



PLANNING STATEMENT

Application:	Class R Permitted Development application to change the use of agricultural building to flexible commercial use, namely Class E(g)iii
Property:	Old Grain Store, off the A342, Wilsford, Wiltshire, SN9 6HA
Client:	Mr M Guinness
Date:	May 2026
Agent:	Chris Cary MSc MRICS FAAV Rural Chartered Surveyor & Planner



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1.0 INTRODUCTION

- 1.1 Woolley & Wallis have been instructed by Mr M Guinness to submit an application for the change of use of an existing agricultural building forming part of Wilsford Manor Farm, Wilsford.
- 1.2 We now apply on behalf of our client, to determine whether the prior approval of the local authority is required for the proposed change of use of an existing agricultural building to a 'flexible commercial use' specifically E(g)iii in accordance with Schedule 2, Part 3, Class R of the Town and Country Planning (General Permitted Development) (England) (Order) 2015 (the "GPDO").
- 1.3 As part of this application please find enclosed the following documents:
 - Site Location Plan

2.0 PERMITTED DEVELOPMENT – CLASS R

R. Development consisting of a change of use of a building and any land within its curtilage from a use as an agricultural building to a flexible use—

(a) falling within one of the following provisions of the Use Classes Order—

(i) Class B2 (general industrial) of Schedule 1;

(ii) Class B8 (storage or distribution) of Schedule 1;

(iii) Class C1 (hotels) of Schedule 1;

(iv) Class E (commercial, business or service) of Schedule 2; or

(v) Class F.2(c) (outdoor sport or recreation) of Schedule 2; or

(b) for the provision of agricultural training.

- 2.1 The proposal presents a change of use to E(g)iii (similar to the previously known light industrial) as presented by R(a) above.
- 2.2 The commercial use of the building will provide a diverse income stream needed to support the ongoing agricultural business on the holding.

Development not permitted - R.1

- 2.3 Paragraph R.1 of Part 3 of Schedule 2 of the GPDO sets out the circumstances under which Class R development is not permitted. The following paragraphs seek to demonstrate that the proposed development is permitted development, by addressing the circumstances set out in paragraph R.1 using corresponding paragraph referencing (a-e):
- a) The building in question forms part of an established agricultural unit known as Wilsford Manor Farm. The building proposed for change of use has always been in agricultural use and for the avoidance of doubt it was in agricultural use on 3rd July 2012.
- b) The building subject to this application extends to 827 sq.m. No other buildings upon the holding have changed use under Class R. As such the cumulative total floorspace of buildings that is proposed for change of use under Class R does not exceed 1,000 sq.m.
- c) The site does not form part of a military explosive's storage area.
- d) The site does not form part of a safety hazard area.
- e) The building is not listed, nor is it within the curtilage of a listed building, nor is it a scheduled monument.

3.0 PRIOR APPROVAL REQUIREMENTS

3.1 Paragraph R.3 of Part 3 of Schedule 2 of the GPDO states that:

“Before changing the use of the site under Class R, and before any subsequent change of use to another falling within one of the use classes comprising the flexible use, the developer must –

(b) Where the cumulative floor space of the building or buildings which have changed use under Class R within an established agricultural unit exceeds 150 square metres, apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to:-

- (i) Transport and highways impacts of the development ;
- (ii) Noise impacts of the development;
- (iii) Contamination risks on the site; and
- (iv) Flooding risks on the site.

3.2 As stated above, this application relates to the change of use of 827 sq.m of floorspace therefore the application should be judged against the above four criteria.

(i) Transport and Highway Impacts of the Development

- 3.3 The proposed development will utilise the existing access onto the council-maintained highway, the A342. This access currently serves the Grain Store as part of Wilsford Manor Farm and has historically accommodated significant levels of agricultural traffic.
- 3.4 The Old Grain Store has historically been used for the drying and storage of grain, with the building forming the operational centre of activity during the harvest period. By its nature, a grain drying operation generated substantial vehicle movements, particularly during the summer and early autumn months. This included frequent trips by tractors and trailers delivering grain to the building, making multiple return journeys per day, together with regular staff vehicle movements required to operate and monitor the drying system.
- 3.5 In addition, heavy goods vehicles are required to collect grain from the site. These HGV movements are not limited to the harvest season and can occur throughout the year, as grain is commonly sold in response to market conditions. Loading operations frequently involve the use of a telehandler or loader, adding to the overall level of on-site activity and associated vehicle movements.
- 3.6 The established agricultural use of the building and access is lawful and extant and therefore represents a realistic fallback position.
- 3.7 Practically the highway access provides very good visibility splays in both directions with over 215m available when measured from 2.5m back off the highways edge.
- 3.8 The existing yard surrounding the building provides adequate space for HGV access and provides sufficient space for turning circles.

- 3.8 When considering traffic and highways impacts of a development the NPPF states that LPAs must ensure:

(110) a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

(111) 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 would be severe.

- 3.9 The broad principle of the change of use of the building is considered to be granted by the PD right under Class R. As such, sustainability matters related to the site location are not considered to be able to be a factor in the determination of prior approval.

- 3.10 The building will benefit from a curtilage of a sufficient size, that already serves the existing building, to provide an area for parking that is considered adequate for the use class order proposed, as detailed in Wiltshire Councils Parking Strategy.



Image 1 & 2 – Visibility from 2.m back from highways hedge showing well over 215m of unrestricted visibility

(ii) Noise Impacts of the Development

- 3.11 With regards to the noise impact of the development, the existing noise pollution created by the lawful existing agricultural use should be taken into consideration. Historically, the Old Grain Store and Dryer would generate a constant mechanical drone through the use of fans, blowers and conveyors including the additional impact of vehicle movements within the yard. It is therefore considered that the proposed development will not generate any additional or adverse noise.

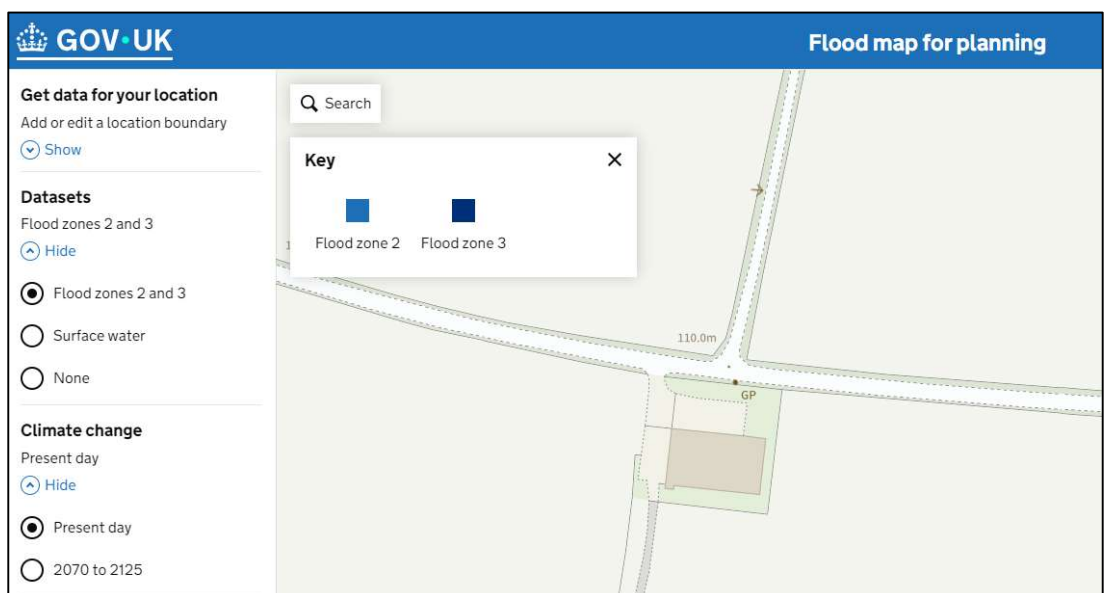
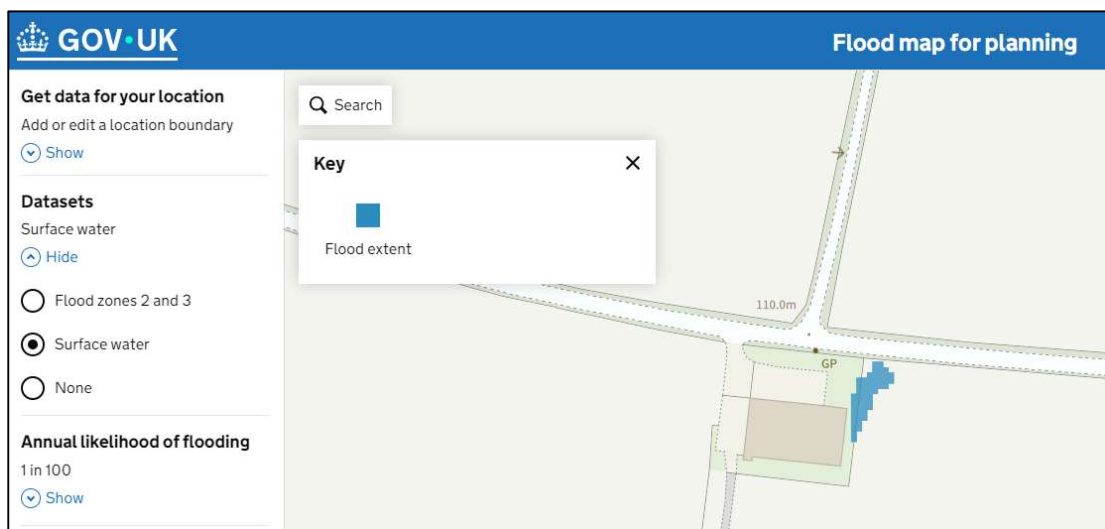
- 3.12 For the avoidance of the doubt, the closest residential properties are located in the village of Wilsford, over 728m to the North on the opposite side of the A342.

(iii) Contamination Risks on the Site

- 3.13 The barn has been in agricultural use up to today's date. There are no apparent contamination risks or concerns on the sites existing or proposed use.
- 3.14 In full transparency, there is a functioning liquid fertiliser tank located to the North of the proposed building. Once emptied it will be removed from the site and therefore does not present a combination risk.

(iv) Flood Risk

- 3.15 As shown below, the site is located within Flood Zone 1 and as such there are no apparent flood risks at the site from surface water of river and sea flooding.



- 3.16 The scheme presents an invisible change of use. There is no building works presented and therefore there will be no runoff increase.



4.0 CONCLUSION

- 4.1 Overall, it is considered that the agricultural building proposed for change of use under Class R comfortably meets the qualifying criteria and would not create any highways, noise, contamination or flooding issues for which Wiltshire Council should be concerned. The proposed change of use will contribute to the stability of the farming business through diversification of new income streams.
- 42 Should you require any further information to determine this application please do not hesitate to contact me.