

APPLICATION FOR FULL-PLANNING PERMISSION CASE OFFICER REPORT

APPLICATION REFERENCE:	PL/2025/08654
APPLICATION TYPE:	Full planning permission
SITE ADDRESS:	The Gables, Brinkworth Road, Ballards Ash, Royal Wootton Bassett, SN4 8DT
DEVELOPMENT DESCRIPTION:	Change of use of land from agricultural to caravan storage (use class B8), construction of hardstanding and erection of fencing
RECOMMENDATION:	That Planning Permission be GRANTED subject to conditions.

SITE DESCRIPTION/CONTEXT

The application site is located within an agricultural field to the east of The Gables and to the south of the previously approved caravan storage land associated with The Gables on the outskirts of Royal Wootton Bassett. The site is accessed via a no through road off the B4042.

The Gables is a modest working farm. It extends to approximately 11 hectares (27 acres) and is home to a flock of approximately 200 breeding ewes. The farming operations are undertaken by the Applicant's family. In addition to the purely agricultural use of the land, the Applicant operates an agricultural engineering business based out of the former farm buildings at Ballards Ash.

The caravan storage for up to 57 caravans was approved under planning permission PL/2022/00826 as part of the diversification of the existing agricultural business. According to the submitted Planning Statement, the applicants limit storage to 53 caravans to ensure sufficient space for the safe manoeuvring of caravans.

There are public rights of way WBAS108 located 350m to the south and WBAS5 411m to the west.

The site is within an area of Archaeological interest. The former Folly Farm Landfill is located to the west of the site.

The site lies within Flood Zone 1 and is at negligible risk of groundwater or surface water flooding.

The site is not within any landscape or ecological designations.

PROPOSAL

This application seeks planning permission for the change of use of agricultural land to caravan storage (under use class B8), including the construction of hardstanding and erection of fencing, as well as the erection of two new security lights in the centre of the proposed storage area.

The submitted Planning Statement proposes that access will be created from the existing caravan storage to the north, which would reduce the capacity of the existing caravan storage area to accommodate 51 caravans, whilst the proposed caravan storage area would accommodate up to 53 caravans.

PLANNING HISTORY

Proposal / Summary
PL/2022/00826 - Change of use land from agricultural to caravan storage (use class B8), construction of hardstanding and track and improvements to existing Access – Approved with conditions 17 June 2022
17/00936/FUL - Change of use from agricultural land to touring caravan storage – Approved with conditions 11 April 2017

RELEVANT LEGISLATION, POLICIES AND GUIDANCE

Statutory Legislation:

- Town and Country Planning Act 1990
- Planning and Compulsory Purchase Act 2004
- Caravan Sites Act 1968

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 Spatial Strategy Royal Wootton Bassett and Cricklade Community Area
- Core Policy 34 Additional Employment Land
- Core Policy 50 Biodiversity and Geodiversity;
- Core Policy 57 Ensuring High Quality Design and Place Shaping;
- Core Policy 62 Development Impacts on the Transport Network;
- Core Policy 64 Demand Management

Draft Wiltshire Local Plan Policies

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

Royal Wootton Bassett Neighbourhood Plan (RWBNP):

- Policy 7: Design
- Policy 8: Employment Land

Supplementary Planning Documents and other Guidance:

- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Local Transport Plan 2011-2026, adopted 2015 - including the Car Parking Strategy and Cycling Strategy, adopted 2015

ISSUES

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

- Whether the development is acceptable in principle (CP 1, 2 and 34)
- 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 proposal would have a negative effect upon highway safety, including if there is sufficient parking for the proposed development (CP 61 and 64)
- Whether there would be any harmful impacts upon protected species or priority habitats (CP 50)

CONSULTATION RESPONSES

The following is a summary of consultation responses. Comments in full are published online.

WC Highways: No objection

WC Ecology: No objection subject to conditions:

- Pre-commencement condition requiring enhancements for biodiversity

Parish/Town Council: Comment

- To request adequate shielding to the visibility of the site to be provided

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;
- A site notice displayed near the site.

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 six 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.

Five letters of representation received represented support for the proposal, summarised as follows:

- Enable storage of caravans locally;
- Existing storage facility is considered to be brilliantly run, clean and secure;
- Limited supply of caravan and motorhome storage facilities;
- Suitable siting with sufficient screening and not visible from public roadways

One letter of representation received represented objection against the proposal, summarised as follows:

- No consultation from the agent;
- Storage would include motorhomes as well as caravans;
- Proposal would detract from residential amenity of Baynards Ash Farm;
- Impacts on visual amenity;
- Adequate screening required;
- Whether caravan storage would constitute land-based rural business;
- There is availability on other caravan sites;
- Unclear whether landscaping requirements have been met;
- Risk of contamination.

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.

Core Policy 34 aims to support the rural way of life through the promotion of modern agricultural practices and appropriate diversification of the rural economy.

Policy 8 of the Royal Wootton Bassett Neighbourhood Plan (RWBNP) supports employment development that respects local character, residential amenity and highway safety.

Assessment

The site is located within countryside and outside of any adopted settlement boundary. The proposal includes the extension to a caravan storage site, to further support the existing agricultural business at The Gables. This represents the diversification of an existing agricultural operation which is supported by the development plan.

Conclusion

The principle of development is acceptable and is supported by Policy 8 of the RWBNP, Core Policy 34 of the Wiltshire Core Strategy and the objectives of the NPPF.

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.

Assessment

concerns have been raised during the public consultation regarding the potential visual impact on the surrounding rural landscape.

The site is not located within a protected landscape. The proposal seeks to accommodate the storage of up to 53 caravans arranged in two rows, in addition to the existing caravan storage area, which was approved under planning permission PL/2022/00826 for up to 57 caravans. The submitted Planning Statement suggests that the existing storage site typically operates with a maximum of 53 caravans to allow sufficient space for safe manoeuvring. It further states that access to the proposed area would be taken through the existing storage site, thereby reducing the overall number on that site by two. Consequently, the combined capacity of both sites would be 104 caravans.

Although the overall scale of caravan storage would effectively be doubled, resulting in increased visual impact on the rural setting, the proposed area lies within the southern landscaped planting belt required by Condition 6 and 7 of planning permission PL/2022/00826. There is evidence available to the Local Planning Authority confirming that condition 6 has been discharged and that the associated planting has been implemented. It is reasonable to expect that the planting will require time to mature, and condition 7 also secures its ongoing maintenance. While the Parish Council has requested additional planting, the existing approved scheme is considered sufficient to mitigate landscape impacts, and there is no evidence to suggest that, once mature, it would not effectively screen the proposed development. As such, the degree of harm to the character and appearance of the rural countryside is regarded as limited.

Furthermore, the proposed layout would be comparable to that of the existing caravan site, and views of the storage area from the public highway are already largely screened. Views from the nearest Public Rights of Way, which are located at least 350 metres from the site, would be experienced at a considerable distance. From these viewpoints, the proposed development would be seen in the context of the existing caravan site and the wider built form and land uses in the surrounding area. Accordingly, it is considered that the proposal would not give rise to a level of harm to the landscape or to users of the Public Rights of Way that would warrant refusal of the application.

Two security lights are proposed towards the centre of the application site, given the application site is located within the rural area, it is considered reasonable to impose a

planning condition requiring the submission and approval of detailed lighting specifications by the Local Planning Authority prior to installation.

An extension to the layby area is also proposed to facilitate the safe passing of vehicles and to provide a short-term holding space for vehicles to pause briefly for routine checks before entering the public highway. It is therefore considered appropriate to impose a condition ensuring that this area is not subsequently used for the storage of caravans.

Conclusion

The proposal is in accordance with Policy 7 of the Royal Wootton Bassett Neighbourhood Plan, Core Policy 57 of the Wiltshire Core Strategy and the design principles 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.

These policies guide the assessment of amenity impacts, which will be considered below.

Assessment

The nearest dwellings to the application site are situated within Folly Farm, located approximately 125 metres to the northwest. This property also operates a caravan storage facility and benefits from a degree of separation provided by intervening agricultural barns. A further cluster of residential properties is situated approximately 190 metres to the northeast at Ballard Ash Farm, on the opposite side of the highway. Baynards Ash Farm lies at a greater distance, approximately 325 metres to the east. In view of these separation distances and the presence of existing built features within the area, the proposal is not considered to result in any unacceptable impact on neighbouring residential amenity.

Conclusion

The proposal is in accordance with Core Policy 57 (vii) of the Wiltshire Core Strategy.

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.

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 proposal has been assessed by the Council's Highways Department and no objections have been raised subject to the number of caravans being limited to 53. It is therefore considered appropriate to impose a condition to ensure adherence to this maximum capacity.

Access to the proposed site would be taken through the existing caravan storage area, utilising the established access from the public highway via the B4042 and the adjoining unclassified section of Brinkworth Road. Given the nature of the use and the typical operational characteristics of caravan storage facilities, it is not anticipated that the proposal would result in an increase in vehicle movements of a scale that would adversely affect the safety or functioning of the local highway network.

Conclusion

The proposal is in accordance with Core Policies 62 and 64 of the Wiltshire Core Strategy.

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 consists of existing hardstanding and areas of modified grassland. The nearest ecological designation is Midgehall Copse County Wildlife Site, located approximately 160m to the north; however, it is separated from the site by the motorway, and the development does not fall within any consultation zones for European protected sites.

A pond is identified to be situated approximately 240 to the southwest, and surrounding habitats may offer suitable terrestrial conditions for Great Crested Newts (GCN). Nonetheless, the on-site grassland comprises a short, managed sward of limited suitability, with higher-quality habitat present within adjacent features such as the western hedgerow. Consequently, the risk to GCN is considered by the Council's Ecologist to be minimal.

The proposed lighting comprises two security lights consistent with those already approved for the existing caravan storage area. These are motion-activated and therefore not in continuous operation. Given the site's proximity to major roads and its existing levels of light disturbance, the additional lighting is unlikely to give rise to significant adverse effects on light-sensitive species.

In accordance with the NPPF and Core Policy 50, developments are required to avoid the loss of functional habitat and should provide biodiversity enhancements proportionate to the site context. Given local species records, features such as hedgehog nesting boxes or bird boxes would be appropriate. The Council's Ecology Team has raised no objections and recommends a condition requiring the submission of a biodiversity enhancement scheme. Given that the proposal would result only in the loss of a small area of modified grassland—a habitat of low ecological value—and that no unacceptable harm to local biodiversity has been identified, it is not considered reasonable or necessary to require a biodiversity enhancement scheme by condition. The development does not give rise to measurable ecological impacts that would justify such a requirement, and therefore a condition would not meet the NPPF tests of necessity or proportionality.

The proposal is not considered to fall within the list of exemptions from BNG requirements. The application is supported by completed maps, condition assessment sheets and statutory metric calculation stating that the baseline and predicted post-development biodiversity units of the site. The submitted metric indicates 0.63 biodiversity units are required to meet the 10% BNG requirement and that on-site BNG is not achievable. Any land situated outside the red-line application boundary is classified as off-site. All off-site biodiversity gain sites must be recorded on the national Biodiversity Gain Site Register.

In any event, a mandatory BNG condition would be attached to any planning permission granted. For this proposal, the condition would require all off-site biodiversity units to be identified within the Biodiversity Gain Plan and formally allocated to the development through entry on the national register.

Conclusion

The application is subject to the mandatory BNG requirements and the proposal is in accordance with Core Policy 50 of the Wiltshire Core Strategy and the relevant provisions of the NPPF.

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 site does not fall within any designated flood-risk zone. Although the land to the west comprises a former landfill site, the proposed development would not encroach upon or otherwise affect that area. Concerns were raised during consultation regarding the potential for contaminated run-off from the stored caravans; however, the likelihood of such an issue arising is considered to be very low. Caravans are typically placed into storage over the winter months and brought back into use during the main holiday season, meaning they are generally well-maintained and in good condition. On this basis, it is concluded that the development would not result in any adverse impacts in terms of drainage or contamination risk.

Conclusion

The proposal is in accordance with Core Policy 67 of the Wiltshire Core Strategy.

Other Issues

N/A

PLANNING BALANCE AND CONCLUSION

The proposed development is considered acceptable in planning terms. The benefits of the scheme, including its economic contribution towards the diversification of an existing agricultural business, are judged to outweigh any identified harms, which can be appropriately mitigated through planning conditions or other controls. The proposal is in accordance with the Wiltshire Core Strategy, the National Planning Policy Framework, and all other relevant material considerations.

RECOMMENDATION:

That Planning Permission be GRANTED, subject to conditions.

CONDITIONS:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

Location Plan; 389.21.001; received 30 October 2025

Existing and Proposed Block Plan; 389.21.002; received 30 October 2025

Fence and Lighting Elevations; received 30 October 2025

REASON: For the avoidance of doubt and in the interests of proper planning.

3. No external lighting shall be installed on-site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals in their publication "The Reduction of Obtrusive Light" Guidance Note 01/21 (reference GN01/21), have been submitted to and approved in writing by the Local Planning Authority. The approved lighting shall be installed and shall be maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area and to minimise unnecessary light spillage above and outside the development site.

4. The site shall be used for the storage of up to 53 caravans and for no other purpose (including any other purpose in Class B8 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended) (or in any provisions equivalent to that class in any statutory instrument revoking or reenacting that Order with or without modification).

REASON: The proposed use is acceptable but the Local Planning Authority wish to consider any future proposal for a change of use having regard to the circumstances of the case.

5. The layby area shown on the approved Proposed Block Plan (dwg no. 389.21.002) shall be used solely for the passing of vehicles and for the temporary stopping of vehicles for brief safety checks prior to entering the public highway. At no time shall the layby area be used for the storage of caravans associated with the permitted use of the site.

REASON: In the interest of visual amenity of the area.

INFORMATIVE NOTES:

Biodiversity Net Gain Required

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition)” that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Wiltshire Council.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. For further information on exempt developments please refer to:

<https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site, and/or allocate off-site gains to your development (e.g., through the purchase of biodiversity units) can be found here:

<https://www.gov.uk/guidance/make-off-site-biodiversity-gains-as-a-developer>

In order for the Biodiversity Gain Plan condition to be discharged, all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

Irreplaceable habitat

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is

minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

Building Regulations

Any alterations to the approved plans, brought about by compliance with Building Regulations or any other reason must first be agreed in writing with the Local Planning Authority before commencement of work.