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# TOWN PLANNING CONSULTANCY



**Site: Former Agricultural Barn, Keevil, Wiltshire, BA14  
6NQ**

**Proposal: Demolition of redundant agricultural  
building and its replacement with a new building for  
B8 storage use in connection with Hayes GFS Ltd**

**On behalf of: Hayes GFS Ltd**

**Date of Issue: January 2018**

## PLANNING SUPPORTING STATEMENT

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## 1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of the applicant to support their full planning application for the demolition of an existing agricultural building and erection of a replacement building for B8 Storage Use in association with the applicants business.
- 1.2 The statement will examine how the proposed development relates to the site and its context. The statement will also provide an explanation and justification for the scheme having regard to the national and local plan policy context.

## 2.0 BACKGROUND AND PLANNING HISTORY

- 2.1 This application relates to a detached former agricultural building located c.1km north-west of Bulkington, Wiltshire. The building is single-storey, constructed largely of red-brick and sits on an area of existing hardsurfacing.
- 2.2 The building is no longer required for agricultural purposes and the applicant, Hayes GFS Ltd, is seeking to demolish the existing structure and replace it with a slightly larger building for their own 'low-key' storage purposes.
- 2.3 Hayes GFS Ltd installs and refurbishes tanks for various users and is a successful and well-established business, being in operation for over 20 years. They have become recognised throughout the water industry as leading experts in the installation and refurbishment of glass-fused-to-steel tanks. Their services include:
- The supply & installation of Permastore glass-fused-to-steel tanks
  - On site tank surveys & comprehensive condition reports
  - Refurbishment of tanks
  - Emergency repairs
  - Replacement Roofs
  - Supply and retrospective fitting of ancillaries
  - Replacement tanks
- 2.4 Hayes GFS are specifically looking for storage space for the agricultural element of their business which supplies and installs slurry storage tanks, rainwater harvesting tanks and grain silos to farms all over the south west. In particular, the building will be used for the storage of unique 'glassed fused to steel' tank panels that are for the refurbishment and repair of existing slurry stores and grain silos, which have been manufactured by companies no longer trading or in existence. The items to be stored do not deteriorate at all and are required infrequently (6-7 time a year) but they need a readily available supply of stock of this nature to enable them to respond rapidly as and when required, this is usually due to existing tank failure.
- 2.5 The modest size of the existing building means that it is unsuitable to meet the specific storage needs of the business and the size of the equipment to be stored. The client is therefore seeking to demolish the existing building (which is of no architectural or historic merit) and erect a slightly larger building to accommodate the materials and equipment used by Hayes GFS within the region.
- 2.6 Malford Environmental Consulting was commissioned to undertake a Phase 1 (bat roost inspection) and protected species survey of the building. The report relating to this accompanies this planning application and should be read alongside this statement.

### 3.0 CONTEXT

- 3.1 The building the subject of this application, lies between Pinkney Farm to the south and the Whorwellsdown Sewage Works to the north. It is a former agricultural building sited on an area of hardsurfacing and has an existing access into the site.
- 3.2 Figure 1 shows the location of the site in its wider context, whilst figure 2 depicts the building in relation to its immediate setting. Figures 3 and 4 contain photographs of the site.

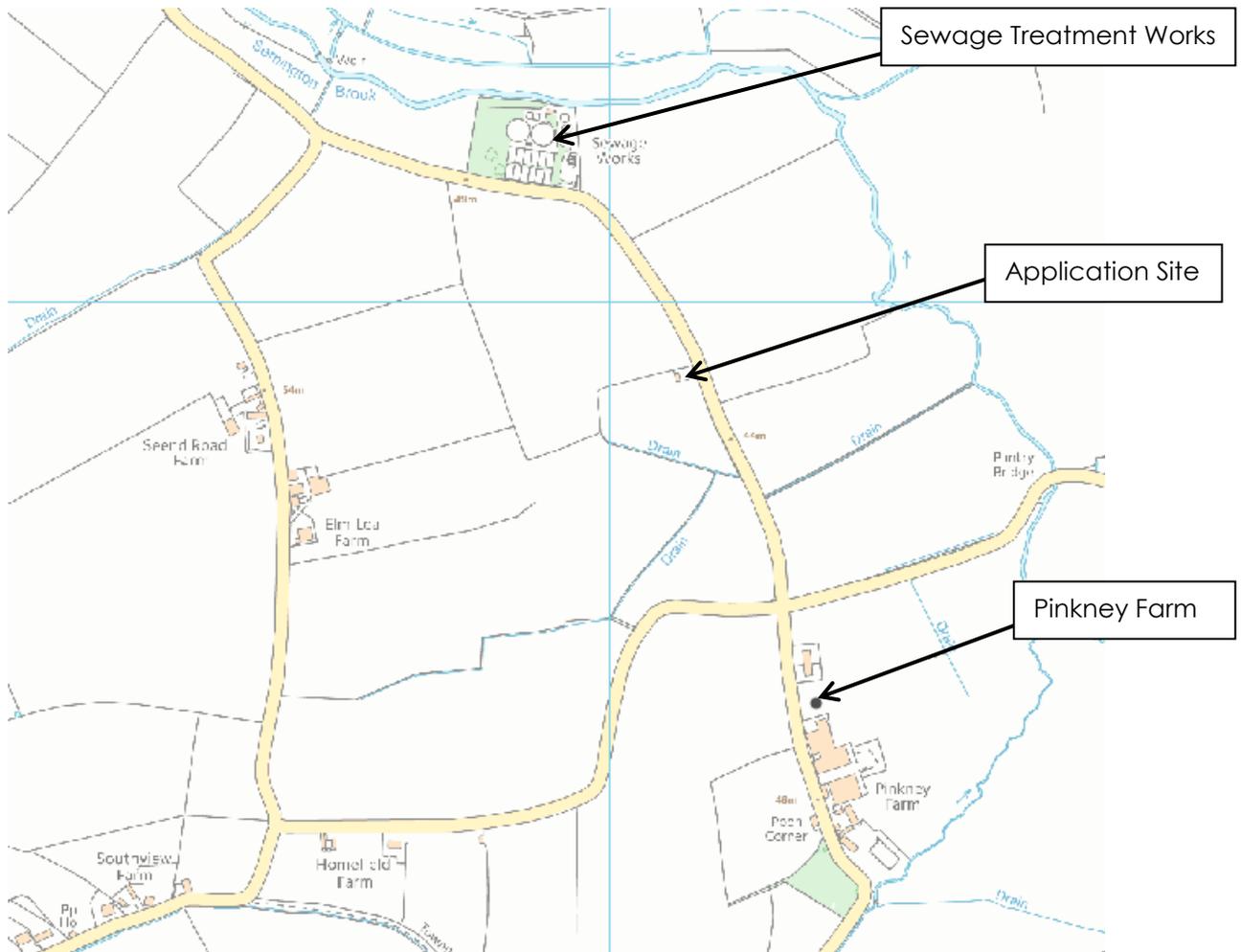


Figure 1: Site Location Plan



Figure 2: Site Location Plan



Figure 3: Eastern and southern elevations of building on site



Figure 4: Southern gable end (left) and open northern gable end (right) of existing building

## 4.0 PLANNING POLICY

- 4.1 The main planning policy framework relevant to this proposal is the Wiltshire Core Strategy 2015 (WCS) and the Government guidance within the National Planning Policy Framework (NPPF). The NPPF IS supplemented with the National Planning Practice Guidance (NPPG) which is intended to clarify issues relevant to the planning regime.
- 4.2 The relevant policies and guidance are set out in the tables below:

### WILTSHIRE CORE STRATEGY

Policy	Title
CP1	Settlement Strategy
CP2	Delivery Strategy
CP15	Spatial Strategy for Melksham Community Area
CP 34	Additional Employment Land
CP 48	Supporting Rural Life
CP51	Landscape
CP57	Ensuring High Quality Design and Place Shaping
CP60	Sustainable Transport
CP61	Transport and Development
CP64	Demand Management

### NATIONAL PLANNING POLICY FRAMEWORK

Chapter	Title
1	Building a strong, competitive economy
3	Supporting a prosperous rural economy
4	Promoting sustainable transport
11	Natural environment
12	Historic Environment

## 5.0 PLANNING ASSESSMENT

5.1 The key planning issues relevant to this proposal are:

- The principle of the change of use;
- Highway safety, and
- Impact upon visual amenity within the wider landscape.

### Principle of the proposed change of use

- 4.3 In determining this application, it is clear that the proposals do not strictly conform to the policies of the WCS. Nevertheless, it is contended that the scheme conforms to the spirit of planning policy and guidance at both local and national level.
- 4.4 The WCS is an 'economic-led' plan, which places the strengthening of the economy, as part of sustainable development, at its heart. In general, Core Policies 1 and 2 of the WCS only allow the principle of employment development within the higher tier settlements. However, these policies also recognise that there will be circumstances in which other forms of development are acceptable. These are permitted as an 'exception' and the two most relevant policies are Core Policy 34: additional employment land and Core Policy 48: supporting rural life, which specifically covers the conversion and re-use of rural buildings. Whilst the thrust and emphasis of these policies refers to employment development within the larger settlements, they nonetheless also recognise the rural nature of the County and the need for rural employment sites.
- 5.2 The NPPF, at chapter 3, encourages rural economic development. It states that in order to promote a strong rural economy and to support the "expansion of all types of business and enterprise in rural areas", local planning authorities should encourage economic development both through the conversion of existing buildings and well-designed new buildings.
- 5.3 It is clear that the NPPF places emphasis upon the need to support established businesses in order to promote a strong economy. It does not place preference upon the re-use of buildings or stipulate the location of development. Rather, it is clear that the driving force behind chapter 3 is the need to support existing businesses and enable their continuing growth. Reference is made to the need for the building to be "well-designed" to ensure visual impact within the wider landscape is not compromised.
- 5.4 It is also important to consider, with respect to the principle of the development, the existence of the permitted development rights pertaining to this building. This is a valid and likely fall-back position and is therefore a significant material consideration.
- 5.5 Notably, Class R of the Town and Country Planning (General Permitted Development) Order 2015 as amended, would permit the use of this agricultural building which has an area under 150 square metres, for a flexible commercial use falling within any of the following uses; Class A1 (shops), Class

A2 (financial and professional services), Class A3 (restaurants and cafes), Class B1 (business), Class B8 (storage or distribution), Class C1 (hotels) or Class D2 (assembly and leisure), without needing to apply either for planning permission or prior approval for any of the usual considerations.

- 5.6 The Council would therefore have no control over internal works, the sustainability of the location, transport or highways implications, amenity or the external appearance of the building itself or associated works, such as the creation of car parking within the curtilage. The existence of these permitted development rights are a firm indication of the Government's support for the re-use of agricultural buildings for employment purposes and rural employment development in general.
- 5.7 As detailed in section 2.0 of this statement, Hayes GFS Ltd, operate nationally but the agricultural element of their business is particularly focussed in the south west. The nature of the business is such that they are often required to supply new tanks or replacements parts in an emergency situation due to existing tank failure on farms. Consequently, storage facilities are required within the region to rapidly respond to the situation. As such, the storage is very low key and typically required 6-7 times a year. The storage facility will not only support the business but, in turn, enable Hayes GFS to support the local agricultural sector. The business has struggled to find a suitable site to accommodate their low-key storage needs and the application site is well placed to meet their needs being geographically placed with easy access to the nearby towns of Devizes, Trowbridge, Westbury and Melksham and their rural hinterland. The storage would all be contained within the building and there is no requirement for this to be placed externally on the land.
- 5.8 It is simply the case here that permitted development rights are not to be implemented and, instead, in line with Chapter 3 of the NPPF, the building is to be demolished and rebuilt (rather than re-used). The rebuild will enable the creation of a slightly larger building to meet the specific needs of the equipment that is to be stored by Hayes GFS. Although the WCS does not specifically allow for this situation, it does recognise the need for rural employment sites and would normally allow for the re-use of this building. We submit therefore that the rebuild, instead of the re-use of the existing building, would not cause any material harm as this statement will now detail.

#### Impact upon visual amenity with the wider landscape

- 5.9 Policy CP57 and the NPPF require development to be of a high standard of design, having regard to the character and appearance of the area. Furthermore, CP51 and CP58 as well as the relevant sections of the NPPF place high importance on conserving the wider landscape.
- 5.10 As it currently stands, the existing barn is separated from the road by a hedge and is set against the backdrop of a number of trees. These landscape features will remain and additional landscaping can be incorporated at the site if deemed necessary by the Council, for example new tree planting to the front of the site. Because of the materials used (reclaimed brick walls with a

profiled sheeting roof), the building would appear as a typical rural structure and would not be unduly prominent within the landscape.

- 5.11 The replacement building is on the same site as the existing building. In terms of dimensions, the proposed storage building would have a ridge height only 545mm higher than existing building and the footprint is only 17m<sup>2</sup> larger than the building that originally stood at the site, i.e the roofed building and the walled area between this and the fence.
- 5.12 The size of the building has not only been dictated by its context and the building which it is to replace but also the requirements of the business both now and in the future. The building needs to be of sufficient height to accommodate the storage requirements of the tanks and the associated equipment.
- 5.13 As the extract from the submitted plans show, the building is similar in scale and appearance to that which presently exists on the site.

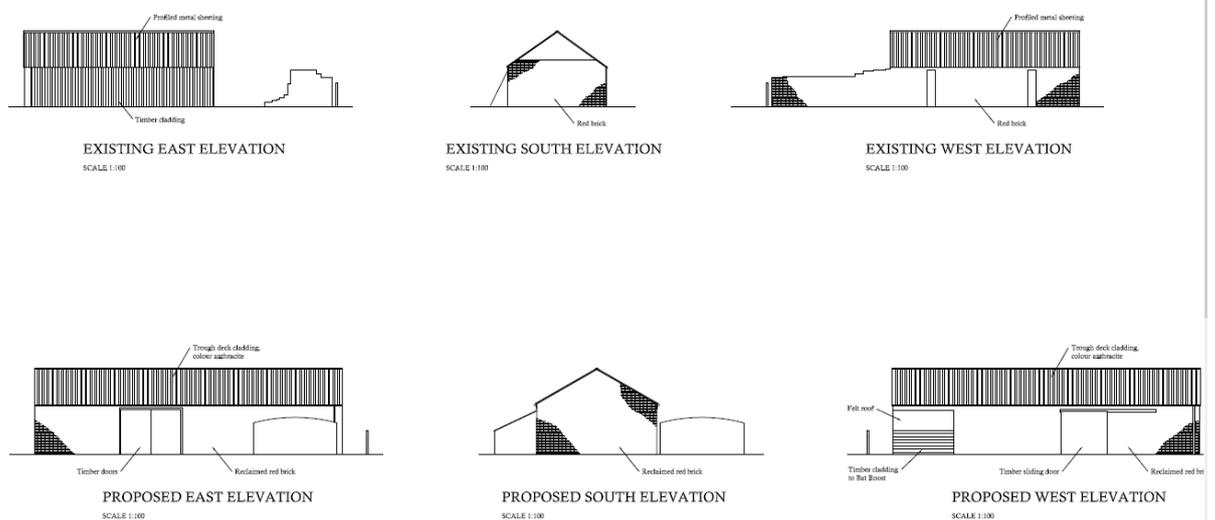


Figure 5: Existing and proposed elevations

- 5.14 The replacement building, being on the site of the existing, would be set back from the road with the hedging and trees remaining on site. This planting will help soften the appearance of the building, ensuring it assimilates into its rural context as is the case with the existing building. Moreover, the building design takes its reference from traditional agricultural buildings typically seen within the rural landscape. The proposed materials also serve to minimise any potential impact: timber boarding, reclaimed red-bricks and 'anthracite' profiled roofing. These materials have been purposely chosen because they are typical rural materials, akin to those used on agricultural buildings generally. The elevation facing towards the roadside is to be constructed of reclaimed red-brick with a pair of timber doors, rather than standard metal doors often

seen on commercial buildings. Again, this design feature helps to ensure the building is well-designed and appropriate for its rural setting.

- 5.15 As a result of the design and choice of materials, the building will readily assimilate into its rural context. Furthermore, the existing trees and hedging will also serve to filter views.
- 5.16 As previously stated, all storage is to be contained within the building itself and there is no need or desire for external storage.
- 5.17 It is therefore our contention that the scheme will not give rise to any significant landscape impacts and the scheme subsequently complies with policies CP51 and CP57 of the WCS.

#### Parking and highway safety

- 5.18 Turning to highway matters, policies CP60 and CP64 deal with the traffic impacts of development and parking standards. These policies aim to ensure developments adequately address matters of access arrangements and road safety alongside adequate parking provision.
- 5.19 Paragraph 32 of the NPPF states that “*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are **severe***” (our emphasis).
- 5.20 This scheme is a modest proposal utilising a well-established access and will not result in additional traffic movements over and above what an agricultural use would have experienced. Moreover, the low-key storage, as described at paragraphs 2.4 and 5.7, would result in less traffic movements. The scale of the development, being storage for just Hayes GFS Ltd, is therefore relatively modest and although it will generate traffic movements, these will not be high, particularly in comparison to the established agricultural use of the site and the types and number of vehicles movements that could be associated with this.
- 5.21 The access affords good visibility on this quiet road and there is sufficient hard-standing space within the site to accommodate the necessary turning space and parking provision.
- 5.22 In considering this matter, the traffic movements associated with the previous use is a relevant consideration that must be taken into account, together with any alternative permitted uses that could result from a change of use of the building under permitted development rights without the need for planning permission.
- 5.23 Having regard to the existing uses at the site and the low-key nature of the storage, the scheme is considered to accord with policies CP60 and CP64 of the WCS and the advice and guidance contained within the NPPF having regard to highway safety.

## 6.0 CONCLUSION

- 6.1 Hayes GFS Ltd is a well-established and respected business within their field and operates across the south-west region within the agricultural sector.
- 6.2 This statement has demonstrated that the construction of a B8 storage building for the company would not cause any adverse impact having regard to highway safety, neighbour amenity or visual impact. Although there are no specific policies contained within the WCS for a situation such as this, the replacement building for commercial buildings reflects the spirit of the Strategy supporting Hayes GFS Ltd and, in turn, the wider rural sector. Moreover, as the building could be used for commercial purposes under permitted development rights, there is simply no material harm in allowing a replacement building for the same purpose.
- 6.3 The Council is therefore requested to approve this application.