



PLANNING, DESIGN AND ACCESS STATEMENT

To support a planning application for

ERECTION OF AN AGRICULTURAL BUILDING TO PROVIDE GRAIN STORAGE AND DRYING (RETROSPECTIVE)

at

UPPER COMBE FARM
UPPER CASTLE COMBE
CHIPPENHAM
WILTSHIRE
SN14 7HE

on behalf of

WP Prior & Sons

Prepared by

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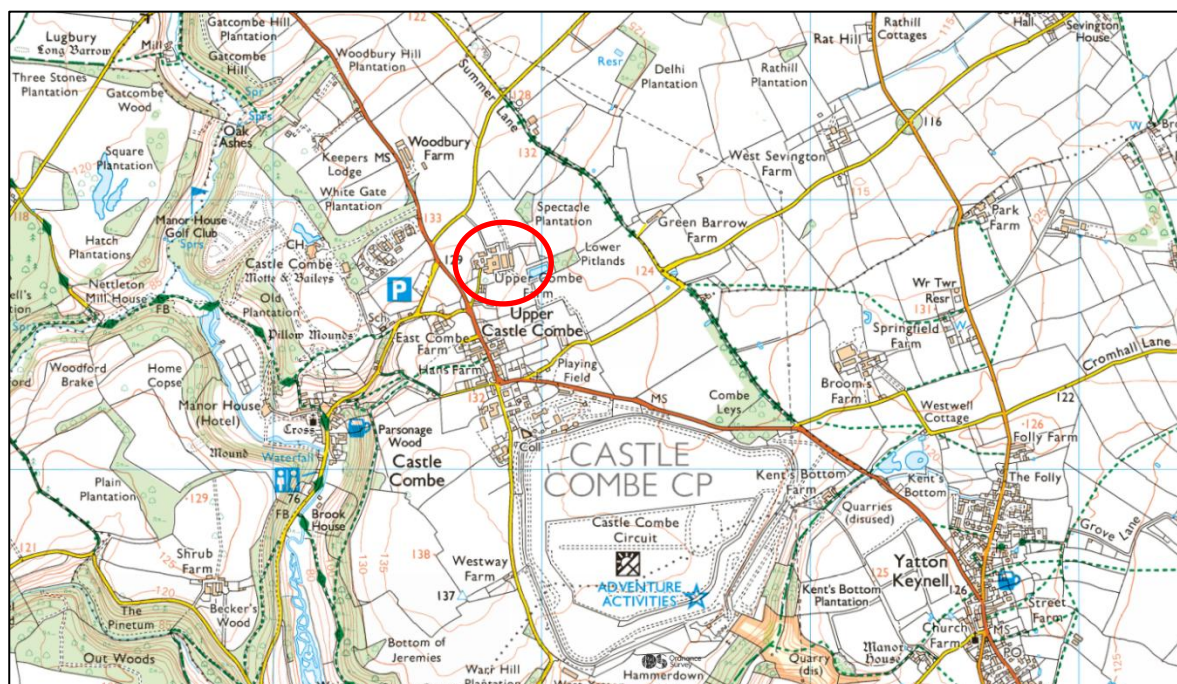
Ref P138-1
NOVEMBER 2025



PLANNING, DESIGN AND ACCESS STATEMENT

1. Introduction

- 1.1 This Planning, Design and Access Statement accompanies a planning application for the erection of an agricultural building to provide grain storage and drying at Upper Combe Farm, Upper Castle Combe, Chippenham, Wiltshire, SN14 7HE. This application is made retrospectively.
- 1.2 The building is in support of the long-established farm business operated by WP Prior & Sons.
- 1.3 Upper Combe Farm is located approximately 0.3 miles to the north of the village of Upper Castle Combe and approximately 5.5 miles to the north west of Chippenham. The location of the buildings at Upper Combe Farm is shown in Insert 1, edged red.



Insert 1: Ordnance Survey Map Extract – Upper Combe Farm

- 1.4 The farm business has diversified to grow approximately 40 hectares (approximately 100 acres) of specialist wheat each year. It has lost access to its rented grain store and has been reliant on temporary grain storage solutions. Due to the specialist nature of the wheat crop and the high value the harvested grain commands, a dedicated store at Upper Combe Farm was required to consolidate the temporary storage and ensure optimal drying and storage conditions are achieved.
- ## 2. The Holding
- 2.1 WP Prior & Sons is a farm partnership operating an established dairy and beef business at Upper Combe Farm. The Prior family have been farming at Upper Combe Farm since 1938.
- 2.2 The farm business occupies approximately 400 hectares (approximately 1,000 acres) of which around 242 hectares (600 acres) is owned, with the remainder of the land being occupied under Farm Business Tenancies and Contract Farming arrangements. Upper Combe Farm is the centre of the farming operations and is the primary owned holding. All of the farmed land is located in and around Castle Combe.

- 2.3 The farm business operates a substantial organic business, supplying milk to Rachel's Dairy from their herd of 250 pedigree Holstein cows. The business rears all its own dairy replacements with surplus heifers being sold to diversify its income streams. A beef enterprise is also in operation.
- 2.4 The majority of the 400 hectares (1,000 acres) is down to grassland to support the organic dairying and beef enterprises. Approximately 10% of the land holding (c. 40 hectares (100 acres)) is used for arable cropping.
- 2.5 Each year approximately 40 hectares (100 acres) of organic Maris Widgeon grain is grown. This is a specialist heritage wheat variety. The organic grain is popular for breadmaking and with organic millers.
- 2.6 The harvested straw from the Maris Widgeon crop has historically been used within the livestock enterprise, for cattle feed and bedding. However, at this year's harvest, more specialist machinery was used to harvest the grain to ensure that the straw could be preserved as a thatching material. The farm business is currently working with Wiltshire Historic Buildings to produce the specialist thatching straw it requires for building restoration.

3. Planning Designations and Constraints

- 3.1 Upper Combe Farm is located within the open countryside, within the Cotswolds National Landscape (formerly known as the Cotswolds Area of Outstanding Natural Beauty).
- 3.2 The site is not located within any other statutorily designated areas.
- 3.3 The site falls outside of the Castle Combe Conservation Area. The nearest listed building is Upper Combe Farmhouse which is Grade II listed (listing entry 1363556). Upper Combe Farmhouse is located some 90 m to the south west of the agricultural building.
- 3.4 The site is located approximately 8 km to the north of the Bath and Bradford-on-Avon Bat Special Area of Conservation (SAC). It is located within the SAC consultation zone.
- 3.5 The site is located within Flood Zone 1 where there is a low probability of flooding. The site is not at risk of surface water flooding, nor is it at risk of flooding from the rivers or sea.
- 3.6 There are no public rights of way that cross the site. The closest public footpath is some 407 m to the south with there being a byway approximately 410 m to the east.

4. The Development

- 4.1 The development consists of the erection of an agricultural building to provide a dedicated grain store and drying building for the premium wheat crop that is produced on the holding. The building has been erected and retrospective planning consent is sought.
- 4.2 Each year around 40 hectares (100 acres) of the Maris Widgeon wheat variety is grown. This is a specialist heritage variety that the farm business grows within its organic system.
- 4.3 The grain is sold into premium markets, securing a price per tonne well in excess of conventional wheat varieties. The grain is milled by Shipton Mill who supply one of the farm businesses' main customers, Hobbs House Bakery (c. 10 miles from Upper Combe Farm), as well as two bakeries in Bath and a Michelin star establishment in Cornwall.
- 4.4 The Maris Widgeon flour is in demand given its specialist heritage variety and its organic status.

- 4.5 Upper Combe Farm is the centre of the dairy operations and is predominantly a livestock holding. All of the buildings are designed for livestock housing rather than for grain storage. Historically, the farm business would rent a grain storage building locally however a couple of years ago the building was no longer made available for grain storage, instead being repurposed for commercial lettings.
- 4.6 Over the past couple of years, and for the current harvest, the farm business has had to seek temporary rented storage facilities. These have been less than ideal, particularly bearing in mind the specialist and high value crop.
- 4.7 The income from the Maris Widgeon grain makes a valuable contribution to the farm businesses diversified income. The farm business has therefore taken the decision it needs to consolidate the temporary storage arrangements into one purpose-built grain storage and drying building to ensure optimum storage conditions are achieved. This will ensure a high-quality organic grain continues to be produced for sale.
- 4.8 The building has been designed for grain storage and drying with a concrete floor and vents throughout. It will operate an automatic control system to ensure optimal storage conditions are maintained; particularly relating to the temperature and moisture content of the grain in store.
- 4.9 The building is fully enclosed to ensure it is weather-tight and to ensure the store is vermin proof. A concrete apron has been laid over existing hardstanding.

5. Planning History

- 5.1 Enquiries via Wiltshire Council's planning pages indicate that the most recent planning consent granted in and around the yard at Upper Combe Farm was in April 2016 for the "*construction of cow building and associated works*" (15/05705/FUL).
- 5.2 Prior to 2016, the following applications have been made and granted at Upper Combe Farm:
- 14/07567/FUL – Construction of silage clamp. Approved 3rd October 2014.
 - 14/03555/FUL – Agricultural building to house a slurry separator. Approved 9th June 2014.
 - N/12/00371/FUL & N/12/00374/LBC – Removal of silos, rebuilding of wing to farmhouse and conversion of cow byre to annex. Approved 21st February 2013.
 - N/10/01721/FUL – Erection of building to house cows, associated hardstanding (demolition of existing steel framed storage building). Approved 9th July 2010.
 - N/09/00648/AGN – Open grass silo. Permitted development 12th May 2009.
 - N/06/01882/FUL – Erection of new cow shed and extension to existing cow shed. Approved 7th September 2006.
 - N04/03092/LBC – Proposed internal and external alterations to farmhouse. Approved 20th December 2004.
 - N/03/02444/FUL – Erection of agricultural building. Approved 16th October 2003.

6. Design

- 6.1 The building consists of a steel portal framed structure, approximately 18.3 m long by 8.8 m wide, with an overall footprint of approximately 161 sqm. The building rises to approximately 5.5 m to the eaves and 6.7 m to ridge height. The building has a clear span internally.

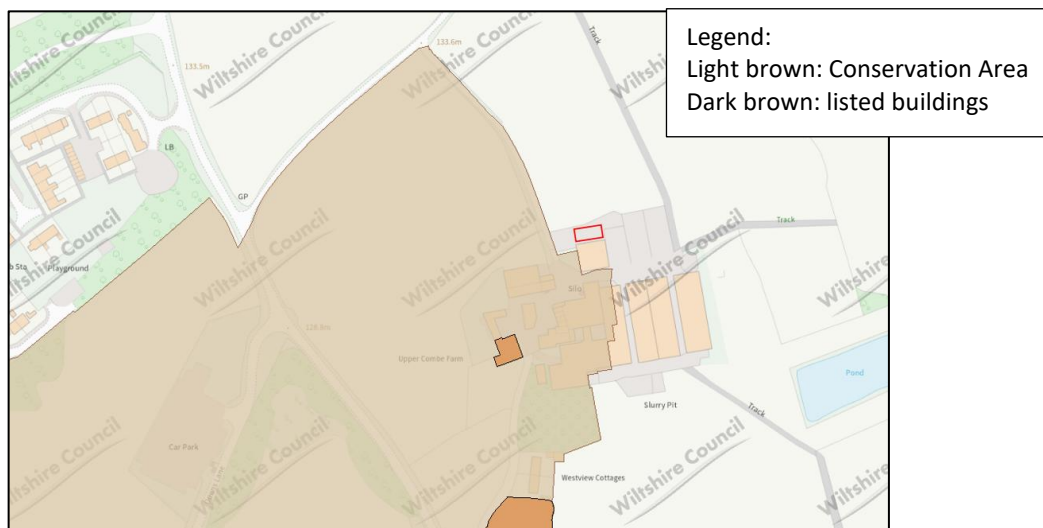
- 6.2 The building has a concrete floor with concrete panels to a height of approximately 3 m with Olive Green box profile steel cladding above on the northern, eastern and southern elevations. A roller shutter door at the western elevation provides access. The building has a dark grey fibre cement roof. The building is fully enclosed to protect the valuable crop in storage from the weather and vermin. The building is shown in the photograph below.



- 6.3 Electricity connected from the adjacent yard will operate the automatic control system.

7. Siting

- 7.1 The siting of the building has been chosen to utilise an area of existing hardstanding within the farm building complex, rather than encroaching on adjacent agricultural land. Being sited adjacent to existing farm buildings means that the building is not isolated or prominent in the landscape when taking into account the wider farm building complex.
- 7.2 The siting ensures the building is not in direct view from the Listed Farmhouse, nor is it located within the Castle Combe Conservation Area. The following extract from the adopted Core Strategy Policies map shows the building and wider farmyard in context with the heritage assets.



Insert 2: extract from Wiltshire Council Policies Map (approximate building edged red)

8. Highway Access

- 8.1 No changes are proposed to the existing access provisions. Adequate access already exists.
- 8.2 Upper Combe Farm benefits from access via the adopted highway, Candlebridget Lane to the south, as well as via a privately owned track to the north leading onto the highway signposted towards Grittleton from the B4039 through Upper Castle Combe.
- 8.3 The existing hardstanding which the building has been erected on has been used for general farm storage. The existing access from the highway has been used by large farm vehicles and machinery for many years.
- 8.4 The siting of the building ensures the grain store has a clean entrance route via the privately owned track away from the existing livestock uses at Upper Combe Farm. This ensures sufficient separation is in place for the operation of the grain store away from the livestock, as well as ensuring the overall yard area has not needed to be extended to accommodate the building.
- 8.5 The use of the private drive access to the north will ensure no additional traffic associated with the grain storage (grain trailers) are travelling past the listed farmhouse or through the Conservation Area.
- 8.6 There will be no conflict in use of the access at harvest for grain trailers with the daily movements associated with the dairy enterprise (milk tankers, etc) which predominantly use the access to the south via Candlebridget Lane.
- 8.7 The operation and safety of the highway network will not be affected.

9. Planning Policy

National Planning Policy Framework ('NPPF')

- 9.1 The National Planning Policy Framework ('NPPF') sets out the overarching planning policies for England and how they should be applied at the local level. The guidance states that the document should be read as a whole. Notwithstanding this, the following paragraphs and subject areas are considered of particular relevance to the determination of this application. The NPPF was most recently updated in December 2024 (with updates in February 2025).
- 9.2 Paragraph 8 outlines the three dimensions to sustainable development, paraphrased below:
- An economic objective – to help build a strong, responsive and competitive economy;
 - A social objective – to support strong, vibrant and healthy communities; and
 - An environmental objective – to contribute to protecting and enhancing the natural, built and historic environment.
- 9.3 Paragraph 88 states planning policies and decisions should '*enable [inter alia]: the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings*' (bullet point (a)) and '*the development and diversification of agricultural and other land-based rural businesses*' (bullet point (b)).
- 9.4 At paragraph 187, the NPPF states that policies and decisions should contribute to and enhance the natural and local environment by (inter alia) recognizing '*the intrinsic character and beauty of*

the countryside' (bullet point (b)) and *'minimising impacts on and providing net gains for biodiversity'* (bullet point d).

9.5 Paragraph 193 relates to habitats and biodiversity. It confirms that when determining planning applications, local planning authorities should apply the following principles: *'(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; and (d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate'.*

9.6 Biodiversity Net Gain ('BNG'), introduced by the Environment Act 2021, came into force from the 12th February 2024. Retrospective developments and consents are exempt from BNG.

Wiltshire Core Strategy (2015)

9.7 The Wiltshire Core Strategy Development Plan Document was formally adopted on the 20th January 2015. The plan covers the period up to 2026.

9.8 The Core Strategy focuses upon delivering stronger, more resilient communities and sets out six strategic challenges that broadly apply. The key challenges are, in summary, economic development, climate change, providing new homes, planning for resilient communities, environmental quality and infrastructure.

9.9 Core Policy 34 relates specifically to additional employment land, including agricultural development. Outside of the Principal Settlements, Market Towns and Local Service Centres, developments will be supported that *"ii – support sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification"*.

9.10 Core Policy 34 goes on to confirm that such developments as described under (ii) will be supported where they:

- a) Meet sustainable development objectives as set out in the policies of this Core Strategy; and
- b) Are consistent in scale with their location, do not adversely affect nearby buildings and the surrounding area or detract from residential amenity; and
- c) Are supported by evidence that they are required to benefit the local economic and social needs; and
- d) Would not undermine the delivery of strategic employment allocations; and
- e) Are supported by adequate infrastructure.

9.11 Core Policy 50 relates to biodiversity and geodiversity. This policy confirms, in brief, that *"development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale"* and *"all development should seek opportunities to enhance biodiversity"*.

- 9.12 Core Policy 51 requires development to protect, conserve and where possible enhance landscape character and must now have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. It goes on to confirm that proposals for development within or affecting Areas of Outstanding Natural Beauty (AONB's) shall demonstrate that they have taken into account the objectives, policies and actions set out in the relevant Management Plans for these areas.
- 9.13 Core Policy 57 relates to ensuring high quality design and place shaping. A high standard of design is required in all new developments. This includes, amongst other criteria, *(ii) the retention and enhancement of existing important landscaping and natural features (eg. trees, hedges, etc), (iv) being sympathetic to and conversing historic buildings and historic landscapes, (vi) making efficient use of land whilst taking account of the characteristics of the site and the local context and (vii) having regard to the compatibility of adjoining buildings and uses.*
- 9.14 Core Policy 58 relates specifically to ensuring the conservation of the historic environment. Development proposals should protect, conserve and where possible enhance heritage assets and their settings.

Cotswold National Landscape Management Plan 2023 - 2025

- 9.15 The Cotswold National Landscape Management Plan is a statutory plan, which sets out the vision, outcomes and policies for the management of the Cotswold National Landscape for the period 2023 – 2025.
- 9.16 One of the visions of the Management Plan is *“working towards ensuring that the Cotswolds stays a working landscape, where agriculture thrives and supply chains are secure”*. The plan goes on to confirm in relation to natural beauty that *“it is widely accepted that natural beauty is, in part, due to human intervention, such as agriculture”*.
- 9.17 Policy CE3 relates to local distinctiveness. It requires proposals to be designed, and where relevant, landscaped, to respect local settlement patterns, building styles, scale and materials and be in accordance with design guidance prepared by local planning authorities.
- 9.18 Policy CE6 relates to the historic environment and confirms that *proposals that are likely to impact on the historic environment and cultural heritage of the Cotswold National Landscape should have regard to heritage assets and their setting, and seek opportunities to conserve and enhance them.*
- 9.19 Policy CE8 relates to rural land management. The commentary alongside this policy confirms that the two main aspects of rural land management are farming and woodland management. It confirms that farming has an essential role to play in nature recovery as many of the distinctive Cotswold habitats are a result of farming activity and farming operations such as grazing are necessary to manage and restore them. The policy commentary acknowledges that climate change is likely to result in an increase in crop and grass yields, but with a greater variability in quantity and quality, including crop failure. In relation to climate change and the type of crops grown, *“new management methods and new varieties are likely to be adopted in response to warmer, drier conditions. The area of energy crops and novel crops is likely to increase”*.

10. Planning Policy Assessment

- 10.1 Retrospective planning permission is sought for the erection of an agricultural building. The site is located in the open countryside, within the Cotswold National Landscape but outside of the Castle

Combe Conservation Area. Agricultural buildings are an appropriate development type within the open countryside and Cotswold National Landscape.

- 10.2 The building serves a clear business need; to support the farm's ability to diversify its income by growing specialist heritage wheat crops that are sold into premium markets. The high value of the harvested crop makes it essential a dedicated store is provided to reduce reliance on antiquated temporary storage elsewhere over which the business has no control. The grain store and dryer will ensure optimum storage conditions are provided which is essential to maintain the quality of the crop for the end users (mills, bakeries, etc). The building will enable the business to control its supply chain.
- 10.3 The grain store is of a modest scale, to meet the identified storage need of the specialist crop that is grown. Upper Combe Farm is a livestock farm. Its buildings were designed for livestock housing and are in use for such a purpose. Grain storage requires enclosed, secure buildings with access to drying facilities. There are no existing buildings that are available or could be successfully repurposed.
- 10.4 The building has been designed entirely for its proposed grain storage use with a concrete floor throughout, concrete panel retaining walls and a roller shutter door for access. The height of the building ensures that loaded grain trailers can reverse and tip within the building. The building is fully enclosed to protect the stored grain from the elements and ensures no vermin can contaminate the stored grain.
- 10.5 In relation to Core Policy 34 directly, the proposed development is for a new building to support a sustainable farm business producing high quality produce for consumers. The business has diversified its income by growing specialist heritage wheat varieties within its organic system. Given the loss of rented facilities, dedicated infrastructure is now required to support the enterprise. In relation to the specific points of Core Policy 34 (where relevant):
- a) The development meets the sustainable development objectives set out in the Core Strategy.
 - b) The building is modest in scale, designed entirely for its proposed purpose and the scale of the heritage grain diversification. It has been sited alongside existing buildings on an area of existing hardstanding ensuring it functions effectively alongside nearby buildings. The addition of one agricultural building for storage and drying purposes will not affect residential amenity.
 - c) The building is required to support the local economic need. It will store and dry heritage grains that are in demand from local bakers and specialist millers. In addition, the enhanced value of these crops makes a meaningful contribution towards the diversified income of the farm business.
 - e) Adequate infrastructure is in place. The building is sited on existing hard standing, adjacent to existing farm buildings, with existing access to the highway and services. Surface water will be sustainably managed by being directed to a soakaway.

Heritage Assets and the Cotswold National Landscape

- 10.6 The grain storage building is located some 90 m to the north east of the Grade II listed farmhouse. The site is separated from the farmhouse via the private farm access track, as well as a number of traditional and modern farm buildings. There would be no overlooking views from the listed farmhouse to the proposed building. Given the physical separation and the modest scale of the building it is not considered it would have any negative impacts on the setting of the listed building.

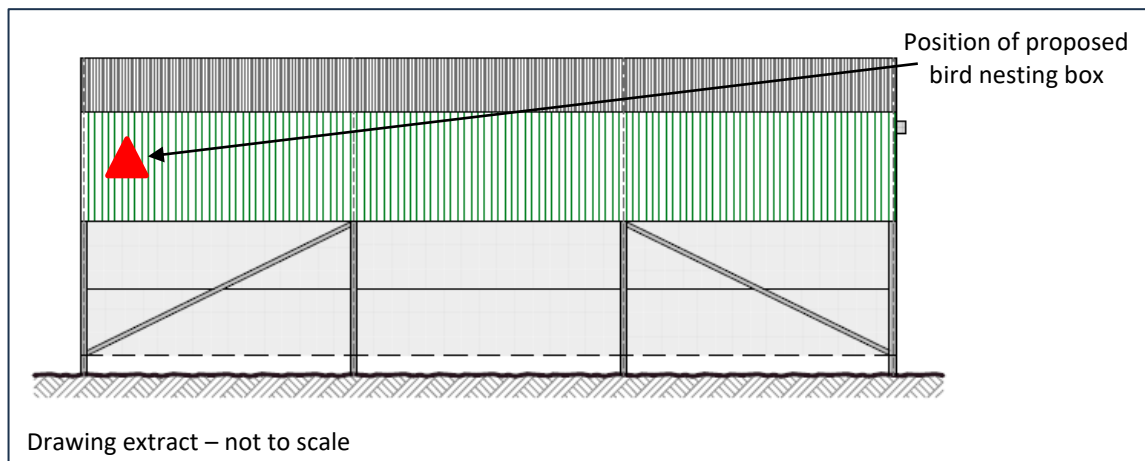
- 10.7 The building is sited outside of the Castle Combe Conservation Area. The siting outside of the Conservation Area has been chosen to utilise an existing access and an existing area of hardstanding, adjacent to existing modern agricultural buildings. With reference to Insert 2 above, a proportion of the existing modern buildings and yard at Upper Combe Farm are located within the boundary of the Conservation Area. This application does not propose to increase development within the Conservation Area.
- 10.8 The materials for the building have been chosen to ensure they are appropriate to the surrounding site context and the more sensitive location. The building is much seen in the context of the existing modern farm building complex at Upper Combe Farm and is therefore not anticipated to affect the Conservation Area or its setting.
- 10.9 The access to the building is located within the Conservation Area, at its eastern boundary. No changes to the access are proposed. It will continue to be used for agricultural purposes as is currently the case. No adverse effects upon the Conservation Area are therefore expected.
- 10.10 The northern access is proposed to be used for access to the grain store to minimize any additional traffic movements (i.e. grain trailers) past the listed farmhouse and through the main body of the Conservation Area, as well as for practical purposes to maintain separation from the livestock uses of the remainder of the yard.
- 10.11 The site is located within the Cotswold National Landscape. The development is for an agricultural building in support of a long-established farm business that farms and manages land within the National Landscape.
- 10.12 The building will support the ongoing production of organic heritage grains. The Cotswold National Landscape Management Plan acknowledges that more “novel crops” may be produced due to climate change and that it will strive to keep the Cotswold National Landscape a place where agriculture can thrive.
- 10.13 When considering the landscape impact:
- The development is outside of the Castle Combe Conservation Area. No heritage assets will be affected.
 - The site is located adjacent to existing buildings and within the envelope of built development at Upper Combe Farm. It does not extend the built footprint into the open landscape, nor is it in an isolated or prominent position.
 - The building is sited entirely on existing hardstanding. No habitats have been lost or affected.
- 10.14 The siting has been chosen to work practically for the ongoing farming operations as well as to limit landscape impacts, particularly within the Cotswold National Landscape.

Ecological Enhancements

- 10.15 The application seeks retrospective consent. It is therefore exempt from the mandatory Biodiversity Net Gain requirements.
- 10.16 The development involved the erection of a new agricultural building on existing hardstanding. There are no effects upon roosting bats. Any adverse effects upon commuting or foraging bats are not expected.

- 10.17 An ecological enhancement will be provided in the form of 1no. wall mounted bird nesting box to be located on the northern elevation, approximately 3m above ground level. A box such as a Vivara Pro Seville 28mm or 32 mm Woodstone nest box will be installed, as shown below.

10.18



Insert 3: Proposed Biodiversity Enhancement

11. Conclusion

- 11.1 WP Prior & Sons seek retrospective planning consent for the erection of an agricultural building for use as a grain storage and drying facility in connection with their diversified arable cropping.
- 11.2 The loss of longer term rented grain storage facilities has meant the business became entirely reliant on rented temporary grain storage. This was not viable in the long-term given the organic status, specialist and premium nature of the crop and need to meet more stringent storage and drying standards. A purpose-built grain storage and dryer building was therefore required and has been built.
- 11.3 Agricultural development is an appropriate development type in the open countryside and in the Cotswold National Landscape. Heritage assets are unaffected.
- 11.4 National and local planning policy seeks to enable and support the development of agricultural businesses.
- 11.5 The proposals are supported by national and local planning policy. This application can, we respectfully suggest, be recommended for approval.

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