 of the NPPF.

Highways Impacts and Parking

Policy Context

Transport implications are a key factor in assessing planning applications, especially for larger developments. Proposals must demonstrate:

- Safe and suitable access for all users, including pedestrians, cyclists, and those with mobility impairments.
- No severe residual impacts on the surrounding highway network.
- Promotion of sustainable travel, reducing reliance on private vehicles.
- Adequate parking and cycle provision, in line with adopted standards.
- Protection and enhancement of public rights of way and active travel routes.

Relevant policies include Core Policies 60–64 of the Wiltshire Core Strategy, supported by the Wiltshire Local Transport Plan, Car Parking Strategy, and Cycling Strategy. The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTN 1/20 (DfT) provide further design guidance for active travel infrastructure.

Proposals must also ensure safe access for refuse collection vehicles and comply with the Wiltshire Council Waste Storage and Collection SPD (2017).

Where necessary, Transport Assessments or Statements should be submitted to evaluate impacts and identify mitigation. Planning conditions or legal agreements may be used to secure off-site improvements, travel plans, or contributions to sustainable transport infrastructure.

Assessment

The application site is located at South Farm, approximately 1 mile southwest of Castle Eaton and 4 miles from the outskirts of Swindon. It is accessed via an established concrete track and comprises a mix of agricultural and commercial buildings approved under previous permissions. The proposed development is situated between existing hardstanding and the access drive, within open countryside outside any defined settlement boundary. In terms of highway considerations, the Highways Officer notes that self-storage container sites typically generate low levels of daily vehicle movements, with the primary concern being the initial delivery of containers. Once installed, the containers are expected to attract minimal traffic over a weekly period, and no highway objection has been raised.

Conclusion

Accordingly, it is concluded that the proposal would be acceptable in Highway Safety terms and thus in accordance with the provisions of the WCS and of the NPPF.

Ecology and Biodiversity

Policy Context

The ecological impact of development is a key planning consideration, especially for larger schemes. Proposals must assess and address potential effects on:

- Protected species
- Priority habitats
- Ecological networks
- Green and blue infrastructure

Core Policy 50 of the Wiltshire Core Strategy requires development to:

- Avoid harm to ecological assets.
- Deliver measurable Biodiversity Net Gain (BNG), in line with the Environment Act 2021.
- Support habitat restoration and connectivity.
- Integrate biodiversity into site design.

The Green & Blue Infrastructure Strategy (2022–2030) promotes nature recovery, ecosystem services, and habitat connectivity through development.

Unless exempt, National policy requires a minimum of 10% Biodiversity Net Gain (BNG) for major developments, demonstrated via:

- Biodiversity Metric calculations
- Ecological assessments (e.g. PEAs, Phase 1 surveys, protected species surveys)

Assessment

The application site lies within the open countryside and, according to the Council's GIS mapping, part of the proposed development area falls within the Priority Habitat Inventory. While the applicant asserts that the site is "de minimis" due to existing hardstanding, this position is not supported by the planning history or visual assessment. The hardstanding and associated clearance works were undertaken without planning permission and have resulted in the loss of habitat previously identified as Priority Habitat. This is consistent with the concerns raised in the refusal of application PL/2023/10620, where ecology advised that further information was required to ensure compliance with statutory duties.

No ecological survey has been submitted with the current application, nor has a Biodiversity Net Gain (BNG) metric or plan been provided, despite BNG being a legal requirement under Schedule 7A of the Town and Country Planning Act 1990 (as amended by the Environment Act 2021). The applicant has only proposed the installation of a hedge as enhancement, which is insufficient to demonstrate compliance with the biodiversity gain condition.

It is acknowledged that the application is retrospective in nature and that Gov't guidance confirms the statutory BNG condition cannot be applied to retrospectively (as it is a pre-commencement condition). However, anti-avoidance measures ensure developers cannot intentionally degrade a site to lower the baseline and make a 10% gain easier to achieve or to avoid entirely. In this case the LPA considers an intentional degradation of the habitat has occurred (after January 2020 as defined by the regulations) and as such the LPA can use the habitat's condition before the degradation as the baseline for BNG calculations to ensure that (as a minimum) a net gain can be achieved in accordance with Core Policy 50. The absence of a BNG metric or other form of ecological survey prevents the LPA from making an informed assessment on this matter.

Further to the above, the absence of an ecological assessment means the Local Planning Authority cannot be reasonably certain that the proposal will avoid significant adverse effects on protected habitats or species, and given the site location within a Priority Habitat area this is a significant concern.

The proposal fails to demonstrate that it would conserve and enhance biodiversity or deliver the mandatory 10% net gain required by law. This represents a clear conflict with national and local policy and legislative requirements.

Conclusion

In the absence of an ecological survey, BNG metric, and mitigation strategy, the proposal is contrary to Core Policy 50, Paragraph 180 of the NPPF, and the biodiversity gain condition under the Environment Act 2021, and therefore cannot be supported.

Flood Risk and Drainage

Policy Context

Core Policy 67 of the Wiltshire Core Strategy and NPPF paragraphs 170–182 require:

- Avoidance of increased flood risk.
- Use of appropriate mitigation measures.
- Application of the sequential and exception tests for developments in Flood Zones 2 or 3.

Sustainable Drainage Systems (SuDS) are required for all major developments and must:

- Manage runoff near its source.
- Improve water quality.
- Support biodiversity and amenity.
- Be integrated into the site layout and green infrastructure.

Assessment

The application site is located within Flood Zone 1, which represents the lowest probability of fluvial flooding. The site is not within an area identified as immediately vulnerable to flood risk; however, parts fall within an area with a 1 in 100 Climate Change Event, but these are minimal, as they are limited to the edge of the development area. Therefore, the sequential and exception tests do not apply.

Public representations have raised concerns regarding surface water flooding along the access track and adjacent agricultural fields. However, these areas of ponding appear to result from localised topography and agricultural drainage characteristics rather than any fluvial flood risk. The submitted proposal does not include significant new impermeable surfaces beyond the existing hardstanding, and the scale of development is such that it is unlikely to materially increase surface water runoff. While SuDS are encouraged for all major developments, this application does not meet the threshold for a major scheme. Nevertheless, the applicant should ensure that any surface water arising from the site is managed appropriately to prevent discharge onto the highway or neighbouring land.

Conclusion

Given the detail set out, the proposal is deemed to be in accordance with Core Policy 67 and the NPPF.

PLANNING CONCLUSION

Having regard to the relevant provisions of the Wiltshire Core Strategy, the National Planning Policy Framework, and all other material considerations, the proposed development is not acceptable. The site lies within open countryside, outside any defined settlement boundary, and the change of use to B8 storage does not meet the criteria for sustainable rural development under Core Policies 1, 2, and 34. The proposal would result in harm to the character and appearance of the area, introducing an incongruous industrial form into a rural setting, contrary to Core Policy 57 and the NPPF. Furthermore, the development has resulted in the loss of Priority Habitat without appropriate assessment or mitigation, and no ecological

survey, Biodiversity Net Gain metric, or enhancement plan has been provided, contrary to Core Policy 50, Paragraph 180 of the NPPF, and the Environment Act 2021. While highway and flood risk impacts are considered acceptable, these do not outweigh the significant policy conflicts and environmental harm identified. For these reasons, the application fails to accord with the development plan and national policy, and planning permission is therefore recommended for refusal.

RECOMMENDATION:

That Planning Permission be REFUSED.

Refusal Reason(s): (3)

1. The proposal seeks the installation of 8 self-storage containers and a change of use to Class B8 (Storage). However, the site is located in open countryside and does not provide employment opportunities or contribute to the wider strategic objectives for economic development in Wiltshire. As such, the development is not considered essential or sustainable. The proposal conflicts with Core Policies CP1, CP2, CP35, and CP51 of the Wiltshire Core Strategy and fails to align with the principles and objectives of the NPPF. Therefore, the principle of development cannot be supported.

2. The applicant has claimed a biodiversity exemption under the de minimis threshold set out in the Biodiversity Gain Requirements (Exemptions) Regulations 2024, on the basis that the proposal affects existing hardstanding. However, part of the site lies within a designated Priority Habitat Area where hardstanding was laid without planning permission and was previously identified in a refused application PL/2023/10620. The de minimis exemption applies only where development does not impact priority habitat and affects less than 25 m² of habitat with a biodiversity value greater than zero. These criteria are not met, and no details have been provided regarding the site's ecological condition or the proposal's impact. The local planning authority must conclude that intentional degradation of the habitat value of the site has occurred. Furthermore, no Biodiversity Net Gain assessment or plan has been submitted to demonstrate compliance with Section 7A of the Town and Country Planning Act, or the mitigation hierarchy in Paragraph 180 of the NPPF. The proposal is therefore contrary to Core Policy 50 of the Wiltshire Core Strategy, Paragraph 180 of the NPPF, and statutory BNG requirements.

3 The proposal would result in an unacceptable impact on the character and appearance of the locality. Rather than enhancing the landscape, it would extend the existing urban footprint into the countryside, including part of a designated Priority Habitat Inventory Area. While the proposal indicates the addition of hedging, no details have been provided to demonstrate how this would mitigate the visual or ecological harm. The design and choice of materials are considered more suited to an industrial setting than a rural environment. Consequently, the development fails to respect local landscape character and would not accord with Core Policies 51 and 57 of the Wiltshire Core Strategy or Paragraph 180 of the NPPF.