



RCC TOWN PLANNING CONSULTANCY



Site: Whyr Farm, Worton Rd, Potterne, Devizes, SN10
5PU

Proposal: New beef unit comprising 2 x agricultural
buildings, and temporary siting of mobile home for use
as an agricultural worker's dwelling together with
associated works, submitted as two separate
applications as described in this statement.

On behalf of: Bodman Livestock Ltd



RCC TOWN PLANNING CONSULTANCY

PLANNING, DESIGN AND ACCESS STATEMENT

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1.0 INTRODUCTION

- 1.1 This statement has been prepared on behalf of the applicants to support their proposed applications to establish a new beef unit on land known as Whyr Farm, situated off Worton Road, Potterne. The proposals include two agricultural buildings together with temporary permission for the siting of a mobile home for use by an agricultural worker and associated works. It follows a pre-application submission to the Council earlier in the year under their reference ENQ/2025/00692.
- 1.2 Due to the size of buildings, whilst one of the proposed buildings (the agricultural storage building) complies with the permitted development criteria and is thus proposed for consent under the prior approval procedure, the proposed livestock building and associated works fall outside of this scope, and thus necessitates a full planning application. The scale of full planning proposals amount to 'major' development and consequently, this statement shall cover Design and Access Statement requirements.
- 1.3 This statement shall examine how the proposed development relates to the site and its context and, furthermore, will provide an explanation and justification for the scheme having regard to the legislative prior approval considerations and the national, local and neighbourhood plan policy context as applicable.
- 1.4 The statement should be read in conjunction with the Agricultural Report prepared by the Farm Consultancy Group. This application is also supported by an Odour Report, Flood Risk Assessment and Drainage Strategy, Transport Note, Landscape Report, Ecological Survey and Biodiversity Net Gain Report.



2.0 BACKGROUND & CONTEXT

- 2.1 Whyr Farm is situated east of the village of Worton, although the site itself lies just within the parish of Potterne. The beef unit will comprise 64 acres at Whyr, which the applicants rented for 8 years before purchasing in 2024, 35 acres at Freith, 10 acres at Windsmere Farm together with a further 50 acres of rented land at Potterne.
- 2.2 The land at Whyr Farm has historically been farmed as arable. The site benefits from its own access and driveway off Worton Road in the west. Aside from the land, there is just a single, modest open-sided storage building adjacent to a residential property known as 'Ware Farm House' which is in separate ownership. Whyr Farm lies directly adjacent other land already owned by the applicants. The land the business now farms is approximately 300 acres, the majority of which is owned (see Appendices to Agricultural Justification).
- 2.3 For clarity, Ware Farm House has not been associated with the application land since at least the 1980's and is a private residential dwelling with no farm buildings.

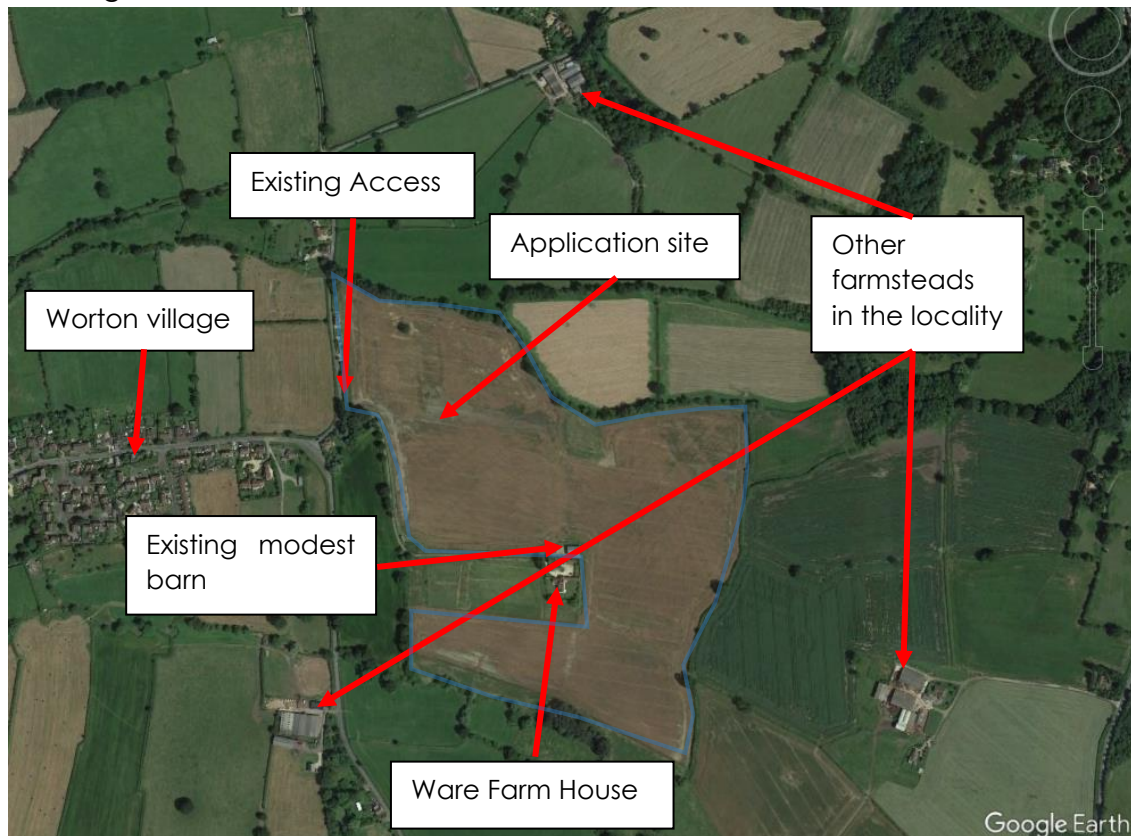


Figure 1: Showing approximate extent of land at Whyr Farm outlined in blue in relation to nearby features

- 2.4 The land at Whyr Farm is lower-lying and gently slopes downwards towards the drainage ditch along the northern boundary. The site does, however, lie entirely in low-risk Flood Zone 1. The land is not subject to any particular landscape, historic or other formal designations, save for being within the 6.4km mitigation zone for the Salisbury Plain SPA. This is designated in relation to the

protection of stone curlew, and the pressure additional residents and thus visitor numbers will place on habitats. Nonetheless, the Council have a 2018 mitigation strategy in place, which essentially means that appropriate mitigation has already been planned with contributions secured via CIL.

- 2.5 There are a number of local public footpaths which transverse or run close to the land as shown below, providing a variety of public vantage points, including from close range. However, it is considered that the proposed new farmstead would sit comfortably within this established agrarian landscape. There are also two, low voltage, overhead power lines which join close to the applications site. Their position is shown on the site layout plan dashed in pink. There are no minimum buffer distances prescribed between the lines and new development, however an 8m buffer has been allowed for any potential swag and sway, and the proposed construction methodology would manage the risk of building close to these.

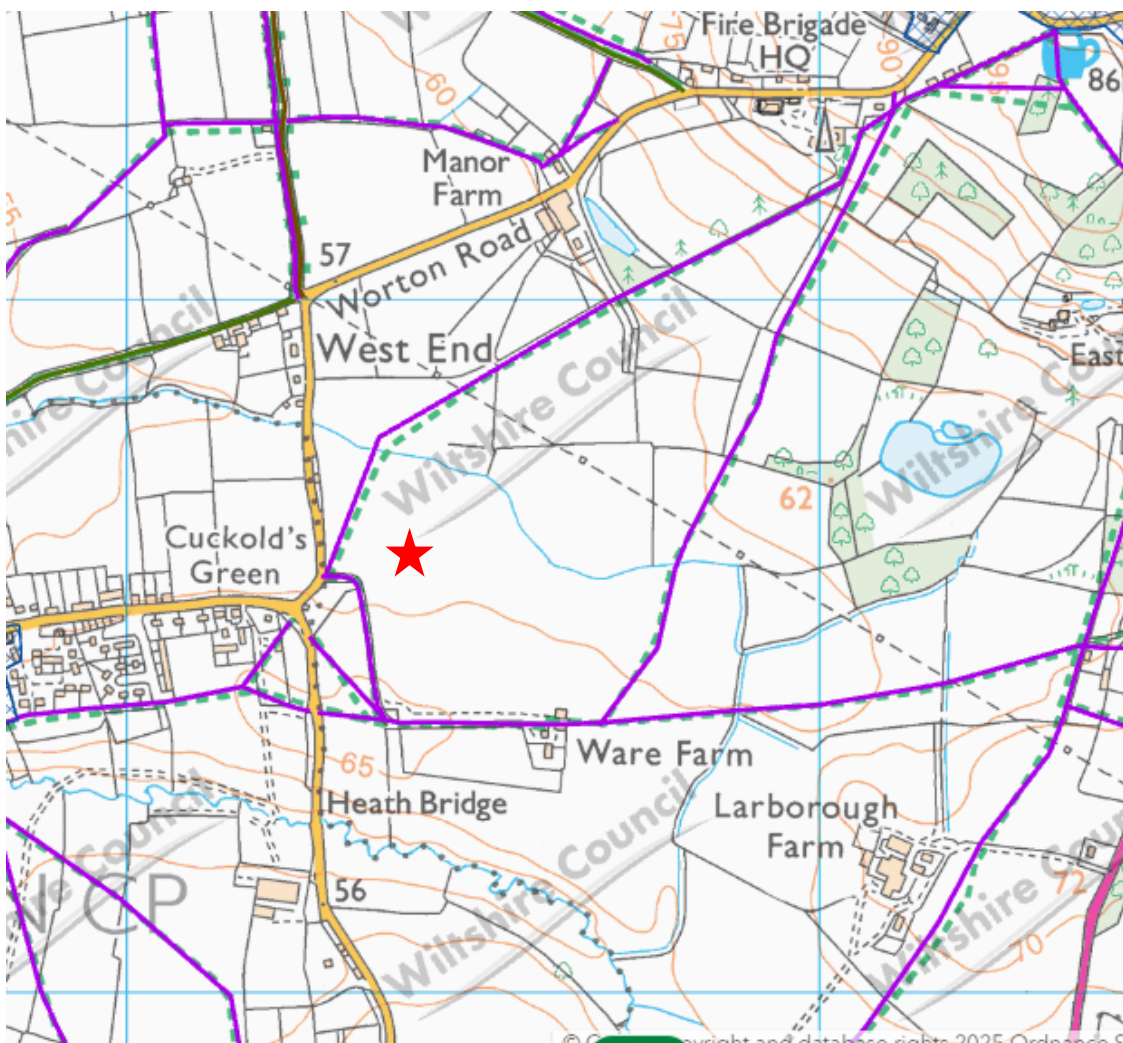


Figure 2: The Ordnance Survey Extract taken from Wiltshire Council's mapping system shows PROW's in purple and green and the flatter, low-lying contours at the proposed site. Star denotes approximate location of the proposed 2 new buildings.

- 2.6 The applicants are the Bodman family, who have a long-established and successful pig and arable farming business, with principal farms owned at Worton at Windsmere Farm, and at South Park Farm, Great Shoddesden near Ludgershall. They are a highly experienced farming family with a proven track record in high standards of animal welfare and widespread experience in farming matters. Joe Bodman, the son of Jim and Helen Bodman, has shown significant interest in the farming business. Joe has management control of the beef enterprise, with a majority shareholding, and this is an area the business would like to expand with Joe's support.
- 2.7 The land at Whyr Farm recently came up for sale and was purchased by JR Bodman Ltd to provide long term security and enable the farm further scope to adapt to changing farming practices, and to diversify and expand through the establishment of a beef unit on their own land. It is worth noting that to keep pace with costs, the farming business needs either to expand or find efficiencies totalling some 4-5% per annum. Thus, the emphasis is on efficient and sustainable design with the business aiming to become carbon neutral in the coming years.
- 2.8 The proposals are consequently purpose designed to meet modern farming requirements, with a temporary dwelling sited west of the two agricultural buildings (for Joe) to allow the expansion of the beef enterprise. Buildings are arranged for efficiency and with sufficient clear head height to allow access by modern machinery. In all other respects they are designed to minimise their appearance on the landscape, including the use of low pitched roofs and materials to blend with the agrarian landscape.
- 2.9 The site for the proposed farm has been chosen for a number of reasons. Firstly, it is close to an established access and as regards character and appearance, is situated in an area which is strongly characterised by farms and groups of farm buildings set amongst fields, where the proposals would sit seamlessly as part of this rural fabric. The chosen site is a lower lying area of land, which, together with landscaped boundaries, minimises longer range views. Field boundaries here, are typically mature native hedgerows or treelines, such as the northern boundary of the application site, which help to limit longer range views and provide some softening and filtering of views.
- 2.10 Furthermore, the chosen site is 'lower value' land in terms of biodiversity and landscape, being away from any particular designations and areas of woodland. Nevertheless, the submission is supported by a landscape report which objectively assesses the likely impact of the proposals and provides a landscape strategy to provide appropriate mitigation and enhancement.
- 2.11 Moreover, the chosen site utilises land which is otherwise poor for agricultural production - the current corn crop has failed as the land has simply been too wet and can't be accessed for spraying etc. Instead, it is proposed to site the new farm buildings here with the surrounding area utilised for grass/ crops as required. The site is a reasonable (equi) distance from neighbouring properties and the prevailing wind and degree of openness allows for good ventilation of the site which is critical for the keeping of healthy livestock, whilst its direction



means that neighbouring amenity would be preserved as demonstrated by the submitted odour report. The noise report provides an assessment of the likely worst case scenario regarding farm yard noise and considers these acceptable. Additionally, it proposes a number of mitigation measures as set out in that report which the applicant is happy to comply with in order to further minimise any noise impacts.

- 2.12 Whilst it is accepted that farm dwellings are necessarily (and allowably) frequently sited in more isolated countryside positions due to the reliance upon the land, it is helpful that the proposed site affords a relatively sustainable position in rural terms.
- 2.13 Worton Road provides easy access into the adjacent village of Worton, which benefits from a pavement all along the High Street, enabling access to the primary school, garage, pop up village pub, church and village hall. The site entrance is also less than 300 metres from a bus stop which provides easy access into Devizes and nearby settlements.
- 2.14 The nearby village of Potterne also benefits from a church, village hall, village shop, a popular cricket ground and club, a youth club, a village pub and regular bus services. The local road network provides good access into the market town of Devizes which provides a wide range of leisure, employment, educational and shopping opportunities, including access to supermarkets and secondary school with sixth form. By 'rural' farm standards, the site does therefore benefit from being reasonably accessible and sustainable.
- 2.15 In the context of the application site, it is noteworthy that the former Sandlease Farm site is currently being developed for housing, and a relatively new (within the last 15 years) livestock farm site with large buildings has been established at Home Farm. Similar collections of farm buildings exist at Larborough Farm, Cadley Farm and Potterne Park Farm in the east, as well as Freith Farm, Windsmere Farm, Manor Farm and Hurst Farm all nearby. Cherry Tree Farm is believed to now be in commercial usage. Some of these are identified in Figure 1 above, and this highlights how a new farm in this low-lying location, would fit entirely with the established character of the area.

3.0 PROPOSALS

- 3.1 This statement covers all development proposed at the site. However, the proposals are essentially broken down into two separate applications - one for prior approval simply for the agricultural storage building, because it is considered to fall within agricultural 'permitted development' rights, and the second, a formal full planning application covering the livestock building, yards and driveway, the temporary siting of a mobile home for an agricultural worker and associated drainage, landscaping and biodiversity net gain works. These are shown in the proposed site layout below at Figure 3. As discussed, the accompanying reports provide overarching strategies will be provided with the formal application, with proposals linked to the necessary mitigation as required.



Figure 3: Proposed site layout showing the two proposed buildings and siting for a temporary mobile home together with drainage basin.

- 3.2 Both agricultural buildings have been designed to fulfil the needs of a modern beef unit, whilst minimising their impact on the surroundings. This statement has summarised why the proposals are now necessary to support the beef unit, however readers should reference the FCG Agricultural Report for further details. In this regard, it should be noted that any farms with land and buildings coming up for sale in this locality, are priced well beyond the means of most young farmers.
- 3.3 The justification for the siting of the proposed farm buildings has been explained in Section 2.0 above, which references the position of public footpaths, the local topography and landscape features which help to minimise the impact of the proposed new farmstead. This section also notes the site being suitably distanced from neighbouring properties and that it utilises

the poorest agricultural land. The site benefits from an existing established access which affords good visibility in both directions.

- 3.4 Building designs have a simple agrarian form with a minimal palette of materials with elevations softened through the use of timber boarding above the concrete panels and natural grey sheeting for the roofs. Hardstanding areas would be constructed by removing the top layer of topsoil, installing a recycled base layer and topped with Mendip stone.
- 3.5 The proposed storage and feed building would allow for the agricultural storage needs of the holding, including straw for bedding, fodder such as hay, silage, and feed along with accommodating internal water tanks to allow for rainwater harvesting and use of water by the livestock to enhance the sustainability of the proposals and limit surface water run-off. The storage building would be shorter than the livestock building, and although taller in height, being situated downslope of the livestock building means that its ridge is proposed to be c 0.5 metres lower as shown in the section drawing provided. The storage building would be open to the south and east elevation to allow for efficient storage of materials and access by modern machinery for moving and stacking bales etc.
- 3.6 The livestock building has been arranged for efficiency of modern farming practices, allowing for open straw cow yards both sides of a central access. Its length is determined by the proposed beef numbers needed for a sustainable beef unit as planned by this business and set out in the submitted Agricultural Report. A c. 6 metre eaves height allows the necessary access by agricultural vehicles, with a minimal roof pitch. Building design allows for maximum ventilation, with elevations finished in timber boarding above cream concrete panels where necessary, as shown on the drawings. Profiled natural grey roof sheeting would shelter the cows from inclement weather. The intention is that all cows would be bedded on straw within the livestock building, with soiled bedding stored and then removed and spread on the land or taken elsewhere, depending on the time of year.

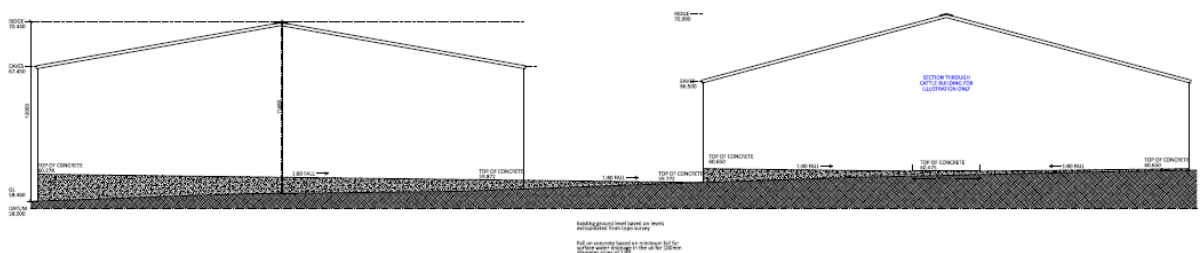


Figure 4: Showing section through taller storage building on the left situated slightly downslope of the livestock building on the right.

- 3.7 The proposals allow for a driveway spur taken from the bend in the existing access drive to provide access to the farm buildings as covered by the planning application. A central track/yard would allow access whilst minimising visual impact and containing noise. A small yard area would be provided at

the front (west) and this would allow for the temporary siting of a mobile home for an agricultural worker, whilst another modest yard area would be provided east of the main storage buildings to allow for loading. All hardstanding areas would be constructed by removing the top layer of topsoil, installing a recycled base layer and topped with Mendip stone.

- 3.8 The use of the existing small barn structure, adjacent Ware Farm, would continue as storage for agricultural machinery or for hay and straw as necessary.
- 3.9 Drainage of the site has been carefully considered and as part of this, the applicants propose to harvest rainwater for use by the farm. Storage tank(s) would enable this, with any overflow/ excess surface water flowing to a basin downslope to the east to enable any water to be recycled for irrigation use on the farm, with overflow at a controlled rate to the existing field drainage ditch below greenfield runoff with the required betterment. This is identified within the full drainage strategy which provides the necessary calculations and details to demonstrate the suitability and adequacy of the arrangements.
- 3.10 The proposals have also considered the ecological and biodiversity impacts, concluding that ecological potential at the site is extremely limited. Required biodiversity gains (note, BNG is not necessary for prior approval applications) are proposed through proposed planting of the new basin.

4.0 LEGISLATIVE BASIS AND PLANNING POLICY

- 4.1 Regarding the proposed 'permitted development' agricultural storage building, Schedule 2, Part 6, Class A of The Town and Country Planning (General Permitted Development) (England) Order 2015 establishes the principle of the erection of buildings on units of more than 5 hectares that are reasonably necessary for agriculture within that unit, subject to compliance with the criteria. The following section sets out that the proposed storage building complies with the relevant criteria and thus, the relevant considerations are limited to those listed as part of the prior approval procedure; that is, siting, design and external appearance.
- 4.2 The principal planning policy framework relevant to the planning application (for the livestock building, temporary siting of a mobile home for an agricultural worker and associated works) is the Wiltshire Core Strategy 2015 (WCS) together with the made Potterne Neighbourhood Plan.
- 4.3 Material considerations comprise the following:
- The Wiltshire Design Guide (2024)
 - National Planning Policy Framework 2024 (NPPF)
 - National Planning Practice Guidance (NPPG)
- 4.4 The emerging Draft Wiltshire Local Plan is currently with the Inspectorate but has not yet been formally examined. It cannot therefore be attributed any significant weight, but does represent the likely direction of travel for Wiltshire's planning policy.
- 4.5 The relevant policies and guidance are set out in the associated tables:

WILTSHIRE CORE STRATEGY

Policy	Title
CP1	Settlement strategy
CP2	Delivery strategy
CP50	Biodiversity and Geodiversity
CP51	Landscape
CP57	Ensuring high quality design and place shaping
CP60	Sustainable transport
CP61	Transport and new development
CP67	Flood Risk

NATIONAL PLANNING POLICY FRAMEWORK

Policy	Title
2	Achieving sustainable development
5	Delivering a sufficient supply of homes
6	Building a strong, competitive economy
9	Promoting sustainable transport



11	Making an effective use of land
12	Achieving well-designed places
13	Meeting the challenge of climate change, flooding and coastal change
15	Conserving and enhancing the natural environment

- 4.6 Regarding the 'made' Potterne Neighbourhood Plan, the plan sets out various community objectives, including to maintain the village's distinctive character, and the maintenance of 'green corridors' between settlements. It also aims to give protection to specific views into and out of the village and to avoid development on land which is potentially high in ecological value. However, the NP contains no plans or policies identifying such views, land or corridors. Rather, it appears that these have been used as base criteria for site selection of housing sites immediately adjacent and within the settlement.
- 4.7 The NP similarly, does not specifically discuss rural housing for countryside workers or the development of farms or farm buildings and so we defer to the WCS and the National Planning Policy Framework, as set out within Section 5.0 below. It is interesting to note however, that the NP does set out a particular need for First Time Buyer housing. In this regard, it is noteworthy that the proposals would provide an affordable temporary mobile home to house a young agricultural worker at an affordable price and located at his place of work, whilst he builds up his own farming business. We therefore submit this accords with the spirit of the NP.

5.0 PLANNING ASSESSMENT

5.1 This planning statement covers the two different forms of application which together are being submitted in order to establish a new beef unit at the application site. The issues for consideration are identified as:

- Compliance of agricultural storage building with the permitted development criteria
- Consideration of the 'prior approval' matters in respect of this agricultural storage building- siting, design and external appearance
- The principle of establishing a new beef unit at the site and the principle of the temporary siting of a mobile home for an agricultural worker (incorporating functional and financial evidence)
- Related key planning matters including;
 - Visual amenity and the wider landscape
 - Residential amenity including Odour and Noise
 - Highway Impacts
 - Flood Risk and Drainage
 - Ecology and Biodiversity Net Gain

Consideration of Building A against the permitted development criteria.

5.2 As noted above, the storage building is considered to be 'permitted development' under the Schedule 2, Part 6, Class A of the Town and Country (General Permitted Development) Order 2015 as amended. Subject to compliance with the various criteria and processes, this Order effectively grants planning permission for agricultural buildings up to 1500 square metres.

Permitted development Building A

Development criteria:	Assessment Commentary	Compliant?
A. The carrying out on agricultural land comprised in an agricultural unit of 5 hectares or more in area of— (a) works for the erection, extension or alteration of a building; or (b) any excavation or engineering operations, which are reasonably necessary for the purposes of agriculture within that unit.	The agricultural unit exceeds 5 hectares in area. The proposals are limited to the erection of an agricultural storage building, proposed to store feed, silage and straw. As reasoned in this statement and the agricultural report by FCG, the proposals are reasonably necessary for the purposes of agriculture within the unit, notwithstanding the proposed livestock unit.	✓



A1: Not permitted if a) development would be carried out on a separate parcel of land forming part of the unit which is less than 1 hectare in area	The development would be carried out on a large arable field c.64 acres (24 hectares) and not on a separate parcel	✓
b) any pd rights under Class Q or S have been exercised on this unit within the last 10 years	No permitted development rights have been exercised on this agricultural unit within the last 10 years	✓
c) it would consist of, or include, the erection, extension or alteration of a dwelling	The permitted development application does not include a dwelling. A separate planning application is submitted to cover the proposed siting of a mobile home.	✓
d) it would involve the provision of a building, structure or works not designed for agricultural purposes;	The proposed building and works are purpose-designed for agriculture, as per the proposed uses	✓
e) the ground area which would be covered by— (i) any works or structure (other than a fence) for accommodating livestock or any plant or machinery arising from engineering operations [F1 would exceed 1,000 square metres]; or (ii) any building erected or extended or altered by virtue of Class A would exceed 1,500 square metres	ei) No such works are proposed ii) The proposed permitted development building would not exceed the 1500 square metre allowance.	✓
f) the height of any part of any building, structure or works within 3 kilometres of the perimeter of an aerodrome would exceed 3 metres;	The site is not within 3km of an aerodrome	✓
g) the height of any part of any building, structure or works not within 3 kilometres of the perimeter of an aerodrome would exceed 12 metres;	The height of the building would not exceed 12 metres	✓

h) any part of the development would be within 25 metres of a metalled part of a trunk road or classified road;	No part of the proposed building would be within 25 metres of a trunk or classified road	✓
i) It should not be used for the accommodation of livestock or for the storage of slurry or sewage sludge where the building, structure or excavation is, or would be, within 400 metres of the curtilage of a protected building;	It is anticipated that the proposed agricultural storage building would be used for storage of straw bedding, silage, and feed. It would not be used for livestock, storage of slurry or sewage sludge (building is within 400m of the curtilage of a protected building).	✓
j) it would involve excavations or engineering operations on or over article 2(4) land which are connected with fish farming;	The site is not on article 2(4) land nor does it involve fish farming	✓
k) relates to any building for storing fuel for or waste from a biomass boiler or an anaerobic digestion system	Does not apply as would not be used for this purpose	✓
l) the erection or extension of a building would be carried out on land or a building that is, or is within the curtilage of, a scheduled monument	Neither the building or the land is or is within the curtilage of a scheduled monument	✓

Various conditions are set out within **A.2** which are noted.

2 i) confirms that for Class A permitted development buildings, an application is to be made as to whether the prior approval of the authority will be required as to the siting, design and external appearance of the building. ..

This statement is provided in support of the prior approval application.

2 ii) confirms the application must be accompanied by a written description of the proposed development and of the materials to be used and a plan indicating the site together with any fee required to be paid;

Written description 'Erection of agricultural storage building' (red line for the prior approval application is limited to the building only, all other proposed works are covered by the planning application)

Materials proposed are annotated and shown on the submitted drawings and are outlined above in Section 3.0.

A plan showing the proposed layout is provided in addition to scale drawings of the building.

The applicant shall pay the relevant fee following submission to the Planning Portal.

Consideration of the 'prior approval' matters in respect of the agricultural storage building – siting, design and external appearance

- 5.3 As reasoned above, the local landscape is characterised by agricultural holdings, including clusters of farm buildings pepper potted across the surrounding landscape. In this location, on lower lying land and outside of any AONB or other special designations, the proposed 'permitted development' farm storage building would be entirely in keeping with this established character. As identified above, its location has also been chosen to maximise the use of poorly performing agricultural land and minimise any effects on neighbours.
- 5.4 The design is a simple, agrarian form, governed by the need for efficient modern farming practices. It includes a need for a c. 9m eaves height to allow access by modern farm machinery. The roof pitch has been kept purposely low to minimise the overall height of the building. Materials have been chosen for practicality and visual appearance so as to assimilate the structure with its environment. The use of timber boarding above concrete panels, is typical of larger agricultural buildings in the area. It provides the necessary protection from the elements whilst being visually attractive and blending with the local landscape. Profiled natural grey sheeting allows for low roof pitches to minimise building heights and provides the necessary shelter and durability.
- 5.5 As explained in sections 2.0 and 3.0 above, the site would utilise an existing established agricultural access. The access already provides good visibility in both directions and is not considered to pose any particular highway safety risk. At present, tractor movements (with trailer or other machinery) regularly access the field to plough, drill, spray, muck spread, and harvest. Regular crop inspection is also necessary. Machinery is also collected from the existing store. Harvest movements currently take most of the crop off site. A separate Transport Note is provided for further clarity.
- 5.6 In future, all of these movements would be contained on the site and so would be offset from proposed movements. Whilst noting that the prior approval application relates to the storage building only, and thus, if it were to be constructed in isolation, movements would be very similar to existing, it is considered prudent to have regard to how the beef unit as a whole is intended to function. The beef unit is designed to be largely sustained by the surrounding land, with limited need to bring in additional bedding/ forage.
- 5.7 These movements together with any movements of cattle would equate to:



- Bringing in additional bedding/ forage needed and cattle movements together equate to c. 1 movement by tractor and trailer in and out once or twice a week. Worst case scenario is therefore only 104 movements per annum based on 2 per week
- Once-a-month feed deliveries by lorry are anticipated so 12 per annum.
- Waste would be in the form of solid waste which would be used directly on the land at the appropriate time. Excess waste would be removed from the site by contract to two local locations, accessed via the High Street/ Cheverell Road route onto the A360. This would equate to 30 movements per annum.
- There would be some additional movements by car, largely restricted to the occupant of the temporary mobile home, though noting that this would effectively be a live/work unit with the agricultural worker not needing to travel out for work, and thus movements would far more limited than with an unrestricted dwelling.
- A second worker would be needed in due course and this worker will likely travel to site daily by car.

It is thus concluded that whether taken as an application in its own right or cumulatively together with the proposed beef unit, the proposals would not be detrimental to highway safety.

- 5.8 Whilst drainage and ecology aren't named as specific considerations for prior approval applications, the site is of low ecological potential and the proposed drainage arrangements as part of the related planning application for the wider scheme, show how this has been carefully designed to conserve water for re-use wherever possible, to enhance biodiversity and ensure flood risk is not increased elsewhere.
- 5.9 It is concluded that the proposals meet the permitted development criteria, and for the reasons outlined above, in conjunction with the submitted plans, there is no good planning reason to withhold the granting of prior approval.

Consideration of the full planning application:

Principle of establishing a new beef unit at the site

- 5.10 The Development Plan is silent upon the establishment of new farms and indeed upon agricultural developments more generally. Consequently, in principle, there is a policy reliance upon Section 6.0 of the NPPF, which confirms strong support for the rural economy. Specific support is set out at paragraph 88. which requires that:

'Planning policies and decisions should enable (inter alia):

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;



b) the development and diversification of agricultural and other land-based rural businesses;...

- 5.11 As set out in the supporting Agricultural Report, the proposals represent the continued diversification and development of an existing farm business, allowing for a beef herd to be run alongside the existing pig/ arable enterprises, utilising the farm's own new buildings proposed at Whyr Farm. For clarity, it is not suitable to accommodate the beef unit at the same site as the pigs.
- 5.12 Moreover, the Agricultural Report demonstrates that the proposed business expansion into beef is well-planned on a sound financial and sustainable basis, which in turn should help to broaden the farm's economic base and support the long-term sustainability of the farm, including supporting the livelihoods of existing and proposed employees, which includes the applicants' son.

The principle of the siting of a mobile home for an agricultural worker

- 5.13 Core Policy 2 references exceptions where countryside accommodation is permissible, including circumstances listed in Core Policy 48 of the WCS. This policy supports the principle of accommodation for countryside workers, setting out the requirement for applications to be supported by functional and financial evidence. It states that outside of settlements;

'proposals for residential development will be supported where these meet the accommodation needs required to enable workers to live at or in the immediate vicinity of their place of work in the interests of agriculture or forestry or other employment essential to the countryside. Proposals for accommodation to meet the needs of employment essential to the countryside should be supported by functional and financial evidence.'

[Policy CP48, WCS, 2015]

- 5.14 Paragraph 84 of the NPPF whilst presuming generally against new countryside homes, also allows for these in certain very particular circumstances, including where:

' a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;''

- 5.15 However, neither the WCS policy nor its supporting text prescribe precisely what the financial and functional evidence must demonstrate, CP48 only requires the dwelling to be *'in the interests of'* employment essential to the countryside and the NPPF reference simply states an *'essential need to live permanently at their place of work'* with notably no reference at all to financial evidence. All previous policy guidance in this respect has been cancelled and

this has been tested on appeal, such that these more prescribed tests no longer apply.

- 5.16 Nonetheless, in considering 'need', it is appropriate to have regard to: 'Essential need/ in the interests of' – meaning an agricultural requirement for someone to reside on the site to be available at most times, which can reasonably equate to the requirement for at least one full-time agricultural worker, tending to livestock who require on-hand attention round the clock. It is also reasonable to consider whether this need can be fulfilled by any existing dwelling.
- Secondly, in looking at the requirement for financial evidence, it would seem reasonable that it ought to be demonstrated that the agricultural business, is planned on a sound financial basis and there is at least a reasonable prospect of it remaining so, such that the business is likely to remain or become sustainable.
- 5.17 The submitted Agricultural Report provides evidence relating to the existing beef enterprise and how it is proposed to be developed. This demonstrates a need for the scale of the proposed buildings and that it would clearly be supported by existing and proposed assets. This evidences a well-planned and sustainable business that will give rise to the requirement for at least one full time worker on site. Furthermore, it reasons that due to the nature of the livestock and the proposed numbers, this worker must be on hand and available at most times to respond to animals in distress and provide round the clock care. There are no other dwellings at or near the site that would be affordable to a young farmer and suitably close to fulfil this requirement.
- 5.18 Evidence has been provided of the existing business and related accounts demonstrating its strong financial position to fund the proposed development whilst remaining financially stable. Moreover, it also shows that the proposed beef unit, even if considered in isolation, is soundly planned such that it could afford to service the financing of the proposed buildings.

Other key planning matters:

Visual amenity and the wider landscape

- 5.19 Chapter 12 of the NPPF sets out a requirement for good design which is reinforced in Core Policy 57 of the WCS. Alongside these policies, CP51 of the WCS Landscape and Chapter 15 of the NPPF, relating to the natural environment, look to protect and conserve the landscape.
- 5.20 In accordance with the Council's pre-application response on landscape matters, these applications are supported by a comprehensive Landscape Report and Landscape Mitigation and Enhancement Strategy, with particular reference to the landscape typologies and nearby public rights of way as noted by the Landscape Officer. These demonstrate that the proposals would fit with the established character of the area, which includes frequently positioned farmsteads pepper potted across the landscape.



- 5.21 They would not disrupt hedged field boundaries or trees, which, together with the lower lying position, with rising land out to the west, would enable the buildings to sit comfortably as part of the landscape. Additional landscaping is provided in the form of the re-establishment of historic field boundaries through the planting of a mixed native hedge which would contain the new farmstead. This planting would be complemented by tree planting as shown, however it has not been deemed necessary to plant woodland blocks.
- 5.22 The new basin would be appropriately planted to provide biodiversity enhancement in addition to the proposed new landscape planting.
- 5.23 The proposals therefore accord with the BNG requirements under the Environment Act 2021, policies CP50 and CP51 of the WCS and Chapter 15 of the NPPF.

Residential amenity

- 5.24 The siting of the proposal has been carefully considered to maximise distances to residential dwellings. Following the Council's pre-application response, specialist reports have been provided to analyse the likely impact on neighbour amenity resulting from odour and noise.
- 5.25 As far as the permitted development building is concerned, odour is not likely to be a particular association with an agricultural storage building. Regarding the livestock building, the odour report considers:

'there is likely to be an insignificant effect on odour at local receptors due to the operation of the proposed livestock building'

and goes on to conclude at 5.1.3

'There should be no constraints to the development of a livestock building with regard to odour as the proposed development is consistent with the relevant' (policies as outlined).

- 5.26 We refer readers to the accompanying odour report for further information.
- 5.27 Regarding noise, the submitted noise report provides an objective analysis of the likely noise impacts on nearby receptors, having regard to relevant factors such as distance, prevailing wind direction, the noise levels resulting from various farming operations and the nature of those buildings and reasonable amenity levels for residential use. The report has considered a 'worst case scenario basis' and concludes that noise levels will remain at an acceptable level for nearby residents.
- 5.28 In practice, noise levels would be unlikely to be at this worst-case scenario basis, and even if this were to be the case, it is likely that this would only be for short periods of time or on sporadic occasions. The report has also outlined a

number of mitigation measures which the applicants would seek to adhere to wherever possible in order to further limit any impacts on neighbours.

- 5.29 The buildings are sufficiently far from neighbouring dwellings so as not to result in any particular harm resulting from loss of light, overbearing impact or overshadowing, and, as demonstrated by the reports, the proposals would not result in significant harm to amenity as a result of odour or noise.
- 5.30 The proposals thus accord with policy CP57 of the WCS and Chapter 12 of the NPPF.

Highway Impacts

- 5.31 The existing and proposed (cumulative – relating to both applications) highway movements have already been discussed at paragraphs 5.5 – 5.7 of this report and the suitability of the highway network to accommodate these movements is set out in the separate Transport Note which accompanies this application.
- 5.32 It first must be remembered that these movements relate to a proposed farm unit which is necessarily sited within the countryside – being a land-based use. In any case, these movements are not considered significant, particularly when offset against existing, in the context of the existing access which affords good visibility in both directions and the local and wider transport network. It therefore accords with planning policy outlined in policies CP64, the WLTP3 and Chapter 9 of the NPPF and would certainly not result in any unacceptable or severe highway impact.

Flood Risk Assessment and Drainage

- 5.33 This application is accompanied by a Flood Risk Assessment and Drainage Strategy. The site is not known to be at risk of flooding and the principle is for the majority of rainwater to be harvested from the scheme. The reports conclude that:

'The proposed new buildings and external areas will generate an increase in impermeable surface area when compared to existing. Surface water runoff from the new impermeable surfaces will be directed to sustainable drainage systems that dispose of water via restricted rate to the adjacent watercourse maintaining the existing greenfield runoff rates.'

On site storage will be provided within an attenuation pond Sustainable Urban Drainage System (SUDS). The SUDS features have been designed to accommodate the 1 in 100 year storm, including a 45% allowance for climate change, in accordance with NPPF guidance. The attenuation pond will also provide a volume of rainwater harvesting for use within the proposed development.

Foul flow from the proposed workers dwelling will drain into a new package treatment plant, with treated water then discharging into the watercourse bounding the north east of the site. The proposals can be accommodated without increasing flood risk within the locality in accordance with objectives set by Central Government and the EA and meet the requirements set out by the Wiltshire Council Core Policy 67: Flood Risk.'

Ecology and Biodiversity Net Gain (BNG)

- 5.34 The proposals are accompanied by a Preliminary Ecological Assessment, confirming the low ecological potential for the site and appropriate mitigation and enhancement measures. Furthermore, the planning application contains the necessary BNG calculations (noting that permitted development applications are exempt from BNG). The proposals incorporate an enhancement strategy for the proposed drainage basin area. The calculations show that these BNG features are sufficient to provide the 10% gain.
- 5.35 It is therefore considered that the proposals demonstrate a suitable approach in accordance with the Environment Act 2021, Chapter 15 of the NPPF and Core Policy 50 of the Wiltshire Core Strategy.

6.0 CONCLUSION

- 6.1 JR Bodman Ltd is an established and successful agricultural enterprise which includes two pig farm units, arable, and a beef herd. It manages a substantial area of land and provides important rural employment.
- 6.2 It is necessary for farming businesses to continue to seek ways to meet rising costs and spread risk, both through expansion, efficiency savings and diversification. The business estimates it must increase by 4-5% year on year just to maintain the status quo.
- 6.3 The proposals support the continuation of the farm through Jim's son Joe, who manages the beef herd, by proposing a beef unit on land which they have recently purchased and in so doing, would also provide temporary accommodation on site.
- 6.4 The buildings are purpose designed for the scale of the proposed enterprise and to modern farming standards which demand efficiency in order to be sustainable. Their position, layout and design has been carefully considered so as to fit with the landscape and minimise any harms, including the re-establishment of hedgerows interspersed with tree planting.
- 6.5 This statement, together with the Agricultural Report, has demonstrated how the principle of the proposed beef unit is well-planned, sustainable and is acceptable in planning policy terms. Moreover, it has also demonstrated that on the basis of the proposed business, there will be an essential need for a full-time farm worker to reside on the site.
- 6.6 This statement has explained how all other relevant planning matters have been duly considered, and why the applications (one for prior approval with more limited considerations and the second, a full planning application) ought to be supported by the Council.

