

**The Roger Lewis Building,
Goodwood Close, White Horse
Business Park, Trowbridge,
BA14 0XF**

Planning Supporting Statement

May 2026

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&CO

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1.0 Introduction

- 1.1 This Planning Statement has been prepared by tor&co on behalf of Micheldever Tyre Services (the “Applicant”) in support of a full planning application for the change of use of The Roger Lewis Building, Goodwood Close, White Horse Business Park, Trowbridge, BA14 0XF (the “Site”).
- 1.2 The application seeks permission to change the lawful use of the building from Class B8 (Storage and Distribution) to a Sui Generis use to enable the operation of a tyre depot, including tyre fitting, servicing, MOT testing, and associated ancillary activities. The description of the Proposed Development (‘the Proposed Development’) is:
- ‘Change of use from Class B8 (Storage and Distribution) to a mixed use comprising the operation of a tyre depot, including tyre fitting, servicing, MOT testing, and ancillary uses (Sui Generis)’.*
- 1.3 The application is submitted to Wiltshire Council as the Local Planning Authority.
- 1.4 This Planning Statement provides an assessment of the Proposed Development in the context of relevant national and local planning policy and demonstrates why planning permission should be granted.
- 1.5 The structure of this Planning Statement is as follows:
- **Section 2** details the background and context for the Site;
 - **Section 3** outlines the Site’s planning history;
 - **Section 4** describes the Proposed Development;
 - **Section 5** sets out the relevant planning policy framework for the Site;
 - **Section 6** evaluates the application proposal in the context of the planning policy framework and other material considerations; and
 - **Section 7** summarises our conclusions.

2.0 Site Context

- 2.1 The Site extends to approximately 0.38 hectares and comprises an existing warehouse building known as the Roger Lewis Building, located within the established White Horse Business Park.
- 2.2 White Horse Business Park is a well established employment area situated approximately 2.4km to the south of Trowbridge town centre. It benefits from strong strategic connectivity, with access via the A363 and A350, which in turn link to the M4 motorway. In addition, regular bus services (including the D1, 87, and 87A routes) serve the business park, offering connections to Trowbridge and surrounding settlements.
- 2.3 The Roger Lewis Building is currently in lawful Class B8 use, following the grant of planning permission in September 2021 (ref. PL/2021/06501), which also allowed for an ancillary showroom and trade counter.
- 2.4 The building comprises three units with ancillary office space and a covered loading canopy, providing a total floorspace of approximately 1,736 sqm.
- 2.5 Vehicular and pedestrian access to the Site is taken from Epsom Road and Aintree Avenue. Two areas of parking and servicing are provided with a car parking area to the north of the building providing 7 spaces, and a second car parking area is located south of the site providing 26 spaces.
- 2.6 An extract of the Site's location can be seen in Figure 1 below.

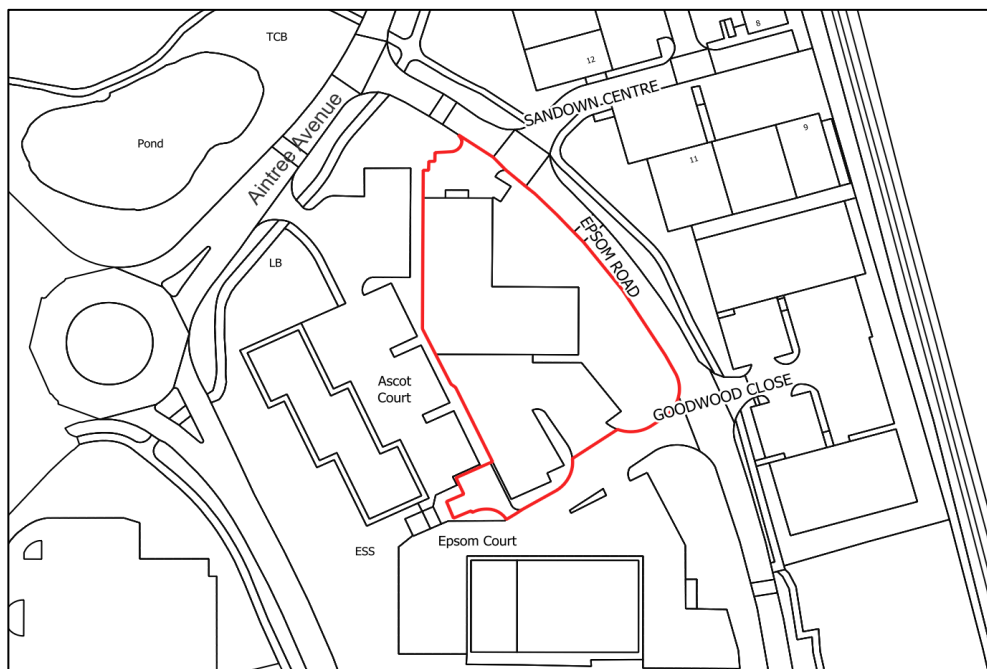


Figure 1: Site Location Plan

- 2.7 The Site is located within the defined settlement boundary of Trowbridge and forms part of the White Horse Business Park, which is designated as a Principal Employment Area and safeguarded for employment uses under Core Policy 35.

- 2.8 The Site lies within Flood Zone 1, indicating a low probability of flooding.
- 2.9 The surrounding area is characterised by large scale commercial and industrial units, including warehousing, manufacturing, and office uses, reflecting the established employment function of the Business Park.

3.0 Planning History

3.1 A desk top search of Wiltshire Council's online database has been carried out to determine the relevant planning history for the Site which is outlined below in chronological order:

- **PL/2021/06501** | Change of use of unit from B1c (Class E) to Class B8 (storage and distribution) with an ancillary showroom/trade counter | Approved 17 September 2021
- **W/01/01910/FUL** | Enlarged access and changes to car park | Approved 25 January 2002
- **W/00/02145/FUL** | Warehouse extension, covered loading canopy and two car parking areas | Approved 18 May 2001
- **W/96/01597/FUL** | Two B1 units and one B2 unit with ancillary offices | Approved 30 January 1997
- **W/85/00502/OUT** | New business park together with roads and sewers and services | Approved 11 June 1985

3.2 The most recent planning permission (ref. PL/2021/06501) confirms that the lawful use of the Site is Class B8 (Storage and Distribution), with an ancillary showroom/trade counter.

3.3 The planning history demonstrates that the Site has consistently been used for employment purposes since its original development, including B1 (now Class E), B2 (General Industrial), and B8 (Storage and Distribution) uses. This establishes a strong precedent for various employment generating activities on the Site.

3.4 The current application seeks to change the use of the building from Class B8 to a Sui Generis use to enable its operation as a tyre depot, including fitting, servicing, and MOT testing. The Sui Generis classification reflects the combination of activities proposed within a single use.

3.5 The Proposed Development therefore represents a continuation of the Site's established employment function, retaining its role as an active employment site and supporting a range of commercial activities consistent with its historic and lawful use.

4.0 The Proposed Development

- 4.1 The application seeks full planning permission for:

‘Change of use from Class B8 (Storage and Distribution) to a mixed use comprising the operation of a tyre depot, including tyre fitting, servicing, MOT testing, and ancillary uses (Sui Generis)’.

- 4.2 The proposal relates solely to the change of use of the existing building, which comprises approximately 1,736 sqm of floorspace. No extensions, demolition, or external alterations are proposed as part of the application.
- 4.3 The Site is located within the established White Horse Business Park, which accommodates a range of commercial, industrial, and warehousing uses. The Proposed Development represents a logical and compatible use within this context, reflecting the operational characteristics of the surrounding area.
- 4.4 The existing building layout is suitable for the proposed use, and no material internal alterations are required. Any minor internal works that may be necessary to facilitate the use would not constitute development requiring planning permission.
- 4.5 Access arrangements to the Site would remain unchanged, with vehicular and pedestrian access continuing to be taken from Epsom Road and Aintree Avenue. The existing servicing arrangements are also to be retained.
- 4.6 The Site currently benefits from 33 car parking spaces, which would be retained as part of the Proposed Development. This level of provision is considered appropriate to support the operational requirements of a tyre depot and MOT testing facility.
- 4.7 As no operational development is proposed, there would be no change to the building’s footprint, scale, or external appearance. The proposal would therefore preserve the existing character of the Site and its relationship with the surrounding business park.
- 4.8 The Site is mostly hardstanding with the exception of a few grassed areas and trees within the car park. As the proposal does not involve any physical works, it would not result in any direct impacts on biodiversity. This matter is considered further within the Planning Assessment.

5.0 Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

National Planning Policy and Guidance

- 5.2 The NPPF (December 2024, updated February 2025) sets out a presumption in favour of sustainable development (Para 11), which for decision making means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

- 5.3 Section 6 relates to 'Building a strong, competitive economy', where paragraph 85 refers to creating conditions in which businesses can invest, expand and adapt. It also refers to giving significant weight to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 5.4 Paragraph 125 (d) refers to planning policies and decisions needing to promote and support the development of under-utilised land and buildings.

The Development Plan

- 5.5 The development plan for Wiltshire Council currently comprises the following documents:

- Wiltshire Core Strategy (2015)
- Wiltshire Local Transport Plan 4 2025-2038
- Trowbridge Neighborhood Plan (area designated 2018)

Wiltshire Core Strategy (2015)

- 5.6 Core Policy 1 'Settlement Strategy' identifies Trowbridge as a Principal Settlement and a primary focus for sustainable development, where growth should support its role as an employment and service centre.

- 5.7 Core Policy 2 'Delivery Strategy' reinforces this approach, directing development towards Principal Settlements such as Trowbridge in order to support sustainable economic growth.
- 5.8 Core Policy 29 'Spatial Strategy' confirms that development within the area should accord with the settlement strategy and identifies White Horse Business Park as a Principal Employment Area.
- 5.9 Core Policy 35 'Existing Employment Land' seeks to safeguard designated employment areas for B1, B2, and B8 uses. It supports proposals that retain or enhance employment uses and requires that alternative uses demonstrate continued economic benefit, including appropriate job generation.
- 5.10 Core Policy 36 'Economic Regeneration' supports the reuse of previously developed land within Principal Settlements where this contributes to economic growth and regeneration objectives.
- 5.11 Core Policy 57 'Ensuring High Quality Design and Place Shaping' requires development, including changes of use, to respond positively to local character, ensure compatibility with surrounding uses, and safeguard residential amenity.
- 5.12 Core Policy 60 'Sustainable Transport' seeks to promote sustainable travel choices and ensure developments are appropriately located and accessible.
- 5.13 Core Policy 64 'Demand Management' requires that parking provision is appropriately managed and does not encourage unnecessary reliance on private vehicles.

Wiltshire Local Transport Plan 4 Principal Settlements sub-strategy (March 2025)

- 5.14 The Principal Settlements Strategy identifies Trowbridge as a key employment and service centre for west Wiltshire, benefiting from strong transport connections, including access to public transport and the wider strategic road network.

Site Specific Policies and Designations

- 5.15 The adopted Policies Map confirms that the Site lies within the White Horse Business Park Principal Employment Area, safeguarded under Core Policy 35.

Emerging Wiltshire Council Local Plan

- 5.16 Wiltshire Council is in the process of preparing a new Local Plan. The submitted plan (November 2024) was recommended for withdrawal by the Inspector in March 2026 due to concerns regarding deliverability and programme. The Council is currently considering its next steps.

6.0 Planning Assessment

6.1 This section assesses the Proposed Development against the relevant national, strategic, and local planning policies. It assesses the following key planning considerations in turn:

- Principle of Development;
- Effect on Character & Amenity;
- Parking & Highways;
- Biodiversity Net Gain; and
- Flood Risk & Sustainable Drainage.

Principle of Development

- 6.2 The Site is located within the established White Horse Business Park, a designated Principal Employment Area protected under Core Policy 35 of the Wiltshire Core Strategy. The Site has a long standing lawful employment use, most recently as a Class B8 (Storage and Distribution) unit, with historic permissions for B1 (Class E) and B2 uses. This establishes the Site as being inherently suited to a range of employment generating activities.
- 6.3 Whilst the proposed tyre depot and MOT test station falls within the Sui Generis use class, it is closely aligned in function and character with Class E, B8 and B2 activities. The nature of the proposed use comprising tyre fitting, servicing and MOT testing, represents a compatible and complementary employment use that reflects the operational characteristics of the surrounding business park environment.
- 6.4 Core Policy 35 seeks to safeguard employment land for B1, B2 and B8 uses. However, the supporting text and wider policy objectives recognise the importance of maintaining viable employment generating uses within designated areas. The Proposed Development would retain the Site in active economic use, supporting local employment and contributing to the vitality of the Principal Settlement of Trowbridge, in accordance with Core Policies 1, 2 and 29.
- 6.5 Furthermore, the proposal would make effective use of an existing building within a sustainable location, consistent with Core Policy 36, which supports the reuse of previously developed land for economic development purposes.
- 6.6 At a national level, Section 6 of the National Planning Policy Framework (NPPF) places significant weight on supporting economic growth and productivity. Paragraph 85 specifically encourages planning decisions that enable businesses to invest, expand and adapt, while paragraph 125 promotes the effective use of under-utilised land and buildings. The Proposed Development directly accords with these objectives by facilitating the continued productive use of an existing employment unit.
- 6.7 The proposal would not result in the loss of employment land to a non-employment use. Instead, it would maintain the employment offer within the Business Park, supporting a resilient local economy.
- 6.8 Overall, the Proposed Development represents a logical, sustainable and policy compliant use of the Site. It accords with the overarching objectives of both

local and national planning policy, and the principle of development is therefore strongly supported.

Effect on Character & Amenity

- 6.9 Core Policy 57 requires development to respond positively to local character and to safeguard the amenity of surrounding occupiers. The Site is located within a well established business park characterised by large scale commercial, industrial and warehouse units, with associated servicing and vehicular activity.
- 6.10 The Proposed Development would not materially alter the character or appearance of the Site or its surroundings. The use of the unit as a tyre depot with MOT testing and servicing is entirely consistent with the established employment and industrial context of the Business Park.
- 6.11 No external alterations are proposed as part of the application. The existing building, layout and hardstanding would remain unchanged, and there would be no visual impact on the surrounding area. The proposal would therefore preserve the character and appearance of the site and its wider context.
- 6.12 The level of activity associated with the Proposed Development, including vehicle movements and servicing operations, would be typical of the Business Park environment and comparable to other permitted uses within the area.
- 6.13 The proposal would not give rise to any unacceptable impacts in terms of noise, disturbance or general amenity. It is therefore considered to comply with Core Policy 57.

Parking & Highways

- 6.14 Core Policies 60 and 64 seek to promote sustainable transport and ensure that development is supported by appropriate parking provision, whilst managing reliance on private vehicles.
- 6.15 The Proposed Development does not involve any changes to the existing access arrangements. Vehicular and pedestrian access would continue to be taken from Epsom Road and Aintree Avenue, which currently serve the wider Business Park.
- 6.16 The Site benefits from an existing provision of approximately 33 car parking spaces, which would be retained. This level of parking is considered appropriate to support the proposed use, particularly given the operational characteristics of a tyre depot and MOT facility.
- 6.17 Trip generation associated with the Proposed Development is expected to be comparable to, the existing B8 use, which typically generates regular HGV and delivery movements. The proposed use would primarily involve light vehicles.
- 6.18 The Site is located within a highly accessible employment area with good connectivity to the strategic road network, including the A350 and A363, and benefits from bus services serving the Business Park. This supports opportunities for sustainable travel in accordance with Core Policy 60.

- 6.19 Accordingly, the proposal would not give rise to any adverse highway or parking impacts and is considered compliant with Core Policies 60 and 64.

Biodiversity Net Gain

- 6.20 The minimum Biodiversity Net Gain (BNG) of 10% became mandatory for all planning applications from 2 April 2024, with some exceptions to this, as set out Paragraph: 003 (Reference ID: 74-003-20240214) of the BNG Planning Practice Guidance (PPG), and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 6.21 Paragraph: 003 of the PPG confirms that development which impacts less than 25 sqm of onsite habitat is subject to a 'de minimis exemption' and therefore exempt from complying with the BNG legislation. Paragraph: 004 (Reference ID: 74-004-20240214) of the same PPG goes into further detail about the 'de minimis exemption', giving specific examples of certain types of development which would be exempt under the legislation, one of which would be "*Change of uses to development where there is no or only a de minimis impact on onsite habitat.*"
- 6.22 Having reviewed the relevant legislation and the PPG paragraphs referenced above, this planning application is for change of use where there is no affect of habitat and most of the site comprises of hardstanding. The application would therefore be considered exempt under the 'de minimis exemption' and is as a result not required to demonstrate a BNG of 10% as per Paragraph 004 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Flood Risk & Sustainable Drainage

- 6.23 The Site lies within Flood Zone 1, where there is a low probability of flooding in this location. As such, no additional drainage mitigation measures are required, and the proposal is considered acceptable in flood risk and drainage terms.

7.0 Summary and Conclusions

- 7.1 This Planning Statement has been prepared in support of a full planning application for the change of use of The Roger Lewis Building, White Horse Business Park, Trowbridge, from Class B8 (Storage and Distribution) to a Sui Generis use comprising a tyre depot, including tyre fitting, servicing, MOT testing, and ancillary activities.
- 7.2 The assessment demonstrates that the Site is located within a well established Principal Employment Area and has a long standing lawful employment use. The Proposed Development represents a logical and compatible form of development, closely aligned in function and character with industrial uses typically found within such locations.
- 7.3 The proposal would retain the Site in active employment use, supporting local jobs and contributing to the economic vitality of Trowbridge, consistent with the objectives of the Wiltshire Core Strategy and the National Planning Policy Framework, which places significant weight on supporting economic growth and business adaptability.
- 7.4 The development would make effective use of an existing building within a sustainable and accessible location, with no requirement for external alterations or expansion. This ensures the efficient reuse of previously developed land.
- 7.5 The Planning Assessment confirms that the Proposed Development would not give rise to any unacceptable impacts. The character and appearance of the Site would remain unchanged, and the use is entirely compatible with the surrounding commercial context. There are no nearby sensitive receptors that would be adversely affected in amenity terms.
- 7.6 Existing access, parking, and servicing arrangements are sufficient to accommodate the proposed use, and no adverse highway impacts are anticipated. Furthermore, the proposal raises no concerns in relation to flood risk, drainage, or biodiversity, with the development qualifying for a de minimis exemption from Biodiversity Net Gain requirements.
- 7.7 Overall, the Proposed Development represents a sustainable, appropriate, and policy compliant form of development. It supports economic growth, maintains employment land in active use, and preserves the character and function of the wider Business Park.
- 7.8 In the context of the presumption in favour of sustainable development, there are no adverse impacts that would significantly and demonstrably outweigh the benefits of the scheme. Planning permission should therefore be granted without delay.

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