

CASE OFFICER'S REPORT

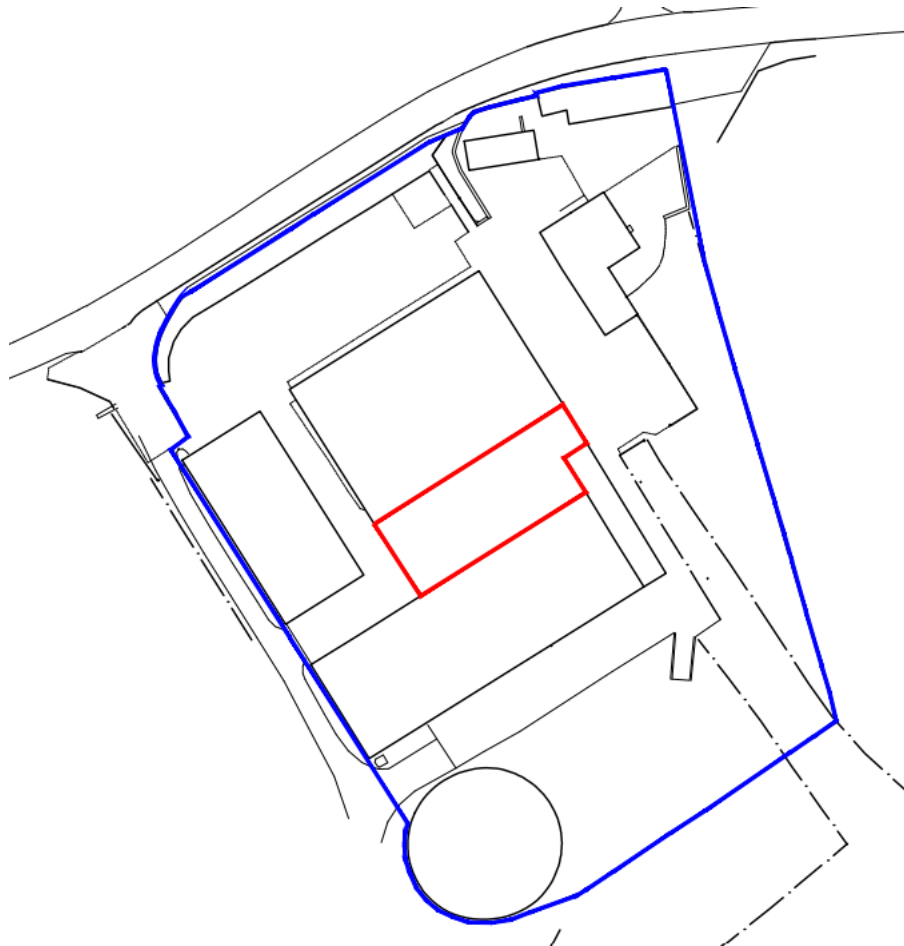
Application Reference:	PL/2025/08539
Application Type:	Full planning permission
Consultation ends:	01 December 2025
Case officer:	Steven Sims

Site Address:	Kingston Farm, Holt Road, Bradford on Avon, BA15 1TS
Proposal:	The erection of an extension and change of use to B8 use (retrospective application)
Recommendation:	Approve with Conditions

PROPOSAL AND SITE DESCRIPTION

The site

The application relates to a site that contains a complex of barns off the B3107 (Holt Road), to the east of Bradford on Avon. Whilst it is understood that the site was originally wholly agricultural, many have buildings been converted to alternative uses in recent years as detailed in the planning history section of this report.



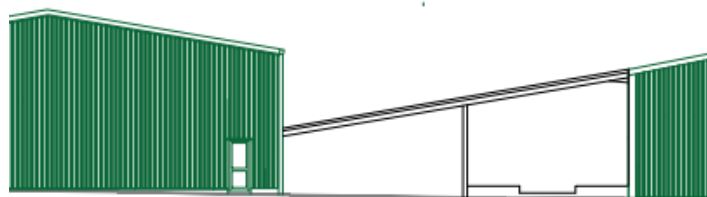
Location plan

The site is located within the open countryside and within the West Wiltshire Green Belt. The site is also located within the Bath and Bradford on Avon Bat Special Area of Conservation (SAC).

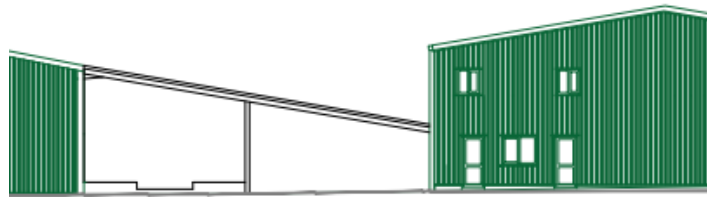
The site does not lie within Flood Zones 2 or 3 and is not subject to high levels of surface water flooding however the site is susceptible to high levels of ground water flooding (as detailed on the council's strategic flood risk map).

The application

This is a full retrospective planning application for the erection of a single storey extension to the existing barn and change of use to B8 storage use to provide additional storage facilities to the approved B8 storage / class E commercial uses on site, following removal of the existing structure.



West Elevation



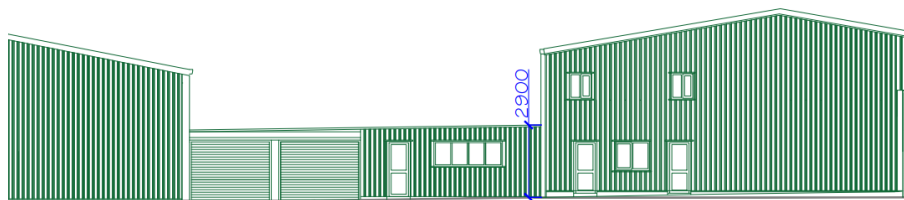
East Elevation

Existing elevations

The extension measures 502 sq. metres infills a gap between existing buildings/barns. External materials would consist of steel green profile cladding for the elevations with a charcoal-coloured flat roof to match adjacent buildings. As detailed in the following plans –



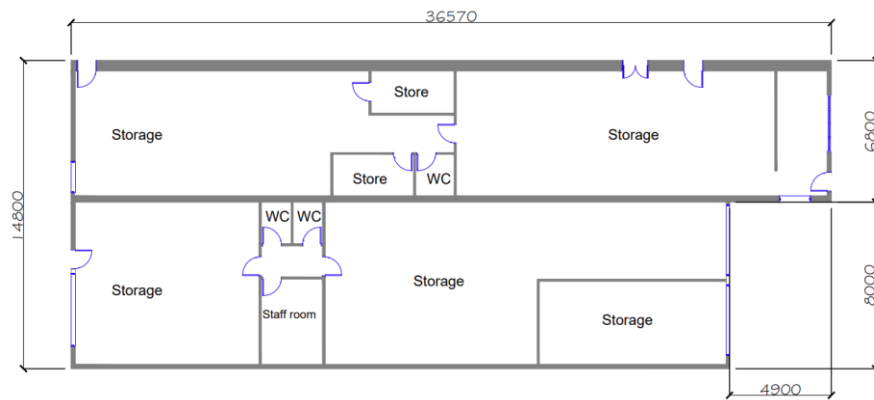
West Elevation



East Elevation



Photo of east elevation as constructed (applicant's planning statement)



Floor plans



Goggle Maps aerial view detailing site and barn extension

POLICIES

Wiltshire Core Strategy (WCS) 2015

Core Policy 1: Settlement Strategy; Core Policy 2: Delivery Strategy; Core Policy 7: Spatial Strategy for the Bradford on Avon Community Area; 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 64: Demand management; Core Policy 67: Flood Risk

National Planning Policy Framework 2024 (the Framework) and Planning Practice Guidance (PPG)

Other

Wiltshire Local Transport Plan 2011 – 2026

Wiltshire Local Transport Plan 2025 – 2038 (endorsed at full council on 11 March 2025)

Bradford on Avon Neighbourhood Plan 2013-2026

Wiltshire Design Guide SPD 2024

Wiltshire Local Plan Pre-Submission Draft 2020-2038 (at Regulation 24 stage) – The Council's draft Local Plan has reached Regulation 24 stage, although at the time of writing this report, the examination has been paused by the examining inspectors. It is therefore a material consideration which will be given weight as appropriate at the time of any subsequent application.

Emerging Policies –

Policy 1 – Settlement strategy

Policy 2 – Delivery strategy

Policy 4 – Addressing climate change

Policy 57 – Bradford on Avon Market Town

Policy 64 – Additional employment land

Policy 70 – Sustainable transport

Policy 71 – Transport and new development

Policy 73 – Transport: Demand management

Policy 83 – Health and wellbeing

Policy 85 – Sustainable construction and low carbon energy

Policy 88 – Biodiversity and geodiversity

Policy 89 – Biodiversity net gain

Policy 91 – Conserving and enhancing Wiltshire's landscapes

Policy 95 – Flood risk

Policy 98 – Ensuring high quality design and place shaping

RELEVANT PLANNING HISTORY

PL/2023/11083 – Proposal to convert and extend an existing agricultural barn, changing use to class B8 and class E, with associated internal and external alterations. – Approved

PL/2022/02254 – (Retrospective) Proposed Change of Use of 113m² of barn from B8 use to Class E flexible commercial use and associated operational development including, installation of windows, doors, a mezzanine floor and internal stairs. – Approved

20/10397/FUL - Change of use from flexible uses permitted via Class R to B8 Use. - Approved with conditions

19/08523/FUL - Change of Use of Part of an Agricultural Building to B8 Use - Approved with conditions

17/06275/PNCOU - Notification for Prior Approval under Class R - Change of Use of Agricultural Building to Flexible Uses (B8) - Prior approval not required

16/06815/PNCOU - Notification for Prior Approval under Class R - Proposed change of use of existing agricultural building to a flexible use within Shops, Financial and Professional services, Restaurants and Cafes, Business, Storage or Distribution, Hotels, or Assembly or Leisure - Prior approval granted

CONSULTATION RESPONSES

Bradford on Avon Town Council: No objection

Highways Team: The building is to be used as part of the existing Five Zeros business. On this basis, the proposals are unlikely to represent a significant increase in traffic and as such, no Highway objection is raised.

Ecology Team: No comments received

Drainage Team: No comments received

Bradford on Avon Preservation Trust: No objection

REPRESENTATIONS

None received

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 adopted Wiltshire Core Strategy (2015) and, where applicable, any made Neighbourhood Plans.

Principle of development

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The development is for an extension to an existing B8 storage/ class E premises. Core Policy 35 of the WCS states proposals for renewal and intensification of employment uses within

employment sites will be supported. Paragraph 85 of the NPPF states '*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*'

The applicants advise the existing use of the removed structure was agricultural use but this use had ceased and has become redundant. There are no objections to the loss of this agricultural use because the buildings/ barns located to the north of the application site mainly have planning permission (with the odd exception) for B8/ class E commercial uses as detailed in the planning history section below and the current scheme would support these uses.

The scheme would support the ongoing commercial storage business operating at the site. It is therefore considered the principle of development for an extension to the existing building has been established.

Impact on the openness of the Green Belt

There are no relevant development plan policies relating to the Green Belt at local level therefore the NPPF provides policy direction. The NPPF (paragraph 153) states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Paragraph 154 states development in the Green Belt is inappropriate unless one of the following exceptions applies. These exceptions include, amongst others, the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. However, the NPPF does not quantify what disproportionate extensions constitute, and the Council does not prescribe a volume/percentage maximum in any policy. Consequently, each case must be assessed on its own merits.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of the Green Belt is their openness and their permanence. Openness means 'being free from development' and is the absence of development notwithstanding the degree of visibility of the land in question from the public realm and has both spatial and visual aspects.

Although the site is located in the open countryside officers recognise that it is an existing developed brownfield commercial / storage site. The extension replaces an existing structure and infills a gap between existing storage barns and in terms of floorspace would be no larger than the building it replaces. The development would therefore not encroach further upon the openness of the Green Belt.

The extension is single storey and as stated above. The eastern elevation of the building would be visible when viewed from the east otherwise the extension would be hidden from views by existing development on site. As such the visual impact of the development on the openness of the Green Belt would be very limited.

Officers therefore consider the scheme to be appropriate development in the Green Belt that would not cause harm to openness.

Impact on the character of the area

Core Policy 51 of the CS outlines that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character. Core Policy 57 requires a high standard of design in all new developments and states that development should respond positively to the existing townscape and landscape.

Use of external materials for the extension (steel green profile cladding) is considered appropriate, and materials would be an approximate match for existing external materials. The extension is set back on site from the highway and is well screened by existing development on site. Due to restricted views of the site, limited size of the development and acceptable use of external materials, it is considered the scheme would have no adverse impact on the character of the area or harm landscape setting.

Impact on neighbour amenity

Core Policy 57 of the WCS requires a high standard of design in all new developments and that development has regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants and ensuring that appropriate levels of amenity are achievable within the development.

The closest residential development to the extended building is located approx. 150 metres distant to the northeast at The Beeches. The applicants advise that the development would not lead to greater vehicular movements.

Hours of operation will be imposed along the lines of those agreed under application PL/2022/02254 (8am to 6pm Mondays to Sundays) for the change of use of part of the barn from B8 use to Class E flexible commercial use.

As such due to this separation distance, and position of the extension between existing storage barns, it is not considered the development would lead to harm to neighbour amenity in terms of noise or light pollution.

Highway/parking issues

Core Policy 61 of the WCS seeks to ensure that all new developments are capable of being served by safe access to the highway network. Core Policy 64 sets out to manage the demand for parking. Paragraph 116 of the NPPF states *'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, following mitigation, would be severe, taking into account all reasonable future scenarios.'*

The extension would provide additional storage space associated with the main approved B8 storage and class E uses of the site. The applicants advise that the development would not lead to greater vehicular movements. No additional off road parking is being proposed and existing parking on site is considered suitable to accommodate use of the extension. The council's highways team have no objections to the scheme and state –

'The building is to be used as part of the existing business. On this basis, the proposals are unlikely to represent a significant increase in traffic and as such, no Highway objection is raised.'

As such it is considered the development would not lead to significant increase in traffic and the development would cause no harm to highway safety.

Ecology issues

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of local biodiversity resource and to secure the integrity of local ecological networks. Core Policy 50 also requires development to seek opportunities to enhance biodiversity, whilst the NPPF encourages applications to deliver measurable net gains (para 193 d).

The application site is located within a consultation zone for lesser horseshoe and greater horseshoe bats associated with the Bath & Bradford on Avon SAC and therefore has potential to result in significant adverse impact on the special features of that site.

The development is retrospective and the application was not accompanied by an ecological survey, however surveys carried out in May 2023 with regard to the conversion of the straw barn (as part of the consideration of application PL/2023/11083) located directly to the northwest of the application site discovered lesser horseshoe bats were recorded foraging on the site during the surveys although no greater horseshoe bats were recorded. The use of the site by foraging bats is relevant to the current scheme, and a condition will be imposed restricting new lighting on the building and requiring the submission of bat mitigation / enhancement measures.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species Regulations 2017 (as amended). The footprint of the extension is confined to an existing area of hardstanding located between 2 existing buildings and no vegetation has been removed to facilitate the proposal. The development is small in scale and nature and located on a brownfield plot adjacent an existing business and therefore the site is already subject to a certain level of human disturbance and light spill (from windows and security lighting from the adjacent barns etc). Whilst the extension will have windows/ doors this is not expected to result in a significant increase in light spill on the site. In addition, due to the nature of the business (B8 storage/ E class uses) it is expected that the majority of the use will be limited to daytime hours only when SAC bats are not present and increases in disturbance from human presence are not expected to be significant. The test of likely significance therefore concluded that there is no mechanism for adverse effect and operational impacts would be de-minimis. The HRA has concluded that the application is not likely to have significant impacts on the SAC and Appropriate Assessment is not required.

Core Policy 50 of the WCS requires development to seek opportunities to enhance biodiversity, whilst the NPPF encourages applications to deliver measurable net gains (para 193 d). As such a condition will be imposed requiring bat and bird enhancement/ mitigation details to be submitted and approved, in accordance with an agreed timetable of implementation.

The application is submitted as a retrospective application and is therefore exempt from Biodiversity Net Gain (BNG) requirements. In addition, the scheme would also be 'De minimis'.

Drainage/ flooding issues

Core Policy 67 of the WCS states all new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

The site does not lie within Flood Zones 2 or 3 and is not subject to high levels of surface water flooding however the site is susceptible to high levels of ground water flooding (as detailed on the council's strategic flood risk map).

Paragraph 174 of The Framework states that within the context of the sequential approach to flood risk *the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.*

Paragraph 175 of the Framework confirms that *the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).*

The application is not supported by a site-specific flood risk assessment and is not accompanied by a sequential test. The scheme involves the retrospective demolition of the existing structure located between 2 existing buildings and the erection of a new extension to serve the existing storage/ commercial uses on site. The extension would be located on an area of existing hardstanding and the footprint of the extension would be the same as the structure removed. The use of the extension would be storage purposes while the existing structure was used for agricultural purposes (albeit no longer in operation). Although the scheme is not accompanied by a sequential test, it is clear the development cannot be located in area with a lower risk of flooding as the scheme is designed to support the existing uses on site and there are very limited opportunities for such development elsewhere.

In terms of the exception test (para 178 of the NPPF) it is considered the development is located in a sustainable location and provides a wider social benefit to the community in terms of providing economic support to an existing business and would provide additional employment in the local area.

Surface water drainage would be dealt with by SuDs and foul drainage would be dealt with by package treatment plant. Surface water details will be conditioned.

As such it is considered the development complies with Core Policy 67 of the Wiltshire Core Strategy and with the Framework in this regard.

CONCLUSION

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The proposed development is located in a sustainable location and would provide economic benefits to the community in terms of supporting an existing business, providing additional employment in the local area and during the construction phase of the development.

In terms of neutral impacts, officers are satisfied that the development would not harm the amenity of neighbouring residents or future occupiers. Sufficient off road parking is available on site and the development is served by safe access to the road network. In addition, the scheme is served by suitable drainage connections, and the development would cause no harm to local biodiversity interests.

The proposal is therefore recommended for approval.

RECOMMENDATION: Approve subject to conditions